Implementing global framework agreements: the limits of social partnership

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Abstract *Global framework agreements, negotiated between representatives of transnational corporations and trade unions, are a form of private regulation of labour relations on a global scale. Conceived and promoted by the global union federations, their numbers have increased considerably over the past two decades. However, as empirical research has shown, their record of implementation has been poor. We attribute this to them having been negotiated within the limits of a labour-management relationship based on 'social partnership'. This highly institutionalized setting of dialogue contrasts markedly with the widespread incidence of contested labour relations in subsidiaries of transnational corporations and in particular throughout their global production networks. Yet, workers and their unions at such sites, where global framework agreements are most needed, have mostly not been involved in their negotiation. Instead of relying on 'social partnership', we argue for unions to embrace a 'conflict partnership' approach, one that recognizes and addresses the tension between dialogue and conflict in labour relations. To highlight our arguments, we present two contrasting case studies from the service sector.*

Keywords GLOBAL PRODUCTION NETWORKS, GLOBAL FRAMEWORK AGREEMENTS, TRANSNATIONAL CORPORATIONS, GLOBAL UNIONS, SERVICE SECTOR, LABOUR RELATIONS

For the past two decades, trade unions have made a concerted effort to set basic standards and to institutionalize labour relations in transnational corporations (TNCs). Led by the global union federations (GUFs), their policy instrument for filling this 'governance gap' (Egels-Zandén 2009) is the global framework agreement (GFA). By the end of 2014, some 110 transnational corporations had signed a GFA with one or more of the GUFs. Most of the agreements reference the TNC's suppliers and contractors as being generally subject to its provisions as well.

A GFA is a unique instrument of private regulation in global governance because it creates an arena for the pursuit of global labour relations by defining the content, recognizing which actors represent labour and management, delineating the processes of implementation and conflict resolution and setting the organizational boundaries of labour–management interaction. One can conceive of this arena as a political space in the global economy 'where conflicts can be regulated and problems solved institutionally', and as a 'battlefield' on which actors pursue their interests and change 'the rules of the game' (Müller-Jentsch 2004: 31). In other words, it is still a contested space (Edwards and Bélanger 2009; Levy 2008). As empirical research has shown, management resistance to TNC subsidiaries having union recognition has been a constant barrier to implementation (Fichter and Stevis 2013; Fichter et al. 2012).

As the number of GFAs has increased, so too have fundamental questions about their overall utility in setting minimum employment standards, in providing a platform for dialogue, and in building and strengthening unions in TNCs and throughout their global production networks (Croucher and Cotton 2009; Cumbers and Routledge 2010; Fichter et al. 2012; Herrnstadt 2007, 2013; McCallum 2013). For us, the important aspect is to understand how GUFs and their affiliates can use GFAs most effectively to raise standards for workers and to build unions.

In this article, we argue that global framework agreements are an underutilized instrument of trade union policy. As their poor record of implementation shows, the parties to the agreements have not systematically extended them beyond the limited realm of the corporate-level 'social partnership' arrangements in which they were negotiated. Instead, a union strategy of 'conflict partnership', combining dialogue and battle, is called for to realize fully the potential of GFAs to contribute to an effective regulatory institutionalization of global labour relations.

GFAs have shown their potential for promoting global labour relations through establishing an arena of labour relations that ideally covers not only a single TNC but also the TNC's global production network. However, in the hands of the GUFs and their strongest affiliates at European TNC headquarters, GFAs have largely been 'top–down' instruments, the usefulness of which has seldom moved beyond the institutionalized context of the social partnership in which they are negotiated and signed. Nevertheless, as we shall illustrate through one of our case studies,[1] they have the potential to enhance union power and to open space for union building and collective bargaining. To realize this potential on a broader scale, however, requires a new transnational approach that will build consensus and extend involvement, mobilization and ownership to union affiliates in TNC subsidiaries as well as the suppliers and subcontractors in TNC global production networks. And, as we show below, GFAs can be most effective when union power resources are openly invoked to challenge corporate power, moving beyond social partnership to a more forceful representation of workers' interests in the context of a 'conflict partnership'. The contradiction embodied in this term reflects how institutionalization channels conflict in the representation of interests in labour relations. At the same time, the pacifying nature of institutionalization in labour relations is incomplete, allowing autonomous individual and collective actors to exercise power. Arguably, such power is very unevenly divided. For example, while

TNCs control 80 per cent of world trade through their global production networks (UNCTAD 2013), trade unions represent only 7 per cent of the world's estimated workforce of 2.9 billion (ITUC 2013).

Labour relations are actor-driven within a wide range of institutional settings. Our arguments in this article are based on 'actor-centred institutionalism' (Scharpf 1997) combined with a power resource approach. Actor-centred institutionalism recognizes that institutions limit the choices actors make but do not function deterministically. Actors 'act in institutional and organizational contexts that they themselves produce, reproduce, and modify' (Müller-Jentsch 2004: 27). The institutional context will thus have an impact on how the interests of actors, such as trade unions or corporate management, are represented and on the manner in which they interact. Equally important to consider is the overall balance of power among the actors, the dynamic nature of that relationship, and the power resources they can each mobilize. In our focus on trade unions, we will refer in particular to the concepts of associational and institutional power as developed by Wright (2000) and Brinkmann et al. (2008). Wright (2000: 962) defines associational power as 'the various forms of power that result from the formation of collective organizations of workers'. Institutional power in labour relations is a social compromise resulting from the negotiations and conflicts of interest representation. It is manifested in a basic agreement or framework, usually legally anchored, regarding 'the rules of the game' of social conflict (Brinkmann et al. 2008: 25).

The underutilization of GFAs in their social partnership version, and the potential power they offer unions in an organizing context, can be illustrated through two case studies from the services sector. One of them, the ISS case, highlights a corporate-level social partnership model, which refers to company-based relationships between management and trade unions conducted through 'mature' and institutionalized channels of negotiation such as works councils and codetermined supervisory bodies. Conflict is not fully absent in these cases, but it is well contained within mutually accepted structures and a limited geographical and organizational space. Labour relations are generally cooperative within a context of guidelines rather than strict regulations. In contrast, our second case on G4S represents a conflict partnership model in which unions are 'enlarging the scope of conflict' (Schattschneider 1960: 40) by involving more actors and using a broad spectrum of campaigning and mobilizing strategies to put pressure on anti-union management, gain access to the bargaining table, negotiate 'eye-level' agreements and institute forums of dialogue.

Paradoxically, our analysis suggests there is good reason to believe that an enlightened management, one that is generally supportive of securing the GFA and indicative of a social partnership approach, might ultimately be a large factor in ensuring that it is never implemented. It is, however not mere artifice. Rather, a friendly employer tends to decrease the need for a mobilized workforce, a dynamic emblematic of what Richard Hyman calls the 'fatal attraction of the elitist embrace' (Hyman 2005: 24). Our second and related finding, then, is that conflict can lead to a deeper implementation process explicitly because workers must necessarily be organized to play a role first in winning the GFA and then ensuring it is fully implemented throughout the corporate network. When workers and local managements are involved in the process to struggle for or against the agreement, the stakes are higher. Finding an acceptable compromise and putting it into practice involves a wider range of interests that have to be negotiated and managed on each side.

We based our insights on an extensive international and inter-disciplinary research project on the motivation for and implementation of GFAs (Fichter et al. 2012). We conducted the fieldwork between 2009 and 2011. From the 73 GFAs in existence at the outset, we selected 22 as particularly relevant and representative. We based this on the following three criteria. First, one of four GUFs, which account for more than 90 per cent of all those in existence, signed the GFA – these were the Building and Wood Workers' International (BWI), the International Chemical, Energy, Mining and General Workers' Union (ICEM), the International Metalworkers' Federation (IMF),[2] and UNI Global Union (UNI). Second, the TNC is headquartered in Europe (in 2009, 85 per cent of all firms with GFAs), attesting to a European style of HRM policies and labour relations at the HQ level. Third, and last, the TNC has subsidiaries in Brazil, India, Turkey and the USA. Not only do these four countries rank among the top ten in foreign direct investments by TNCs with global framework agreements, but their labour relations systems also differ widely with possible implications for differences in the implementation of GFAs.

In the course of our empirical fieldwork, we were able to collect primary and secondary source material as well as interview data from management and labour for 16 of the 22 GFAs. At both the international headquarters and at the subsidiary level in the four focal countries, we conducted *semi-structured interviews* with key people in the signatory TNC (central and local management, works councils) and at the actively involved unions (GUFs, home and host country trade unions). The interviews ranged between 30 and 120 minutes in length. Using academic software (atlas.ti), we submitted the transcribed interviews to text analyses along with the texts of all existing GFAs as they became available. We based the GFA evaluations on 125 substantive and procedural characteristics relating to four general categories – actors, substance, procedures and scope. In addition, we conducted numerous background interviews with academic experts and policymakers familiar with the broader issues of corporate social responsibility, international labour standards and labour relations. We were also able to attend labour and management meetings as observers and to participate actively in workshops and other forums dealing with GFAs.

In the next section, we provide an analysis of how global framework agreements have developed and assess their achievements and deficits on their usefulness as an instrument of global union policy. From this background, we then turn to presenting our case studies of 'global players' in the property services sector. By way of introduction, we provide a brief summary of property services in the global economy and the key strategic elements of GFA policy at UNI Global Union, the GUF responsible for a wide range of industrial and private services. In a final section, we summarize our arguments and findings in the light of the two case studies and explain how they contribute to a better understanding of the nexus of conflict and partnership in the context of global framework agreements.

Global framework agreements in context: achievements and deficits

Since the late 1990s, global framework agreements have become a major policy instrument of the global union federations. In the absence of a binding set of legally enforceable global labour rights, they represent a key element in a paradigm shift in GUF activities from ‘cautious lobbying’ (Gumbrell-McCormick 2004: 46) in international organizations and institutions (World Bank, IMF, WTO) to engaging transnational corporations directly. This shift was, in general, recognition of the greater need for organized labour to challenge the dominant and expanding role of transnational corporations in a rapidly globalizing world economy. While the international labour movement had failed to build a comprehensive consensus on the need to link trade and workers’ rights in its campaign to incorporate a ‘social clause’ into the World Trade Organization (Anner 2001), other international institutions such as the ILO, the UN and the OECD[3] were showing renewed attention to labour standards. In fact, NGOs and media-savvy consumer campaigns were already gaining headway in uncovering human and labour rights violations attributable to brand-name transnationals (Klein 1999). Although they still regarded private regulation in the global context as a ‘second best solution’ (Mund and Priegnitz 2007: 671), global unions sought to reframe these debates around labour relations, claiming their own right to negotiate agreements on behalf of employees and challenge the legitimacy of the growing number of voluntary and unilateral corporate codes of conduct. During the 1990s, a few global framework agreements were negotiated and signed, and the international unions adopted a ‘basic code of labour practice’ (ICFTU 1997) as a model for individual agreements. However, it was not until after 2000, following the reorganization of the international trade secretariats into global union federations[4] that there was a marked increase in the number of GFAs. TNCs that had rebuffed attempts years before by international unions to gain recognition (Stevis and Boswell 2008: 111) were now more acquiescent. Concerned to avoid risks and to protect reputations, they now had to contend with new international forms of public pressure and more intense debates on global governance, so were eager to show off some CSR practice. By mid-2015, the GFA count had climbed to over 110, of which some 105 are currently operational.[5]

In assessing the usefulness of having a GFA with a transnational corporation, it is necessary to raise a number of points with regard to their limitations. First, the negotiation and signing of GFAs is still very much a European phenomenon, with only 20 per cent of them concluded with non-European TNCs. In the core member states of the European Union, labour relations have long been a model of institutional embeddedness and neo-corporatism. Institutional changes in the European Union, particularly the passing of the European Directive on Works Councils in 1994, played a part in opening the path to global agreements by establishing supra-national bodies of employee representatives that interacted with corporate management on EU-level and cross-border issues affecting employees. It is equally important, however, that powerful national unions in the EU, working through their company employee representatives, used their organizational strength and institutional position to push for extending ‘home country’ standards and cooperative procedures (social dialogue and social partnership) to cover corporate global operations. A leading example is the German union IG Metall, which passed a congress resolution in 2003 setting the goal of signing global framework agreements with 25 corporations within its jurisdiction by 2010.[6] Nonetheless, there is a legitimate risk that the trend toward GFAs is merely the ‘scaling up of a corporatist model’ to the global level (Cumbers and Routledge 2010) and that most GFAs will be used to assist the most protected segments of the global labour force in the core countries.

Second, labour has mostly acceded to corporate management’s preference for negotiating in an atmosphere of ‘familiarity’ – namely, with employee and union representatives with whom they interact routinely and who understand and practise social partnership. Thus, it has been rare to have union representatives from foreign subsidiaries participate, and there have been several cases, for example at DaimlerChrysler (now Daimler AG), where the global union federation was needed to sign the agreement but was not allowed to participate in negotiations (Müller et al. 2004: 179). Shutting out union representatives in this manner may be a recipe for tempering open conflict during negotiations, but it only shifts the burden of finding acceptable solutions to the implementation phase.

Third, suppliers, subcontractors, and other business partners are mentioned in only one-half of the existing GFAs. Many of those GFAs with no mention of suppliers are in the services sector, where the employment problems that have become so evident in manufacturing (outsourcing, offshoring, agency and contract work) are not as prevalent. In the GFAs that do include suppliers and contractors, those references are usually couched in very general language. This means that implementation in the increasingly important global production networks of TNCs is even less likely. The best that the unions have been able to achieve in this sense is the inclusion of GFA provisions in master contracts for suppliers and subcontractors at a small number of TNCs, for example, at Daimler.

Fourth, while originally conceived to turn unilateral and management-driven CSR initiatives into a negotiated settlement between management and labour that governed corporate behaviour and protected worker rights in a meaningful way, GFAs have often only enabled TNCs to upgrade their CSR principles and gloss over deficits in their labour and employment practices. It is rare to find a GFA on the TNC’s internet site with reference to its negotiated character as a labour-management agreement. More commonly, excerpts will be embedded in the TNC’s statements of principles on social responsibility and sustainability. This usurps the original intent and makes it difficult for the unions to inform workers of the agreement and its purpose.

Fifth, and probably most importantly, GFAs often suffer as ‘top–down’ instruments, without any involvement from rank-and-file workers whose interests they are intended to protect. Our extensive survey of GFAs across four countries found that workers and even local union representatives were often unaware that a GFA had been signed or was in force. Not only does this hamper their use of the agreement, more seriously, it has the potential to establish an employer-friendly dynamic where the GUF and its national affiliates in the TNC headquarter countries position themselves as the self-appointed voice of the workers in a given company and its global production network.

Where such a dynamic of exclusiveness in decision-making has taken hold, it has led to deep cynicism on the part of many unions in the global South and in North America, leading them to reject the GFA strategy out of hand as simply another ‘paper tiger’.

In sum, the widespread practice of negotiating and signing GFAs has been successful in bringing the global union federations to the fore as essential actors in the development of global labour relations. At the same time, a number of important weaknesses in the overall strategy have limited this approach. In many cases, these weaknesses mean that even GFAs with a strong content fail to be implemented. As we have reported elsewhere on our research findings, ‘explicit processes, procedures, and resource commitments regarding implementation have not been incorporated into agreements. Headquarters management simply exercises its prerogative to implement the GFA in the TNC’ (Fichter et al. 2012: 6). Overall, we found no systematic pattern of cases of successful implementation. Where there were examples of successful implementation in South Africa, Brazil, India, Turkey and the USA, they were initiated through union agency at the local level, or as so-called boomerang campaigns, that include the assistance of rich-country allies (Keck and Sikkink 1998).

For the GUFs and their affiliates who have expended considerable resources pursuing GFAs, such criticisms might provide strong arguments for abandoning this policy. Should this instrument be repaired or abandoned? We believe that there is far too much at stake concerning the future of a worker voice and collective representation not to make a concerted effort to engage in a thoroughgoing debate of this issue. We need to look more carefully at the reasons why GFAs have not been more effective in practice, in fact why they have not actually been used.

With GFAs, unions have created a policy instrument that has the potential to promote global labour relations through establishing an arena of labour relations that ideally covers not only a single TNC but also the TNC’s global production network. However, in the hands of the GUFs and their strongest affiliates at European TNC headquarters, GFAs have largely been a ‘top–down’ instrument, the usefulness of which has seldom moved beyond the institutionalized oasis in which it has been negotiated and signed. We can show this pattern in our first case. Nevertheless, as our second case shows, as a policy instrument GFAs have the potential to enhance union power and open space for union building and collective bargaining. Drawing on this case, we argue that GFAs can be most effective when union resources are openly invoked to challenge corporate power, moving beyond social partnership to a more forceful representation of workers’ interests in the context of a ‘conflict partnership’ in which local actors are significantly involved.

Case studies: property services in the global economy

Property services are only one segment of the diverse and growing global service economy. In themselves, they bring together a bundle of industries such as cleaning and security. Most of them are characterized by high labour turnover rates, precarious employment through temporary contracts, low pay, little to no training or career development and low occupational status (Dube and Kaplan 2010). The employees are largely non-unionized and instances of worker–management dialogue are rare (Dølvik and Waddington 2004). Further, triangular forms of employment involving labour brokering and franchising, in which the client (usually the property owner) controls the employment conditions and not the direct employer, complicates union organizing. These factors lead to comparably low working standards and a challenging industrial relations climate for unions.

Table 1: Global agreements signed by UNI (as of March 2015)

Service sector	Total number of GFAs*	Number of European service MNCs
Telecommunication	10	5
Retail, commerce	8	4
Property services	4	4
Temporary work agencies	7	4
Banking	8	4
Others	9	5
Total	46	26

* The total number of agreements within the domain of UNI is difficult to assess. UNI declares to have signed up to 54 global agreements in total (2015). However, four of these are not listed on the UNI website www.uniglobalunion.org/about-us/global-agreements, and four more are with semi-public postal agencies.

In devising a global strategy for tackling these problems in the property services sector, UNI has been able to build on using global framework agreements. UNI is the single most active GUF, having signed 46 GFAs to date in private services (including banking and commerce) overall, nearly one-half of all active GFAs. In the property services sector it has 11 agreements, counting its memorandum of understanding with 7 private temp agencies (see Table 1). UNI's GFA strategy is different from that of other GUFs in two respects. First, UNI, and especially its property services division, has proven especially effective at globalizing the organizing concept, as its collaborative work with the Service Employees International Union (SEIU), its largest American affiliate, has introduced many European and Southern unions to this approach (see McCallum 2013). In promoting an organizing strategy, UNI's aim is to mobilize, activate and empower workers to challenge corporate power rather than merely to have a representative seated at a faraway bargaining table. As one UNI official noted, 'in our case, certainly the ability to freely organize unions is the key goal of a global agreement: to enable us to establish that multinationals are going to respect some key elements that allow workers to organize.' Second, at least in the past, UNI has sought to build union density within the various sectors by trying to sign as many GFAs as possible, even if it meant ending up with agreements that are 'hollow', that is, only really exist on paper. According to UNI's logic, a threshold of GFAs in one business segment might pave the way for industry-wide agreements going beyond single TNCs. As one UNI official summarized the rationale:

> It's just really clear when you organize a group of workers in a market and you drive up their wages and benefits. And the client can go down the street and then contract with a company that is cheaper and you don't do anything to organize that market … the workers are going to lose their jobs, because those companies are going to lose the bids.

This two-pronged strategy also reflects the fact that while poor and precarious working conditions are pervasive in property services, UNI did not face solid opposition to bargaining with unions among the 'global players' in this sector. National systems and traditions of labour relations have been important factors in driving the two-pronged strategy and influencing how UNI has initiated its approach to securing a GFA at each TNC. Both these approaches and their differences are clearly reflected in our case studies of GFAs signed by UNI and two major property services companies, from which we will endeavour to explain both the differences in approaches and how these affected implementation in each case.

The ISS case

ISS offers a range of property services – from cleaning and maintenance to laundry and catering – for both corporate and government clients. Founded in Denmark in 1901 as a family firm, ISS is currently owned by British and US-based financial investors. Between 2007 and 2014, the company increased its global footprint from 50 to 77 country locations while the number of employees increased from 438,000 to 511,000. Since 2000, ISS has acquired more than 600 companies worldwide, making it one of the largest multinationals in the services industry. Despite its size, ISS has centralized control of most of its subsidiaries, and its management reports that subcontracting is rare.

ISS is renowned for its cooperative social partnership approach and its amicable relations with the union representing service employees in its home country of Denmark, despite operating in an industry otherwise characterized by hostile and fragmented labour relations. Although the home country union (United Federation of Danish Workers – 3F) was not a direct participant in the GFA negotiations, its cooperative relationship with management was reflected in the comparatively short time it took to complete negotiations and sign the GFA with UNI in 2003 (less than a year). Five years later, the agreement was renewed with added detail in a similar spirit of partnership. From management's perspective, the GFA underlines its cooperative style of labour relations and human resource (HR) policies indicative of the company's European–Scandinavian roots. For example, the company is proud that it was the first service multinational in Europe to establish a European Works Council (EWC), and that it did this in 1995, a year before the binding European directive went into effect.

While TNCs with global framework agreements are generally vocal proponents of social partnership, the emphasis that the corporate HR department at ISS attaches to this is exceptional, recognizing social partnership as 'the most profitable way to run our business' (ISS management). In their words:

> Employees should be engaged, satisfied and should feel comfortable and welcomed. … Our product is our people, our people is our product. It is really in line with our business to make an agreement … with UNI … because we think of them as one of the biggest suppliers … of our product, one of our biggest cooperation partners. We need to have good relationships with … the unions … because we need to make sure that our employees feel engaged and satisfied and want to stay and work for us.

Management sees the GFA as a means to confront what it regards as unfair competition from small and medium sized companies in ISS's local markets (Nisim and Benjamin 2008). Their hope is that UNI could help eliminate these so-called 'bottom feeders' (Drezner 2000) within global facility services industries, whose business models survive on driving down the cost of labour. In addition, ISS promotes the 'risk management' role of the agreement with its corporate customers that expect reliability, high quality standards and compliance with basic labour standards. In ISS, UNI found the kind of management that was both willing to support cooperation and good labour relations with unions in its global operations and recognized for its own good the importance of UNI and its affiliates being able to organize throughout the property services sector. In negotiating the GFA, UNI insisted on the inclusion of an 'organizing fund', seeded by the company, as a central factor in the agreement. As one union official said:

> I think that as a company at the top level, ISS is more respectful of unions and of the role workers' organizations play in the success of their company than [others]. … And I can absolutely tell you, … most companies in the world don't have that attitude about unions.

The content of the revised GFA is remarkable, extending beyond ILO core labour standards to include 'a commitment to pay the legally required minimum wages and to respect limitations on the hours of work and overtime obligations' (ISS and UNI 2008). Most notably, the renegotiated agreement contains detailed prescriptions on the right of UNI affiliates to enter corporate sites, information rights, recognition of local unions as a bargaining partner, and a commitment by the company to remain neutral during union organizing drives. Management accepted UNI's demand to include an 'organizing fund' as an explicit statement in favour of raising standards in the whole industry.[7]

The GFA also sets high standards in assessing the progress of implementation and the handling of disputes that may arise in conjunction with that process. UNI and ISS management will evaluate implementation through bi-annual meetings and 'ongoing communication'; an independent mediator/arbitrator will address any disputes that cannot be resolved in this context.

The ISS GFA language on trade union rights and dispute resolution compares quite favourably with other GFAs, even though UNI agreed to drop its demand that ISS recognize only UNI affiliates. Considering the extremely low union density rate in this sector, of which management is well aware, the GFA could offer a real window of opportunity to unionize. According to a UNI official interviewed in 2010, two of its stronger affiliates in Australia and in the Netherlands were actually using the agreement. However, beyond these cases, neither UNI nor any of its other affiliates have systematically taken advantage of the strength of this agreement and used it as an instrument in support of organizing campaigns. Apparently, this is because local ISS management in subsidiaries has not openly embraced the idea of cooperative labour relations. Company representatives in Mumbai, for example, where ISS is the second largest player in the industry, stressed the importance of keeping the company non-unionized, ostensibly because they wanted no part in having to deal with the highly bureaucratic Indian unions. In other countries as well, local unions reported management policies detrimental to employees as well as to labour relations. Headquarter management has confirmed this:

> Some countries do not have this tradition to work together with the unions; they still see that you are better off without them. … So, there were some countries that were quite concerned. 'Oh, what does that mean? Does it mean that the unions will be all over us?' And we said: 'yes, start to talk nice to them and they will talk nice to you instead of fighting all the time.'

In the GFA, UNI handed over monitoring of its implementation to ISS, so that it does not have any direct channel of information regarding possible violations. Interestingly, both ISS and UNI confirmed to us that there had not been a single report of a violation of the GFA. In the light of the generally acknowledged poor working conditions and low level of unionization in this sector, this seems astounding. Moreover, according to the union representatives we interviewed in different countries during our research project, local management, eager to improve its operational results, has been ready to subcontract some jobs to firms with lower wages and benefits. This has not been a topic of the regular joint UNI-management meetings, especially since the clause in the original GFA extending coverage to suppliers and contractors was deleted in the revised version of 2008. Adding to the problems of implementation are further reports from local representatives, for example in Brazil, that they were not using the provisions of the GFA because they were not even aware of its existence. For its part, UNI claimed that the agreement had been distributed to all of its affiliates.

Given the very low density of union membership in the sector and the GFA's supportive provisions, how can one explain UNI's inactivity? Has the high level of cooperation and agreement between UNI and ISS corporate management made UNI reluctant to foster union campaigns at ISS subsidiaries? UNI argues that while it has urged its affiliates to use the GFA and run organizing campaigns, it does not have enough resources of its own to get involved in such activities. Considering the weakness of union organization in this sector, the challenges are indeed daunting. However, even if UNI cannot fund and run such campaigns on a larger scale, it could be more active in other ways. It could systematically inform its affiliates of the GFA, run pilot training sessions at chosen sites to build awareness of the opportunities embodied in the GFA, and even work with some of its strong affiliates to provide basic support in getting pilot organizing projects off the ground. Such campaigns could target not only ISS facilities but also its competitors, for which the organizing fund foreseen in the GFA was established.

Both parties concur that there is still a long way to go before they can implement the agreement locally. While we cannot offer any final proof, it seems that both UNI and ISS corporate management are more interested in maintaining a stable and cooperative relationship than in pushing implementation and, in the course of that process, having to deal with potentially disruptive union organizing campaigns. Management regards UNI as 'one of the biggest suppliers … of our product, one of our biggest cooperation partners' (ISS manager) and the GFA shows that its corporate policies are based on social partnership. Unionization campaigns would complicate the situation for corporate management, as they would meet with the resistance of some local managers and, where successful, would insert a new collective actor into the decision-making process, and thus change the existing power relations between managers and workers. For UNI, a more proactive approach, reaching out to its affiliates, would also require changes and possibly even raise questions among its affiliates about its role in maintaining the status quo and not pushing for a more proactive implementation of the GFA. As long as UNI is content to view ISS as 'a pretty good company' (UNI official) without systematically probing the situation on the ground, the GFA will remain a shining example of an unused but impressive artefact of social partnership.

The G4S case

G4S offers security services to corporate customers and governments. These include placing buildings and infrastructure under surveillance, 'securing' high-profile individual elites, guarding prisons, and protecting military and nuclear facilities. Founded in 1934 in Sweden as a family-owned company, G4S is currently owned by financial investors, private equity funds and a foundation[8] with strong ties to the original owner family. Several divisions, mergers and acquisitions later, it is now headquartered in the United Kingdom. In the years between 2007 and 2015, the company increased the number of its employees from 560,000 to 618,000, making it the third largest private employer on earth behind Walmart and Foxconn. With subsidiaries in 125 countries, its global presence is massive.

Like ISS, G4S is archetypical of a service model based on global production networks, for it explicitly tries to benefit from the outsourcing trend in corporate security. Nevertheless, G4S itself is much more heavily involved in governmentinduced outsourcing in high-security areas like war zones and nuclear facilities (in recent conflict zones in Iraq, Afghanistan and Sudan, for example), activities it proudly advertises (Cutler 2010; Elms and Phillips 2009; Singer 2005). Similarly, G4S offers border control services and surveillance of prisoners in North America and Africa. Its corporate structure is largely decentralized.

With fewer than 100 employees at corporate headquarters, where finances and strategic planning are located, the local managers of country and regional divisions take on the operative management and organization of local activities. This is critical for union organizing, for it seemingly relieves corporate headquarters of any responsibility for local labour relations policies and makes it more difficult to focus union leverage. Like ISS, it tries to offer ‘wall-to-wall’ services and, in many of its business fields, to limit its use of subcontractors. In contrast to ISS, cooperative social partnership has not been a cornerstone of HR policy. As one union representative dealing with G4S in the UK explained:

> No. I can remember years ago, when I used to work for G4S, the company was ready to decertify a trade union. They … started up a staff association, to try to get rid of the union. The reason why we have the situation we have in the CoO [corporate organization-headquarters] is that we are very strong in the CoO. We have a strong organizing clan in G4S, and we have a very high membership in G4S, so the strength comes from our membership and not from any social partnership.

From the outset, the GFA process differed profoundly from the situation at ISS. Instead of sitting down to negotiate in a congenial atmosphere, G4S rebuffed all attempts to initiate steps towards an agreement. As a result, UNI launched a global corporate campaign against the company in 2003, which highlighted violations of human and worker rights. This campaign coincided with an organizing drive of the SEIU against its American subsidiary.[9] An incredibly acrimonious campaign, including lawsuits and physical assaults, erupted that spread to as many as ten countries simultaneously (see McCallum 2013). Although UNI attempted to work with the company’s European Works Council, it found the body ‘very, very wishy-washy’, according to a union representative, who had been a former chair of the council. UNI found more affiliates and budding unions in the global South willing to join the campaign and fight for recognition. In the campaign, raucous protests at the company’s annual shareholder meetings in London complemented reports from Asia and Africa of horrific human rights violations.

The campaign also further distinguished GFAs from CSR practices. In a letter to the OECD, in response to a series of UNI grievances, the company tried to deflect the growing attention paid to the many instances of poor working conditions and rights violations. It did this by touting its substantial corporate social responsibility commitments, which included a school in India, assistance to homeless youth in Russia, farms in Malawi and a Chinese orphanage. Despite none of these having any bearing on labour standards, it presented them as evidence that G4S had fulfilled its social obligations and should therefore be absolved of the union's charges. After five years of resistance to UNI's global campaign, the company eventually submitted to a GFA after investors began to divest, some for reasons of 'moral outrage'.[10] A parallel agreement, securing organizing rights for US workers specifically, was also completed the following day. In essence, UNI's campaign to expose the company's global operations worked, but it also had a deep impact on how management saw its relationship with UNI. Even two years after the battle had ended and a GFA signed, one of our interview partners confirmed to us that the conflict was still not history: 'I'm sure you know about the corporate campaign, and feelings were running very high. And frankly when you dig in the past the temperature starts to rise all over again because we will never reconcile our differences from that time' (G4S, management).

The G4S agreement contains some outstanding provisions; foremost among these is that UNI was able to force the company into a significant implementation process, which is an outlier among all other GFAs. Moreover, the very detailed complaint procedure and the arbitration process in the case of disagreement are exceptional.[11]

Immediately after it was signed, the management and union representatives agreed on a formal implementation phase in selected countries, a highly contentious process in which UNI was able to win its main objective, namely to implement the agreement in South Africa and India. While the GFA was extended to other countries as well (see McCallum 2013 for examples), UNI felt that it was important that it should have an impact on labour relations in these two countries. How this process unfolded is the focus of the next two sections.

South Africa

The global agreement was clearly useful in Johannesburg. To jumpstart an organizing programme, UNI donated $100,000 to the South African Transport and Allied Workers Union (SATAWU), its local affiliate, to allow it to hire staff and generate an organizing programme. The money also funded research and other resources that laid the basis for a strategic plan. To build a base among existing members, UNI held workshops on organizing, member involvement, international solidarity and strategic research. SATAWU established security guard worker committees in nine new sites. With the GFA in force, SATAWU staff gained access rights to local worksites. Both the presence of local union representatives and the existence of the GFA restrained the company from anti-union campaigning when workers attempted to unionize. Still, gains were slow to materialize as local management claimed to be ignorant of the GFA and repeatedly found ways to resist unionization.

In the light of such incidents, UNI had continually to impress on G4S management that it had an obligation at all levels of the company to respect the neutrality clause in the global agreement it had signed. In the union camp, as management resistance subsided and it became clear to local activists that the GFA offered access and neutrality, some of SATAWU's initial scepticism toward the efficacy of such an agreement faded. Within 15 months, campaigns in Johannesburg and Durban brought an estimated three thousand security guards into the union, the majority of them being employees of G4S. These numbers represented an increase of approximately 40 per cent in the total number of SATAWU's security guard members.

Although not technically a 'phase-in' country, UNI's Malawian affiliate, the Textile Garments, Leather and Security Workers Union, also made use of the agreement. In the period immediately preceding the union's involvement with UNI, labour relations between G4S and its employees were fractured and chaotic. For its part, management occasionally felt terrorized by its own workforce. G4S leaders report that on two occasions angry groups of workers attacked its executives, causing one to flee the country and another reportedly to travel with a police escort.

To attend to violations of human rights, UNI established the Legal Aid Fund for African Unions with a view to facilitating a lawsuit alleging underpay and non-compliance with ILO conventions. One can attribute much of the advances in unionization in Malawi to the active involvement of a strong local union in the campaign and in GFA implementation, illustrating the absolute importance of a strong local affiliate. Malawian unionists and management representatives concur that the GFA has provided a more stable basis for industrial relations, and worker representatives relate that some of the mistreatment characteristic of the work environment before the signing of the GFA has subsided.

India

The Indian context presented UNI with an altogether different set of issues, obstacles and opportunities. By some estimates, there are 100,000 trade unions in India, organized along myriad axes – caste, religion, region, language, class and worksite. Almost all belong to one of ten political parties. In this context, fierce inter-union competition has guarded against solidarity. Rudolph and Rudolph (1987) have referred to the Indian situation as 'involuted pluralism', a term used to describe the paradoxical multiplication and simultaneous weakening of interest groups. UNI helped construct the Indian Security Workers Organizing Initiative (ISWOI), which included trade unions from across the political and social divides.

UNI and SEIU installed full-time organizers in India to mentor local unionists on the finer points of a North American organizing model – strategic mapping, one-on-one conversations with workers, data collection and a focus on the market-dominant company, whether G4S or one of its competitors. One Bangalore-based security guard union has roughly tripled in size since it began working with UNI. Nonetheless, despite significant membership gains, organizing did not generally take off. G4S local management was even more aggressively anti-union than in South Africa, and the more UNI and SEIU put into the campaign, the more the local management intensified its retaliation against organizers and member activists. Violence at work became more common and the unionization effort created new divides among individual security guards.

Though stymied to some extent by management's stance, union activity produced important results for security guards countrywide. Union pressure obligated G4S to provide all new hires with appointment letters, detailing the terms of the employment relationship. This was an important step towards more job security and better working conditions. The organizing drive also helped to break down the practice of using labour brokers and other third-party entities to hire guards. The company also began to pay regular benefits such as minimum wages, pension contributions, overtime pay and bonuses to workers based on seniority. The responsible union, PSGU, has also incorporated the global agreement into its organizing message, and has translated it into regional languages such as Kannada, Tamil, Malayalam and Telugu. 'Now, [organizing is] a science,' says one PSGU organizer. 'We have a plan of action. We have a strategy. We have [a] number [of] goals and we must reach them. That is something new. It is a good thing' (cited in McCallum 2013: 134).

Still, use of the global agreement has varied widely throughout India, highlighting the significance of local actors. In Kolkata, for example, it was not nearly as useful as in Bangalore or Delhi, and the affiliated union there has since left the ISWOI organization. Subsequent to our fieldwork in India, reports suggest that workers in Mumbai started organizing against G4S well after the original ISWOI unions began, suggesting the campaign, as a national movement, is still active. Overall, while there have been small advances towards institutionalizing the acceptance of unions and labour–management relations, hostility still governs the relationship. As one UNI representative has noted, its organizing approach still raises red flags for management.

> The rollout of the agreement is not as aggressive as we would like it to be. And G4S feels like they are really way out beyond their comfort zone. We have affiliates … they will engage in direct action and in a way that makes G4S doubtful whether they really benefit [from] the bargain on their side.

There have been no quick 'wins' for the unions where G4S operates. However, a number of impressive gains resulted from the implementation of the agreement. The local context for GFAs is perhaps most important, as it is where changes in workers lives happen, if at all. Without active involvement via organizing drives and campaigns, the likelihood of management promoting its CSR policy and its adherence to the local laws and customs is quite strong (Fichter 2011). GFAs, on the other hand, are often negotiated explicitly because national legislation is so weak. The examples above detail cases where global–local reciprocity yields some dramatic results.

Conclusions

At the outset of this article, we argued that GFAs are an underutilized instrument of trade union policy. Findings from our extensive empirical research reveal a rather dismal record of implementation, which we attribute to the inherent shortcomings of a negotiation process dominated by corporate-level 'social partnership'. In this approach, representatives of labour and management at TNC headquarters – corporate HR or CSR managers, union leaders in the home country, employee representatives and GUF leaders – conduct the GFA negotiation process. An emphasis on dialogue characterizes their pursuit of good relationships. As the evidence shows, however, although social dialogue is a strategic way to secure a GFA, it is less useful for implementing it.

Instead, the social partnership approach common to GFA negotiations has resulted in generally inserting agreements into the corporate social responsibility programmes of the signatory TNCs, which then rely heavily on corporate protocols for adequate implementation. This shifts the emphasis from a proactive promotion of the GFA to putting reactive systems in place to handle alleged violations. The ISS case offers a perfect illustration of this – a global player in property services with over half a million employees worldwide, yet with no reported violations in an industry rampant with 'bottom feeders'. Since both ISS management and UNI were well aware of the danger of pricing the company out of the market, it seems highly unlikely that excellent working conditions at ISS facilities can explain this anomaly.

Our cases indicate that one can attribute the implementation of a GFA to the process it takes to secure it in the first place. GFAs resulting from a social partnership approach are prone to being still born; GFAs resulting from a broader mobilization of workers and from a wider array of union participation are more apt to be implemented. In practice, our cases presented here and the larger research that provides the backdrop, suggest that workers and their unions actively involved in a campaign are more able to enhance their bargaining power in their local setting. An example of this is the G4S case in which unions in several countries, including some not chosen for the rollout phase, used the GFA. While the implementation in the G4S case was certainly driven by UNI, those local unions took the initiative and forced their local managers towards an implementation procedure. This happened only because a five-year campaign preceded the winning of the GFA, during which time those unions were directly or indirectly involved along the way. In the ISS case, no such campaign took place to win the agreement because ISS management was so agreeable. Workers and local unions had few opportunities to interact with each other in the process.

In a global economy lacking global binding regulations on labour, GFAs have laid the foundation for institutionalizing global labour relations by establishing an arena and formulating the 'rules of the game'. For that arena to have any real meaning, though, it must be relevant to all potential and existing actors, global and local, management as well as unions and their representatives. If the institutionalization process is to encompass all TNC operations worldwide, and potentially its global production network too, it is imperative that actors beyond those in the limited social partnership setting are involved. By embodying the ILO's core labour standards, among them freedom of association and the right to collective bargaining, GFAs have the potential to mandate the recognition of a much wider range of actors and open the way for union representation and developing labour relations throughout the arena of GPNs.

Our example of this, the G4S case, is an instance of both battle and dialogue. This is what a 'conflict partnership' is, an unstable relationship characterized by more elastic boundaries, with each side angling to change the balance of power between management and labour.

Obviously, unions have neither the resources nor the inclination to wage the kind of battle represented by the G4S case whenever they try to reach a GFA with a transnational corporation. Nonetheless, they do have viable options for developing and exercising their associational power – and are beginning to use them – to build and organize transnational union cooperation. Opening opportunities for local unions at TNC subsidiaries or at operations within the TNC's global production network to participate actively (that is to take 'ownership') in all the phases of the GFA process, from its initiation through negotiation and into implementation, reframes the process.

More often than not, ensuring the rights embodied in GFAs has proven to be conflict laden with respect to both union–management relations and relationships among cooperating unions. Concerning the latter, the history of trade union internationalism is wrought with political and organizational conflict (Lucio 2010) and we recognize that transnational unionism, with its many strategic and organizational dimensions, is a highly complex issue involving organizations 'characterized by asymmetrical power relations, resources and capabilities' (Lévesque et al. 2013: 279).

If the unions are to implement GFAs in any meaningful sense, they need to move beyond social partnership and to embrace conflict partnership. Based on our case studies, this entails both a different strategic approach to dealing with global capital (TNCs), greater organizational networking across national borders, and concerted mobilization efforts at the local level. Whether this will suffice to move the institutionalization of global labour relations forward or will prove to be ineffective, as some critics argue (Lillie and Lucio 2012), is still an open question, but one that will profoundly influence the future of global unionism.

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Notes

1. Fichter (2011), Fichter and Helfen (2011) and Fichter and Stevis (2013) provide further case studies in which individual local unions took the initiative to force implementation.
2. In 2012, the International Metalworkers' Federation (IMF) and the International Chemical, Energy and Mining Federation (ICEM) merged with the global union federation for textiles and leather, ITGLWU, to form IndustriALL. See www.industriall-union.org.
3. For example, the core labour standards as embodied in the ILO's declaration on fundamental principles and rights at work (ILO 1998); the founding of the UN Global Compact in 1999 (see www.unglobalcompact.org); and the revised OECD guidelines on multinational corporations (OECD 2000).
4. The ITS and its successors, the global union federations, are the member organizations of national and local sectorial and multi-sectorial unions at the global level. See www.global-unions.org.
5. Non-functional are those GFAs in TNCs that have merged, been acquired, or have folded.
6. The IG Metall fell just short of this goal with 22 signed agreements.
7. Interestingly, as far as we know, neither UNI nor its affiliates have yet used the fund.
8. Such foundations are generally a means of saving taxes and protecting individual owners from economic liabilities.
9. Originally Wackenhut, now G4S Secure Solutions (USA).

10. The UK-based General Workers' Union (GMB) is also a signatory of the GFA. It had a considerably less volatile relationship with the company than UNI. At times, one could potentially perceive GMB as trying to broker a kind of social partnership within a conflict partnership, as we have defined those terms here (see McCallum 2013).
11. Interestingly, this is the only agreement explicitly recognizing the possibility of labour-side violations. 'In the event of a dispute arising between a UNI affiliate and G4Smanagement regarding the interpretation or application of this agreement, the following procedures will apply: … (i) The complaint should first be raised with the local management; (ii) If the complaint is not resolved with local management, it may be referred to the Country Manager by the appropriate trade union where recognized or UNI if recognition has yet to be established; (iii) If still unresolved, the complaint will be referred to the agreed representatives of UNI who may raise the matter with the Company's Director of Employee Relations; (iv) Where infringements are confirmed, the Director of Employee Relations will raise these with the responsible member of management who will ensure corrective steps are taken; (v) Disputes that cannot be resolved in this way or which relate directly to the terms of this agreement should be referred to the Review Meeting [meeting twice a year] for discussion and resolution' (G4S, GFA text).

References

Anner, M. (2001) 'The international trade union campaign for core labor standards in the WTO', *WorkingUSA*, 5 (1), 43–63, doi: 10.1111/j.1743-4580.2001.00043.x.

Brinkmann, U., H.-L. Choi, R. Detje, K. Dörre, H. Holst, S. Karakayali and C. Schmalstieg (2008) *Strategic unionism: aus der krise zur erneuerung? Umrisse eines forschungs-programms*, Wiesbaden: VS Verlag für Sozialwissenschaften.

Croucher, R. and E. Cotton (2009) *Global unions, global business: global union federations and international business*, Middlesex: Middlesex University Press.

Cumbers, A. and P. Routledge (2010) 'The entangled geographies of trans-national labour solidarity', in A. C. Bergene, S. Endresen and H. M. Knutsen (eds) *Missing links in labour geography*, Farnham: Ashgate Publishing.

Cutler, A. C. (2010) 'The legitimacy of private transnational governance: experts and the trans-national market for force', *Socio-Economic Review*, 8 (1), 157–85, doi: 10.1093/ser/mwp027.

Dølvik, J. E. and J. Waddington (2004) 'Organizing marketized services: are trade unions up to the job?', *Economic and Industrial Democracy*, 25 (1), 9–40, doi: 10.1177/0143831X04040099.

Drezner, D. W. (2000) 'Bottom feeders', *Foreign Policy*, 121, 64–70, available at: http://foreignpolicy.com/2009/11/19/bottom-feeders/.

Dube, A. and E. Kaplan (2010) 'Does outsourcing reduce wages in the low-wage service occupations? Evidence from janitors and guards', *Industrial & Labor Relations Review*, 63 (2), 287–306, doi: 10.1177/001979391006300206.

Edwards, P. and J. Bélanger (2009) 'The multinational firm as a contested terrain', in S. Collinson and G. Morgan (eds) *Images of the multinational firm*, Chichester: Wiley, 193–216.

Egels-Zandén, N. (2009) 'Transnational governance of workers' rights: outlining a research agenda', *Journal of Business Ethics*, 87 (2), 169–88, doi: 10.1007/s10551-008-9877-y.

Elms, H. and R. A. Phillips (2009) 'Private security companies and institutional legitimacy: corporate and stakeholder responsibility', *Business Ethics Quarterly*, 19 (3), 403–32, doi: 10.1017/S1052150X00010162.

Fichter, M. (2011) 'Exporting labor relations across the Atlantic? Insights on labor relations policies of German corporations in the US', *WorkingUSA*, 14 (2), 129–43, doi: 10.1111/j.1743-4580.2011.00328.x.

Fichter, M. and M. Helfen (2011) ‘Going local with global policies: implementing international framework agreements in Brazil and the United States’, in K. Papadakis (ed.) *Shaping global industrial relations: the impact of international framework agreements*, Basingstoke: Palgrave Macmillan, 85–115.

Fichter, M. and D. Stevis (2013) ‘Global framework agreements in a union-hostile environment: the case of the USA’, Study series, Berlin: Friedrich-Ebert-Stiftung, available at: http://library.fes.de/pdf-files/id/10377.pdf.

Fichter, M., J. Sydow, M. Helfen, L. Arruda, Ö. Agtas, I. Gartenberg, J. McCallum, K. Sayim and D. Stevis (2012) ‘Globalising labour relations: on track with framework agreements?’, Persective series, Berlin: Friedrich-Ebert-Stiftung, available at: http://library.fes.de/pdf-files/iez/09422-20121129.pdf.

Gumbrell-McCormick, R. (2004) ‘The ICFTU and the world economy: a historical perspective’, in R. Munck (ed.) *Labour and globalisation: results and prospects*, Liverpool: Liverpool University Press, 34–51.

Herrnstadt, O. (2007) ‘Are international framework agreements a path to corporate social responsibility?’, *Journal of Business and Employment Law*, 10 (1), 187–224, available at: http://scholarship.law.upenn.edu/jbl/vol10/iss1/4.

Herrnstadt, O. (2013) ‘Corporate social responsibility, international framework agreements and changing corporate behavior in the global workplace’, *Labor & Employment Law Forum,* 3 (2), 263–77, available at: http://digitalcommons.wcl.american.edu/cgi/viewcontent.cgi?article=1061&context=lelb.

Hyman, R. (2005) ‘Trade unions and the politics of the European social model’, *Economic and Industrial Democracy*, 26 (1), 9–40, doi: 10.1177/0143831X05049401.

ICFTU (International Confederation of Free Trade Unions) (1997) ‘The ICFTU/ITS basic code of labour practice’, available at: http://training.itcilo.it/actrav_cdrom1/english/global/guide/icftuco.htm.

ILO (International Labour Organization (1998) ‘ILO declaration on fundamental principles and rights at work’, available at: www.ilo.org/declaration/lang--en/index.htm.

ISS and UNI (Integrated Service Solutions and UNI Global Union) (2008) ‘ISS–UNI global agreement’, available at: http://goo.gl/SSmJda.

ITUC (International Trade Union Confederation) (2013) ‘ITUC global poll 2013: building workers’ power’, available at: www.ituc-csi.org/IMG/pdf/itucreport2013_building_workers_power_web_6_0.pdf.

Keck, M. E. and K. Sikkink (1998) *Activists beyond borders: advocacy networks in international politics*, Ithaca: Cornell University Press.

Klein, N. (1999) *No logo: no space, no choice, no jobs; taking aim at the brand bullies*, New York, NY: Picador.

Lévesque, C., M.-A. Hennebert and P. Fairbrother (2013) ‘Futures of transnational trade unionism’, in P. Fairbrother, M.-A. Hennebert and C. Lévesque (eds) *Transnational trade unionism: building union power*, New York: Routledge, 265–80.

Levy, D. (2008) ‘Political contestation in global production networks’, *Academy of Management Review*, 33 (4), 943–63, doi: 10.5465/AMR.2008.34422006.

Lillie, N. and M. M. Lucio (2012) ‘Rollerball and the spirit of capitalism’, *Critical perspectives on international business*, 8 (1), 74–92, doi: 10.1108/17422041211197576.

Lucio, M. M. (2010) ‘Dimensions of internationalism and the politics of the labour movement: understanding the political and organisational aspects of labour networking and co-ordination’, *Employee Relations*, 32 (6), 538–56, doi: 10.1108/01425451011083618.

McCallum, J. K. (2013) *Global unions, local power: the new spirit of transnational labor organizing*, Ithaca: ILR Press.

Müller, T., H.-W. Platzer and S. Rüb (2004) *Globale Arbeitsbeziehungen in globalen Konzernen? Zur Transnationalisierung betrieblicher und gewerkschaftlicher Politik*, Wiesbaden: VS Verlag für Sozialwissenschaften.

Müller-Jentsch, W. (2004) 'Theoretical approaches to industrial relations', in B. E. Kaufman (ed.) *Theoretical perspectives on work and the employment relationship*, Champaign, IL: Industrial Relations Research Association, 1–40.

Mund, H. and K. Priegnitz (2007) 'Soft law: second best solution or a privatisation of social rights? Some pointers for a future discussion', *Transfer*, 13 (4), 671–78, doi: 10.1177/102425890701300410.

Nisim, S. and O. Benjamin (2008) 'Power and size of firms as reflected in cleaning subcontractor's practices of social responsibility', *Journal of Business Ethics*, 83 (4), 673–83, doi: 10.1007/s10551-007-9647-2.

OECD (Organisation for Economic Co-operation and Development) (2000) 'OECD guidelines for multinational enterprises', available at: http://mneguidelines.oecd.org/text/.

Rudolph, L. I. and S. H. Rudolph (1987) *In pursuit of Lakshmi: the political economy of the Indian state*, Bombay: Orient Longman.

Scharpf, F. W. (1997) *Games real actors play: actor-centered institutionalism in policy research*, Boulder, CO.: Westview Press.

Schattschneider, E. E. (1960) *The semisovereign people: a realist's view of democracy in America*, New York: Holt, Rinehart & Winston.

Singer, P. W. (2005) 'Outsourcing war', *Foreign Affairs*, 84 (2), 119–32, available at: www.foreignaffairs.com/articles/2005-03-01/outsourcing-war.

Stevis, D. and T. Boswell (2008) *Globalization and labor: democratizing global governance*, Lanham: Rowman & Littlefield.

UNCTAD (United Nations Conference on Trade and Development) (2013) 'World investment report 2013. Global value chains: investment and trade for development', Geneva: United Nations, available at: http://unctad.org/en/PublicationsLibrary/wir2013_en.pdf.

Wright, E. O. (2000) 'Working-class power, capitalist-class interests, and class compromise', *American Journal of Sociology*, 105 (4), 957–1002, available at: www.jstor.org/stable/3003886.

