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Trade union strategies against precarious work: Common trends and sectoral divergence in the EU

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journals.sagepub.com/home/ejd**Maarten Keune**

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Abstract

We present comparative research on precarious work and trade union strategies in three sectors (construction, industrial cleaning, temporary agency work) across seven European countries. Specific sectors have a profile of precarious work that is remarkably similar across countries, originating from similar employer strategies and work organizations. This results in unions facing comparable challenges concerning precarious work at sectoral level and developing comparable sectoral strategies to combat precarious work. The success of these strategies depends to a large extent on the available power resources. Between sectors within single countries, we observe some similarities but also very substantial differences in their institutional configuration and in actors' constellations, power resources and repertoires of action. National institutional contexts seem much less significant than often assumed.

Keywords

Europe, industrial relations, labour market, non-standard forms of employment, precarious work, sectors, trade unions

Introduction

In recent years, the rise in low-quality, precarious jobs in the EU (Benach et al., 2014; Greenan et al., 2010; Grimshaw et al., 2016; Vaughan-Whitehead, 2015) has become a salient political issue (Häusermann et al., 2015; Standing, 2011). Growing groups of workers face uncertainty, vulnerability or low-quality employment conditions (Doellgast et al., 2018; Kalleberg, 2009), with tendencies towards labour market dualization and growing inequality (Emmenegger et al., 2012; OECD, 2015; Wilkinson and Pickett,

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2009). There are important and fairly stable differences in the level of precarity and job quality between countries (Antón et al., 2012; Green et al., 2013). These can to some extent be explained by national structural and institutional characteristics, including levels of prosperity, types of capitalism and labour market (de)regulation (Green et al., 2013; Prosser, 2016).

Apart from this national dimension, there are important differences in the type and level of precariousness between sectors, which show many similarities across countries (van Houten et al., 2014). These within-country sectoral differences and across-country sectoral similarities point to between-sector differences in work organization and job characteristics, following from differences in the levels of technology, international competition and skills, as well as from enterprise size, inter-enterprise relations, vertical and horizontal integration and the productive strategies of the employers.

There has been increasing attention to the responses of trade unions to precarious employment. Most research concerns the national level or addresses one particular precarious group or sector in one or two countries (Alberti et al., 2013; Keune, 2015; Knox, 2010; Pulignano and Doerflinger, 2013; Pulignano et al., 2016; Simms, 2017). In this article, we discuss the sectoral dimension of precarious work and union responses from a comparative perspective, examining construction, industrial cleaning and temporary agency work (TAW) in Denmark, Germany, Italy, the Netherlands, Slovakia, Spain and the UK. We expect union strategies in particular sectors to depend on four factors: the type and level of precariousness in the sector, the main factors causing precariousness, the power resources of unions (Korpi, 1983), and union identity and ideology.

In the next sections, we make a case for studying union strategies comparatively at the sector level and outline our cases and methods. This is followed by an analysis of the character and dynamics of precarious employment in the three sectors. In the fourth section, we discuss the strategies of trade unions and we finish with a set of conclusions.

Precarious work, sectors and union strategies

The increase in precarious work is related to the growth of non-standard jobs. However, a dichotomous use of the concept of precarious work is inadequate, since there are different types and levels of precariousness (Keune, 2015) and both non-standard employment and standard (permanent and full-time) jobs can be precarious (Grimshaw et al., 2016). Indeed, the growth of precarious, low-quality employment has resulted from the growth of both non-standard and insecure jobs (Eichhorst and Marx, 2015; Koch and Fritz, 2013) and the declining quality of standard jobs (Dekker and van der Veen, 2017). Still, there is a strong association between non-standard employment and precariousness (Broughton et al., 2016; Kretsos and Livanos, 2016).

The increase in precarious work is also closely related to changes in industrial relations, as in most EU countries trade unions have seen their grip on the labour market weaken in the past two decades. Employers, the major architects of job quality and labour inequalities (Grimshaw et al., 2017), enjoy increasing discretion to utilize precarious employment to reduce costs, increase flexibility and shift risks onto the shoulders of workers (Baccaro and Howell, 2017). Orthodox economists blame the trade unions for co-responsibility for the growing number of precarious workers, claiming that they

do not represent the interests of these so-called outsiders. Indeed, the interests of well-protected insiders with good-quality jobs and precarious outsiders are often argued to differ, and trade unions, with generally limited membership among precarious workers, are argued to further the interests of the insiders while ignoring or opposing the interests of outsiders (Lindbeck and Snower, 2002; Rueda, 2007). However, in the past 20 years, unions have been making more and more attempts to tackle precariousness and to improve the employment conditions of precarious workers (Burgess et al., 2013; Doellgast et al., 2018; Hyman and Gumbrell-McCormick, 2017; Keune, 2015; Martínez et al., 2017; Simms, 2017). They have developed a range of strategies to defend the rights of precarious workers, because they see themselves as champions of social justice and hence also as representatives of the weak in society and in the labour market, because they recognize that the fates of the two groups are interrelated and that employers use precarious workers to put pressure on the wages and conditions of the insiders, and because precarious workers are seen as a potential new source of membership.

Industrial relations scholarship has approached this issue largely from a national or single-sector perspective. However, we argue that a comparative sectoral perspective is also of major relevance. One of the key understandings emerging from recent industrial relations scholarship is the need to abandon the exclusive ‘methodological nationalism’ that still dominates the field; major sectoral differences prevail between sectors within countries and similarities can be observed across countries within the same sector (Bechter and Brandl, 2015; Bechter et al., 2012; Benassi et al., 2016; Larsen and Mailand, 2018). In this article, we introduce such a sectoral perspective to the study of trade union strategies against precarious work.

Penninx and Roosblad (2000) and Heery and Abbott (2000) distinguish a variety of union strategies regarding precarious work and precarious workers. They can reject precarious work and aim for its elimination, or can try to bridge the divide between precarious and regular employees by reducing the gap between the two groups through improving the conditions of precarious workers. Strategies can also be directed at different actors that play a part in creating or allowing for precarious employment. These are the employers, who ultimately design jobs; the government, which, apart from being an employer itself, creates much of the institutional context in which work takes place; and ‘third parties’ that indirectly shape employment conditions through (public or private) procurement and the conditions they attach to the granting of tenders (Havard et al., 2009; Jaehrling, 2014; Jaehrling et al., 2011; Rubery et al., 2005). In addition, union strategies can have a conflictive logic (strikes, protests, organizing) or a cooperative and negotiated logic (collective bargaining, social dialogue, bilateral initiatives). Union strategies and their outcomes are strongly affected by their power resources (Korpi, 1983), which include the level of membership, centralization of union movements, cooperation between unions and the institutional positions unions occupy in collective bargaining and social dialogue (Frege and Kelly, 2003; Gumbrell-McCormick and Hyman, 2013; Keune, 2018). The more power resources, the more successful unions will be in fighting precarious employment.

Table 1. Interviews with union and employer representatives.

	DK	DE	ES	IT	NL	SK	UK	Total
Unions	8	5	4	13	6	6	13	55
Employers	6	3	3	5	5	8	2	32

The research

We draw on the research project ‘Bargaining for Social Right at Sectoral Level’ (BARSORIS), which took place during 2013–2015 and included seven country studies (Denmark, Germany, Italy, the Netherlands, Slovakia, Spain and the UK). National experts studied precarious work and union strategies in construction, industrial cleaning and TAW. These are sectors where many jobs are precarious, but they are very different in terms of industrial and work organization, as we discuss below.

The case studies focused on understanding the extent, types and causes of precarious work and on the strategies of trade unions to improve the situation of precarious workers. We concentrated the analysis mainly but not exclusively on non-standard jobs, and in particular temporary employment (fixed-term and zero-hours contracts), involuntary and small part-time jobs and self-employment without employees. We focused on the time period since the start of the crisis in 2008 but also considered longer-term trends.

The case studies involved a common set of jointly developed questions and concepts, and a mixed-method approach. We analysed documents and other materials, including legislation, collective agreements, union policy statements, campaign material, newsletters, social media and web pages, reports and statistics. We then interviewed key trade unionists, some from national confederations, but the majority from sectoral unions. We also interviewed a number of employers’ representatives. Table 1 presents data on the 87 interviews with unions and employers. In addition, we interviewed a limited number of academics and other observers.

Dynamics and causes of precarious work

Our comparison across sectors and countries confirms the existence of within-country differences and cross-country similarities between sectors. The sectors have distinct profiles of precariousness. In construction, temporary employment and self-employment without employees play an important part, together accounting for around 20 percent in Denmark and Germany and over 35 percent in the other five countries (see Table 2). Large and growing shares of self-employment in construction are reported to be bogus, depending on a single contractor. In cleaning, the incidence of part-time work is very high, and is often involuntary and marginal, with low numbers of working hours. In TAW, virtually all employment is non-standard.

The crisis had a strong negative effect on total employment in its first years, whereas employment later recovered (Broughton et al., 2016; Grimshaw et al., 2016; Storrie, 2018; Vacas-Soriano, 2015). In the three sectors, this led to varied responses. In construction, the shares of the main two types of non-standard employment have both

Table 2. Share of the main non-standard forms of employment by sector and country.

	Construction: % of sectoral employment		Cleaning: % of sectoral employment	TAW: % of total employment (2014)
	Temporary	Self-employed, no personnel	Part-time	
DK	11.8	8.6	44.0	0.8
DE	9.0	7.9	83.5	2.4
ES	30.1	20.5	63.0	0.6
IT	9.3	26.8	80.0	1.2
NL	11.5	25.7	83.0	3.0
SK	6.3	37.2	n.a.	0.8
UK	2.6	35.9	78.0	3.8

Sources: Construction: Eurostat; Cleaning: case study estimates, Equality and Human Rights Commission (2014); TAW: Eurociett.

increased in four countries (Italy, the Netherlands, Slovakia and the UK); change was marginal in Denmark and Germany, while in Spain a substantial part of temporary employment was replaced by self-employment without employees. In cleaning, in all countries except Denmark the share of part-time employment went up. The size of the TAW sector has fluctuated over the period following the business cycle, with sharp declines in the beginning and growth in the later years, but the overall changes have been limited.

As mentioned above, non-standard employment is not necessarily precarious but much of precarious employment is non-standard. Table 3 summarizes the main dimensions of precariousness in the three sectors. To varying degrees, all suffer from low wages, low job security, limited access to social benefits and limited representation and voice, underlining the relatively precarious character of work in the three sectors. A few elements deserve special attention. One is the high incidence of low income from work for the self-employed in construction and part-time workers in cleaning. This results both from low hourly wages and fees, as well as limited yearly hours of work. Second, in cleaning, much part-time work involves marginal jobs with a low number of working hours, also often split between early morning and evening. Third, TAW work is very diverse, covering, in principle, all sectors and skill levels. Hence, it is not necessarily low-wage work; often the pressing wage issue is the pay gap compared to those working permanently in the companies where they are placed. TAW workers do generally suffer from low job security, limited access to social benefits and limited representation.

Apart from the role-played by national institutions, each sector has its own configuration of industrial and work organization, with clear similarities across borders. In construction, much of the work is organized through highly fragmented international supply chains: major construction companies are responsible for large projects, but outsource much of the work to a long chain of smaller construction companies. Cost competitions is intense, partly because their clients (national and local governments, large private firms) impose strong budget constraints; this pressure is transmitted throughout the

Table 3. Major dimensions of precariousness per type of employment relation.

	Low pay	Job security	Social benefits	Unionism and voice	Other (where countries not specified, the feature exists in all)
<i>Construction</i>					
Temporary contracts	Medium	Low	Limited	Limited	Few training opportunities, long hours (NL, IT, ES),
Self-employment	High	Very low	Very limited	Very limited	high work intensity (UK, IT, ES, NL)
<i>Cleaning</i>					
Part-time	High	Low	Limited	Limited	Unsocial hours (DE, IT, ES, SK, NL), work intensity (DE, SK, NL)
<i>TAW</i>					
	Frequent pay gaps	Very low	Limited	Limited	Limited training opportunities, long variable working hours (SK)

supply chains and particularly affects smaller enterprises, migrants, posted workers and self-employed. In particular, the share of dependent self-employed with low pay, high levels of uncertainty and very limited entitlements to social benefits (pensions, unemployment insurance, disability insurance) has grown sharply since the start of the crisis. The search for lower labour costs also stimulates non-observance of regulations and results in increasingly precarious work conditions. Migrants and posted workers bear the brunt of these developments, exacerbated by the fact that they do not always know their rights and are fearful of contesting employer malpractice. The fragmentation of the supply chain results in construction sites where workers of many nationalities and with many different employers work at the same time, but do not feel they belong together. Trade unions in the sector are relatively strong in terms of membership (over 70 percent in Denmark and more than 40 percent in Italy; the lowest levels are in the UK and Slovakia, below 10 percent). However, everywhere unions experience great difficulties in organizing workers along the supply chain and in countering the strategies of employers aimed at shifting cost pressures and uncertainty onto the shoulders of the workers.

Likewise in cleaning, cost pressure from major clients like airports, universities, large offices and ministries leads to pressure on wages. It is a low-skilled sector and often involves split shifts, resulting in a high incidence of (involuntary) marginal part-time jobs, with few weekly and yearly working hours and hence with low income. It can also affect eligibility for social benefits. In Denmark, the Netherlands and Spain bogus self-employment occurs, but its incidence is much lower than in construction. In addition, in most countries work is increasingly subject to intensified performance standards. Cleaners are often low- or unskilled female migrants, one of the weakest groups in the labour market who have little bargaining power, are easily replaceable and fear employer retaliation. Union membership is generally low and everywhere below the national average: an estimated 40–50 percent in Denmark, around 20 percent in Italy, 10–15 percent

in the Netherlands, Germany and Spain, below 10 percent in the UK and almost-zero in Slovakia. Dispersion over multiple workplaces and split shifts make cleaning workers largely 'invisible' to their co-workers and to those who work in the buildings they clean. It also undermines forming common identities and complicates union organization efforts. In some countries, for example, the Netherlands, union initiatives for cleaners are largely developed by the national confederations. In others, there are strong union federations covering various services sectors, such as in Italy and Spain, or indeed in Germany covering also construction, forestry and agriculture. In this way, union weakness and its lack of power resources in the cleaning sector may be compensated by union strength in other parts of the economy.

In the TAW sector, one of the main problems with working conditions is high employment instability. This worsened after the outbreak of the crisis: in all the cases, the length of assignments is decreasing, with a growing spread of very short contracts. In addition, TAW work has become less and less a stepping-stone towards open-ended contracts; workers increasingly risk being trapped in precarious employment. These features generate job insecurity and pay discontinuity, together with problems regarding skill development and career prospects. Other consequences are difficulties in access to social benefits provided by law and collective agreement. TAW workers have a very weak presence in institutions of worker representation such as unions and works councils. Union membership is generally low, and few countries have specific organizations for TAW workers (Voss, 2016).

The sector also presents problems with the principle of equal treatment; agency workers report worse working conditions than those of permanent employees. Unequal treatment often arises from non-observance of regulations set up by legislation and collective agreements. There are many cases of illegal practices by agencies with the aim of minimizing labour costs, often under the pressure of competition by more flexible and cheaper alternatives. In some countries (such as the Netherlands and the UK), this tendency is linked to the presence of illegal or irregular agencies, offering low-cost options through cross-border provisions of workers.

Union strategies

Common strategies

There are both common union strategies across sectors and countries, and strategies that can be observed in specific sectors across countries. A first, major commonality, confirming other recent research (Doellgast et al., 2018; Keune, 2015), is that across the countries and sectors, precarious work is high on the union agenda and precarious workers are considered a key target group for union policy, not only in terms of recruiting, but also for improving their terms and conditions. This position is, however, still relatively recent: some 15 years ago, many unions still simply rejected precarious work and largely considered precarious workers as outside from their constituency. Today, their approach is more inclusive and aimed at bridging the gap with regular workers, often explicitly targeting non-standard workers, both to improve the position of precarious workers and to protect the standards of regular workers.

Common strategies also reflect the fact that precariousness has common causes. Trade unions often observe that precarious work stems in part from the non-compliance with regulations set by law or collective agreement; hence, strengthening compliance by employers has become a major strategic activity. Actions in this area include campaigns denouncing non-compliance and abuse. German and Danish unions campaigned against 'dirty cleaning', Italian unions in the construction sector against exploitation of bogus self-employed and the *¿Somos profesionales?* (Are we professionals?) campaign by Spanish union COMFIA-CCOO in the TAW sector denounced illegal employer practices, in particular unpaid overtime. Unions in all sectors increasingly target violations against foreign workers, confirming an ever more inclusive and solidaristic approach to labour migrants (Doellgast et al., 2018; Refslund, 2018). Our findings show that, because of their weak labour market position and lack of knowledge of rules and regulations, foreign workers are frequently exploited, with sub-standard wages and working conditions, creating socially unacceptable situations and unfair competition between workers. To tackle this problem, unions have set up information and support services for migrants and posted workers, often under the auspices of the confederations and with specific sectoral applications.

Another union target has been dependent or bogus self-employment, in particular in construction and in the Danish, Dutch and Spanish cleaning sector, where the phenomenon is more widespread. In several countries (Denmark, Germany, Italy, Slovakia), sectoral unions, usually together with their confederations, have called for a stricter legal definition of self-employment, including criteria to identify and sanction abusive practices. Some unions have called for self-employment certificates; others, for example, in the German construction sector, have called for obligatory control of the status of self-employed persons by public authorities.

A second line of action has been to strengthen cooperation with public institutions like the labour inspectorate and with employers in identifying and combatting illegal practices. Indeed, rule-abiding employers have become a major ally of trade unions in addressing non-compliance, since they have an interest in a level playing field and in ousting competitors who circumvent the rules. Cooperation has in a number of cases resulted in the setting up of bilateral commissions or compliance bureaux. In some cases, unions and employers jointly introduced certification procedures attesting proper observance of regulations. As an example, in Germany, a joint agency SOKA-BAU awards certificates to construction companies that have demonstrated compliance with collective agreements; enterprises can use this certification when tendering for public contracts (www.soka-bau.de/). Similarly, employers and unions in the Dutch TAW sector cooperate in the *Stichting Normering Arbeid*, a foundation that combats illegal agencies by setting up a certification procedure (www.normeringarbeid.nl/).

A third common strategy (although less evident in the TAW sector) has been to address outsourcers, clients and user companies which, as discussed earlier, play an important role in shaping job quality through the cost pressure they exert. Unions aim to reduce these pressures and their impact on working conditions. A key target has been public procurement, particularly relevant in the construction sector where many of the larger projects are publicly funded, but also in large cleaning contracts for ministries or municipalities and the use of TAW by public institutions. Unions have demanded

changes to procurement rules, for example, by introducing social clauses establishing minimum standards or requiring the application of sectoral agreements. They have also pressed local governments, schools and universities to abandon cost as the major selection criterion in tendering. For example, in Denmark, union pressure convinced municipalities to include social clauses in the procurement procedures, while in Germany most *Länder* have approved laws under which public contracts can be signed only with companies ensuring minimum standards of working conditions.

Unions have also targeted private ‘third parties’, denouncing the detrimental effects of the downwards competition they foster between subcontractors, cleaning companies or TAW agencies. For instance, in the cleaning sector, unions target large client companies through strikes, protests and media campaigns, demanding fair wages and working conditions. The German union IG BAU launched the campaign *Sauberkeit braucht Zeit* (Cleanliness needs time), which developed detailed catalogues on the time needed to clean a specific area in different kinds of building (sauberkeit-braucht-zeit.de/). This information could then be used in the tendering processes for cleaning contracts. Similar initiatives were carried out also by employers with the support of unions. An example is the guide for organizations awarding contracts for cleaning services promoted by the European Federation of Cleaning Industries. In the Netherlands, the unions mobilized cleaning workers at Schiphol airport, the main rail company and others, naming and shaming client companies that were unwilling to pay a decent price for cleaning services and interrupting their operations. These successful actions eventually resulted in a Code of Responsible Market Conduct in which employers, workers and third parties together take responsibility for the social dimension of work.

Unions increasingly put the issue on the bargaining table in the sectors or companies that are major users of TAW, aiming to regulate the conditions under which client companies can make use of these workers, the reasons for which TAW can be used, the maximum share of the workforce that can consist of TAW workers and their equal treatment in terms of pay and other conditions. Focusing on the user companies also allows workers in a sector where unionization is generally very low and unions are weak to draw on the organizational strength of unions in better organized sectors. For example, in Germany, the powerful metalworkers’ union *IG Metall* launched in 2008 a campaign aimed at the user companies, resulting in more than 1200 workplace agreements improving terms and conditions of agency workers. Following the example of the metal industry, the issue of TAW became a bargaining issue for unions in other sectors in Germany. Successful initiatives can also be observed in Denmark, Italy, Spain and the UK.

Fourth, across all cases, unions have tried to reduce precarious work by improving training and skill development opportunities, above all for less skilled workers. They consider upskilling a fundamental means to strengthen job stability, career prospects and working conditions. Since upskilling is also of interest to employers, cooperative actions have often been developed on this issue, in many cases resulting in increasing training rights for workers with atypical employment included in sectoral and company collective agreements. In the cleaning sector in Catalonia, a bargaining table was set up to develop a system of professional cleaner accreditation and re-qualification to allow workers to become specialists in certain techniques and methods, such as environmentally

sustainable cleaning. In the Italian TAW sector, a joint training fund (Forma.Temp) was established to support further training; it promotes and finances on-the-job training and more formalized basic and vocational training (www.formatemp.it/it/). However, these types of training initiative often involve workers with part-time and temporary contracts, and hardly ever address the dependent self-employed.

Sector-specific strategies

There are also differences in unions' responses to precarious work between sectors within countries, and similarities in types of actions in the same sector across countries. These sectoral differences are closely related to the sector-specific factors producing precarious work and to differences in the power resources of the sectoral unions.

In construction, a key union strategy has been to tackle the fragmentation of the supply chain and the resulting fragmentation of the workforce in terms of employer, employment status, working conditions and nationality. Unions have tried to reduce this fragmentation by ensuring a common basis of rights and conditions along the supply chain and on construction sites, limiting unfair competition between workers with different employers or from different countries. Compared to the other two sectors, unions in construction have much higher membership levels and hence more power resources to achieve their objectives. This is particularly evident in Denmark, the Netherlands, Germany and Italy. At the same time, in construction much more than in the other sectors, unions face complicated cross-border supply chains that are difficult to disentangle and to target.

Unions have tried to regulate the sector internally, above all through collective bargaining. They have used collective agreements to agree with employers on the regulation of certain aspects of outsourcing and sub-contracting. These agreements introduce social clauses, enforce workers' rights during transfers of undertaking, limit sub-contracting to specific operations (in Spain) or establish that sub-contractors cannot offer working conditions below the sectoral standards (as in Denmark, the Netherlands and Germany). The unions in most countries (Denmark, the Netherlands, Germany, Italy and Spain) have also attempted to establish or strengthen the responsibility of the main contractor along the supply chain so that the contractor would become responsible not only for the quality of work in its own company but also in the companies to which it directly or indirectly subcontracts. However, most attempts to establish mechanisms of supply chain responsibility have failed because they have been vehemently opposed by the employers, who argue that main contractors cannot control employer behaviour and the quality of work across supply chains made up of tens or even hundreds of (small) companies and self-employed. As a result, unions have turned to governments and parliaments, demanding legislation establishing supply-chain responsibility and guaranteeing minimum social standards in outsourcing and sub-contracting procedures.

Other union initiatives aimed at regulating the supply chain and reducing precarious employment include proposals to employers and governments for the introduction of certificates or similar documents detailing the sub-contracting and outsourcing practices within supply chains and attesting respect of minimum standards of wages and working conditions. Moreover, several construction unions have been arguing for personal

documents as instruments to map and monitor who is working where, employed by whom and under which conditions. As an example, the Dutch construction unions called for an identity card without which workers cannot enter construction sites; this should detail information on the construction worker, including the employing company, formal education and skills and if and where social contributions are paid. In this way, unions, employers and public authorities can better monitor who works on construction sites and exercise control over their wages, working conditions and social security entitlements. In Germany, IG BAU supported a similar proposal: an individual identity card for all workers, documenting employment status, working time and other relevant working conditions.

In the cleaning sector, one strategic union objective is to reduce the ‘invisibility’ of cleaners, usually dispersed and isolated across many different workplaces and working outside regular working hours, and to improve their wages and working conditions. These aims are considered of paramount importance in a sector with highly precarious work, low unionization and very weak (UK and Slovakia) industrial relations institutions. Unions have developed a series of campaigns to strengthen the mutual contacts and a common identity among cleaning workers, to increase their representation and voice, to recruit new members, to win public recognition and respect for the valuable contribution of cleaning workers to the economy and society, and to improve wages and working conditions. These activities constitute a mix of organizing campaigns, industrial action, collective bargaining, building alliances with local communities and social movements and public information campaigns. Sometimes they are supported by the national confederations, compensating for the lack of sectoral union power resources.

In the UK, the cleaning sector has been the target of a number such campaigns. A high-profile one, modelled on ‘Justice for Janitors’ in the USA (Simms, 2017; Wills, 2008), was the ‘Justice for Cleaners’ campaign in London, started in 2006 and strongly supported by local alliances with community organizations. Its key feature was to target both the organizations purchasing cleaning services and the provider companies; it employed more than 30 organizers, comprising many migrant workers. The main priority was to establish institutions of workers’ voice, and it used a variety of organizing tactics including protest meetings, demonstrations outside the buildings of the major clients, pressure on local authorities and media campaigns. By 2008, unions signed agreements with the four largest cleaning providers covering almost 55 percent of the office space in the zones targeted by the initiative, securing substantial improvements in terms and conditions. The campaign has been less successful in increasing union membership.

Also in other countries, unions carried out campaigns influenced by the US ‘organizing model’, even if they adopted it selectively (Thomas, 2016). Interesting examples are the campaigns launched by IG BAU: for instance, the campaign *Ich putze Deutschland* (I clean Germany) highlighted the value and importance of cleaning workers and underlined the need for better working conditions, and the campaign *Sauberkeit hat ihren Preis* (Cleanliness has its Price) had very similar objectives. Similar initiatives were launched in other countries, including Italy, Denmark and the Netherlands. In the latter case, the FNV devoted substantial resources, largely provided by the confederation, to organizing cleaning workers and increasing their visibility to the public at large. Its

campaigns were again strongly modelled on the 'Justice for Janitors' repertoire (Connolly et al., 2017; Knotter, 2017); at the heart of these campaigns were improved working conditions and respect for their work. They led to a 9-week strike in 2010, and two further strikes in subsequent years. It also resulted in the Code mentioned earlier, in a number of experiments with scheduling cleaning activities during regular working times and in the insourcing of several thousands of cleaners by public authorities.

In the TAW sector, the core issue underlying union action has been equal treatment, in accordance with national and EU norms and principles governing wages, working conditions and also entitlements to pensions and other elements of social security. Unequal treatment of TAW workers compared to their peers in permanent positions in the user company results from employer behaviour and from legal regulations. With significant similarities across countries, unions have been addressing this problem with two types of action: first lobbying their governments for legislation that strengthens the protection of TAW workers, their equal treatment compared to their regular co-workers and their access to social security benefits, including the proper transposition of EU regulations. Second, with the exception of Slovakia, unions have used collective bargaining and social dialogue at sectoral and agency level to improve the situation of precarious workers. Collective agreements serve both to clarify the rules and regulations governing the sector and to strengthen equal treatment and improve standards for the workers (Arrowsmith, 2009). They have generally resulted in more training and career opportunities, representation and voice possibilities and social benefits. The Italian and Spanish experience of social dialogue and collective bargaining in the TAW sector is considered best practice by the European service sector federation UNI Europa, as well as by its employer counterpart Eurociett. One of the objectives is to increase job security for workers: in Spain, the 2009 sectoral agreement established a minimum proportion (65 percent) of workers with open-ended contracts in agencies, and our case study shows that this rule was respected in most of them. In Italy, the 2009 agreement required agencies to hire a worker on an open-ended contract after 42 months of (even discontinuous) assignments. However, here it did not work so well and the 2014 agreement introduced additional incentives for job security.

In Italy, unions and employers also set up an extensive system of social protection, provided by a co-funded bilateral agency *Ebitemp*. This includes benefits for unemployment, maternity, childcare, health care and personal loans. In the Netherlands, the social partners established a joint foundation in 2007, the *Stichting Fonds Uitzendbranche*, financed by a contribution of 0.2 percent of the wage bill, which has assisted employers and workers with vocational training, improvement of working conditions and the proper implementation of the sectoral agreements. In these cases, as well as in many other countries, collective bargaining was favoured by a set of conditions, including pressure from the European institutions, the proactive role of the state in the definition of a regulatory framework and the limited fragmentation of union and employers' organizations. This partially compensates for the limited union membership and workplace presence.

However, as emerged from interviews, the unions manage to use collective agreements in the TAW sector only to reduce but not to close the gap with regular workers. For example, workers often still have to work for a longer period than their regular colleagues before they build up pension entitlements, they often have no access to bonuses

and other additional wage elements, they receive less training than their regular peers and they have only limited possibilities to enter permanent employment.

Conclusion

In this article, we have compared precarious work and related union strategies in three sectors across seven countries, discussing the types and sources of precarious work and the ways in which unions have been trying to reduce precariousness. Each sector has its own profile of precarious work that is remarkably similar across countries: temporary contracts and (dependent) self-employment in construction, marginal part-time work in cleaning and short-term work in the TAW sector. These types of work all entail, in distinctive ways, (relatively) low pay, insecurity, limited access to social benefits, limited representation and voice, limited training opportunities and/or high work intensity. These different types of precarious work are closely related to the distinct ways in which industrial and work organization are shaped in the three sectors: fragmented international supply chains in construction, short morning and evening shifts and isolated, ‘invisible’ work in cleaning and highly unstable and fragmented work in TAW. Nevertheless, the three sectors also share some common causes of precarious work, in particular the strong cost competition exerted by ‘third parties’ and the non-observance of rules and regulations by employers.

The similarities and differences across sectors are reflected in similarities and differences in union responses. Across countries and sectors, unions have targeted public and private third parties, aiming to relieve cost pressure on wages and working conditions and to foster socially responsible and worker-friendly market behaviour. Likewise, across all cases, unions have pushed for better compliance with rules and regulations laid down by law and collective agreement. In the latter, they have been cooperating closely with rule-abiding employers interested in a level playing field and with public authorities interested in strengthening the rule of law.

Sector-specific factors lead, however, to differentiation in union strategies. In construction the unions have tried to reduce supply chain fragmentation and its negative effects on wages and working conditions by better regulation and by strengthening the supply chain responsibility of the main contractor. In cleaning, unions have developed a variety of campaigns to reduce isolation, fortify the common identity of cleaning workers, strengthen representation and voice and gain public recognition and respect. In TAW, unions have focused on strengthening equal treatment for workers through lobbying for legislation, collective agreements and creating joint support institutions.

From this analysis, it can first of all be concluded that unions across countries and sectors emerge as collective actors that, contrary to the expectations of orthodox economists, do consider precarious workers as part of their constituency and do try to defend their interests. They have an inclusive approach towards precarious workers, aiming to stop the downwards pressure on wages and working conditions, to close the gap between their standards and those of regular workers and to limit the incidence of low-quality employment. Their approach is motivated both by the pursuit of social justice and by the protection of the interests of insiders. They pursue their objectives by exploiting traditional regulatory institutions (collective bargaining, statutory regulation), by setting up

new institutions and by protest, information and organizing campaigns. They also combine conflict and confrontation with negotiated and cooperative strategies, building alliances with employers and public actors where possible and useful.

Our research highlights the need to strengthen the sectoral dimension of comparative industrial relations (Bechter et al., 2012). Unions in the same sectors across countries face very similar challenges and develop very similar strategies to deal with these challenges. Between sectors, we observe certain similarities but also very substantial differences in institutional context, actor constellations, resources and repertoires of action. National institutional contexts are much less determinant of the extent and shape of precariousness, of union power resources and of union strategies than often assumed by institutionalists. Also, diversity between national systems seems much less important than often assumed (Baccaro and Howell, 2017), as sectors follow quite similar paths cross-nationally. The success of union strategies depends to a large extent on their power resources. However, where unions in a particular sector are weak, as in cleaning, power resources available in other sectors or at national level can be employed to fight precariousness in the sector.

Finally, the achievements of trade unions have undoubtedly contributed to slowing down the decline of job quality; we have documented a series of successful union initiatives. However, they have not been able to reduce precariousness in a comprehensive way. Indeed, in spite of their important efforts, their resources and capacity to shape the labour market remain constrained (Gumbrell-McCormick and Hyman, 2013; Pulignano et al., 2015), as evidenced by the increase in precarious work across countries and sectors.

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