

The limits of institutional work: a field study on auditors' efforts to promote sustainability assurance in a trust society

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Abstract

Purpose: The aim of this paper is to enrich extant understanding of embedded agency in the context of the uptake of sustainability assurance. To this end, we examine the efforts of auditors to promote sustainability assurance as well as their interactions with other actors and diverse societal logics.

Design/methodology/approach: Applying institutional work (Lawrence & Suddaby, 2006) and institutional logics (Thornton, 2002; Thornton, Ocasio & Lounsbury, 2012) as our method theories, we examine interview data and a variety of documentary evidence collected in Finland, a small country that has been characterized as a CSR-oriented “high-trust society”.

Findings: Our findings suggest that, first, the supporting institutional work undertaken by auditors relates to undermining work undertaken by other actors drawing on diverse institutional logics. Second, we find that the institutionalization of sustainability assurance hinges upon two different institutional logics associated with organizations' degree of internationalization. Third, the level of societal trust in companies appears to reduce the demand for sustainability assurance in the case of domestic companies even in societies where the public exhibits an interest in social environmental issues.

Originality: We believe these findings to add new knowledge to both the interpretative and functionalist streams of research on sustainability assurance as well as Power's (1997) audit society thesis.

Keywords: assurance; auditing; institutional logics; institutional work; sustainability

1. Introduction

This paper analyses auditors' attempts to promote sustainability assurance and establish it as a practice requiring the professional involvement of auditors. Over twenty years have passed since Power (1997a) presented his seminal book on the emergence of the audit society, in other words the unprecedented proliferation of auditing, assurance and verification procedures in various societal domains. Over the years, the array of such practices in the social and environmental domain has expanded from the verification of environmental reports to include the assurance of more extensive corporate social responsibility (CSR) or sustainability¹ reports. As a professional practice, sustainability assurance is similar to financial auditing in the sense that it involves the production of comfort (Pentland, 1993) in the form of a written statement, which indicates that the sustainability-related information disclosed by an organization does not contain material misstatements. Yet, sustainability assurance differs from financial auditing by being an unregulated,

¹ We acknowledge that to refer to CSR reports as “sustainability” reports is problematic from a critical point of view; however we deem this to be an issue beyond the scope of the present study. We employ the term here only for the sake of being consistent with the established notion “sustainability assurance”.

heterogeneous, largely voluntary practice² that can be undertaken not only by auditors but also by consultants. According to Power (1997a), such heterogeneity together with the inherent epistemological ambiguity of auditing fuel the diffusion of audit-like practices in contemporary society. He further argues (Power, 1997b) that the managerial turn, which has turned social and environmental concerns into issues to be managed, facilitates auditing professionals' attempts to conquer the practice from environmental consultants.

The proliferation of sustainability assurance has attracted considerable attention from accounting scholars interested in explaining and understanding this phenomenon. In general terms, Power (2000) has suggested that audit is a substitute for societal trust, and called for studies examining the extent to which his thesis holds in different institutional contexts (Power, 2003). Since then, empirical studies approaching the question from a functionalist perspective have sought to identify the institutional drivers of sustainability report assurance in various jurisdictions (e.g. Nitkin & Brooks, 1998; Kolk & Perego, 2010; Simnett, Vanstraelen & Chua, 2009). Based on these studies, it appears that macro level factors, such as a strong legal enforcement regime, stakeholder-oriented legislation and public pressure on firms to exhibit sustainable practices, create demand for sustainability assurance. Other researchers interested in the expansion of the practice have assumed a more interpretive approach, focusing on the organization-level efforts of auditing professionals to promote sustainability report assurance (O'Dwyer, 2011; O'Dwyer, Owen & Unerman, 2011) and their aspirations to portray themselves as relevant experts in this field (Andon, Free & O'Dwyer, 2015; Andon, Free & Sivabalan, 2014; Power, 1997b). These interpretive studies have increased our understanding of the discursive and other strategies that auditing professionals deploy in their attempts to construct and legitimate sustainability assurance and to claim professional jurisdiction over this new audit space.

However, these two lines of inquiry into the factors and strategies propelling sustainability assurance remain largely separate. This is, to some extent, understandable due to the different ontological and epistemological assumptions underpinning the functionalist and interpretive research approaches. Yet, to us, the separation also appears somewhat artificial considering that these explanations are not mutually exclusive but rather complementary. Namely, the auditing professionals' attempts to promote the uptake of sustainability assurance on a micro (organizational) or meso (field) level are embedded in a macro-level (societal) context comprising multiple logics that may be more or less conducive to such efforts, potentially setting limits to what can be achieved by active agents. This suggests the need for research that takes into account both active agency and more stabilized frames of reference when considering the increase (or not) of sustainability assurance, in other words research that takes embedded agency (Battilana & D'Aunno, 2009) seriously.

Hence, our purpose in this paper is to enrich extant understanding of embedded agency in the context of the uptake of sustainability assurance. We do so by seeking to answer the following questions: How do auditors attempt to institutionalize sustainability assurance, particularly as an audit issue? How do their efforts interact with those of other actors as well as diverse societal logics? Our examination of these questions is informed by institutional theory, in particular the notions of institutional work and, albeit to a somewhat lesser extent, that of institutional logics. Institutional work has been defined as "the purposive action of individuals and organizations aimed at creating, maintaining and disrupting institutions" (Lawrence & Suddaby, 2006, p. 215). Institutional work is suitable for our purposes as it enables us to study the distributed, uncoordinated agency surrounding a management fashion (Perkmann & Spicer, 2008), particularly the efforts of a variety of actors, the occasional alignment or clashing of their interests and the intentions underlying their activities (Canning & O'Dwyer, 2016; Malsch & Gendron, 2013; Chiwamit, Modell & Yang, 2014). Institutional logics, on the other hand, refers to frames of reference through which actors make sense of the world, construct their identities, and interact with the world around them (Thornton, 2002; Thornton, Ocasio & Lounsbury, 2012). The mobilization of institutional logics in the present study facilitates an analysis of how

² The Johannesburg Stock Exchange requires listed companies to have their sustainability reports assured as per the recommendations of the King III Code (Ackers & Eccles, 2014). The French government also requires listed companies to publish third-party verified CSR information in the annual directors' report (KPMG, 2016).

various groups' logics, such as societal trust or the CSR culture of a given jurisdiction, relate to the institutional work undertaken by auditing professionals to promote sustainability assurance.

Our empirical analysis is situated in Finland where both sustainability reporting and associated assurance have existed as voluntary practices since the early 1990s. Currently, some 160 Finnish firms produce sustainability reports and only about a fifth of these are independently assured (PwC, 2016). What makes Finland a particularly intriguing empirical environment for our study is that, due to the small size of the country, we have been able to identify and interview the key representatives of all relevant actor groups as well as to support the interview findings by analyzing all sustainability assurance statements published in the country in a given year. Our main source of empirical material comprises 40 semi-structured interviews conducted between 2010 and 2016 with individuals representing auditor assurors, consultant assurors, corporate lobby groups, regulators, government offices, institutional investors, non-governmental organizations (NGOs), and firms. Our secondary data consists of publicly available documents, such as all sustainability reports containing assurance statements, auditor assurors' and consultant assurors' promotional material, policy papers and drafts, stakeholder statements on legislative drafts, and blog entries.

Another reason for why Finland constitutes an interesting empirical environment for our study is that, contrary to the global trend, voluntary sustainability assurance has not increased in the country in the past few years, having stabilized as a practice only in a handful of listed companies. This is intriguing from the perspective of institutional theory as it suggests that the institutional work undertaken by Finnish auditors has been successful to an extent and then encountered limits of some sort. Prior work makes us alert to the possibility of there being not only supporting but also undermining forms of institutional work (Chiwamit et al., 2014) as well as to the fact that institutional work does not take place in a vacuum but is always conditioned by diverse institutional logics (Hampel, Greenwood and Tracey, 2017; Suddaby and Leca, 2011; Zilber, 2013). The Finnish case therefore provides us with an opportunity to examine the interplay of forms of institutional work supporting and resisting sustainability assurance as well as the role of institutional logics therein.

With this study, we are able to make three contributions to extant knowledge. First, we contribute to the body of knowledge on auditors' strategies to promote and claim professional jurisdiction over the sustainability space (Power, 1997a, b; O'Dwyer et al., 2011; Andon et al., 2014). We do so by illustrating how the supporting institutional work undertaken by auditors relates to undermining work undertaken by other actors drawing on diverse institutional logics. In empirical terms, our analysis illustrates how auditors' EU-level advocacy efforts were supported by parallel work undertaken by some NGOs but undermined by the work of legislators, lobby groups and the Government informed by a logic of deregulation, leading the auditors to reject (Canning & O'Dwyer, 2016) national-level advocacy work as futile. NGOs mainly seem to prefer their own investigations, instead of sustainability reporting and assurance, as sources of reliable information. Further, as the absolute majority of the public trusts companies and the information they disclose, there is very little perceived need for formal assurance of such information. Our findings also indicate that the trust society logic sets limits to what auditors can achieve through cultural work. Finnish investors do not consider it necessary to pressure Finnish companies to conduct sustainability assurance as they obtain the necessary information from first-hand involvement in companies' governing bodies as well as from their own investigations, NGO reports and the media. Regarding technical work, we did not find indications of the influence of institutional logics. Instead, what appears to be at stake is limited standardization of sustainability assurance due to contradictory forms of technical work undertaken by auditors engaged in inter- and intra-professional competition.

As a second major contribution, we respond to Power's (2003) call for country-specific studies exploring the extent to which the audit society thesis holds. Our analysis qualifies the audit society thesis by considering also the international dimension of listed companies. Namely, our findings indicate that the institutionalization of sustainability assurance hinges upon two different institutional logics associated with organizations' degree of internationalization. In the case of stock-listed, partially foreign-owned companies, where distance and asymmetry of information prevail, a logic of distrust drives the demand-side pressures

exerted by international investors and the public (through NGOs), supporting auditors' promotion of sustainability assurance. In contrast, in the case of local companies with mainly domestic ownership, where proximity reduces asymmetry of information, a logic of trust prevails, limiting the expansion of sustainability assurance and substituting for audit.

Finally, our study has bearing on the functionalist studies that have identified public awareness of CSR issues and stakeholder-oriented legislation as the institutional drivers of sustainability assurance (e.g. Nitkin & Brooks, 1998; Kolk & Perego, 2010; Simnett et al., 2009). To these studies, we can add that the level of societal trust in companies appears to reduce the demand for sustainability assurance in the case of domestic companies even in societies where the public exhibits an interest in social environmental issues.

The paper proceeds as follows. In the second section, we review prior literature on the assurance of sustainability reports as well as outline our theoretical framework based on institutional work and institutional logics. In the third section, we describe our empirical research material and setting as well as elaborate on the methods of data collection and analysis. In the fourth section, we analyze our material through the theoretical framework introduced. In the final section, we discuss our findings in light of extant literature as well as present the conclusions and implications of our study.

2. The prior literature

2.1. The assurance of sustainability reports

According to recent surveys, both sustainability reporting and associated assurance are increasing, with 63 per cent of the world's biggest firms (G250) having their sustainability reports independently assured (KPMG 2016, p. 40). Within this group, 65 per cent of assurance services are purchased from professional audit firms, while 35 per cent are acquired from non-audit service providers such as certification bodies and consultants (KPMG 2016, p. 41). This development has attracted the attention of accounting scholars, resulting in an expanding literature. The two major streams³ that are most relevant for the present paper examine the drivers of sustainability assurance (demand side) and auditors' strategies to develop and legitimate the practice (supply side).

First, there are functionalist studies that have examined the institutional and firm-level determinants of sustainability assurance, both in individual countries and globally. According to Nitkin and Brooks' (1998) study of sustainability assurance in Canada, institutional factors driving the practice include public perception of sector-wide environmental issues and firms' exposure to legal liability. In a worldwide study comprising over 2,000 firms, Simnett et al. (2009) find that firms operating in sensitive industries, domiciled in countries with a strong legal environment and stakeholder orientation are more likely to have their sustainability reports assured and to choose an auditing professional as the assurer. Similarly, in an investigation of seven post-industrial countries, Darnall, Seol and Sarkis (2009) find a positive association between corporate use of environmental audits and perceived stakeholder influence. Perego (2009) in turn argues that firms domiciled in countries with a weaker governance system are more likely to choose a Big4 accounting firm as assurance provider and that Big4 firms have a positive effect on assurance quality in terms of reporting format and assurance procedures. In a global study of country-level institutional factors driving sustainability report assurance, Kolk and Perego (2010) find that firms operating in countries with stakeholder-oriented legislation, weaker governance enforcement regime and public pressure for sustainable corporate practices are more likely to adopt the practice. Furthermore, their results indicate that companies operating in stakeholder-oriented countries are more likely to choose an auditing professional as the assurer. Wong et al. (2016) in turn found that factors positively associated with the choice of service provider include firm size,

³ There is also a sizeable literature on the oftentimes problematic outcomes of sustainability assurance. We deem this topic to be outside the scope of the present paper; interested readers are referred to Adams and Evans (2004); Ball, Owen and Gray (2000); Belal (2002); Deegan, Cooper and Shelley (2006a, b); Edgley, Jones and Solomon (2010); Gray (2000); Manetti and Becatti (2009); Manetti and Toccafondi (2012); O'Dwyer & Owen (2005) as well as Owen, Swift, Humphrey and Bowerman (2000).

profitability, liquidity and societal pressure. Thus, by way of synthesis, there appears to be a broad academic consensus that public pressure on firms to exhibit sustainable practices as well as stakeholder-oriented legislation create demand for sustainability assurance. Likewise, with the exception of Kolk and Perego (2010), sustainability assurance seems to be driven by a strong legal environment. In the present study, we consider public pressure on firms to be a concrete manifestation of the broader CSR culture prevailing in a given country or region. Correspondingly, stakeholder orientation and the strength of the legal environment are manifestations of the institutional infrastructure of a given jurisdiction. Taken together, CSR culture and institutional infrastructure constitute the stabilizing structures that, further below, we conceptualize as institutional logics.

The second group of studies most relevant for the paper at hand has focused on the supply side, in other words the promotion of sustainability assurance and the role of auditors therein. Power (1997b) has examined the expansion of auditing to new areas, focusing on the representational strategies by which accountants have presented themselves as relevant experts in environmental auditing. Power (1997b) states that the various skills needed in environmental auditing compete for their position in the professional hierarchy, but the managerial emphasis in environmental regulation sets management skills at the top. This enables accountants to present themselves as experts using three strategies: by establishing sufficient similarity between accounting know-how and environmental auditing; by presenting auditing as a discrete set of skills in which accountants have a comparative advantage; and by subordinating competing claims from applied scientists (e.g. engineers) by referring to their knowledge as relating to narrow technicalities, something which can be acquired through subcontracting. Although his choice of topic is indicative of a critical stance, Power (1997b) explicitly refrains from passing judgement on whether the expansion of auditing into social and environmental domain is a good thing or not⁴.

Similarly, the work of O'Dwyer and colleagues (O'Dwyer, 2011; O'Dwyer et al., 2011) focuses on the strategies and dynamics involved in practitioners' attempts to construct and legitimate sustainability assurance in the eyes of various audiences. Although not explicitly mobilizing institutional work as a method theory (Lukka & Vinnari, 2014), O'Dwyer (2011) highlights a key theme in that literature, namely the fragile and indeterminate nature of attempts to create a new institution. In particular, O'Dwyer's (2011) case study of two Big4 professional service firms illustrates how difficult it is for auditors to transport the traditional methodology of financial auditing and the associated mindset to the domain of sustainability reporting, which is replete with qualitative information and recalcitrant to the traditional methods of auditing. He also notes the inter-professional tensions that emerge from accounting and non-accounting assurors' differing notions as to what the aims of assurance are, what constitutes evidence and how such evidence should be interpreted.

O'Dwyer et al. (2011) in turn focus on the strategies employed by assurors in a large professional service firm to convince both external and internal audiences of the legitimacy of the practice. Applying Suchman's (1995) typology of legitimation strategies, O'Dwyer et al. (2011) demonstrate the interactions and overlaps between various types of legitimacy as well as the legitimation strategies that the assurors in a professional service firm used for each stakeholder group. With clients, pragmatic legitimacy was sought, and acquired, by highlighting the potential instrumental benefits of assurance, such as improving information systems and reporting quality as well as enhancing corporate image. With potential (non-client) readers of assurance reports, particularly critical NGOs, the assurors sought to establish moral legitimacy by appealing to the socially desirable benefits that could be accrued through assurance. However, with this particular audience the auditors encountered difficulties as the NGOs appeared to exhibit little interest in the practice. Finally, to attract new report users that would pressure companies not only to retain assurance but also to expand its scope, the assurors sought to produce more credible statements and also publicly argued for more extensive stakeholder involvement in assurance.

⁴ Building on Power (1997b), Malsch (2013) assumes an explicitly critical stance regarding the prominent role of the accounting industry in the field of corporate social responsibility. However, Malsch (2013) does not examine the processes through which the accounting industry has acquired a central position but focuses on the political consequences of such heavy involvement.

Although the analyses of Power (1997a, b), O'Dwyer (2011) and O'Dwyer et al. (2011) have enhanced our understanding of the accounting profession's aspirations to promote sustainability assurance, we still have limited knowledge of the nature of institutional work undertaken by auditors in conjunction with other agents' supporting or undermining institutional work and as conditioned by broader socio-cultural logics. In our view, an examination of such issues is warranted by the observation that accounting firms have not been able to attain a dominating position in the markets for assurance services and the status of new forms auditing remains contested (Andon et al., 2015, p. 1407). Moreover, while prior analyses (e.g. O'Dwyer, 2011; O'Dwyer et al., 2011) have predominantly taken place at the organizational level, there is also a need for society-level investigations that provide the opportunity to analyse auditors' strategies while taking into consideration their embeddedness in macro-level structures such as national CSR culture and institutional infrastructure. The present field study complements extant research by undertaking such an examination, informed by recent work on institutional logics and institutional work as elaborated in the next section.

2.2 Institutional work and its relationship to institutional logics

Institutions can be defined as taken-for-granted "cultural-cognitive, normative and regulative elements that (...) provide stability and meaning to social life" (Scott, 1995, p. 33). Institutionalization in turn refers to certain practices becoming followed widely, without debate, and exhibiting permanence (Tolbert & Zucker, 1983). During the evolution of new institutional sociology, scholars have paid varying degrees of attention to the role of agency in institutional development and change. While the foundational works in institutional theory (e.g. Meyer & Rowan, 1977) acknowledged the role of human agency in the creation of institutions, this aspect was later placed aside as attention shifted to institutional stability and the diffusion of institutions within organizational fields (e.g. DiMaggio & Powell, 1983). More recently, institutional theory has given rise to two parallel streams, institutional work and institutional logics, emphasizing respectively agency and structure.

2.2.1 Institutional work

The research on institutional work has its origins in studies of institutional entrepreneurship (DiMaggio, 1998; Garud, Hardy & Maguire, 2002; Greenwood & Suddaby, 2006; Battilana, Leca & Boxenbaum, 2009). It has attempted to address the agency gap in institutional theory by focusing on the purposeful activities by which an agent aims to create or modify institutions. Yet, the literature on institutional entrepreneurship has itself been criticized for presupposing superhuman agency (Lawrence, Suddaby & Leca, 2009), and the notion of institutional work has been offered as an alternative to redirect attention to the dynamics of collective agency.

Institutional work has been defined as "the purposive action of individuals and organizations aimed at creating, maintaining and disrupting institutions" (Lawrence & Suddaby, 2006, p. 215). This definition does not exclude ideas of institutional entrepreneurship but rather tempers them through its analytical focus on the efforts of a variety of individual actors and organizations equipped with different skills and having diverging motivations for their actions. Furthermore, the literature on institutional work acknowledges that collective agency may emerge spontaneously instead of being driven by a central powerful actor (Perkmann & Spicer, 2008; Zietsma & Lawrence, 2010; Chiwamit et al., 2014) and that the outcomes of such processes cannot always be predicted (Zilber, 2013; Modell, 2015). Yet, such unpredictability of outcomes cannot be considered similar to the complete indeterminacy postulated for instance by actor-network theory (Latour, 1987; 2005); institutional work theorists remain adamant in their view of agency being embedded in institutions (Lawrence, Suddaby & Leca, 2011; Lawrence, Leca & Zilber, 2013). Lawrence & Suddaby (2006) distinguish between three main categories of institutional work: disrupting, creating and maintaining institutions. Although our analysis concerns auditing professionals' endeavors to institutionalize sustainability assurance and we did not find indications of disrupting and maintaining work in our empirical material, for the sake of comprehensiveness we will elaborate on all three categories of work (Table 1).

Table 1. Typology of institutional work (Lawrence & Suddaby, 2006).

Type of IW	Definition
Disruption	
Disconnecting sanctions/rewards	Accessing the state and court systems to disconnect rewards and sanctions from a set or practices, technologies and rules
Disassociating moral foundations	Disassociating a practice, rule or technology from its moral foundation, which results in an institution that is no longer considered appropriate within its specific cultural context
Undermining assumptions and beliefs	Decreases the perceived costs and risks of innovation and differentiation by weakening the core assumptions and beliefs of an institution
Creating	
Advocacy	The mobilization of political and regulatory support through direct and deliberate techniques of social suasion
Defining	The construction of rule systems that confer status or identity, define boundaries of membership or create status hierarchies within a field
Vesting	The creation of rule structures that confer property rights
Constructing identities	Defining the relationship between an actor and the field in which that actor operates
Changing normative associations	Re-making the connections between sets of practices and the moral and cultural foundations for those practices
Constructing normative networks	Constructing of interorganizational connections through which practices become normatively sanctioned and which form the relevant peer group with respect to compliance, monitoring and evaluation
Mimicry	Associating new practices with existing sets of taken-for-granted practices, technologies and rules in order to ease adoption
Theorizing	The development and specification of abstract categories and the elaboration of chains of cause and effect
Educating	The educating of actors in skills and knowledge necessary to support the new institutions
Maintaining	
Enabling work	Creating rules to facilitate, supplement and support institutions; e.g. by creating new agents/roles to support institutions and divert resources towards them
Policing	Performing oversight activities to enforce, audit and monitor compliance
Deterring	Raising coercive barriers to inst. change
Valourizing and demonizing	Circulating positive and negative examples to the public in order to demonstrate the institution's normative foundations
Mythologizing	Maintaining normative underpinnings of an institution by creating and sustaining myths about its history
Embedding and routinizing	Instilling the normative foundations of an institution into participants' day-to-day routines and organizational practices

Disrupting work

Disrupting institutional work refers to the invalidation of a dominant institution to make room for a new one. This often takes place through the court system (Lawrence & Suddaby, 2006) as the judiciary is able to disconnect sanctions and rewards associated with an extant institution either directly or by undermining the technical assumptions and definitions on which it is founded. Such efforts can be understood as a form of boundary work (Lamont & Molnar, 2002) as they involve the redefinition of concepts to the effect that new boundaries are erected between various actor groups, or extant boundaries between the groups shifted. According to Lawrence & Suddaby (2006), professional groups often engage in disrupting work by challenging the regulatory framework associated with an extant institution, while the state may work against professional groups through re-regulation. Disrupting work also involves the disassociation of moral foundations, in other words gradual and indirect attempts to convince others that an institution is no longer morally appropriate within a specific cultural context. The actor groups most likely to undertake disassociative work include professional bodies and other elite actors, such as large firms, who can utilize their prestige to influence prevailing normative conceptions. The third sub-category of disrupting work is undermining assumptions and beliefs related to the costs of abandoning a taken-for-granted practice or technology for a new one. Such work can involve, for instance, innovative practices that reduce the perceived costs and risks of transitioning to new practices.

Creation of institutions

The creation of new institutions is the most populous category of Lawrence & Suddaby's (2006) framework, comprising several different types of work that can be grouped into political, technical and cultural work (Perkmann & Spicer, 2008). First, political work involves the enticement of actors into coalitions supporting the new institution (advocacy) as well as the establishment of rules that define which actors are allowed to adopt a practice (defining) and conferring rights or powers to particular groups (vesting) in order to establish a connection between an institution and the broader social system. Such work requires political skills, which enable institutional entrepreneurs to define the roles of other actors by illustrating how the interests of the latter are aligned with the institution in question. Examples of agents equipped with political skills include those adept in reconciling diverging interests, such as politicians, trade unions, lobbyists, industry associations and advocacy organizations (Perkmann & Spicer, 2008).

While political work establishes the foundation for an emerging institution, technical work provides recommendations or prescriptions for its functioning. Subtypes of technical work include mimicry, theorizing and educating (Lawrence & Suddaby, 2006). Mimicry involves associating new practices with already institutionalized practices, technologies and rules in order to ease adoption, while theorization refers to the development of abstractions as well as establishing causal relationships between elements. Educating relates to developing actors' knowledge and skills in using a management fashion, to support the new institution. The skills that institutional entrepreneurs require to accomplish the tasks involved in technical work include the ability to create abstract representations and models of an institution that are transportable from one context to another. Such skills of abstraction are usually associated with experts such as management scholars, technical consultancies and other experts (Perkmann & Spicer, 2008).

Finally, cultural work aims to increase actors' attachment to an institution in which they have no direct interest by establishing or reframing values and belief systems that are often linked to broader societal discourses. Cultural work consists of constructing actors' identities to make them susceptible to enacting the institution; changing normative associations by anchoring a practice in a society's moral and cultural framework; and constructing normative inter-organizational networks that form a relevant peer group for those adopting the practice (Lawrence & Suddaby, 2006). To accomplish these tasks, institutional entrepreneurs require cultural skills which enable them to manipulate public views and opinions. Such skills are possessed by, for instance, professional organizations, journalists and management 'gurus' (Perkmann & Spicer, 2008).

Maintaining work

Although institutions are by definition stabilized taken-for-granted practices, their existence requires maintaining work associated with the social systems that are in place to ensure compliance. Maintaining work can be divided into two broad categories, those types of work that preserve rewards and sanctions associated with an institution and those related to normative and belief systems. As concerns the former category, enabling work can be understood as the creation of rules that support an institution, for instance by distributing authority through the formation of agencies or the establishment of intra-professional agreements to prevent intra-institutional conflicts. Policing refers to auditing, monitoring and enforcement systems meant to ensure compliance with an institution, while deterrence denotes the establishment of coercive obstacles to prevent institutional change. In regards to maintaining work associated with norms and belief systems, valorizing and demonizing represent discursive means with which actors highlight the normative underpinnings of an institution, by producing either extremely positive or extremely negative examples for public consumption. Finally, embedding and routinizing involves the active infusion of the normative basis of an institution into organizations' and individuals' everyday habits and repetitive practices. Routine practices related to for instance education, training, certification and recruitment can prove significant in reproducing and maintaining institutions.

Institutional work as method theory in prior accounting research

In the field of accounting, institutional work has thus far been employed as a method theory only in a handful of recent studies. In the domain of management accounting Goretzki, Strauss & Weber (2013) analyse the institutionalization of the "business partner" role for management accountants. On the basis of insights gained from a case study of a German firm, they identify three interrelated kinds of institutional work that are undertaken to support the institutionalisation of the management accountants' new role: legitimising the new role; (re)constructing the management accountants' role identities; and linking the intra-organisational level with an institutional environment in which external actors aim to achieve changes in the management accountants' role on a broader societal level. Chiwamit et al. (2014) apply Perkmann & Spicer's (2008) typology to analyse the forms of institutional work undertaken to promote or resist a managerial innovation, the Economic Value Added (EVA). Their comparative study of Thai and Chinese state-owned enterprises illustrates how the societal relevance of EVA is determined by struggles stemming from the institutional work undertaken by various actors to establish EVA as a legitimate governance mechanism. Chiwamit et al. (2014) also refine Perkmann and Spicer's (2008) theorizing by introducing the concept of field cohesiveness, arguing that initial differences in field cohesiveness between the two countries gave rise to different patterns of institutional work and that the maintenance of such cohesiveness demands different types of institutional work. They also posit that collaborative coalitions may detract from institutional work if they are considered a threat to the fragile balance between different interests. Finally, Kettunen (2017) has examined the institutional work undertaken by the standard-setter, translators and various other constituents to maintain the IFRS as a translingual institution.

In the domain of auditing, Malsch & Gendron (2013) investigate the consolidation of commercial values in accounting as an institutional process structured around a conflict between commercial innovators and guardians of the professional tradition. The authors develop the concept of institutional experimentation in order to offer a view of institutional work as a fragile, unpredictable trial-and-error process through which "agents can refine their more or less coherent initiatives and, after some initial investment, justify their actions to relevant others to gain support and institutional legitimacy" (Malsch & Gendron, 2013, p. 894). Suddaby, Saxton & Gunz (2015) in turn analyze the process of endogenous, micro-level domain change in the auditing profession brought about by the adoption of social media. They identify three types of institutional work undertaken by auditing professionals and social media experts within the accounting firm, resulting in uncontested interaction between the two professional groups (boundary work), reconfiguration of accounting expertise in the language of professionalism rather than ethics (rhetorical work) and the shift in focus from firm-level to individual expertise (embedded agency work). Hayne & Free (2014) examine the institutional work involved in the emergence and diffusion of a dominating risk management standard, the COSO framework. Having identified numerous types of institutional work, they conclude that the institutional

work carried out by COSO transcends the analytical categories of disruption, creation and maintenance of institutions. They argue that the strong role of COSO as a force of diffusion and institutionalization is due its nature as a hybridized professional group that performs a variety of institutional work activities. Canning & O'Dwyer (2016) employ and further develop institutional work to an analysis of regulatory change. They find that regulatory change is a fluid process where actors promoting regulatory change engage in diverse forms of institutional work that may support or replace one another in response to the resistance emanating from the subjects of regulation, in their case the auditing profession. These authors also highlight that in certain situations actors can explicitly reject forms of institutional work considered strategically unsuitable for the situation at hand.

2.2.2 Institutional logics

The focus on structural stability is characteristic of the stream of research on institutional logics, which emerged from the early theorizing of Friedland and Alford (1991). Institutional logics has been defined 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 realities" (Thornton & Ocasio, 2008, p. 101). Such logics thus convey an understanding of culture as being 'anchored in a set of elemental building blocks, not just ... 'floating out there in thin air'" (Thornton, 2004, p. 42). According to Friedland and Alford (1991), institutional logics exist at the level of society, being "available to organizations and individuals to elaborate" (ibid., p. 248), whereas Thornton et al. (2012) posit that logics also exist on the level of organizations and fields. Regardless of level of analysis, institutional logics provide actors with frames of reference that shape the way in which they make sense of the world, construct their identities, and interact with the world around them (Thornton et al., 2012). In such interactions, logics enable actors to overcome their cognitive limitations and informational ambiguity by offering a set of rules for detecting problems, judging their salience, and conceiving of potential solutions (Thornton, 2002).

The research on institutional logics is firmly grounded in the idea of embedded agency (Battilana & D'Aunno, 2009; Holm, 1995), implying that human beings are able to act but in so doing they inevitably draw on one or more logics, which may be complementary or conflicting (Battilana and Dorado, 2010; Greenwood and Suddaby, 2006). Consequently, research informed by institutional logics tends to downplay the significance of purposeful human agency in engendering institutional change, rather conceiving of such change as an evolutionary process conditioned by extant structures (Lounsbury and Boxenbaum, 2013; Zilber, 2013, 2017). It has therefore been pointed out that research on institutional change would benefit from combining institutional logics with the consideration of the active efforts of purposeful agents, and vice versa (Gawer and Phillips, 2013; Hampel et al., 2017). As pointed out by Hardy and Maguire (2008, 961), "embedding structures do not simply generate constraints on agency but, instead, provide a platform for the unfolding of entrepreneurial activities". On a somewhat related note, it has been noted that prior research has yet to examine how actors use of logics in practice with the effect of either changing or further cementing extant structures (Thornton, Ocasio & Lounsbury, 2012; MacPherson & Sauder, 2013).

In the subsequent sections, we will follow this advice, albeit our focus will be on institutional work and we will only consider the conditioning effects of institutional logics thereon. Thus, we will employ the typology of institutional creation work depicted in Table 1 to structure our analysis and provide complementary observations regarding institutional logics where appropriate. First, however, we will elaborate on the empirical context of the study as well as our methods for data collection and analysis.

3. Empirical data, methods and context

3.1 Data and methods

We chose to conduct a field study as prior literature provides limited evidence on the research question in this particular environment (Ahrens & Dent 1998; Lillis & Mundy, 2005). We have studied sustainability assurance from 2010, when it first attracted our attention, until the end of 2017. This forms a natural end point to our study as the EU directive on non-financial information (EU, 2014), which came into effect at the beginning of 2017, affects the reports compiled at the beginning of 2018 for the financial year 2017. The change from voluntary to compulsory disclosure of sustainability information in Finland may convey an increase in the assurance of the information and an extension of the data collection period beyond the end of 2017 would have thus changed our research setting.

As there is no publicly available collated data on the key characteristics of assurance engagements in Finland, we conducted a systematic content analysis of all assurance statements published in 2015 to obtain a snapshot view of the current situation. The key features analyzed include the following: type of review (limited/reasonable), service provider (auditing/non-auditing), assurance standard(s) utilized, procedures undertaken during assurance engagements, and addressee(s) of the statement. The results of this state-of-the-art analysis are reported in section 3.2.

Our primary source of empirical material comprises 40 interviews, which took place in 2010-2016 (see Appendix 1). All but three interviewees consented to having the interviews tape-recorded. In the two instances where tape recording was not allowed, extensive notes were taken during the interview and complemented immediately after the interview. We also kept a research diary, which was updated after our own project meetings, interviews and other, more informal meetings with informants during events such as seminars and training days aimed at practitioners. In total, the study yielded 45 hours of interview material (41h of which were recorded) and 15,000 words of research diary notes. The tape-recorded interviews were transcribed verbatim.

In order to get a broad understanding of the practices and viewpoints associated with sustainability assurance, we interviewed the following actor groups: 1) *Assurors* including seven firms offering independent assurance services (all Big4 audit firms, one smaller audit firm, one consulting firm and one Big4 audit firm in Sweden for the purpose of national comparison); 2) *Auditees* including eight firms, three of which do not have their sustainability report independently assured⁵; 3) *Stakeholders* including five non-governmental organizations (NGOs); 4) Institutional *investors*⁶ including six investment managers focusing on responsible investments; 5) *Regulators* including three civil officials mandated with preparing national legislation regarding the implementation of the EU directive on non-financial reporting; 6) *Supervisors* including a national financial markets supervisor; 7) *Associations* including representatives from two trade associations and 8) *Experts* including an academic member of jury in the annual sustainability report competition.

For the purpose of data triangulation (e.g. Modell, 2005, 2009), our secondary source of empirical material consists of publicly available documents such as sustainability reports, assurance statements, policy papers and drafts, organizations' webpages and blogs, the EU's public consultation documents related to the development of the Directive on non-financial reporting (EU, 2014) and expert statements on the changes proposed to Finnish Accounting Act to implement the said EU Directive. The public material provided us with a general view of the interviewees' organizations before the interviews and thereafter we employed these materials to confirm the information obtained. In addition, analyses of assurance reports and policy papers provided us with information on the development of, and trends in, sustainability assurance. The EU public consultation documents and the expert statements concerning the implementation of the Directive on non-financial reporting in Finland afforded us with insights on whether various institutional actors support or oppose sustainability assurance as a mandatory practice. Supplementing the evidence from the field, press releases concerning the results of the annual Corporate Responsibility Report Award and participation in

⁵ One of these three firms used to assure their sustainability report but discontinued the practice a few years ago.

⁶ To complement our interview data, in May 2016, we administered a focus group discussion for members of the Finnish Association of Socially Responsible Investors. The event was attended by 18 investors who discussed the usefulness of sustainability assurance information. Four of the participants have been individually interviewed during the data gathering.

public corporate responsibility events were further used to explore the voluntary assurance of sustainability reports in Finland.

In terms of analytical method, interviews were organized around the various factors that were considered to either promote or undermine the uptake of sustainability assurance. The interview questions were related to content and development of assurance work, drivers and motivations as well as challenges and barriers in stabilizing this practice. Second, the interview data was then organized and analyzed according to the typology of institutional creation work (Lawrence and Suddaby, 2006; Perkmann and Spicer, 2008; see Table 1). As mentioned above, we did not find indications of disrupting or maintaining work and therefore these categories have been omitted from the subsequent analytical sections. Third, the empirical material was then reviewed in relation to the research questions, and the findings were discussed among the authors to arrive at a joint interpretation.

3.2 Sustainability reporting and assurance in Finland

For the majority of Finnish firms, the production and assurance of sustainability reports is voluntary; only state-owned enterprises (of which there are about a dozen) have been required to produce sustainability reports since 2011. The total number of sustainability reports published in Finland has remained relatively stable since 2011 with some 160 reports being published annually (PwC, 2016). Compared to the size of financial markets, the number of firms reporting on sustainability is rather large as only about 130 firms are listed on the Helsinki Stock Exchange. Figure 1 illustrates that third party assurance of sustainability reports published in Finland has similarly remained rather stable since 2011 (PwC, 2016). In 2015, a total of 161 Finnish firms published a sustainability report and 36 of them had that report externally assured (PwC, 2016). Of these 36 assurance statements, 34 were made publicly available and according to our analysis, all statements except one were limited (as opposed to reasonable) reviews. In terms of service provider, auditors assured 27 (79 %) sustainability reports and consultants as well as quality inspectors assured seven (21%) reports. One of the Big4 firms dominates the assurance market, having assured 14 (41 %) sustainability reports in 2015. ISAE 3000 was the most often used assurance standard (in 21 cases) because it is mainly employed by auditors.

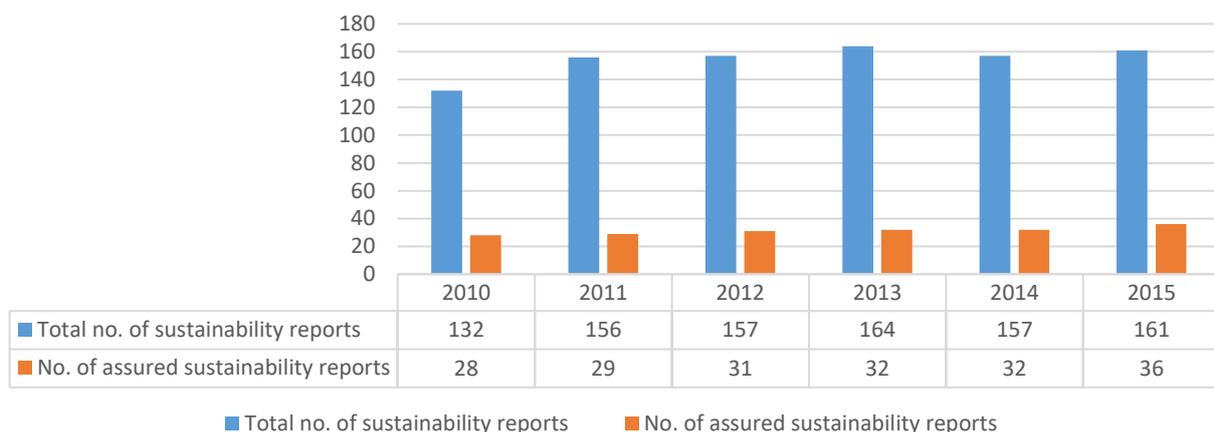


Figure 1. Development of sustainability reporting and associated assurance in Finland (PwC, 2016).

It seems that Finnish auditors have a need to emphasize their professionalism by highlighting their use of the standard since Kolk and Perego (2012) report that the assurance standard is not usually specified in the assurance statements of large international firms. Finnish auditing assurors also explicitly mention in their statements that their work is independent assurance. In contrast, international studies have reported that assurors' independence is not always mentioned in the assurance statements (Bepari and Mollik, 2016; O'Dwyer and Owen, 2005). These facts may indicate that Finnish auditors have a greater need to prove their

professionalism and independence than their international peers do because there are no professional qualification criteria for Finnish assurers. Of the 34 assurance statements, 29 (85 %) were addressed to the management of the company and they all were assured by auditors. Two reports were addressed to both the management and stakeholders of the company and consultants assured them. Three assurance reports were addressed to nobody in particular. In sum, Finnish auditors more often provide evidence on their professional qualifications, independence and limitations than do consultants.

The most common activity undertaken during assurance engagements (see Appendix 2) was data assurance to test the accuracy and completeness of the information from original documents and systems on a sample basis (although there was a quite a variation in the number of reported indicators assured; in some instances only one indicator was subject to assurance). Of the 34 assurance statements, 32 (94 %) included a test of at least some data. Assurance usually included interviews with management as well as with individuals responsible for collection and reporting of the information. Sustainability assurance activities differ between auditor and consultant assurers indicating that the assurers do not share the standardized assurance practices or even the idea of what activities sustainability assurance should include.

The international step towards mandatory reporting was taken in September 2014 when the EU Directive on non-financial information was approved by the EU Council. The Directive requires publicly listed European companies with more than 500 employees to disclose on policies and risks related to human rights, employee-related issues, diversity, and the environment. Member States had to transpose the Directive into national law by December 2016 and the first time firms had to report on non-financial information was for the financial year of 2017. Thus, this study examines the institutional work related to voluntary sustainability assurance from 2010 until the end of 2016. The Directive leaves it up to the member states to decide on whether to make sustainability assurance mandatory or not, and in Finland, the practice has not become mandatory.

3.3 Institutional and cultural context

In general, Finland has been characterized as a high-trust society (Korhonen and Seppälä, 2005). A European wide survey found that 92 per cent of Finns trust the police, 72 per cent trust the court system, 42 per cent trust the press, and 41 per cent trust environmental NGOs (European Values Study, 2009⁷). These findings are complemented by the results of a recent national survey (T-Media, 2017), which found that 75 per cent of respondents trust Finnish companies. According to Transparency International⁸, which ranks 180 countries according to business actors' and experts' perceptions of public sector corruption, Finland is among the top three least corrupted countries in the world.

Moving on to CSR issues, Finland is characterized by a strong legal enforcement regime, stakeholder oriented legislation, and high public pressure towards CSR (Simnett et al., 2009). Panapanaan and Linnanen (2009) list a number of characteristics of the Finnish CSR culture, including strong compliance with laws and regulations; shared moral principles based on social democratic values and a puritanical tradition; strong emphasis on trust; and a tradition of good governance. They also note how the small size of the country leads to a close-knit society where 'everybody knows everybody' and news of corporate malfeasance quickly become common knowledge. The interview-based findings of Panapanaan and Linnanen (2009) are supported by the responses obtained in a survey commissioned by the European Commission (2013), selected results of which are presented in Table 2.

As can be seen from Table 2, a considerable share of Finns at least claim an interest in CSR issues. Similarly, according to a recent national survey (T-Media, 2017), 94 per cent of Finns consider it quite important or

⁷ The European Values Survey is administered approximately once in a decade. In May 2018, the data collection for the next round is still ongoing, so we have utilized the data from 2009.

⁸ https://www.transparency.org/news/feature/corruption_perceptions_index_2017

very important to take care of the environment. Further, Table 2 indicates that about half of Finns believe that large firms make attempts to behave responsibly, whereas the same belief is held by less than half of EU residents. Finland is also characterized by a more positive attitude towards small and mid-sized enterprises (SMEs) than EU countries on average, with 83 per cent of Finns believing in the responsibility aspirations of SMEs.

Table 2. Selected results of Finnish and EU citizens' CSR perceptions (European Commission, 2013).

Aspect surveyed	Finland	EU average
% of respondents interested in CSR	83 %	79 %
% of respondents who believe <i>large</i> firms make efforts to act responsibly	57 %	48 %
% of respondents who believe <i>SMEs</i> make efforts to act responsibly	83 %	71 %
Main negative effects of firms on society identified by respondents:		
- Corruption	18 %	41 %
- Environmental pollution	46 %	39 %
- Reducing the number of their employees	58 %	39 %
- Poor working conditions/failure to respect labor standards	24 %	35 %
- Excessive influence on government policy	15 %	28 %
- Encouraging over consumption	25 %	25 %
- Poor quality of products or services	22 %	19 %

Thus, within the limits of what large-scale surveys can capture, the Finnish society seems to be characterized by socially and environmentally oriented *values* and cultural *beliefs* about a relatively uncorrupt society with reliable institutions. However, alongside their overall trust in governmental institutions, Finns' perceptions regarding companies appear to diverge according to organizational size: SMEs are trusted considerably more than large companies. This suggests that the notion of "trust society" is too broad-brushed in the case of commercial organizations and that different societal logics might apply to, respectively, large firms and SMEs. Further below, in the context of exploring forms of institutional work undertaken by auditors and other societal groups to support or undermine sustainability assurance, we will also examine the types of institutional logics drawn upon by these groups when undertaking such work.

4. Institutional work undertaken by auditors to promote sustainability assurance in a trust society

4.1 Political work

Political work in the form of advocacy, defining and vesting constitutes the first form of work associated with the creation of an institution (Lawrence & Suddaby, 2006; Perkmann & Spicer, 2008). As expected, the auditing profession has attempted to institutionalize sustainability assurance by advocating that it be made a compulsory practice. Such advocacy work can be detected for instance in Big4 firms' responses to the EU's 2010-2012 Consultation regarding the then proposed Directive on non-financial reporting, where the Big4 firms unanimously endorse mandatory sustainability reporting and assurance. One of our Finnish Ministry interviewees confirmed that the auditing firms' advocacy efforts have mainly taken place at the EU level because the EU Directives dictate the legislative framework according to which member states must revise their respective national acts and decrees.

The auditors' EU-level advocacy efforts are paralleled by similar work undertaken by two Finnish NGOs focusing on sustainability and global development, who also endorsed mandatory assurance in their response to the EU consultation by referring to problems in large Finnish firms' sustainability report coverage:

Many companies focus on issues that are not controversial, and leave out important environmental, social or even human rights impacts associated with their activities. Because of this and the fact that many companies do not disclose any non-financial information at all, the general public, shareholders, investors and other stakeholders don't have access to the adequate information to assess the company's [sic] accountability.

The NGOs elaborated in their response that mandatory external assurance is required to prevent large companies from providing misleading information. When an expert statement concerning the national implementation of the Directive was solicited from one of these NGOs, they again endorsed mandatory assurance to temper major corporations' efforts at greenwashing. However, interviewed representatives from critical NGOs did not perceive sustainability assurance in its current form to be very useful⁹. One of the reasons cited was that they do not seem to consider the practice useful for improving certain material issues, as illustrated by the following two quotes:

If I think about material problems for instance in the case of [name of energy company], our starting point is that they should not use palm oil in the production of renewable fuel because it leads to destructive logging in [Far East country]. No form of reporting or assurance can change this. Then another thing is that the company is committed to choosing palm oil producers who are not involved in the destruction of forests, but that commitment has been written so vaguely that no assurance can get at it. (NGO representative, interview #24)

First, we need to have a binding human rights due diligence duty for companies, which would require them to establish systems for intervening in human rights risks in their supply chains. That would provide focus to the work of audit firms as well as certification and audit systems, and that in turn would trickle down to factories and farms that are audited in third countries. That is what would help. I don't think that the assurance of sustainability reports would have a marked role in that process. (NGO representative, interview #27)

In other words, reporting and assurance are peripheral and rather irrelevant in situations where a company's business operations are fundamentally unsustainable and extant regulatory frameworks are unable to curb such behavior. Another major reason for why NGO actors consider sustainability assurance unnecessary is that they have other sources of information, such as their own investigations:

We follow for instance forestry companies in [Far East country] or in Finland. The information in their CSR reports is usually very superficial, whereas we try to get deeper and in that case, other sources of information are far better. (...) If you seriously want to get into what they [the companies] are really doing, you have to go into the field, to do your own investigations. (NGO representative, interview #24)

All in all, NGOs appear to draw on a societal logic characterized by distrust towards large companies, including Finnish ones. However, whether or not this logic is translated into political work supporting sustainability assurance differs according to the level of corporate activity targeted. Sustainability assurance is considered useful for preventing outright lies from being disseminated through CSR reports, but not for obtaining relevant information that could help intervene in unsustainable business practices. NGOs' own investigations 'in the field' help them overcome the distance to company operations, reducing asymmetry of information and consequently the need to lobby for sustainability assurance.

The auditors' advocacy work has also been directly countered by contradictory forms of political work undertaken by political bodies and influential interest organizations. The Finnish Ministry of Employment and the Economy (henceforth "the Ministry") as well as business lobby groups have overtly resisted obligatory assurance. In its response to the EU's public consultation regarding the Directive on non-financial reporting,

⁹ In this context, it is useful to note that NGOs did not display distrust towards the auditing profession but merely towards sustainability assurance.

the Ministry opposed both compulsory non-financial reporting and assurance, justifying the latter stance as follows:

Disclosed non-financial information should not be audited by external auditors. Such auditing requirement would only benefit large auditing companies. The auditors have not [sic] such competence. The administrative burden and costs caused by additional mandatory reporting and thereto related external auditing would add the costs of most companies to an unbearable level.

Citing the same ground of avoiding an increase in firms' administrative burden, the Ministry, which is responsible for the implementation of the said EU Directive in Finland, has chosen not to make assurance compulsory (Government of Finland, 2016). This decision is associated with the Government's Programme (Prime Minister's Office, 2015), an official, widely publicized document that sets out the Government's agenda. The major themes of the right-leaning conservative Government's Programme include strengthening the role of businesses, increasing entrepreneurship and cutting down "excessive" regulation (p.8). The Programme, which reflects the Government's neoliberal market logic, presents deregulation as one of the Government's key aims and states as follows (p. 28): "No further national regulatory measures will be taken in connection with the implementation of EU regulations." In other words, when the Directive on non-financial reporting was accepted in the EU with allowance for national discretion regarding whether or not to make sustainability assurance compulsory, it was already common knowledge that the Ministry responsible for the Directive's implementation in Finland would be bound by the Government Programme informed by a neoliberal market logic. This provides an explanation for why the auditing profession rejected (Canning & O'Dwyer, 2016) national-level advocacy work to promote mandatory sustainability assurance.

Two lobby groups, the Finnish Chamber of Commerce and the Confederation of Finnish Industries, have similarly conducted undermining political work by resisting sustainability assurance in their responses to the EU Consultation:

Auditors have no expertise in the field of non-financial information. This requirement would force auditors to acquire training in these matters. We believe that such a requirement would increase the administrative burden of companies without any real profit from the new obligation. (Finnish Chamber of Commerce)

Should companies wish that the non-financial information they have provided is to be verified or rated, there are analysts at the market that are specialized to do exactly this kind of evaluation. (Confederation of Finnish Industries)

The quotes above suggest that the lobby groups draw on the same neoliberal market logic as the Government.

To summarize, even though auditors' EU-level advocacy work to make sustainability assurance compulsory has been supported by similar work undertaken by two NGOs on both EU and national levels, it has been buttressed by the government's, the national legislators' and business lobby groups' simultaneous undermining work informed by the market logic. Moreover, NGOs that distrust companies perceive sustainability assurance to be of little help in their fight against unsustainable business models, citing their own investigations as a way of reducing distance and asymmetry of information.

4.2 Technical work

Technical work makes up the second category of creation work, consisting of mimicry, education, theorization and standardization (Lawrence & Suddaby, 2006; Perkmann & Spicer, 2008). A considerable extent of mimicry is naturally involved in sustainability assurance as the formulation of the statements, at least of those written by assurors from Big4 firms, bears resemblance to financial audit statements (see also Power, 1997b). Likewise, the assurance statements as well as the auditing firms' websites often foreground

the strictness of their internal control procedures due particularly to the firms being involved in financial auditing.

Mimicry also extends to the involvement in sustainability assurance of financial auditors and other individuals, apparently because they are believed to lend legitimacy to the practice:

The make-up of an assurance team is dictated by the regular practices of firms like us [Big4]. A partner needs to be involved. And then, if we are conducting assurance for a firm that is also our financial auditing client, then the partner responsible for that needs to be involved. And then of course a project leader and a sufficient number of auditors. (Assuror, Interview #12)

From our data, we also identified educating by assurors as a form of technical work driving the institutionalization of sustainability assurance. This can take place in the form of concrete education, as explained by one of the interviewed corporate representatives:

For several years, they [assurors] have arranged training days for us. Like, half-day sessions where they tell us what's happening in the field of sustainability, what the latest trends are, and so on. (Sustainability manager, interview #16)

Education work can also take place in the form of recommendations to management, which can be included either in the public assurance statements or in the assurors' letters produced exclusively for the management team. When included in the public statements, such recommendations constitute of form of education directed not only to the client company but also at other firms looking to outperform their competitors in CSR.

However, our results in terms of other forms of technical work, such as theorization and standardization, are mixed. The issues we identified in this respect relate to assurance standards, reporting frameworks, assurance methodology and tools, as well as professional qualifications. The first problem relates to assurance standards: there is no agreement on which standards can be used and by whom. Auditing assurors have until recently enjoyed a competitive advantage as only they have been allowed to apply the ISAE 3000 standard in their assurance work. However, in December 2015 the IASB released the use of that standard to all assurance providers, including consulting assurors. However, as the ISAE 3000 only instructs assurors to verify the sustainability reporting process, this leaves room for managerial discretion regarding the scope of the assurance engagement. Several assurors were worried about this and called for a generally accepted scope for assurance. Presently the ISEA 3000 label on an assurance statement does guarantee much, as illustrated by a very experienced assuror:

Let's say we have an assurance statement that has been written by an auditor following the ISAE 3000 standard. One option is that the auditor has conducted a limited review, checked the reporting process, the controls and the contents of the sustainability report, both the text and the numbers. Then a second option is that the engagement has been limited so that the assuror does not check the process but only takes a look at the sustainability report, its texts and numbers. Then [a third option is that] the assuror doesn't look at the reporting process but only the report's tables that contain numbers. But when the report narrative contains a statement referring to an increase or decrease in something, there is also a number behind that argument. In that sense the narrative can also contain numbers, so if you just look at the tables with figures you leave things out [from the assurance]. (Assurance provider, interview #31)

Most consulting assurors, and also some auditing assurors, have applied the AA 1000, in addition to which some assurors apply the ISO quality standards. As an extreme outcome - due to the lack of standardization and common rules - we also found a consulting assuror's statement with an ISAE 3000 label dating from the time when the standard's use was restricted to auditing assurors only. Despite this, we did not find indications of field-level work to promote more detailed standards.

A related technical issue is the lack of a generally agreed reporting framework to serve as the basis of sustainability assurance. The content of assurance is very much associated with the underlying reporting framework:

It is a bit like assembling furniture. You have the assembly instructions that you get from IKEA when you buy a piece of furniture. Then you can look at the completed piece and tell if it has been assembled according to the instructions or not. There is nothing like that in sustainability reporting. GRI is the only proper framework at the moment but it is not mandatory. (Assurance provider, interview #19)

In this case, some attempts at standardization can be argued to exist. The Big4 firms make full use of GRI, while consulting assurers apply their own tailor-made principles which may or may not include parts of GRI. As competition is fierce, it makes sense for Big4 firms to undertake standardization work that will help them defend their market share against consulting assurers.

In addition to the inter-professional rivalry described above, intra-professional rivalry has led auditing firms to develop their own assurance approaches, methodologies and tools. In this context, an interesting observation relates to the paradoxical way in which auditors perceived the consultative element sometimes included in assurance engagements. On the one hand, assurance tools that did not emulate financial audit tools were dismissed as “consultative” and therefore antithetical to auditing, as firmly stated by one of our interviewees:

I think media analysis is not an assurance procedure. If you list media analysis as an assurance procedure, you have listed a consultancy procedure. In other words, you can consultatively go through a client's stakeholders to find out their views about the client, but by no means does that provide any kind of assurance. (Assuror, Interview #31)

The interviewee explicitly mentioned their efforts to make assurance similar, if not even equal, to auditing:

The spirit of assurance has been a little consultative, so to speak. But I would want to see it become more like auditing. In my work I have tried, and still try, to change it towards that direction. I hope that clients would also understand that this change will benefit them and they would then purchase the service. (Assuror, interview #31)

On the other hand, another interviewee perceived consultation to be necessary because it is something clients expect:

Based on what I've seen, companies want more than just that stamp on the paper, they expect a consultative approach to assurance. They just don't want to pay extra for it. So, we try to tell them what the difference is between producing a stamp and something that is more expensive and takes more time, in other words a consultative commission. (Assuror, Interview #5)

A final standardization-related issue is the lack of a consensual intra-professional view regarding assurers' professional requirements. In the interviewed assurers' view, some sort of standardization of qualifications would be necessary to overcome the problematic situation:

At the moment everyone is allowed to assure them [sustainability reports]. You [interviewer] could write an assurance report. That's not a problem. If some company would buy the [assurance] service from you, it would be fine. If we would get some sort of certification to this industry, it would of course make assurance reliable. (Assurance provider, interview #19)

Some countries, such as Sweden, have developed standardized certification systems for sustainability assurers, whereas in Finland only those assurers who are also certified auditors need to follow certain professional guidelines. As our interviewee based in Sweden explained:

Here [in Sweden] the auditing community has developed a shared vision of what assurance is, how it is carried out and by whom; also the Swedish Association of Chartered Accountants in one of its standards. (Assurance provider, interview #33)

The above does not mean that sustainability assurance would have become institutionalized in Sweden; it only indicates that the Swedish auditing profession has collectively undertaken technical standardization work whereas its Finnish counterpart has not.

Thus, sustainability assurance is a technically unstandardized practice that is not demanded by firms' Finnish stakeholders. A consulting assessor illustrated firms' and stakeholders' lack of interest with reference to a round table discussion that they had planned to arrange on the theme of sustainability assurance:

There were so few registered participants that we had to reschedule the event to take place later this year. This topic does not raise any discussion. Our company arranges quite a few events and this is the only one we've had to reschedule. Just because our clients were not interested. I know that Big4 firms have tried to hold similar events, for instance they planned to have a round table discussion on the assurance of integrated reports last spring, and the same thing happened, it didn't work out. This does not move the masses. But then if an event relates to, say, the business benefits of corporate responsibility or human rights, tens of participants turn up. The Ministry of Foreign Affairs for instance recently held an event on human rights, which attracted almost 200 participants. (Assurance provider, interview #35)

It is mainly large international firms with foreign investors that have their sustainability reports assured. Companies with domestic owners are interested in human rights issues related to foreign workers in the supply chain since potential problems pose a reputational risk for the firm.

Thus, examined through the lens of institutional work, our empirical material suggests that auditors undertake technical work to promote sustainability assurance through mimicry and education. As a means of inter-professional competition, they also try to standardize the use of GRI as the sustainability reporting standard of choice. However, simultaneously, intra-professional rivalry seems to have yielded diverse, unstandardized assurance tools and approaches. Particularly the position of "consultative work", both in the form of specific tools and more generally, remains contested among the profession.

4.3 Cultural work

The third main form of creation work is cultural work that comprises the construction of actors' identities, normative relationships and normative networks (Lawrence & Suddaby, 2006; Perkmann and Spicer, 2008).

The Finnish auditing profession has attempted to construct a normative network through the national Corporate Social Responsibility Reporting Competition that has been organized annually since 1996 by FIBS, the Finnish corporate responsibility network. The organizing committee, which decides on the evaluation criteria of the reports, consists of representatives of FIBS, the Ministry, a responsible investors' association, a business school, the Finnish stock exchange, and the Association of Finnish Auditors. The Competition's expert panel, which evaluates the reports, comprises one representative from each of the Big4 firms. Interestingly, a partner from the market leading Big4 audit firm is involved in the Competition in two different roles: in the organizing committee as a representative of the Finnish Auditors' Association, and in the expert panel evaluating the reports. As will be elaborated further below, s/he has also undertaken other forms of cultural work to institutionalize sustainability assurance.

To be eligible for nomination in the Competition, a firm's sustainability report must "fulfill the reporting criteria of a good international corporate responsibility framework, in practice those of the Global Reporting Initiative guidelines" (FIBS, 2015). The Competition's expert panel automatically reviews the reports of all

listed companies, in addition to which non-listed firms can voluntarily sign up for the competition¹⁰. The evaluation criteria includes awarding points for sustainability reports that have been assured. The Competition could, at least in principle, be an effective form of cultural work since the winner automatically receives image benefits through media attention once the winners have been declared.

Another visible attempt to construct a normative network is undertaken by the market-leading Big4 firm, especially the partner mentioned above, through the Corporate Responsibility Barometer, a report the firm has published annually since 2009. In essence, the Barometer charts developments in, and offers auditor commentaries on, how Finnish companies manage and report on sustainability issues. One of the aims of the report is stated as being “To challenge companies to develop”, which arguably translates into an exhortation for companies to increase their efforts in sustainability management, reporting and assurance. The foreword to the report is usually written by the partner mentioned above who heads the auditing firm’s corporate responsibility services and whom many of our interviewees credited for introducing the practice of sustainability assurance in Finland. In the context of discussing the implications of the EU Directive on non-financial reporting, the partner suggests in the latest Responsibility Barometer’s foreword why it would be a good idea for firms to purchase assurance:

For many board members, the requirement to sign off on non-financial information has increased awareness of their liability in these matters. The Boards’ duty of care has also led to questions concerning whether the reliability of the information has been secured for instance through assurance. I therefore believe that assurance will increase.

Similarly, in a recent blog post, the partner borrows a contemporary fashion term “cloudy transparency” when referring to sustainability reports that have not been assured:

I recommend it [assurance] to all corporate responsibility reporting [hyperlink to audit firm’s corresponding webpage] and particularly to the non-financial information that the Board will undersign either as part of the annual report or as a separate account. Apparent transparency is only cloudy transparency.

In other words, in these writings the partner undertakes cultural work by insinuating that assurance is necessary to protect the members of companies’ Boards of Directors from litigation risks and that companies’ transparency claims are only ostensive as long as the non-financial data has not been assured. In addition, s/he is implicitly appealing to a logic of distrust, trying to create distance between firms and their stakeholders, which assurance helps overcome.

However, institutional investors, usually said to drive the demand for sustainability assurance, have not done so in Finland. For instance, a representative from a Finnish investment fund referred to cultural differences when commenting on the extent of sustainability assurance in Finland:

In some cultures there may be bigger suspicions about whether or not firms have done their business properly (...) And then it’s natural they purchase these kinds of services [sustainability assurance]. However, Finnish investors know Finnish companies quite well, they are actually insiders in these firms. Pension funds, for example, are significant owners of Finnish companies and they are very much involved in those companies’ governing bodies. This is a small country so people are quite close to things. (Responsible investor, #37)

This comment clearly reflects the characterization of Finland as a small, close-knit society where everybody knows everybody (Panapanaan & Linnanen, 2005). The interviewee continued that asymmetry of information, which is the major reason for auditing and assurance, constitutes a problem in markets with a larger number of participants. In Finland, where the number of stock-listed companies is small and the share of foreign ownership is similarly small, such a problem rarely arises. Even the neighboring country Sweden,

¹⁰ In 2013 for instance 16 non-listed firms signed up, of which one was an SME, eight were public sector organizations and the rest were other non-listed firms.

which is also a Nordic welfare state with high trust in institutions, the stock market is already larger and more international¹¹. In this context, proximity fosters trust: since institutional investors are close to, or even have a board seat in, Finnish companies, they come to know the management personally.

On the other hand, another investor highlighted the significance of NGOs and media in bringing about relevant information about companies' CSR behavior:

The role of NGOs and the media is enormous (...) We have signed the Global Compact and the associated norms are our minimum requirement [for firms]. The related information comes from GES [Global Engagement Service¹²] and they in turn obtain the information from the media or from NGOs, and the media often gets their information from NGO reports. If we didn't have a civic society to monitor companies, then we would only get the information from the firms themselves. (Responsible investor, interview #38).

This, again, echoes the societal logic informing NGOs' responses regarding the necessity of having other, reliable sources of sustainability information to complement corporate reports.

Contemplated from the perspective of institutional work, it would appear that auditors' cultural work to entrench sustainability assurance has been successful only at the level of internationally owned listed companies, who consider their peer group to consist of international top performers included in ESG ratings and sustainability indices. Finnish investors in turn obtain the information they need from first-hand involvement in companies' governing bodies as well as from reports produced by NGOs and the media.

5. Discussion and conclusions

Prior research attempting to explain the uptake of sustainability assurance has focused either on its macro-level institutional drivers (e.g. Nitkin & Brooks, 1998; Kolk & Perego, 2010; Simnett et al., 2009) or on auditors' micro-level strategies to legitimate the practice (O'Dwyer, 2011; O'Dwyer et al., 2011; Power, 1997b). We have sought to straddle this division by taking into account both of these aspects when analyzing auditors' attempts to claim the sustainability space. In particular, we have sought to answer two research questions: How do auditors promote sustainability assurance, especially as an audit issue? How do their efforts interact with those of other actors as well as diverse societal logics? As previous analyses have focused, to a large extent, on what might be called success stories, we considered it worthwhile to focus also on the obstacles that can undermine the institutionalization of the practice. Applying institutional work (Lawrence & Suddaby, 2006) and institutional logics (Thornton & Ocasio, 2008; Thornton et al., 2012) as our method theories, we examined interview data and a variety of documentary evidence collected in Finland, where sustainability assurance appears to have become a stabilized practice only among the 35 largest international stock-listed companies out of a total of 160 sustainability reporters. In other words, the Finnish context enabled us to analyze a situation where the institutional work undertaken by auditors has been successful to an extent and then encountered limits of some sort. Mindful of previous studies, we anticipated the possibility of finding evidence of both supporting and undermining forms of institutional work as well as the of the conditioning effect of institutional logics.

To summarize our empirical findings, we noted that Finnish auditors have engaged in EU-level political work by advocating compulsory sustainability assurance. Their political efforts have been supported by parallel advocacy work undertaken by two NGOs but buttressed by the undermining political work undertaken by business lobby groups and the Ministry responsible for the implementation of the EU Directive in Finland, as well as the more indirect political work of the Government, informed by a neoliberal market logic. We suggest that the Government's commonly known, explicit promise not to undertake additional regulatory measures

¹¹ About 130 companies are listed on the Helsinki Stock Exchange, while the Stockholm Stock Exchange list contains about 320 companies. Moreover, 24 Global Headquarters of the Forbes Global 2000 list are located in Sweden, while only 10 such headquarters are located in Finland (Oresunds Instituttet, 2015).

¹² GES is a company which provides portfolio screening services for responsible investors.

in the context of implementing EU directives effectively resulted in auditors' rejection (Canning & O'Dwyer, 2016) of national-level advocacy work. Moreover, our analysis indicates that a key explanation for the lack of society-level demand for sustainability assurance lies in two types of institutional logics, one of distrust in large multinational firms and one of trust in local SMEs. The absolute majority of citizens trust Finnish companies, apparently believing that the latter would have no reason to falsify their sustainability information - and even if they did, the media and NGOs would bring it to public attention. Thus, the public at large perceives very little need for formal assurance of such information¹³. On the other hand, critical NGO actors who might harbor a more suspicious attitude towards companies do not consider sustainability disclosures useful and instead rely on their own investigations to overcome asymmetry of information; therefore, sustainability assurance is of little significance to them as well.

In terms of technical work, we found that, as could be expected, auditors have educated firms on sustainability assurance by arranging training and, more indirectly, by offering management recommendations in public assurance statements. The auditing profession has also engaged in mimicry by emphasizing similarities between sustainability assurance and financial auditing (Power, 1997b; O'Dwyer, 2011), and by foregrounding their robust internal controls and systematic methodology. The more ambiguous aspects of technical work we identified related to the limited standardization of the practice, especially as concerns assurance standards, sustainability reporting frameworks, assurance methodology and tools, as well as professional qualifications. Our analysis suggests that two issues are at stake in the limited standardization of sustainability assurance, namely inter-professional and intra-professional competition in a small national market for assurance services. When engaged in inter-professional competition against consultants, Big4 auditors join forces in attempting to standardize the GRI as the preferred sustainability reporting framework and the ISAE 3000 as the assurance standard to be utilized. Yet, by promoting the GRI they effectively limit their client pool to those firms that can afford to pay for using the framework. On the other hand, limited standardization of assurance approaches, tools and professional qualifications benefits the market leading Big4 firm in its intra-professional competition against other major audit firms. Thus, the Finnish auditing profession is in a paradoxical situation where it is simultaneously trying to both promote and undermine the standardization of sustainability assurance.

Finally, in terms of cultural work, we noted the market leading Big4 firm's attempt to create a normative network by publishing the annual Corporate Responsibility Barometer as well as participating actively in the organization of the annual Corporate Responsibility Reporting Competition. Further, the partner responsible for corporate responsibility services in that Big4 company could plausibly be called an institutional entrepreneur as s/he was the one who, according to several interviewees, first introduced sustainability assurance to Finland and has continued to champion the practice through, for instance, a personal blog. Yet, despite these attempts, it appears that auditors have not succeeded in creating a normative network around sustainability assurance in Finland that would extend beyond major listed companies with international ownership. In line with the logic of trust in local companies, domestic investors do not consider it necessary to pressure Finnish companies to conduct sustainability assurance as they obtain the necessary information from first-hand involvement in companies' governing bodies as well as from their own analyses, NGO reports and the media. In contrast, large internationally owned companies need to play up to the expectations of geographically remote international investors who need to overcome asymmetry of information.

Moving on to contemplate our results in theoretical terms, with this study we offer three contributions to the prior literature. First, we contribute to the body of knowledge on auditors' efforts to promote and institutionalize sustainability assurance (Power, 1997a, b; O'Dwyer et al., 2011; Andon et al., 2014; 2015). To our knowledge, this is the first field-level analysis on auditors' attempts to promote sustainability assurance as earlier studies have been situated on the level of individual organizations (e.g. O'Dwyer 2011; O'Dwyer et al. 2011; Andon et al. 2014). We also provide a direct response to the call of Andon et al. (2015) for more research on the institutional work undertaken by auditors in a new audit space. Moreover, previous interpretive studies have focused almost exclusively on auditors' tactics and strategies. O'Dwyer et al. (2011)

¹³ Whether or not all relevant information is actually disclosed in the reports is a different debate.

encourage the investigation of a wider group of actors from whom auditors seek legitimacy for a new assurance practice. Due to Finland being a small country in terms of population size, we were able to identify and interview all the key actors who were envisaged to play a role in institutionalizing assurance practice in Finland as well as to analyse all sustainability assurance statements published in a given year. In addition, situated in an open yet relatively culturally homogenous society, we were able to identify a national CSR culture and examine its association with these groups' actions.

Our findings illustrate that the uptake of sustainability assurance involves an interplay of various agents' more or less coordinated, supporting or undermining efforts as well as the conditioning effects of societal-level logics. As institutional entrepreneurship is a fundamentally political process (Fligstein, 1997; Seo and Creed, 2002; Garud et al. 2002), it is not surprising we found several examples of political work, both supporting and undermining sustainability assurance. Likewise, institutional logics appeared to play the most prominent role in the context of political work. Both O'Dwyer et al. (2011) and Andon et al. (2014) examine the difficulties auditors encounter when promoting assurance in a new field, and their at least partial success. In contrast, we offer an analysis of a situation where auditors only managed to increase assurance marginally, and explain their limited success by leveraging the conceptualizations of institutional work and institutional logics. O'Dwyer et al. (2011) conclude that while the auditors in a professional service firm proved successful in securing pragmatic legitimacy for sustainability assurance among their client base, they encountered obstacles when trying to secure moral legitimacy from an external "dormant audience", in other words the public and NGOs who displayed little interest in the practice. Our study qualifies their findings as we can distinguish two reasons for such a lackluster attitude: on the one hand, the logic of trust towards local SMEs that reduces citizens' need for assurance and, on the other hand, NGOs' preference for first-hand information instead of organizational sustainability disclosures. Interestingly, in contrast to O'Dwyer et al. (2011), we did not find any evidence of auditors trying to educate NGOs of the benefits of the practice; this particular form of technical work was targeted mainly at the firms.

We are also able to complement the challenges identified by Andon et al. (2015) with the suggestion that such challenges include not only undermining forms of institutional work undertaken by other actors and contradictory forms of work undertaken by the auditors themselves, but also CSR-related institutional logics. It appears that deeply rooted societal logics can indeed play a part in limiting the effect of especially the field-level political and cultural work supporting sustainability assurance. However, the contradictory forms of technical work undertaken by auditors appear to have been guided by a different logic, namely the market logic giving rise to auditors' inter- and intra-professional rivalry.

As a second major contribution, we respond to Power's (2003) call for country-specific studies exploring the extent to which his audit society thesis holds. Specifically, Power (1997) argues that audit is a substitute for democracy and Power (2000) posits that an audit society is a less trusting society. Our study differs from Power (1997) in that his thesis concerned especially society's lack of trust in public sector organizations, the operation of which is largely limited to a specific jurisdiction. Our analysis qualifies the audit society thesis by considering also the international dimension associated with listed companies. Namely, our findings indicate that the institutionalization of sustainability assurance hinges upon two logics associated with organizations' degree of internationalization. In the case of large, partially foreign-owned companies, where distance and asymmetry of information result in a logic of distrust that supports demand-side pressures exerted by international investors and auditors' promotion of the practice. In contrast, in the case of smaller companies with mainly domestic ownership, where proximity reduces asymmetry of information, a logic of trust prevails, limiting the expansion of sustainability assurance and substituting for audit.

Finally, our study has bearing on the functionalist studies that have identified public awareness of CSR issues and stakeholder-oriented legislation as the institutional drivers of sustainability assurance (e.g. Nitkin & Brooks, 1998; Kolk & Perego, 2010; Simnett et al., 2009). To these studies, we can add that a logic of trust in local SMEs appears to limit the expansion of sustainability assurance to large foreign-owned firms, even in a society where the public cares about social and environmental issues.

As concerns future research, it will be interesting to observe whether or not the EU Directive on non-financial reporting will increase integrated reporting and what the impact of integrated reporting on assurance will be. Other questions to explore in the future include whether or not sustainability reporting will become more standardized and how such a development will affect the sustainability assurance process and its scope and subsequently stakeholder perceptions of, and participation in, the practice. The role of firm's governing boards in assurance will also open up interesting new research avenues. Finally, to complement our findings creation work undertaken by auditors to institutionalize sustainability assurance, evidence of maintaining work could be found in contexts where such assurance has advanced further.

In terms of practical implications, our study suggests that to regain the original stakeholder centric spirit of sustainability assurance, there is a need to critically reflect on ongoing developments such as the introduction of integrated reporting. It will be challenging for the reliability of accounting if integrated reports contain a mix of audited, assured, and unassured information. There is a risk that stakeholders will not be able to detect whether a certain piece of information is verified or not and to what extent. From the perspective of stakeholder theory, assurance should increase stakeholders' trust towards reported information but our results suggest that Finnish stakeholders do not know much about the assurance process, its contents or its coverage. They also do not trust sustainability assurance in its current form, meaning that the practice does not fulfill its original purpose. In origin, this problem relates to the fact that companies' choice of relevant indicators do not always fit with the information needs of stakeholders. While companies buy a limited level assurance, which is conducted in a very unstandardized fashion by different assurance providers, the stakeholders might be confused about which parts of sustainability information have been assured and on how. In the long run, such an unstandardized situation is untenable as it benefits neither the firms nor the stakeholders.

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Appendix 1. List of interviews.

#	Actor group	Title of the interviewee	Organization	Duration (min)	Date
1	FIRM/AUDITEE	Sustainability manager	Firm Alpha	62	Nov 2010
2	FIRM/AUDITEE	1) Sustainability Manager 2) Head of a Business Control 3) CFO	Firm Beta	104	Dec 2010
3	FIRM/AUDITEE	Communication and Sustainability Manager	Firm Gamma	144	Jun 2011
4	STAKEHOLDER	A member of CSR competition jury, CSR researcher	University	110	Oct 2012
5	ASSUROR	Assurance provider	Auditing firm A	76	Nov 2012
6	ASSUROR	Assurance provider	Auditing firm B	60	Nov 2012
7	INVESTOR	CEO	Institutional Investor A	63	Nov 2012
8	INVESTOR	Head of Responsible Investments	Institutional Investor B	79	Jan 2013
9	FIRM/AUDITEE	Sustainability Manager	Firm Delta	49	Dec 2013
10	FIRM/AUDITEE	Sustainability Manager	Firm Epsilon	44	Dec 2013
11	ASSUROR	Assurance provider	Auditing firm A	45	Feb 2014
12	ASSUROR	Assurance provider	Auditing firm B	77	May 2014
13	REGULATOR	Public Officer	Ministry	105*	May 2014
14	INVESTOR	Manager of Sustainable Investments	Institutional investor C	49	May 2014
15	ASSOCIATION	1) Senior Adviser, Sustainable Business 2) Lawyer	Business Association A	63	Jun 2014
16	FIRM/AUDITEE	Communication and Sustainability Manager	Firm Gamma	82	Aug 2014
17	ASSUROR	Assurance provider	Auditing firm C	47	Aug 2014
18	ASSUROR	Assurance provider	Auditing firm B	101	Aug 2014
19	ASSUROR	Assurance provider	Auditing firm D	113	Apr 2015
20	ASSUROR	Assurance provider	Auditing firm B	38	Apr 2015
21	ASSUROR	Head of Assurance Services	Auditing firm E	48	Apr 2015
22	ASSUROR	Assurance provider	Auditing firm C	31	Apr 2015
23	FIRM/AUDITEE	Director, Corporate Responsibility	Firm Zeta	64	Jan 2016
24	NGO	Programme manager	NGO 1	45	Jan 2016
25	REGULATOR	Senior Advisor	Ministry	58	Jan 2016

26	REGULATOR	Senior Financial Counsellor	Ministry	61	Jan 2016
27	NGO	Executive Director	NGO 2	52	Jan 2016
28	NGO	Executive Director	NGO 3	47	Jan 2016
29	INVESTOR	Investment Manager	Institutional Investor D	70	Jan 2016
30	NGO	Secretary General	NGO 4	48	Feb 2016
31	ASSUROR	Head of Assurance Services	Auditing firm E	58	Feb 2016
32	ASSOCIATION	CEO	Business Association B	61	Feb 2016
33	ASSUROR	Senior Manager, Climate Change and Sustainability Services	Auditing firm F in Sweden	61	Feb 2016
34	REGULATOR	Civil Official	Ministry	65*	Mar 2016
35	ASSUROR	Senior Advisor	Consultant assuror	58	Mar 2016
36	SUPERVISOR	Financial market supervisor	Stock market supervisor	90*	Apr 2016
37	INVESTOR	ESG Manager	Socially responsible investors	86	Sep 2016
38	INVESTOR	Senior Analyst	Socially responsible investor	61	Sep 2016
39	FIRM/AUDITEE	Sustainability Manager	Firm Eta	90	Nov 2016
40	FIRM/AUDITEE	Sustainability Manager	Firm Theta	44	Nov 2016
			In total	45 hours	

Note: * notes only, not tape recorded interview.

Appendix 2 Sustainability assurance activities of auditor and consultant assurers in Finland.

	Auditor assuror (27) %	Consultant assuror (7) %	Total (34) %
Test of the accuracy and completeness of the information from original documents and systems on a sample basis	27 100 %	5 71 %	32 94 %
Interviews with people responsible for collection and reporting of the information	20 74 %	7 100 %	27 79 %
Management interview	25 93 %	1 14 %	26 76 %
Site visit(s)	19 70 %	0 0 %	19 56 %
Evaluation of adherence to the principles and/or guidelines	16 59 %	1 14 %	17 50 %
Test of the consolidation of information and performing recalculations on a sample basis	16 59 %	0 0 %	16 47 %
Evaluation of reporting and data gathering systems	10 37 %	5 71 %	15 44 %
Assessment of the Company's defined material sustainability topics	13 48 %	2 29 %	15 44 %

Comparison to the Company's reporting principles	13 48 %	0 0 %	13 38 %
Document review	10 37 %	1 14 %	11 32 %
Evaluation of the Company's sustainability procedures	7 26 %	4 57 %	11 32 %
AA1000APS application	4 15 %	1 14 %	5 15 %
Assesment of stakeholder inclusivity and responsiveness	5 19 %	1 14 %	6 18 %
Employee interviews	4 15 %	0 0 %	4 12 %
Analytical review	4 15 %	0 0 %	4 12 %
Evaluation of sustainability information and calculations	0 0 %	2 29 %	2 6 %
Media search	2 7 %	0 0 %	2 6 %