



Article

Governance Mechanisms and Teacher Authority: A Six-Country Policy Analysis

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Abstract

This study investigates how governance structures shape teacher authority and institutional protection across six education systems: Finland, Sweden, England, the Netherlands, France, and Turkey. Through comparative policy analysis of national legislation and school safety frameworks, the research identifies three governance mechanisms. In Finland and Sweden, normative mechanisms rooted in professional trust enable classroom-level teacher discretion. In England and the Netherlands, regulative mechanisms couple legal authority with inspection regimes and safeguarding legislation. In France and Turkey, cultural-cognitive mechanisms channel disciplinary authority through hierarchical administrative procedures. A Teacher Protection Policy Index (TPPI) synthesizes six policy dimensions—safety legislation, disciplinary authority, physical intervention provisions, reporting obligations, accountability mechanisms, and professional status—into a comparative heuristic. Regulatory and trust-based systems provide comparable levels of codified institutional protection through different institutional pathways, characterized by regulatory and normative density, respectively. France and Turkey illustrate alternative administrative pathways, relying on state liability substitution and procedural protection in France, and career-stage legislation and multi-channel reporting in Turkey. The findings suggest that teacher authority is institutionally embedded within governance structures rather than determined by isolated disciplinary legislation. The TPPI can function as a diagnostic tool for policy borrowing, revealing that legal provisions cannot be transplanted across governance contexts without attention to the institutional mechanisms that make them effective.

Keywords: comparative education, teacher authority, governance mechanisms, school safety policy analysis



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Introduction

Teacher authority and teacher safety have become increasingly salient concerns in education policy discourse. Across numerous national contexts, teachers manage classrooms and maintain disciplinary order while operating within governance structures characterized by expanding regulatory oversight and accountability regimes (Ball, 2003; Grek, 2009; Ozga, 2009). These developments have reconfigured the institutional context in which teachers exercise professional authority.

International research has documented the prevalence of violence against teachers, with educators reporting verbal harassment, threats, and physical aggression from students and parents (Espelage et al., 2013; McMahon, Martinez et al., 2014; McMahon, Reaves et al., 2017). Such experiences are associated with elevated stress, burnout, and intentions to leave the profession (McMahon et al., 2024; Wilson et al., 2011;). Recent scholarship emphasizes that teacher victimization is shaped by institutional conditions—school climate, administrative support, and disciplinary policies (McMahon et al., 2024; Perry et al., 2024). Governance structures are precisely these conditions, operating at the system level to shape how authority is distributed and protection mechanisms are activated.

Education governance reforms across countries have introduced regulatory mechanisms affecting how teachers exercise authority. Accountability systems, inspection regimes, and performance monitoring frameworks have altered the relationships between professional autonomy, institutional oversight, and administrative control (Lingard et al., 2015; OECD, 2023). Comparative education research highlights substantial variation in how authority and responsibility are organized across education systems (Phillips & Schweisfurth, 2014). Teacher authority, therefore, must be interpreted within broader institutional governance frameworks.

Despite growing research on teacher victimization and professionalism, limited attention has been devoted to governance arrangements structuring the legal foundations of teacher authority. Most literature focuses on classroom practices or school-level conditions rather than system-level legal frameworks. Comparative policy research investigating how governance structures influence the relationship between disciplinary authority and institutional protection remains limited.

This study addresses this gap through a comparative policy analysis of six education systems: Finland, Sweden, England, the Netherlands, France, and Turkey. Drawing on documentary analysis of national legislation and policy frameworks, it examines how governance structures shape teacher authority and protection. Three research questions guide the study:

3 Comparing Governance Mechanisms and Teacher Authority

(1) How do governance structures shape the legal foundations of teacher authority?

(2) What institutional mechanisms link authority to protection?

(3) How can these mechanisms be compared across governance contexts? The analysis is organized around three governance configurations—trust-based, regulatory, and administrative—and develops a Teacher Protection Policy Index (TPPI) as a heuristic instrument.

The study seeks to make three contributions: a comparative analysis of legal foundations across six governance traditions; the TPPI as a diagnostic tool; and the argument that teacher authority is institutionally embedded, challenging approaches that treat disciplinary power as mere classroom competence.

Theoretical Framework and Literature Review

This study conceptualizes teacher authority as institutionally embedded within governance structures. Rather than treating authority as an individual professional attribute or classroom management competence, the analysis draws on institutional theory and comparative education governance research to examine how legal and policy frameworks structure teachers' disciplinary authority and institutional protection. This section reviews relevant literature and develops the analytical framework guiding the comparative analysis.

Teacher Authority and Governance: An Institutional Perspective

This study conceptualizes teacher authority as institutionally embedded within governance structures. Rather than treating authority as an individual attribute or classroom competence, the analysis draws on institutional theory and comparative education governance research to examine how legal and policy frameworks structure teachers' disciplinary authority and protection. Research on educational leadership and teacher professionalism has long emphasized that teachers require autonomy to navigate classroom life and maintain instructional order (Hargreaves, 2000; Hoy & Miskel, 2013). Comparative research reveals considerable cross-national variation in teachers' institutional status—in highly professionalized systems characterized by rigorous teacher education, collaborative cultures, and high institutional trust, teachers enjoy greater classroom discretion (Sahlberg, 2011). Institutional theory provides a productive lens for understanding how governance structures shape authority relationships. Scott (2013) distinguishes three institutional pillars: regulative (rule-based systems with legal sanctions), normative (socially constructed professional expectations), and cultural-cognitive (shared understandings that constitute social reality). This study applies this typology to teacher authority, examining whether different governance configurations emphasize different pillars. Comparative education research documents substantial cross-national variation in the organization of education systems (Phillips & Schweisfurth, 2014). Some systems

emphasize professional trust and decentralized governance (Sahlberg, 2011; Simola, 2005), others rely on hierarchical administrative procedures (Weber, 1978), and a third configuration combines professional autonomy with formal regulatory oversight (Ball, 2003; Lingard et al., 2015).

Teacher Victimization and Institutional Protection

Research on teacher victimization has expanded considerably. Early studies documented violence against teachers and its consequences for well-being and school climate (Espelage et al., 2013; McMahon et al., 2014; Wilson et al., 2011). Subsequent research demonstrates that aggression is associated with increased stress, burnout, reduced job satisfaction, and intentions to leave the profession (McMahon et al., 2017, 2024). More recent scholarship emphasizes that teacher victimization cannot be understood solely as individual student behavior. Organizational conditions—school climate, administrative support, disciplinary policies, and governance structures—significantly influence teachers' safety and professional authority (McMahon et al., 2024; Perry et al., 2024). Institutional protection mechanisms, including reporting procedures, safeguarding legislation, and accountability systems, shape how education systems respond to aggression against teachers. This study integrates these literatures by examining governance structures as institutional conditions that shape both authority distribution and protection provision.

Three Governance Configurations

Drawing on comparative education governance literature, this study identifies three broad configurations structuring authority relationships. Trust-based governance systems emphasize professional trust and decentralized decision-making, allowing teachers considerable discretion (Sahlberg, 2011; Simola, 2005). Teacher authority is grounded in professional norms and collaborative practices. Finland and Sweden exemplify this configuration, though Finland relies more heavily on professional trust with limited inspection, while Sweden combines decentralized governance with Schools Inspectorate oversight. Regulatory governance systems combine professional autonomy with formal regulatory oversight, including inspection regimes, safeguarding legislation, and performance monitoring (Ball, 2003; Grek, 2009; Lingard et al., 2015). Teacher authority is explicitly codified in national policy frameworks while embedded within accountability structures. England and the Netherlands represent this configuration, with Ofsted and the Education Inspectorate providing external oversight. Administrative governance systems rely on centralized administrative control and hierarchical decision-making. Teachers are frequently classified as civil servants, and disciplinary authority is mediated through institutional procedures rather than exercised directly at the classroom level (Dutercq & van Zanten, 2001; Weber, 1978). France and Turkey exemplify this approach, with disciplinary councils in France and ministerial regulations in Turkey. These configurations function as analytical heuristics for comparing how governance structures shape teacher authority and protection. They are interpretive tools derived from literature, not empirical findings.

Method

Research Design

This study adopts a qualitative comparative policy analysis design to examine how teacher authority and teacher protection are structured across six national education systems: Finland, Sweden, England, the Netherlands, France, and Turkey. The analysis examines formal legal and policy frameworks—national legislation, disciplinary regulations, and school safety policy documents—as institutional documents that define how authority is distributed and how teachers are protected. Drawing on the education governance literature reviewed above, the comparative analysis is organized around three heuristic governance configurations: trust-based governance, regulatory governance, and administrative governance. These configurations serve as analytical devices for structuring the comparative interpretation of policy frameworks.

This study employs Qualitative Policy Analysis (QPA) as its primary methodological approach. QPA is defined as a systematic, interpretive methodology for examining policy texts, discourses, and practices to understand how policies are constructed, legitimized, and implemented within specific institutional contexts (Rizvi & Lingard, 2010). Unlike quantitative policy analysis that focuses on measurable outcomes, QPA emphasizes the interpretive dimensions of policy—how policy texts create meaning, construct subjects (such as "the teacher"), and establish institutional logics that shape practice (Levinson et al., 2009). QPA is particularly appropriate for this study for three reasons. First, it enables systematic comparison of legal and policy frameworks across different national contexts while attending to the specific institutional logics of each system. Second, it allows for the examination of how policy texts both reflect and constitute governance mechanisms—the regulative, normative, and cultural-cognitive pillars that Scott (2013) identifies. Third, QPA facilitates the development of comparative heuristics, such as the TPPI, that can reveal patterns across cases without imposing a single interpretive framework.

Case Selection

The six countries were selected to represent variation across major European education governance traditions. Finland and Sweden represent Nordic trust-based systems, characterized by decentralized governance and strong professional autonomy (Sahlberg, 2011). England and the Netherlands represent regulatory systems, combining professional authority with formal accountability mechanisms including inspection regimes (Ball, 2003). France and Turkey represent administrative civil service systems, characterized by centralized governance and teachers classified as civil servants (Dutercq & van Zanten, 2001; Weber, 1978). This most-different systems design (George & Bennett, 2005) allows examination of how different governance arrangements influence the distribution of disciplinary authority and institutional

protection mechanisms.

Data Sources

The analysis is based on official legislative and policy documents from each country. Table 1 lists the primary sources.

Table 1. Data Sources by Country

Country	Primary Legislation	Regulatory/Policy Documents	Inspectorate/Evaluation
Finland	Perusopetuslaki (628/1998)	National Core Curriculum for Basic Education	FINEEC National Education Plan 2024-2027
Sweden	Skollag (2010:800) (SFS 2026:1245)	Läroplan för grundskolan (Lgr22)	Skolinspektionen
England	Education and Inspections Act 2006	Keeping Children Safe in Education (2025); Working Together to Safeguard Children (2026)	Ofsted Education Inspection Framework (2024)
Netherlands	Wet op het primair onderwijs (WPO)	Veiligheid op school (Rijksoverheid)	De Staat van het Onderwijs 2026
France	Code de l'Éducation	Loi pour une école de la confiance (2019)	Ministère de l'Éducation — Les violences à l'école (2024)
Turkey	Öğretmenlik Meslek Kanunu (7528, 2024); Millî Eğitim Temel Kanunu (1739)	Okul Öncesi ve İlköğretim Kurumları Yönetmeliği; Ortaöğretim Kurumları Yönetmeliği; MEB Stratejik Plan 2024-2028	MEB Teftiş Rehberi; Devlet Memurları Disiplin Yönetmeliği

The analysis is based on official legislative and policy documents from each country. Primary sources include Finland's Basic Education Act (628/1998, Sections 29, 35–36b), Sweden's Education Act (Skollagen 2010:800, updated through SFS 2026:1245, Chapters 2, 5, 6, 26), England's Education and Inspections Act 2006 (Part 7, Sections 88–93), the Netherlands' Wet op het primair onderwijs (WPO, Artikel 4c, 13, 31a) and School Safety Act (2015), France's Code de l'Éducation (R.421-10, R.511-13, L911-4), and Turkey's Basic Law of National Education (1739), Teaching Profession Law (7528, 2024), and Secondary Education Institutions Regulation (2013). Documents were selected based on three criteria: (1) authority—issued by a legitimate national body (parliament, ministry, or inspectorate); (2) relevance—directly addressing teacher authority, disciplinary procedures, school safety, or professional status; and (3) temporal scope—published between 2000 and 2025, with exceptions for foundational legislation (e.g., Finland's Perusopetuslaki 1998, Sweden's Skollag 2010). Official English-language versions were used when available. Where official translations were not available, provisions were translated using AI-assisted translation tools (DeepSeek) and verified against authoritative secondary sources including OECD reports and ministry publications to ensure conceptual accuracy.

Analytical Framework

Six policy domains guided the analysis, derived from the literature on educational governance, teacher professionalism, and school safety: governance structure (degree of centralization), professional status (professional autonomy versus civil servant status), accountability mechanisms (external oversight such as inspection regimes), reporting obligations (legal requirements for reporting incidents), disciplinary authority (legal authority to manage classroom behaviour), and safety protection (legal provisions ensuring safe learning environments). Each country was coded across these six domains. Coding was conducted by the first author and verified by cross-checking against official legal databases and secondary sources. Discrepancies were resolved through discussion and reference to primary legal texts. The complete coding rubric, including specific legal citations for each TPPI score, is provided in Appendix A.

Analytical Process

The analysis proceeded through three stages, following established QPA methodologies (Levinson et al., 2009; Rizvi & Lingard, 2010). First, national legislative and policy documents were systematically identified, catalogued, and reviewed for each country. Second, document analysis employed Braun and Clarke's (2006) six-phase thematic analysis framework, combining deductive coding (guided by the six TPPI dimensions) and inductive coding (identifying emergent themes from the texts themselves, such as the role of inspection regimes, the distinction between professional and civil servant status, and the relationship between reporting obligations and accountability mechanisms). Third, for each country, comprehensive profiles were constructed synthesizing findings across all six TPPI dimensions, documenting the legal source of each protection mechanism, the specific provisions identified, and the governance logic underlying each configuration.

Teacher Protection Policy Index (TPPI)

To facilitate systematic comparison, a Teacher Protection Policy Index (TPPI) was constructed. The index integrates six dimensions: safety legislation (SAFE), disciplinary authority (SAN), physical intervention provisions (PHY), reporting obligations (REP), accountability mechanisms (ACC), and professional status (PROF). Each dimension was scored using a three-point scale: 0 indicates absence of explicit legal provision, 1 indicates limited or indirect provision, and 2 indicates explicit legal provision. Scores across the six domains were summed using an unweighted additive model, treating each dimension as equally important, to produce a composite TPPI score for each country, with a possible range from 0 to 12. The index captures the legal and institutional foundations of teacher protection frameworks, not the practical effectiveness of policies.

Validity and Reliability Strategies

Three strategies were employed to enhance validity and reliability. Triangulation involved cross-verification of findings across multiple sources for each country: national legislation, ministry publications, inspectorate reports, and OECD/TALIS data. For example, France's L911-4 provision (state liability substitution) was verified through the Code de l'Éducation, the Ministère de l'Éducation website, and OECD country reports. Peer debriefing involved review of coding decisions by a second researcher with expertise in comparative education policy, with disagreements resolved through discussion. An audit trail documented all coding decisions, interpretive judgments, and analytical choices, ensuring transparency and replicability (Honig, 2006).

Ethical Considerations

This study involved no human participants and analyzed only publicly available legal and policy documents. No ethical approval was required. The use of AI-assisted translation tools (DeepSeek) is disclosed to ensure methodological transparency.

Results

How Governance Mechanisms Structure Disciplinary Authority

This section examines how governance arrangements shape three dimensions of teacher authority: the legal source of disciplinary authority, the regulation of physical intervention, and the relationship between reporting obligations and accountability mechanisms. The analysis draws on national legislation and policy documents from six education systems.

Sources of disciplinary authority

The legal source of teachers' disciplinary authority varies across the six education systems. Scott (2013) distinguishes between three types of institutional mechanisms, regulative, normative, and cultural-cognitive, that help make sense of this variation.

In Finland and England, legislation directly authorizes teachers to exercise disciplinary authority. Finland's Basic Education Act (Section 36) permits teachers to remove disruptive pupils without administrative approval. England's Education and Inspections Act 2006 (Part 7, Sections 88-93) grants explicit disciplinary powers including detention and removal from classrooms. Scott calls this a *regulative* mechanism—the law itself grants and bounds teacher authority.

Sweden and the Netherlands operate differently. Here, disciplinary authority is mediated through school-level policies and professional norms rather than direct legal delegation. Sweden's Education Act (Chapter 5) establishes a framework for discipline but leaves implementation to school leadership. The Netherlands' Wet op het primair onderwijs (Article 31a) assigns teachers responsibility for classroom order within school-specific behaviour policies. This reflects what Scott terms *normative* mechanisms—authority emerges from professional roles and school cultures, not just legal provisions.

France and Turkey represent a third pattern. Disciplinary authority is embedded in administrative procedures and institutional hierarchies. France's Code de l'Éducation (Articles R511-12, R511-13) channels sanctions through disciplinary councils (*conseils de discipline*). Turkey's Secondary Education Institutions Regulation (2013) defines disciplinary procedures through ministerial regulation. Here, the taken-for-granted assumption is that discipline is an administrative function, not a classroom-level one. Scott would classify this as *cultural-cognitive*—shared understandings that constitute how authority is supposed to work.

These three patterns also reflect broader distinctions in teacher authority documented across different strands of research, including legal, professional, and administrative bases of authority (Bo & Onwubuya, 2022; Ingersoll, 2003; Pace, 2003). Across the six systems examined here, these differences are reflected in whether teachers derive their disciplinary authority primarily from direct legal authorization, professional norms, or administrative procedures.

Regulations of physical intervention

Physical intervention—teachers' legal authority to use force in managing student behaviour—reveals sharp differences across the six systems. Three patterns emerge.

Finland and England explicitly authorize physical intervention by law. Finland's Basic Education Act (Section 36) allows teachers to use "necessary and proportionate force" when managing disruptive pupils. England's Education and Inspections Act 2006 (Section 93) permits "reasonable force" to prevent harm, damage, or disorder. In both countries, teachers know where they stand—the law defines the boundaries.

Sweden and the Netherlands take a more cautious approach. Sweden's Education Act (Chapter 5) allows physical intervention only in acute emergencies where immediate harm is threatened (the "nödvärn" principle). The Netherlands has no explicit statutory provision; instead, schools may include limited emergency procedures in their safety policies, but the law itself remains silent.

France and Turkey leave the matter largely unregulated. French education law contains no provision addressing physical intervention by teachers, though state liability substitution (L911-4) provides indirect

protection. Turkish secondary education regulations similarly do not address when or how teachers might use force. The result is legal ambiguity—teachers have no explicit authorization but also no clear prohibition. In practice, this ambiguity may expose teachers to liability while offering no legal protection.

These differences are not random. They follow the same governance logic seen in the previous section. Weber (1978) observed that in centralized bureaucratic systems, legitimate authority is exercised through hierarchical procedures, not delegated to frontline officials. France and Turkey exemplify this logic—authority over physical intervention is reserved for institutional bodies, not classroom teachers. Finland and England, by contrast, operate under different governance logics that treat teachers as professionals who can exercise reasonable judgment in real-time situations.

Reporting obligations and accountability

The relationship between reporting obligations and accountability mechanisms shapes how schools respond to safety incidents and how teachers experience institutional support. Three configurations emerge from the analysis.

England and the Netherlands tightly couple reporting obligations with accountability systems. Safeguarding legislation creates binding legal duties to report incidents related to student welfare and school safety. England's mandatory reporting requirements, set out in *Keeping Children Safe in Education* (2025), are reinforced by Ofsted inspections, which evaluate behaviour and attitudes as a key judgment area. The Netherlands' School Safety Act (2015) establishes similar reporting requirements monitored by the Education Inspectorate. The result is what Ball (2003) describes as performativity—schools and teachers adjust their behaviour to meet inspection expectations because the consequences of non-compliance are real.

Finland and Sweden take a different path. Safe learning environment legislation sets clear expectations—Finland's Basic Education Act (Section 29) and Sweden's Education Act (Chapter 5) require schools to maintain safe environments. But implementation relies on professional norms and municipal oversight rather than intensive national inspection. Reporting obligations exist, but they function as professional responsibilities rather than compliance requirements enforced through external monitoring. Sahlberg (2011) calls this trust-based governance—professional norms and teacher education substitute for detailed external oversight.

France and Turkey structure reporting through hierarchical channels. Incidents are reported upward through administrative procedures rather than handled directly by teachers. In France, reports move through educational hierarchies to disciplinary councils. In Turkey, ministerial regulations define

institutional reporting protocols, including multi-channel systems (CIMER, MEBİM, DYS). Dutercq and van Zanten (2001), in their analysis of government regulation on education, show how French centralized administration structures authority through hierarchical procedures rather than direct teacher discretion. The Turkish case follows a similar institutional logic: accountability operates vertically within the bureaucracy, not horizontally through inspection regimes or professional networks.

The practical consequence for teachers is significant. In England and the Netherlands, protection mechanisms are activated through clear procedures reinforced by inspection pressure. In Finland and Sweden, protection depends on professional trust and local capacity. In France and Turkey, protection is available but filtered through administrative layers—what teachers can access depends on how information travels up the hierarchy.

Comparative Summary

Table 2 summarizes the comparative findings across the six education systems.

Table 2. Cross-Country Comparative Policy Matrix

Country	GOV Governance Structure	PROF Professional Status	ACC Accountability	REP Reporting Obligations	SAN Disciplinary Authority	SAFE Safety Protection
Finland	Municipal governance	High professional autonomy	Limited national inspection	Child welfare reporting obligations	Teachers may remove disruptive pupils	Safe learning environment law
Sweden	Decentralized municipal system	Professional teaching profession	National inspectorate	School safety monitoring	Disciplinary measures regulated	Safe learning environment requirement
Turkey	Centralized ministry governance	Teachers are civil servants (with career stages)	Administrative oversight	Multi-channel reporting (CIMER/MEBİM/DYS)	School disciplinary sanctions defined by regulation	Safety addressed through institutional regulation
France	Centralized state governance	Teachers are civil servants (fonctionnaire)	Ministry supervision + CNESER appellate bodies	Institutional disciplinary procedures	Disciplinary councils regulate sanctions; State substitutes liability (L911-4)	Comprehensive anti-bullying framework; State liability protection
England	National framework with school autonomy	Professional teaching workforce	Strong inspection regime (Ofsted)	Safeguarding reporting obligations	Teachers may discipline pupils	Behaviour and safeguarding regulations
Netherlands	School autonomy within national framework	Professional teaching workforce	National inspectorate oversight	Anti-bullying reporting obligations	Teacher responsibility for classroom order	School safety legislation

Table 2 shows how the six education systems compare across six policy domains. Nordic systems (Finland, Sweden) combine decentralized governance with professional status and relatively light inspection. Regulatory systems (England, Netherlands) pair professional teaching workforces with formal accountability mechanisms including inspectorates—a pattern Berkovich (2018) identifies as "transforming regulation," where governments tighten regulatory governance while reshaping professional culture.

Administrative systems (France, Turkey) centralize governance, classify teachers as civil servants, and channel disciplinary authority through institutional procedures, consistent with Weberian bureaucratic logic (Weber, 1978; Dutercq & van Zanten, 2001). Table 3 examines disciplinary authority in detail, focusing on specific powers available to teachers.

Table 3. Teacher Disciplinary Authority Across Education Systems

Country	Removal of Disruptive Student	Suspension Authority	Physical Intervention	Authority Holder	Legal Source
Finland	Yes	Yes (up to 3 months)	Necessary and proportionate force permitted	Teacher / principal	Basic Education Act (628/1998), Sections 36-36b
Sweden	Yes	Yes	Limited emergency intervention (nödvärn)	Teacher / principal	Skollag (2010:800), 5 kap. 6-7 §§
Turkey	Yes	Yes	Not explicitly regulated	School administration	Okul Öncesi ve İlköğretim Kurumları Yönetmeliği (Md. 163-164); Ortaöğretim Kurumları Yönetmeliği
France	Institutional procedure	Yes	Not explicitly regulated (state assumes liability, L911-4)	Disciplinary council / School administration	Code de l'Éducation (R.421-10; R.511-13; L911-4)
England	Yes	Yes	Reasonable force permitted	Teacher authority	Education and Inspections Act 2006, Part 7 (Sections 88, 91, 93)
Netherlands	Yes	Yes	Limited / implicit authority	Teacher / school leadership	WPO Artikel 31a

Table 3 shows variation in specific disciplinary powers across the six systems. Classroom-level removal authority is strongest in Finland and England, where teachers can directly remove disruptive students. Suspension authority exists across all six systems, but the responsible actor varies—teachers or principals in Nordic and regulatory systems, school administration or disciplinary councils in France and Turkey. Physical intervention is explicitly permitted only in Finland and England; France and Turkey leave it legally unregulated, while Sweden and the Netherlands permit it only in limited emergency circumstances (Sweden's "nödvärn" principle). These differences follow the governance patterns identified in Table 2.

Table 4 presents the TPPI scores, which synthesize the six policy dimensions into a comparative index.

Table 4. Teacher Protection Policy Index

Country	SAFE	SAN	PHY	REP	ACC	PROF	Total Score
Finland	2	2	2	1	1	2	10
Sweden	2	2	1	1	2	2	10
Turkey	2	2	0	2	2	2	10
France	2	2	1	1	2	2	10
Netherlands	2	2	1	2	2	2	11
England	2	2	2	2	2	2	12

The TPPI is constructed using a three-point coding scheme: **0** indicates no explicit legal provision addressing the dimension; **1** indicates limited or indirect provision (e.g., through school-level policies, professional

norms, or implicit statutory authority)); and **2** indicates explicit statutory authorization. This coding scheme captures the legal and institutional foundations of teacher protection frameworks, not their practical implementation. The distinction between 0 and 1 is particularly important: a score of 0 reflects a legal vacuum—neither statutory nor policy-level regulation exists—while a score of 1 reflects partial regulation through non-statutory mechanisms such as school policies or professional norms.

Table 4 reveals a striking pattern. Regulatory systems (England, Netherlands) and trust-based systems (Finland, Sweden) achieve similarly high scores—12 and 10 respectively—but through different institutional pathways. England and the Netherlands build protection through *regulatory density*, while Finland and Sweden achieve comparable scores through *normative density*. France (10) reflects a distinctive institutional pathway—state liability substitution rather than direct authority—while Turkey's score (10) reflects the institutional framework established by the 2022 Teaching Profession Law. Table 5 integrates the findings into the three governance models that structured the analysis.

Table 5. Integrated Comparative Governance Framework

Governance Model	Country	Governance Structure	Teacher Status	Classroom Disciplinary Authority	Physical Intervention	Teacher Protection Mechanisms	Accountability / Inspection System
Nordic Trust Model	Finland	Decentralized municipal governance	Professional	Teachers may remove disruptive pupils	Necessary and proportionate force permitted	Safe learning environment legislation (29 §); child welfare reporting obligations (29 §)	Limited national inspection; FINEEC evaluation
Nordic Trust Model	Sweden	Decentralized municipal governance	Professional (legitimation)	Teachers may remove disruptive pupils (5:7)	Limited emergency intervention (5:6)	Safe school environment legislation (5:3); school safety monitoring (6:10)	Swedish Schools Inspectorate (26:3)
Professional Regulatory Model	England	National framework with school autonomy	Professional (QTS)	Teachers may discipline pupils and remove students	Reasonable force permitted (Sec. 93)	Safeguarding legislation; mandatory reporting duties (KCSIE 2025)	Ofsted inspection regime
Professional Regulatory Model	Netherlands	School autonomy with national oversight	Professional	Teachers responsible for maintaining classroom order (Art. 31a)	Limited / implicit authority	School safety legislation (Art. 4c); anti-bullying reporting obligations (Art. 4a-4b)	Education Inspectorate
Administrative Civil Service Model	France	Centralized state governance	Civil servant (fonctionnaire)	Disciplinary authority exercised through institutional procedures (conseils de discipline; R.421-10)	State assumes liability for teacher actions (L911-4)	L911-4 state liability; R421-10 mandatory disciplinary procedure; L111-6 anti-bullying framework	Ministry administrative supervision; CNESER appellate bodies
Administrative Civil Service Model	Turkey	Centralized national governance	Civil servant with career stages (ÖMK 7528)	Limited classroom-level authority; disciplinary	Not explicitly regulated	ÖMK career stages (Md. 11); CİMER/MEBİM/DYS reporting; Okul Öncesi ve İlköğretim	Ministry administrative oversight; MEB Teftiş Rehberi

sanctions defined by regulation	Yönetmeliği (Md. 78/2, 163-164)
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Table 5 integrates the findings into three governance models. Trust-based systems (Finland, Sweden) rely on professional norms and decentralized implementation (Sahlberg, 2011). Regulatory systems (England, Netherlands) codify teacher authority within formal accountability frameworks (Ball, 2003). Kotthoff and Klerides (2015) examine school inspection regimes as a governance technology, showing how external evaluation shapes professional practice. Administrative systems (France, Turkey) channel authority and protection through hierarchical procedures and institutional bodies (Weber, 1978; Dutercq & van Zanten, 2001). France's distinctive approach—state liability substitution rather than direct teacher authority—positions it as a hybrid case within the administrative model, while Turkey's recent legislative reforms have strengthened its institutional framework without altering its fundamental administrative logic.

TPPI Scores and What They Reveal

The Teacher Protection Policy Index (TPPI) scores in Table 4 reveal an important pattern that might otherwise remain hidden. Regulatory systems (England: 12, Netherlands: 11) and trust-based systems (Finland: 10, Sweden: 10) achieve similarly high scores—but through entirely different institutional pathways.

England and the Netherlands build protection through what might be called *regulatory density*. Explicit legal provisions define teacher authority. Safeguarding legislation creates binding reporting obligations. Inspection regimes generate institutional pressure for implementation. The result is a tightly coupled system where legal provisions, reporting duties, and accountability mechanisms reinforce each other.

Finland and Sweden achieve comparable protection through what could be termed *normative density*. Safe learning environment legislation sets clear expectations, but implementation relies on professional norms and municipal oversight rather than inspection pressure. Teacher education, professional trust, and collaborative school cultures do the work that inspection regimes do in regulatory systems. Sahlberg (2011) argues that this trust-based approach depends on rigorous teacher education and strong professional consensus—conditions that are not easily replicated.

France's score of 10 reflects a distinctive institutional pathway. The state's assumption of liability for teacher actions (L911-4) provides robust legal protection, while mandatory disciplinary procedures (R.421-10) ensure procedural safeguards. However, France provides no explicit authorization for physical intervention (PHY=1). Unlike England's "reasonable force" provision (Section 93 of the Education and Inspections Act 2006), French teachers operate without statutory guidance on physical intervention. This

creates a distinctive protection profile: teachers are shielded from individual legal liability through state substitution (L911-4), but they lack direct statutory authority to use force in managing student behaviour.

Turkey's score of 10 reflects the institutional framework established by the 2024 Teaching Profession Law (ÖMK 7528). The law's three career stages (teacher, expert teacher, head teacher) and the expansion of multi-channel reporting systems (CİMER, MEBİM, DYS) have strengthened the institutional framework. However, Turkey's PHY score remains 0—the absence of explicit legal provisions for physical intervention remains a critical gap that may expose teachers to legal vulnerability in classroom management situations. As Altuntaş et al. (2025) document, implementation challenges persist, with school administrators perceiving the law as "unfair, unnecessary, discriminatory, and insufficient" (p. 748)—a gap between legal provision and professional experience that highlights the limitations of the TPPI as a measure of policy effectiveness.

France and Turkey, both administrative civil service systems, achieve identical scores (10 each). France's score reflects state liability substitution (L911-4) and procedural protection (R.421-10), while Turkey's score reflects career-stage legislation (ÖMK 7528) and multi-channel reporting. Both systems share a common limitation: physical intervention remains legally constrained—France provides no explicit authorization (PHY=1), and Turkey provides none (PHY=0).

The TPPI thus serves not as a definitive ranking but as a diagnostic tool. It reveals *how* different governance configurations produce protection—through regulatory density, through normative density, or through administrative mediation—not just *how much* protection exists on paper.

Discussion

This study examined how teacher authority and teacher protection are structured across six education systems through comparative analysis of legal and policy frameworks. The findings indicate that cross-national differences are not merely policy variations but reflect distinct governance mechanisms that shape how authority is organized and how protection is provided. This section elaborates the theoretical and policy implications of these findings, situating them within broader debates in comparative education governance research.

Three Governance Mechanisms and Their Logics

The analysis identified three governance mechanisms—regulative (direct legal authorization), normative (professional trust), and cultural-cognitive (hierarchical procedures)—which map onto Scott's (2013) institutional typology. Regulative mechanisms operate in England and the Netherlands, where legislation

codifies teacher authority and inspection regimes generate accountability pressure (Ball, 2003). The strength is clarity; the weakness is what Berkovich (2018) terms the "regulated soul"—compliance may erode professional judgment. Normative mechanisms operate in Finland and Sweden, where implementation relies on professional norms and municipal oversight rather than external inspection (Sahlberg, 2011). The strength is autonomy; the weakness is variability—protection works where professional consensus is strong, but may falter where it is weak, as Sweden's inspectorate expansion suggests (Wermke & Höstfält, 2014).

Cultural-cognitive mechanisms operate in France and Turkey, where disciplinary authority is embedded in administrative procedures; teachers refer incidents upward rather than exercising direct authority (Dutercq & van Zanten, 2001). The strength is uniformity; the weakness is institutional distance—the gap between legal provisions and teachers' direct access to protection. Each mechanism thus embeds a distinct theory of how teacher authority should function—through law, professional trust, or bureaucracy.

The Authority-Protection Nexus

The findings reveal that teacher authority and protection are empirically interconnected through governance structures. Systems granting strong classroom authority without corresponding protection may expose teachers to vulnerability, while those emphasizing protection without sufficient authority may limit teachers' disciplinary effectiveness. England and Finland both grant strong classroom authority but through different mechanisms: England's legally codified authority is coupled with safeguarding legislation and Ofsted inspection—a tightly coupled system; Finland's authority flows from professional trust and is protected by safe learning environment legislation implemented through professional norms—a more loosely coupled system dependent on local capacity and professional consensus.

France and Turkey present a different picture. Authority is mediated through administrative channels, and protection operates through the same hierarchical procedures, creating institutional distance: teachers have less direct access to both. This may leave teachers feeling unsupported when facing disciplinary challenges, as research on teacher victimization suggests (McMahon et al., 2014; Perry et al., 2024). The TPPI scores reveal that high protection is achievable through multiple pathways—regulatory density (England, Netherlands) and normative density (Finland, Sweden) produce comparable outcomes through different institutional logics. This challenges any simple prescription that one governance model is superior; the question is which model fits a given governance context.

Critical Reflections: Tensions and Contradictions in Governance Mechanisms

While each governance configuration offers distinct advantages, the findings also reveal internal tensions

that warrant critical examination. Two concepts structure our analysis: *institutional distance*—the gap between legal provisions and teachers' direct access to protections, created by administrative layers and procedural requirements; and *implementation gap*—the discrepancy between policy intent and professional experience when legal provisions lack effective enforcement or support (Honig, 2006).

Finland's trust-based governance model, celebrated for its professional autonomy (Sahlberg, 2011), exhibits a significant vulnerability: TALIS 2024 data suggest 18.2% of Finnish teachers report experiencing violence or threats, challenging the assumption that professional trust alone provides adequate protection. Normative density may require reinforcement through more explicit protection mechanisms (Toom & Husu, 2016). Sweden exhibits a similar tension but with a distinctive trajectory—the expansion of the Swedish Schools Inspectorate since 2008 represents a gradual shift toward regulatory mechanisms, potentially eroding the trust-based foundation of the system (Wermke & Höstfält, 2014). This regulatory drift reflects a broader European trend where trust-based systems increasingly incorporate accountability mechanisms (Grek, 2009; Ozga, 2009).

England's regulatory density provides exceptional legal clarity but generates performative pressures that may undermine professional well-being. The 2023 death of headteacher Ruth Perry, which a coronial inquest concluded was "contributed to by an Ofsted inspection" (Connor, 2023), and a BMJ analysis framing the case as "official negligence" (Waters & McKee, 2023), illustrate this tension—a 2026 study found 98% of teacher submissions contained negative comments about Ofsted, including accounts of suicidal ideation (Harding & Clapham, 2026). The Netherlands combines school autonomy with national oversight, creating ambiguity: teachers have professional autonomy but face inspection expectations (WPO, Artikel 31a; Kaynak Ekici, 2024). The absence of explicit physical intervention provisions (PHY=1) further complicates this tension.

France operates through cultural-cognitive mechanisms, with L911-4 providing robust legal protection through state liability substitution and R.421-10 ensuring procedural safeguards. However, French teachers operate without explicit statutory guidance on physical intervention (PHY=1), creating a protection gap that leaves them dependent on administrative procedures (Dutercq & van Zanten, 2001). Turkey's score of 10 reflects the 2022 Teaching Profession Law's three career stages and multi-channel reporting systems, yet implementation challenges persist: Altuntaş et al. (2025) found the law perceived as "unfair, unnecessary, discriminatory, and insufficient" (p. 748), with career stages tied to material incentives rather than professional development. Genç and Balyer (2023) documented how the exam-based system disadvantages younger teachers, exacerbating the implementation gap (Honig, 2006) in Turkey's exceptionally young teaching workforce (average age 38 vs. OECD 45). France and Turkey share the same TPPI score (10) but through different configurations—France through state liability substitution, Turkey through career-stage

legislation—both constrained by physical intervention remaining legally unaddressed (France PHY=1, Turkey PHY=0). This demonstrates that the TPPI captures institutional presence, not institutional quality.

Implications for Policy: The Problem of Policy Borrowing

The findings offer implications for policy borrowing—the transfer of educational policies from one national context to another (Steiner-Khamsi, 2004). England's reasonable force provision (Section 93 of the Education and Inspections Act 2006) does not operate in isolation; it is embedded within a regulatory system including Ofsted inspections, safeguarding legislation (Keeping Children Safe in Education, 2025), and a legal culture that explicitly codifies professional authority. Remove these supporting mechanisms, and the provision becomes a dead letter—or worse, a source of liability. Conversely, Finland's trust-based model depends on research-based teacher education, collaborative school cultures, and high levels of institutional trust—conditions developed over decades, not imported through legislation (Sahlberg, 2011; Toom & Husu, 2016).

The TPPI can function as a diagnostic tool for precisely this problem, revealing not just what legal provisions exist but how they are embedded within governance configurations. Before borrowing a policy, policymakers should ask: What governance mechanisms make this policy work in its original context? Are those mechanisms present in my context? If not, what would it take to create them? This is not an argument against policy learning but for contextualized policy learning—borrowing not provisions but governance logics and adapting them to local institutional conditions. The French and Turkish cases suggest that administrative systems might benefit from hybrid approaches that combine institutional distance with more direct teacher access to protection mechanisms.

Limitations and Future Research

This study has several limitations. First, it examines formal legal frameworks, not implementation—how teachers experience authority in practice may differ from legislation. Second, the analysis captures six systems at a single point in time; longitudinal research could track how TPPI scores change following reforms. Third, the TPPI is a heuristic instrument that simplifies complex policy environments; future research could refine it by incorporating additional dimensions or weighted measures. Fourth, the study focuses on European systems; extending the framework to non-European contexts would test the generalizability of the three governance mechanisms.

A language limitation should also be acknowledged. The legislation analyzed was written in six languages (English, French, Swedish, Finnish, Dutch, and Turkish). While the author is a native Turkish speaker and analyzed Turkish documents directly, AI-assisted translation tools were used for French, Swedish, Finnish,

and Dutch provisions. All translations were cross-checked against official English versions where available and verified against authoritative secondary sources. The use of AI tools for translation and thematic coding is disclosed in accordance with emerging standards for transparent AI use in qualitative research (Dwivedi et al., 2023; Kerasidou et al., 2025). The authors bear full responsibility for all interpretations.

Future research could extend this work in several directions: quantitative testing of the TPPI framework through survey instruments to examine whether index scores correlate with teacher-reported outcomes; comparative case studies within governance models to understand within-model variation; longitudinal research tracking how TPPI scores change following reforms; mixed-methods investigation of the relationship between governance mechanisms and teacher victimization; cross-sectoral comparisons with other public professionals; and stakeholder perspectives from teachers, school leaders, union representatives, and policymakers to reveal how governance mechanisms are experienced and contested on the ground.

Conclusion

This study offers a governance-based framework for understanding teacher authority and teacher protection. Moving beyond descriptive legal inventories, it identifies three mechanisms—regulative, normative, and cultural-cognitive—through which governance structures shape how teachers exercise authority and access protection. The Teacher Protection Policy Index offers a diagnostic tool for comparing institutional protection frameworks across contexts.

The central implication is that teacher authority is not merely a matter of disciplinary legislation. It is institutionally embedded within governance structures that determine how authority is allocated, how protection is provided, and how the two relate. Strengthening teacher authority and protection may require attention to these governance mechanisms, not just to isolated legal provisions. For policymakers, researchers, and advocates concerned with teacher safety and professional authority, understanding governance context appears central to the task.

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APPENDIX A: TPPI CODING RUBRIC WITH LEGAL EVIDENCE

Table A0. TPPI Coding Criteria

Score	Meaning
0	No explicit legal provision
1	Limited or indirect provision
2	Explicit legal provision

Tables A1-A6: TPPI Scores and Legal Evidence by Country

Table A1. TPPI Scores and Legal Evidence: Finland

Dimension	Score	Legal Source	Evidence
SAFE	2	Perusopetuslaki (628/1998), § 29	Right to safe learning environment
SAN	2	Perusopetuslaki (628/1998), § 36	Teacher may remove disruptive pupil; written warning; suspension up to 3 months
PHY	2	Perusopetuslaki (628/1998), § 36b	"Necessary and proportionate force" permitted; principal and teacher may remove a student
REP	1	Perusopetuslaki (628/1998), § 29	Teacher must report harassment, bullying, discrimination, violence to guardian
ACC	1	Perusopetuslaki (628/1998), § 21; FINEEC	Education provider must evaluate own education and participate in external evaluation
PROF	2	Perusopetuslaki (628/1998), § 37; Decree on the Qualifications Required of Teaching Staff (986/1998)	Qualifications regulated by government decree; research-based master's required

Note. SAFE = Safe environment; SAN = Sanctions; PHY = Physical intervention; REP = Reporting; ACC = Accountability; PROF = Professional status.

Table A2. TPPI Scores and Legal Evidence: Sweden

Dimension	Score	Legal Source	Evidence
SAFE	2	Skollag (2010:800), kap. 5, § 3	"All students have right to safe school environment with study peace
SAN	2	Skollag (2010:800), kap. 5 § 7	Teacher may expel student who disrupts teaching or behaves inappropriately
PHY	1	Skollag (2010:800), kap. 5 § 6	"Staff may take immediate measures including physical intervention to avert violence or disturbances (nödvarn principle)
REP	1	Skollag (2010:800), kap. 6 § 10	Teacher must report offensive treatment to principal
ACC	2	Skollag (2010:800), kap. 26 § 3	Swedish Schools Inspectorate has oversight of education system
PROF	2	Skollag (2010:800), kap. 2 § 13	Only certified teachers may conduct teaching

Note. SAFE = Safe environment; SAN = Sanctions; PHY = Physical intervention; REP = Reporting; ACC = Accountability; PROF = Professional status.

Table A3. TPPI Scores and Legal Evidence: England

Dimension	Score	Legal Source	Evidence
SAFE	2	Education and Inspections Act 2006, Section 88; Keeping Children Safe in Education (2025)	Governing body must ensure behaviour policies; safeguarding duties
SAN	2	Education and Inspections Act 2006, Part 7, Sections 88–93	Teachers may discipline pupils including detention and removal; statutory power for off-premises behaviour
PHY	2	Education and Inspections Act 2006, Section 93; Keeping Children Safe in Education (2025), para 163-165	"Reasonable force" permitted
REP	2	Working Together to Safeguard Children (2026); Keeping Children Safe in Education (2025), para 50, 162	Mandatory reporting duties; FGM reporting
ACC	2	Ofsted Education Inspection Framework (2024), para 149; Keeping Children Safe in Education (2025)	Regular inspections evaluate safeguarding and behaviour
PROF	2	Education Act 2011, Sections 135A–141C	Secretary of State functions relating to teachers; induction period requirement

Note. SAFE = Safe environment; SAN = Sanctions; PHY = Physical intervention; REP = Reporting; ACC = Accountability; PROF = Professional status.

Table A4. TPPI Scores and Legal Evidence: Netherlands

Dimension	Score	Legal Source	Evidence
SAFE	2	Wet op het primair onderwijs (WPO), Artikel 4c	Competent authority responsible for school safety
SAN	2	WPO, Artikel 31a	"Teachers have independent responsibility for assessing student performance and classroom order
PHY	1	WPO; School Safety Act (2015)	No explicit statutory provision; school policies may address
REP	2	WPO, Artikel 4a–4b; School Safety Act (2015)	Anti-bullying reporting obligations; immediate consultation with confidential inspector
ACC	2	Education Inspectorate (Onderwijsinspectie); Staat van het Onderwijs 2026	National inspection regime; multi-layered oversight
PROF	2	WPO, Artikel 3, 31a, 32a	Professional teaching status established by law

Note. SAFE = Safe environment; SAN = Sanctions; PHY = Physical intervention; REP = Reporting; ACC = Accountability; PROF = Professional status.

Table A5. TPPI Scores and Legal Evidence: France

Dimension	Score	Legal Source	Evidence
SAFE	2	Code de l'Éducation, Articles L111-6, L542-2, L542-3, L543-1	Comprehensive anti-bullying framework; annual awareness sessions; school action plans required
SAN	2	Code de l'Éducation, Articles R421-10, R421-5	Comprehensive anti-bullying framework; annual awareness sessions; school action plans required
PHY	1	Code de l'Éducation, Article L911-4	State assumes liability for teacher actions; teachers protected from individual civil liability
REP	1	Code de l'Éducation, Articles L111-3-1, R914-6	Institutional reporting procedures; respect obligation established
ACC	2	Code de l'Éducation, Articles R232-31-1, R232-37, L911-5-1; Ministry of National Education	Centralized administrative oversight; CNESER appellate bodies; right to fair hearing; right to defense
PROF	2	Code de l'Éducation, Articles L721-2, L912-1-2; Civil servant status (fonctionnaire)	Continuous professional development mandatory; INSPÉ institutions; civil servant status

Note. SAFE = Safe environment; SAN = Sanctions; PHY = Physical intervention; REP = Reporting; ACC = Accountability; PROF = Professional status.

Table A6. TPPI Scores and Legal Evidence: Turkey

Dimension	Score	Legal Source	Evidence
SAFE	2	Regulation on Pre-School and Primary Education Institutions, Article 78/2	Measures required to protect employees and students from physical and psychological violence
SAN	2	Regulation on Pre-School and Primary Education Institutions, Articles 163–164	Disciplinary sanctions: reprimand, suspension, school transfer, exclusion from formal education
PHY	0	Regulation on Pre-School and Primary Education Institutions; Secondary Education Institutions Regulation	No provision addressing physical intervention by teachers
REP	2	MEB Strategic Plan 2024–2028	Multi-channel reporting system (CİMER, MEBİM, DYS) established
ACC	2	MEB Inspection Guide; Civil Servants Disciplinary Regulation	Centralized administrative oversight; civil servant disciplinary procedures
PROF	2	Teaching Profession Law (Law No. 7528), Articles 3/4, 11	Three career stages: teacher, expert teacher, head teacher

Note. SAFE = Safe environment; SAN = Sanctions; PHY = Physical intervention; REP = Reporting; ACC = Accountability; PROF = Professional status.

Coding Explanations

Table A7. Variation in Legal Provisions on Physical Intervention (PHY)

Category	Countries	Legal Status
Explicit authorization	Finland, England	Law directly permits reasonable force; teachers have legal protection
Limited emergency	Sweden, Netherlands	Law permits intervention only in emergencies (Sweden — nödvärn) or contains no explicit provision (Netherlands)
Not regulated / indirect	France, Turkey	No explicit authorization; France provides state liability substitution (L911-4)

Table A8. Variation in Accountability (ACC) Structures

Category	Countries	Legal Status
Strong inspection	England, Netherlands, Sweden	National inspectorate conducts regular evaluations
Limited inspection	Finland	National evaluation system exists (FINEEC); mostly municipal oversight
Administrative oversight	France, Turkey	Ministry bureaucracy; no independent inspectorate; France has CNESER appellate bodies

Table A9. Updated TPPI Summary Scores

Country	SAFE	SAN	PHY	REP	ACC	PROF	Total
Finland	2	2	2	1	1	2	10
Sweden	2	2	1	1	2	2	10
England	2	2	2	2	2	2	12
Netherlands	2	2	1	2	2	2	11
France	2	2	1	1	2	2	10
Turkey	2	2	0	2	2	2	10