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Union Strategies, National Institutions and the Use of Temporary Labour
in Italian and US Plants

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Abstract

This article analyses variation in the use of temporary labour based on a comparison of two plants of the same US automotive multinational corporation, one in Italy and the other in the United States. We argue that differences in the use of temporary labour are explained by union capacities to make trade-offs between alternative forms of flexibility as well as trade-offs in the protection of internal and external groups of workers. Union capacity is dependent on the availability of power resources within different national institutional environments. These resources are shown to influence not only the ways in which temporary workers are used but also bargaining outcomes — including employment conditions — benefiting them.

1. Introduction

Over the last 25 years temporary work has been increasing internationally. In the EU15 the share of temporary workers relative to total permanent employees increased from 10 per cent in 1990 to 15 per cent in 2007 (Burgoon and Dekker 2010). Temporary labour constitutes a flexible buffer for companies faced with uncertainty and/or order-related peaks. Moreover, it can also be an attractive way of reducing costs for employers: besides having less employment security than regular workers, temporary workers generally earn less, have less access to training and are often not eligible for social benefits (Appelbaum 1992; Kahn 2010; Kalleberg 2003).

Comparative research shows considerable variation both within and across countries in how the share of temporary jobs in total employment has evolved over time (Vlandas 2013), reflecting the diversity in national employment protection rules, different degrees of labour market regulation

and employment structures, *inter alia* collective agreements. More generally, the erosion of institutional inclusiveness in the last two decades due to the current economic, political and social transformations (Streeck 2009) helped liberalize the use of temporary employment in the sense of ‘commodifying institutions’ (Holst 2014). In addition, trade union strategies shaping both patterns and outcomes of temporary employment have been examined in an attempt to explain its use. On the one hand, the ‘insider-outsider’ argument claims that unions promote temporary work through their institutional involvement at national level and through sectoral and company-level collective agreements protecting their insider members at the expense of outsiders, thereby contributing to segmentation (Lindbeck and Snower 1988). This argument emphasizes the role of unions institutionally protecting permanent workers as a key explanation for differences in the way unions influence the use of temporary labour. Accordingly, temporary labour is seen as the alternative to external flexibility for permanent workers. On the other hand, extensive research also shows that unions, albeit with varied success, can attempt to influence external flexibility strategies by including temporary workers in collective agreements through campaigning and mobilizing (Carre´ *et al.* 1995; Gumbrell-McCormick 2011; van Jaarsveld 2004).

This literature provides evidence that unions can influence the level and form of temporary labour, and it sheds light on how unions exert this influence in different institutional

contexts. However, these studies typically either examine temporary work in isolation from other employment practices; or look at narrow trade-offs between a subset of external or internal flexibility practices. Little comparative research to date has explored how labour market institutions affect unions' broader strategies to gain influence over the multiple, interconnected forms of flexibility that make up a firm's 'employment system'.

This study addresses this question through an analysis of the strategies unions adopted towards the regulation of temporary labour within two plants of the same US automotive multinational corporation (MNC), one in Italy and the other in the United States. Findings show that Italian and US unions pursued different strategies in order to provide management with the demanded flexibility while retaining employees' control over their working conditions. These strategies reflected distinctive trade-offs between different internal and external flexibility practices. Italian unions traded external flexibility for job security for temporary workers, not opposing the use of temporary labour but instead engaging in bargaining aimed at compensating external with internal (including functional) flexibility for temporary workers. This helped to improve temporary workers' working conditions without affecting those of the permanent workforce. In contrast, the US union restricted the use of temporary labour, relying instead on permanent workers' external and internal flexibility, and extending entry options to

this category under flexible conditions.

The different outcomes for temporary labour in the two cases were the result of trade-offs strategically made by unions in their local negotiations

with management. These different union strategies were rooted in distinctive national collective bargaining and labour market institutional structures and workplace information and consultation (I&C) rights, which gave unions different power resources in negotiations over management practices. Thus, the study underlines the need to look at the local (plant) level to analyse how unions use heterogeneous resources to bargain trade-offs between internal and external flexibility in their attempt to influence the use of temporary labour; and what effects these have on both permanent and temporary workers.

More broadly, our findings suggest that although union strategies towards temporary agency work are related to and rooted in institutions, they belong to a series of interconnected, locally negotiated compromises — which, in turn, possibly reflect certain ‘beneficial constraints’ (Streeck 1997). By considering temporary labour as part of a broader ‘employment system’ (Katz and Darbishire 2000; Marsden 1999), the article looks at how institutions influence the aspects of this employment system over which unions have a certain amount of leverage.

The next section presents the relevant literature. This is followed by a description of the case studies, research design and methodology. The subsequent empirical findings are the basis for the comparative analysis and conclusion.

2. Institutions, management and strategic union approaches

to temporary labour

Scholars from different disciplines and research traditions have debated the influence of regulatory settings on management and union approaches to temporary labour. One body of literature focuses on how national institutions influence companies' use of temporary labour to achieve cost-related performance targets. Studies focus on two main institutional factors associated with the use of external numerical flexibility: national employment protection legislation for permanent and temporary workers and collective bargaining institutions.

First, employment protection regulations, whether enshrined in legislation or collective agreements, are widely considered to affect the use of temporary labour. The stricter the employment protection regulations, the more expensive and difficult it is to dismiss permanent workers — due to high severance payments and/or longer notification periods. Strong employment protection rules thus encourage greater use of external numerical flexibility in the form of fixed-term and agency workers. This is particularly the case in countries with weaker regulation of such contracts compared to permanent contracts. For example, van Jaarsveld *et al.* (2009) illustrate how the strong Dutch employment regulations discourage employers from using subcontracting in call centres. Comparing low- and mixed-protection economies, Shire *et al.* (2009) likewise illustrate that when regulations limiting temporary work are relaxed, opportunities emerge for companies to

expand

their temporary workforce. On the other hand, it can also be argued that differences in regulatory employment protection systems for temporary and permanent workers may have an indirect influence on the use of distinctive employment practices and their effect on working conditions. Marsden and Belfield (2010), for instance, found that, in the deregulated British institutional regime, incentive pay systems were less developed than in France, where conversely stronger employment protection legislation has prompted management to use incentive pay as a way of motivating people they cannot easily dismiss.

Second, the coverage and content of labour market institutions can influence the extent and forms of external numerical flexibility. For example, countries differ in collective agreement coverage and the extent to which similar pay structures are established across employment categories and sectors. Differences between European and non-European legislation regarding the 'equal treatment' of temporary workers may also affect incentives for using temporary labour. Moreover, despite the European directives on the equal treatment of temporary agency and part-time workers requiring national governments to adapt national laws to the new European legislation, studies still find cross-national differences in national regulations existing in Europe due to the inconsistent transposition of the directives (MacKenzie *et al.* 2010). These differences may also affect the cost advantages of companies using external numerical flexibility. Similarly, more

encompassing collective agreements can also limit the use of temporary agency work since they may affect the relative cost to employers of using different combinations of externalization strategies (Doellgast *et al.* 2013).

The above debate suggests that by impacting employers' cost advantages in the use of different forms of external flexibility, employment protection regulation and collective bargaining institutions can influence the use of temporary labour. However, research also shows that unions can cushion these institutional effects by developing strategies reducing the cost advantage of externalization for employers. These strategies vary in their approaches. One approach is for unions and their representatives to negotiate concessions reducing internal labour costs relative to external flexible groups. Doellgast and Berg (2014), for instance, illustrate how unions have responded to the widespread use of strategic benchmarking by employers, particularly in contracting relationships across different organizations, with concessions aimed at mirroring the flexibility provided by externalized labour. Concessions can apply to working conditions and pay, as well as to organizational flexibility (Eichhorst 2015; Pulignano and Keune 2015). Companies are interested in combining internal (functional) and external numerical flexibility (Cappelli and Neumark 2004; Lautsch 2002), meaning that there is little distinction in practice between permanent and temporary workers, both being closely integrated in work processes despite their differing status (Holst 2014). Evidence points to companies continuously

using temporary labour for the same kind of tasks as those performed by the permanent workforce (Benassi and Dorigatti 2014; Pulignano and Doerflinger 2013; Vidal and Tigges 2009).

This can result in intra-worker competition, a situation which unions prefer to avoid since it widens the scope for work intensification (Holst and Dörre 2013).

In a further approach, unions have attempted to reduce the cost advantages associated with external flexibility by organizing temporary workers or lobbying for legislation that closes the loopholes in equal treatment legislation (Jaehrling and Méhaut 2013). In contrast to ‘insider-outsider’ arguments claiming that unions encourage the use of temporary labour to defend the interests of the permanent workforce (i.e. their members), research has widely documented union involvement in national campaigns to organize temporary workers with a view to improving their working conditions, whether in different sectors (Benassi and Dorigatti 2014; Holtgrewe and Doellgast 2012; MacKenzie 2009; Turner 2009) or in different national settings (Greer and Hauptmeier 2008). Finally, alongside their main aim of improving pay and working conditions for flexible workers, trade unions can, through facilitating and extending the representation of temporary workers, attempt to directly influence management decisions on the use of temporary labour through collective agreements limiting the use of outsourcing and externalization (Bain and Taylor 2008).

Although the above-mentioned discussion illustrates that union strategies do greatly influence employers’ use of external numerical flexibility within specific institutional contexts, the current debate does not provide clear evidence on why and how.

Our study focuses on how institutions influence broader set of unions' strategies towards different forms of flexibility. In so doing, it highlights the importance of unions' ability to represent temporary workers as well as the local practices unions put in place as relevant when analysing the effects on workers' working conditions. We look at how unions bargain between internal and external flexibility, and what effects union practices have for both temporary and permanent workers. In the two countries examined, USA and Italy, management faces different institutional constraints influencing their cost-saving considerations for using temporary labour. Moreover, the strategies that unions can be expected to adopt in response to management strategies differ, as do union power resources. This is conceptually and empirically relevant because, as mentioned above, if companies are more consistent in combining functional and external flexibility for different types of workers, it is foreseeable that union strategies will develop over time in line with evolving employer choices, as will union bargaining power to accommodate or oppose these measures. Research on unions' influence on management's use of flexibility has so far only looked at either internal work organization flexibility or external temporary work flexibility. In the article, we examine whether (and how) unions influence different combinations of internal and external flexibility by making trade-offs between them, and what outcomes this produces for different groups of workers.

This suggests the need for more systematic comparative

studies of the micro dynamics of collective bargaining, with a view to analysing how unions

bargain locally on different forms of internal and external flexibility and to enhancing our understanding of the differences in their influence on temporary labour. We might expect the balance of power between labour and management to explain whether and how unions seek to influence the advantages of management resorting to the usage of temporary labour. In the case studies below, we examine this through an analysis of negotiations over flexibility in similar US and Italian automotive plants.

3. Case studies, research design and methodology

As case studies we selected two similar plants of the same US automotive MNC, one in Italy and the other in the United States. The fact that the two plants are similar allows us to keep a number of variables constant. Both plants operate as first-tier suppliers of an OEM (original equipment manufacturer) company, producing the same product for the same market. Sector-specific characteristics, such as the uncertain prospects of the automotive industry and the requirement to annually bring down product prices as first-tier suppliers, are similar. This incentivizes management to seek ways of achieving the flexibility needed to remain competitive. The two plants were inaugurated consecutively, in 1998 in Italy and in 1999 in the United States. They are located respectively in Turin and Detroit, both brownfield locations with a long

vehicle manufacturing tradition. Production in both plants is labour-intensive. Both factories are unionized and are similar in size: 199 employees in the Italian and 251 in the US plant.

Despite these similarities we also registered relevant differences between the two plants. First of all, the Italian plant uses more temporary labour, with its 68 temporary workers equal to 34 per cent of the overall workforce, while in the US plant temporary labour represents just 13 per cent of total headcount. Although the percentage of agency workers is similar in both plants (15 per cent in Italy and 13 per cent in the US), 38 fixed-term workers (19 per cent of the workforce) are employed in Italy, compared to none in the US plant. As for unionization, while union density is relatively high in both plants, in Italy both permanent and temporary workers are represented by trade unions, with 46 per cent of permanent and 21 per cent of temporary workers unionized. The *Federazione Impiegati Operai Metallurgici* (CGIL-FIOM) is the main union both in terms of membership and votes in union elections, followed by the *Unione Italiana Lavoratori Metalmeccanici* (UIL-UILM). Conversely, in the United States, agency workers are not represented by trade unions under the plant's union agreement, and the United Automobile Workers union (UAW) is the only recognized bargaining agent among regular employees, with full coverage both in terms of collective bargaining and union density. Another difference is related to pay. Looking at the median monthly wages of temporary and permanent workers, we found that the Italian workers earned

EUR 1,300 and 1,430 gross, respectively, while the comparable US figures were USD 1,936 and 3,256, in both countries for a 40-hour working week. The gap

TABLE 1

Case Study Plant Features		
	<i>Italian Plant</i>	<i>US Plant</i>
Parent company	American MNC company	American company
MNC		
Position in the automotive supply chain	First-tier	First-tier
Total employees (permanent + temporary)	199	251
Temporary workers	38 fixed-term (19% of the whole workforce); 30 agency (15%). Total percentage: 34%	32 agency workers, 13% of the total workforce
Trade unions	CGIL-FIOM; UIL-UILM	UAW
Union density	32%	70%
Union density permanent	Union density permanent	Union density permanent

temporarily	46%	100%
Nature of the labour process	21%	0%
Monthly gross wage	Standardized Temporary	Standardized Permanent
	1,300 euros	1,430 euros
		3,256 dollars
		1,936 dollars

Source: Own compilation.

TABLE 2

External and Internal Flexibility Practices at Plant Level				
<i>External flexibility</i>	<i>Italian Plant</i>		<i>US Plant</i>	
	<i>Permanent</i>	<i>Temporary</i>	<i>Permanent</i>	<i>Temporary</i>
		<i>(both agency and</i>		

	<i>fixed-term)</i>			
Protection from individual dismissal	High	Medium-High	High	Low
Protection from collective dismissal	High	Low	Medium-Low	Low
Internal flexibility				
Work processes	Standardized			Standardized
Standardized	Standardized			
Job rotation	High	High	High	
	Low Overtime availability		Medium-	
low leave rate	Medium	High	High	Sick-
	Medium	Medium-Low		Low
	Low			

in pay between temporary and permanent workers is thus much larger in the American plant than in Italy. Table 1 summarizes the main case-study plant features.

We looked at similar flexibility practices in both plants (see Table 2). With regard to external numerical flexibility for permanent workers these involved changes in headcount via

collective and individual redundancies.

Temporary labour already guaranteed external numerical flexibility due to the fixed duration of contracts. As to internal flexibility, we considered both functional and numerical flexibility. Its functional element consists of job rotation, related training and speed and quality of work in association with standardized production processes. Job rotation refers to workers being able to learn and perform different work within the assembly line. Overtime and sick-leave were also considered as forms of internal numerical flexibility, since they contribute to controlling labour input and costs. In particular, the inclusion of sick-leave reflects its increasing importance in terms of effective working hours, deriving from management concern to have sufficient assembly line workers to avoid disruptions to the production process. Moreover, how sick-leave is handled is considered an important factor in controlling labour costs (Taylor *et al.* 2010).

Empirical data were collected in 2010–2011,¹ with 47 interviews conducted in the two plants. In detail, we interviewed 19 managers and all three local union representatives in the Italian plant, and 22 managers and all three local UAW representatives in the United States plant. In addition to these 47 interviews, one representative of the employer associations, and two regional (territorial) union officials were interviewed in Italy and the United States. This empirical data was complemented by direct ethnographic observations and an analysis of official company and trade union documents, as well as sector- and company-level collective agreements.

Triangulation between the different data sources was used to verify data validity.

4. Temporary workers and the balance of external and internal flexibility: the Italian case

In Italy, an employer's advantage in using temporary work is primarily related to the fact that temporary workers provide external numerical flexibility since there are no restrictions on their hiring and firing, whereas permanent labour is highly protected with regard to individual and collective dismissal. Thus, the ability to quickly adjust the workforce to external market fluctuations is the main advantage associated with the use of temporary labour. On the other hand, it can be argued that cost savings from the use of temporary workers are relatively limited, as wages for temporary and permanent workers are very similar. The National Collective Agreement (*Contratto Collettivo Nazionale di Lavoro* or CCNL), specific to different economic sectors, equally applies to temporary and permanent workers, with some differences being established by company agreements. Equal treatment is based on the transposed EU Directives on Temporary Agency Work (2008/104/EC) and on Fixed-Term Work (1999/70/EC), and reiterated in the National Collective Agreements (*Contratto Collettivo Nazionale di Lavoro* or CCNL), specific to different economic sectors and equally applied to temporary and

permanent workers. Enforcement of the equal treatment principle means that there is little difference in the employment protection index (EPI) – calculated by the

OECD (2011 is the reference year) on the basis of legislation and collective bargaining outcomes – between permanent (3.3) and fixed-term and agency workers (2.71) in Italy, with the gap solely attributable to different ‘hire and fire’ regulations.

These equal treatment provisions meant that it was not possible for the Italian plant to save on direct labour costs through the use of temporary workers. However, the need for additional flexibility encouraged Italian managers to make significant use of temporary labour (34 per cent of the workforce have a fixed-term or agency contract). Generally engaged for periods of 2 years, temporary workers benefit from a two-step promotion path established by the 2010 plant-level agreement under which they work 1 year as agency workers, and then another year on fixed-term contracts, before joining the regular workforce. Temporary workers are first hired as agency workers because agencies can offer managers a preliminary screening of potential candidates.

These contractual provisions regarding temporary workers also derive from local union action. Local unions in Italy are endowed with robust I&C and bargaining rights for both permanent and temporary workers. In particular, the 2008 CCNL in the metal sector sets forth I&C rights with regard to temporary workers, thereby allowing local unions to monitor the number of temporary workers employed in the plant on a monthly basis. Under the CCNL, management is required, as part of its information obligation, to report the recruitment of such workers and their employment conditions, including their

promotion possibilities. Local unions have the right to express their opinion and have management respond to it under management's consultation obligation. Although consultation does not formally oblige management to decide in line with union wishes, it does represent an instrument through which unions can clearly express their position and engage in negotiations with the employer, prior to temporary labour being deployed in the plant. The result is that local unions can monitor and influence the extent of external numerical flexibility within the plant:

'Information and consultation rights allow us to monitor every month the presence of temporary workers and to understand managers' approach towards them. Although recruitment of temporary workers is formally a management prerogative, formal consultation rights over temporary workers allow us to control what happens on the shop-floor by making management hear our voice [...] letting them understand what we accept and what we don't and thereby giving us the capacity to negotiate locally with management over the working conditions of these workers' (UILM trade unionist, June 2010).

Local unions combine workplace involvement through I&C rights with their mobilization capacity to induce management to follow their recommendations on the use of temporary workers and so to bargain over it, with regard to both agency and fixed-term workers. The mobilization capacity of

local unions does not only relate to permanent workers but to temporary employees as well. In fact, 21 per cent of temporary workers within the Italian

plant are union members, a membership supported by the fact that local unions actively bargain to improve their working conditions. As a result, local unions have the potential to threaten management with collective action unless they enter into local negotiations on temporary workers' employment conditions, thereby reducing management scope to take unilateral decisions:

'We forced managers to improve temporary workers' job security by telling them that we would spread worker discontent if temporary contracts were not renewed' (FIOM trade unionist, July 2010).

For instance, local unions reacted decisively to the company's unilateral decision not to renew two temporary (of which one agency) contracts in July 2010 by talking with employees and pointing out the unfairness of the management action. Supported by their permanent peers, this led to temporary workers sabotaging production, in turn forcing managers to take them off the production line for the remaining period of their contracts. As recognized by managers themselves:

'Decisions on individual promotions of temporary workers should be taken by us on grounds of merit assessments. But when we decide not to renew a temporary contract or promote individual temporary workers, we need to inform and consult the

unions, and if we do not listen to them we know that they will create problems along the assembly line, making everything much more difficult (Italian manager, July 2010).

At other times, following consultation with management, local unions were able to reverse decisions on how temporary workers were used, as illustrated by the 2010 plant-level agreement introducing the above-mentioned two-step promotion path. At that time, the company was under pressure to cut prices yet ensure good quality. Management consulted with the unions who pointed out that, although perhaps financially not very attractive for management due to the equal pay principle, temporary workers could be an important factor for enhancing performance and company productivity, should they be given certain job guarantees. On the part of the unions, there was little concern regarding the growing number of temporary workers since they were paid at the same level as permanent workers and were covered by collective agreements, with CCNL provisions modifiable only through plant-level collective agreements. Their only concern was for the job security of temporary workers. In the local agreement, managers maintained their prerogative on temporary workers' single promotions, although local unions were to be consulted over such decisions:

'Over the last few years negotiations with the company have focused on temporary workers, with the aim of allowing as many

temporary workers as possible to eventually be given open-ended contracts, via two steps: from agency to fixed-term contracts, and then to open-ended contracts. It is a way through which people can get more stability in their job status and the company can also use this as a possibility to increase productivity and performance which are important for economic growth' (FIOM tradeunionist, July 2010).

This arrangement contributed to regulating how temporary labour was used in the plant by making its deployment subject to long-term employment considerations. It also helped local unions uphold regular employees' employment protection and working conditions in local negotiations. In 2010, when managers asked local unions for concession-bargaining over extended mandatory overtime, without additional compensation against job security for permanent staff, coupled with the threat of replacing permanent staff with temporary workers, local unions refused this concession on the grounds of their mandatory bargaining rights on possible plant-level changes to the CCNL. Local unions' refusal derived from the awareness that the two-step promotion arrangement for temporary workers favoured their promotion as permanent, making difficult the simple replacement of permanent workers with temporary ones:

'When managers asked us to increase mandatory overtime without additional compensation as a way to save the jobs of the permanent workforce, and threatened to substitute permanent with temporary workers, we knew from the beginning they could not do it as much as they wanted, because of the agreements we already had with them, enhancing 'job protection' guarantees for temporary labour as well' (FIOM trade unionist, June 2010).

Similarly, internal flexibility practices have been negotiated to further improve temporary workers' job security. Work organization is based on a job rotation system linked to

ergonomic and organizational needs, and on standardized workplaces requiring high output and quality. As bargained by local unions, temporary workers are incorporated into the job rotation system alongside permanent employees. Managers initially suggested deploying temporary assembly line staff according to contingency needs, without full rotation. However, local unions have collective bargaining rights established by the CCNL on safety requirements (of which job rotation is one aspect) with regard to the whole workforce. Bargaining with management on safety, local unions demanded the same job rotation system for all workers, pointing out that any other system would constitute an act of discrimination in violation of the law. They also made it clear to management that they would organize shop-floor protests should this principle not be respected:

‘Temporary workers cannot be discriminated against, so we encourage managers to apply the same job rotation principles to both temporary and regular workers, allowing temporary workers to enhance their skills and become important for the company [...]. We can control the correct application of the job rotation system given our bargaining rights on safety for all workers, and when managers do not respect them, we intervene along the assembly line’ (FIOM trade unionist, June 2010).

The unions’ aim was to strategically combine the use of temporary workers with job rotation, thereby allowing temporary workers to learn how to operate different work

stations. As mentioned above, this can be of interest to management as well, considering the equal pay principle established by national legislation. Although managers may prefer to locate temporary

workers where most needed to cope with sudden shifts in volumes, they also value people able to operate different work stations. It can be also argued that by learning how to operate different work stations temporary workers become like permanent employees, further incentivizing managers to take them on permanently. At the end of the day, both management and trade unions are thus interested in moving temporary agency workers onto permanent contracts:

‘There is no difference between regular and temporary workers as regards job rotation, they do the same work. Once the difficult initial period has gone by, temporary employees soon become like regular workers, doing the same rotation and acquiring the same skills. Wherever possible we retain and promote them’
(Italian manager, May2010).

As regards the internal numerical practices of overtime and sick leave, the CCNL contains provisions applying equally to temporary and permanent workers. It sets a maximum overtime limit of 250 hours per year, and requires overtime requirements to be communicated to workers and unions with sufficient advance notice. As to sick leave, workers continue to be paid and do not risk disciplinary action if their absence is justified by a doctor’s certificate. Temporary workers used to be more likely to accept overtime, even without prior notice, and their sick-leave rate was often lower than that of permanent staff because they wanted to impress managers. The regulation bargained by

local unions, favouring temporary workers' promotion, still induce the latter to be available in terms of internal numerical flexibility to impress managers and be promoted. But at the same time, the introduction of the two-step promotion path has meant that temporary workers are less concerned with satisfying managerial requests than they were in the past. The regulation bargained by local unions over temporary workers' external flexibility was also able to improve their working conditions in terms of internal numerical flexibility.

In short, by leveraging the distinctive features of the national employment regulatory context, including bargaining and I&C rights, Italian unions have managed to integrate temporary workers into the plant's broader employment system. This was accomplished through a local bargaining trade-off between different forms of flexibility – internal (i.e. functional and internal numerical) and external flexibility – which resulted in protections for both permanent and temporary workers. This involved, for instance, the inclusion of temporary workers in job rotation and overtime, while bargaining for better possibilities for them to move to permanent jobs. At the same time, this did not require permanent workers to give up control over their working time (i.e. overtime and the ability to take sick leave). Thus, in the Italian case local negotiations occurred without any major union concessions on the working conditions for permanent staff, while the conditions of temporary staff were enhanced. The overall outcome was that conditions were maintained or improved for the whole workforce.

5. Temporary workers as a source of external flexibility? The US case

In the United States, an employer's advantage in using temporary workers is related not only to external numerical flexibility as a way to help the company adjust rapidly to external market fluctuations but also to cost considerations. This is because certain laws protecting permanent workers, such as anti-discrimination provisions (the Fair Labor Standards Act) and workers' health and safety (Occupational Safety and Health Act – OSHA), do not always apply to temporary labour (Blanpain *et al.* 2008). Moreover, in the case of agency workers, the concept of 'co-employment' applied by US courts, under which temporary work agencies and client companies are co-employers of the agency worker, is often used by companies to hire agency workers to circumvent legal compliance obligations (Mitlacher 2007). The principle of equal treatment between temporary and permanent workers does not exist in the American context, as reflected by the very low EPI score of 0.33 for temporary workers calculated by the OECD. However, the United States similarly accords little employment protection to permanent workers, who can be easily dismissed in accordance with the 'employment at will' principle. This is again reflected in the relatively low EPI score of 1.17 for permanent workers. Trade unions are able to add additional contractual conditions via collective agreements to national labour market regulations once they have gained recognition at company

level. Union recognition is regulated by the National Labour Relations Act (1935). With regard to permanent workers, local unions have bargaining rights over pay and working conditions. In contrast, union representation of agency workers and related collective bargaining for this group are more complicated. In 2004, the National Labour Relations Board established that agency workers could only organize along with permanent colleagues when both the 'user company' and the agency agreed – an unlikely scenario (Stone 2006).

The weaker institutional coverage accorded to US temporary workers meant that, unlike in Italy, this group has significantly lower rights compared to permanent workers. Temporary workers are not covered by the plant's union agreement, they cannot be members of the union and the local union is not entitled to bargain over their employment conditions. Temporary workers earn US\$7.50 an hour less than permanent workers, and are not entitled to company benefits. This comes as no surprise in an institutional context where the union representation of agency workers is difficult and where the non-discrimination clause for different types of contracts is not enforced.

'We do not represent temporary workers, they are not part of the union and they are not covered by plant's collective agreement. We do not bargain for them on pay, overtime, training, anything' (UAW trade unionist, April 2011).

Not being covered by the plant's union agreement, temporary

workers are not protected by the grievance procedure against unfair individual dismissal, hence guaranteeing higher external numerical flexibility than permanent workers:

'Managers can hire and fire temporary workers as they like, they do not have any obligation towards us; they only have to respect what was agreed with the temporary labour agency' (UAW trade unionist, April 2011).

Despite permanent workers having both higher pay and stronger job security relative to temporary workers, American managers employ a lower number of temporary workers than the Italian plant (13 per cent of the total workforce) and for much shorter periods. This can be explained both by how the US union negotiated limits on the length of temporary workers' contracts, and by the concessions local unions granted to increase the numerical flexibility of permanent workers.

When they were negotiating the 2008 plant-level agreement, managers proposed not to set any time limits on the deployment of temporary workers. The local union saw this as putting greater pressure on permanent workers and increasing their risk of being replaced by temporary workers. Such a risk derives from the fact that local unions cannot rely on any I&C and bargaining rights over temporary labour deployment, which is also excluded from plant-level collective agreements. As a result, the local union attempted to restrict the employment of agency workers to 90 days via a strike authorization vote, after which managers have to decide to hire them permanently or dismiss them. If temporary workers would be dismissed, they could not be immediately re-hired through agency contracts. This proposal achieved more than 90 per cent approval from permanent workers. The threatening value of this vote was

enhanced by the fact that, as one trade unionist argued, all permanent employees, required to vote under the plant agreement, were union members:

‘Limiting the use of temporary workers in terms of time was crucial for us in the negotiation of the last plant-level agreement, otherwise after a while you would have only temporary workers working here [..] This is what management wants and unions do not have any ‘say’ in the plant. More than 90% of workers voted in favour of a strike [...] It was a good result‘ (UAW trade unionist, June 2011).

Local management can unilaterally decide to deploy temporary workers where most needed on the assembly line, with the result that they, in contrast to permanent staff, only rotate jobs to a limited extent (sufficient to safeguard health), that is, implying less training. This lower level of job rotation is also linked with temporary workers’ brief period of employment in the plant:

‘Temporary workers do not rotate like permanent staff. They are here for a brief period, they are not part of the union. Hence they go where there is more need along the assembly line’ (US trade unionist, June 2011).

Because they did not receive much training and were only employed for a short period of time, temporary workers were unable to develop the required skills. It is obvious that the union-negotiated time limit was meant as a way of stopping temporary labour competing with the permanent workforce on

an equal basis since the former were unable to develop appropriate skills and replace permanent skilled workers. As a consequence, management considered the deployment of temporary workers as problematic

for production volumes and quality despite their high availability in terms of overtime and their low sick-leave rate:

‘To have temporary workers can be a problem in terms of performance if they are employed for only 90 days. [...]. When they arrive the quality is negatively impacted because they are being trained to work properly, they must go slowly and then you have to teach them to go faster‘ (US manager, May 2011).

Though it was clear that temporary labour could guarantee high external numerical flexibility, at the same time temporary workers were low-skilled and of little use in meeting management demands for flexibility, despite their high internal numerical flexibility (i.e. overtime availability and low sick-leave rate). To ensure the flexibility demanded by management and to protect permanent workers' jobs and high pay, the local union negotiated the 90-day limitation on the use of temporary workers also in exchange for concessions over permanent labour external and internal flexibility. Accordingly, the 2008 plant-level agreement increased permanent workers' external and internal flexibility in comparison to previous local collective agreements.

These concessions were facilitated by the lack of sector-wide national agreements putting constraints on flexibility. Since the 2008 plant agreement no longer provided for the negotiated continuing payment of health insurance premiums for a certain period after collective redundancies, the local union did not

oppose the management decision to resort to collective redundancies in the case of market downturns without prior negotiation. This happened in June 2011 when the assembly line supplying with General Motors closed down, resulting in 40 people being laid off without any prior negotiation. Similarly, the local union accorded managers a high level of internal flexibility with regard to the deployment of permanent workers, allowing the use of mandatory overtime without any threshold or advance notice to cope with market fluctuations. Moreover, the 2008 sick-leave scheme entitles workers to two (unpaid) certified absences a year; beyond that number even certified absences count towards disciplinary sanctions. Before the 2008 plant-level agreement, certified absences were unpaid but could not result in disciplinary sanctions, regardless of their number. As a result of the new sanctions, the plant now has a low sick-leave rate. Overall, these 2008 provisions had the effect of making permanent workers highly flexible, thereby eroding their working conditions:

‘Regular workers are highly flexible here. They can be dismissed easily in case of market downturns, without negotiation with the unions; they also give overtime as mandatory and without any limits. Why? We have to [...] flexibility has to come from somewhere because we need to satisfy our client’s requests – it goes without saying that we cannot shut down their operations [...]. Absenteeism is low, discipline is strict. We have accepted the plant’s policy because we have shared the factory’s need to

have all the people, every day, on the shop floor, in order to successfully meet the production requests under a just-in-time production organization' (UAW trade unionist, April 2011).

Naturally the high numerical flexibility assured by permanent workers in terms of overtime and low absenteeism is functional to satisfy company's needs. So managers consider their employment in the plant to be attractive:

'In the USA, even regular workers are flexible. It's not like Europe. They do not have so much protection. They have to be available in terms of overtime, production needs, and if they do not behave properly there are disciplinary sanctions' (US manager, April 2011).

As one US manager argues, permanent workers are not only flexible but also guarantee better performance by virtue of their higher job rotation and training:

'I would say that permanent employees are flexible and also more skilled and committed than temporary ones. Nothing against temps, but I think that permanent workers are more skilled and committed because they know the work process, they have respect for the job, for the employer, while temporary workers have not acquired that yet' (US manager, June 2011).

Within a context of weak employment protection and wage inequality between temporary and permanent workers, the absence of I&C and bargaining rights for the temporary workforce contributed to reducing US unions' local bargaining power over management decisions on temporary labour. At the

same time, to limit the threat coming from the use of temporary workers, permanent workers have seen their working conditions eroded by enhanced levels of flexibility. Hence, the outcome was a relative reduction of the working conditions for everyone, despite the fact that the increase in the flexibility of the internal workforce was associated with union attempts to safeguard permanent workers' jobs and their high pay on the one hand, and strict contractual limits on the use of temporary workers on the other hand.

6. Comparison and analysis

The central question we sought to answer was why, in two similar plants of the same automotive company, one in Italy and the other in the United States, we found temporary labour used in such different ways. Though embedded in two institutionally different national contexts, similarities exist between the two cases with regard to management strategy. In both plants, managers are required to deploy labour in a cost-effective manner, making use of strong external and internal (including functional) flexibility practices. While this similarity is not surprising given the demand volatility and high competitiveness inherent to the automotive sector, it increases the relevance of the contrast uncovered between the two plants with regard to their use of temporary labour.

Looking at the findings presented above, we arrive at two conclusions. The first relates to the influence of national

employment regulatory institutions on local union strategies
and bargaining power regarding the external and

internal flexibility of different groups of workers, while the second refers to the outcomes of these strategies for workers and their working conditions.

Looking at the relation between national institutions and local union strategies and bargaining power, distinctive national collective bargaining institutions in Italy and the United States have provided local unions with very different power resources for use in plant-level negotiations. As a result, local Italian and US unions pursued different strategies to provide management with the required flexibility. These strategies saw trade-offs being made between various external and internal flexibility practices for both temporary and permanent workers, and the protection of these workers. In Italy, local unions used power resources based on local I&C and bargaining rights covering temporary workers and on sector-wide collective agreements applying to different groups of workers and not modifiable without local unions' consent. In a context where the majority of temporary workers are unionized and paid at a similar level to permanent workers (see Burrioni and Carrieri 2013 for a national-level overview), the above-mentioned rights have given unions major room for manoeuvre in local negotiations. Union bargaining power has been enhanced by union involvement in decision-making processes on flexibility policies, supported – though not exclusively – by their capacity to mobilize the whole workforce. These institutional resources were leveraged by local unions in the Italian plant within a comprehensive collective bargaining

strategy over external and internal flexibility, specifically for temporary workers, since permanent workers are well-protected and can act in solidarity with the temporary workforce:

'Moreover, temporary workers are members of the union, so we bargain on their behalf primarily with the aim of getting them into permanent positions and improving their working conditions. We consider them part of our collective bargaining strategy, and permanent workers also act in solidarity with them' (FIOM trade unionist, July 2010).

Local unions have bargained longer temporary contracts with a defined 2-year route to a permanent job while also providing temporary workers with job rotation and training opportunities similar to those applicable to permanent workers. This has helped make the promotion of temporary workers attractive for management as well. Temporary workers have ended up being more advantageous in the Italian plant because unions bargained local flexible arrangements assimilating them with the permanent workforce in terms of skills and commitment, while also providing sufficient external numerical flexibility in comparison to permanent workers. This is because temporary workers can be dismissed more easily and offer higher overtime availability and lower sick-leave rates than permanent employees.

Conversely, in the United States, the principle of equal treatment between temporary and permanent workers is established neither in legislation nor in the plant-level agreement, and national collective bargaining institutions

inhibit the union workplace representation of temporary workers, in particular, agency workers. As a result, local unions do not represent temporary workers and have no I&C rights regarding their deployment, which

is totally subject to unilateral management decisions. On the other hand, it can also be argued that the absence of sector-wide agreements makes permanent workers' pay and working conditions more dependent on local power relations and market forces (Godard 2009). Because permanent workers are not granted employment protection, they are easily replaceable by temporary workers if they do not offer sufficient flexibility. In the US plant, the local union strategically leveraged the permanent workforce's bargaining rights and its workplace mobilization capacity to establish a time limit for the deployment of temporary workers by management. In doing so, they were able to make temporary workers less attractive, since the time limit ensured they remained low skilled and hence less likely to replace permanent workers. Also, by making the permanent workforce almost as numerically flexible as temporary labour via concessions on job security, working time and sick leave, unions were able to influence the cost advantages of management's use of temporary workers.

'When we unionized the company we gained the possibility of bargaining with managers only for our members (i.e. regular workers). [...]. We know we usually give concessions to managers, but this has been necessary to limit temporary workers' presence and to ensure the flexibility needed to keep the plant competitive [...] this implied increasing flexibility regarding the use of permanent staff' (UAW trade unionist, June 2011).

This comparative analysis shows that national institutions influenced unions' bargaining strategies on internal and external flexibility in the two cases, leading to different outcomes – particularly for temporary workers. This brings us to the study's second conclusion concerning the implications of local union strategies for temporary and permanent workers' job security and working conditions. The Italian agreements were of greater value for both temporary and permanent workers, guaranteeing higher job security for the temporary workforce and exerting greater control over the working conditions of both permanent and temporary workers in terms of overtime and sick leave. Moreover, temporary workers in the Italian plant have practically the same skill levels as their permanent counterparts, and benefit from a clear route to permanent jobs, while in the US plant temporary workers have low skill levels and promotions are based on management discretion. American permanent employees are the best paid of the employee groups compared here, but there is also much more pay disparity between the temporary and permanent workforce in the US plant. Italian agreements can consequently be seen as more successful in terms of preserving good employment conditions for all groups of workers, without a need for unions to negotiate concessions. We argue that these contrasting outcomes are also due to differences in power resources available to unions in the two case studies. Italian collective bargaining institutions gave workers greater collective power to shape the employment system, in a way

that guarantees managers the external and internal flexibility they need, but that also limits job insecurity and inequality between different groups of workers. Local US unions had weaker bargaining

rights and less encompassing bargaining structures. At the same time, despite the weaker character of the institutional employment regulatory context, local US unions were successful in reducing the cost advantage of using temporary labour. The attractiveness of employing temporary workers, high in terms of pay and external numerical flexibility with regard to individual dismissals, is greatly reduced by the limited skills they can develop. This is because local US unions negotiated a 90-day limit on the use of temporary workers. As a result, temporary workers do not benefit from a route to promotions or from skill development. On the other hand, permanent workers, despite the concessions granted to management, are protected as regards their skills by the above-mentioned time limit, and additionally receive high pay and cannot be dismissed unfairly on an individual basis.

7. Conclusion

Our study has examined how institutions influence the trade-offs that unions make as they negotiate over employers' use of internal and external flexibility strategies, based on a comparison of two similar manufacturing workplaces in Italy and the United States. We argue that national labour markets institutions have direct effects not only on the strategies employers adopt to differentiate pay and flexibility between permanent and temporary workers, but also on the strategies of unions as they

seek to affect the overall employment system that firm pursue. This contributes to past literature on union influence on temporary labour. Previous studies have argued that unions often seek to reduce the cost advantages of externalization by pursuing different strategies, including extending bargaining to temporary workers and organizing them; or alternatively negotiating concessions for the core workforce. However, there is disagreement on why unions adopt approaches that are more or less inclusive of different groups of workers. Our study demonstrates that national institutions can provide different power resources to unions, which, in turn, influence the trade-offs that unions make as they negotiate with employers concerning their use of internal and external flexibility strategies. The form that these trade-offs take have implications for the working conditions of different groups of permanent and temporary employees.

The findings from this study add to a growing body of evidence concerning the central role that union strategies can play in influencing how employers use external numerical flexibility, and the effects of institutional context on these strategies (e.g. Benassi and Dorigatti 2014; Pulignano and Doerflinger 2013). Our study shows that internal and external forms of flexibility need to be seen in connection with each other to understand how unions influence temporary work. We consider temporary labour as part of a broader employment system, in which a range of internal (including functional) and external flexible practices are locally negotiated between

management and union representatives. Unions influence the broader employment system of flexible practices for both temporary and permanent workers by using specific

and heterogeneous power resources, distinct to each institutional context. Local agreements in both the US and Italian plants affected the mix of these practices, hence influencing the cost advantages associated with the deployment of each group of workers by creating different incentives for management to use combinations of temporary and permanent workers. Whereas in the Italian plant, temporary workers became more attractive as the result of the union bargaining on internal (inclusive functional) flexibility for them without incurring concessions for the permanent workforce, in the United States, union negotiations made temporary labour less attractive while enhancing the numerical flexibility of the permanent workforce through concessions. Moreover, the negotiated outcomes for employees' working conditions differed, as a result of the Italian institutions giving workers more collective power to shape the employment system, but also contributing to better limit insecurity and inequality between different groups of workers.

Hence, we need to comprehensively consider the whole 'employment system', determine where unions have leverage, and look at the way in which institutions influence the different aspects of this employment system, in order to understand differences in unions strategies and negotiation success. Within this employment system, companies and workers organize their mutual relationship, protecting both parties from certain kinds of opportunistic behaviour (Marsden 1999). One particularly interesting insight is that the Italian unions helped to improve

the skills and internal flexibility of temporary workers, hence making them more attractive and productive for management and boosting their employment security within the plant. This suggests that one cannot understand the union approach towards temporary work without contextualizing it within the nature of the employment relationship, at the core of the employment system. An analysis of the dynamics of the employment system is thus essential to understanding the shifting negotiated balanced (compensated) trade-off between internal and external flexibility among different groups of workers. A comparative analysis allows an examination of the conditions enabling local unions, within two different institutional contexts, to influence management use of temporary labour.

Generalization of the findings of this study to the two countries examined is necessarily limited by the specific features of our investigated cases — both unionized manufacturing plants, where unions are relatively strong. However, they do point to certain implications for theory and policy that can be more broadly tested in future research. Specifically, our study shows that unions can reduce workforce segmentation under specific circumstances. In Italy, in particular, where unions had the collective power to resist management's unilateral flexibility policy, and where unions were able to represent temporary workers, the employment conditions of neither temporary nor permanent staff were eroded. Instead the position of temporary labour was upgraded through

promotion paths and job security.

Findings also contribute to debates in comparative employment relations and political economy, demonstrating the value of incorporating the micro power dynamics of collective bargaining and organizational strategy into any

analysis of labour market segmentation patterns (Benassi 2013; Lillie 2012). Specifically, the findings presented here illustrate that, by regulating the use of different forms of flexibility in local bargaining with management, unions have the ability to influence decisions on temporary labour while at the same time positively influencing the working conditions of the workforce as a whole.

Final version accepted on 31 March 2015.

Acknowledgements

We thank the three reviewers for the relevant comments on an earlier version of this article. We are very much grateful to the editor Virginia Doellgast for the constant guidance and insightful feedback provided during the review process.

Note

1. For an overview of the broader study on which these data are based, see Signoretti (2014).

References

Appelbaum, E. (1992). 'Structural change and growth of part-time and temporary employment'. In V. L. duRivage (ed.), *New Policies for the Part-Time and Contingent Workforce*. New

- York: M. E. Sharpe, pp. 1–14.
- Bain, P. M. and Taylor, P. (2008). ‘No passage to India? Initial responses of UK trade unions to call centre offshoring’. *Industrial Relations Journal*, 39 (1): 5–23.
- Benassi, C. (2013). ‘Political Economy of Labour Market Segmentation: Agency Work in the Automotive Industry’. ETUI Working Paper 2013.06.
- and Dorigatti, E. (2014). ‘Straight to the core: the IG Metall campaign towards agency workers’. *British Journal of Industrial Relations*, doi: 10.1111/bjir.12079.
- Blanpain, R., Corbett, W. R., Zimmer, M. J., Bisom-Rapp, S. and Josephs, H. K. (eds.). (2008). *The Global Workplace*. Cambridge: Cambridge University Press.
- Burgoon, B. and Dekker, F. (2010). ‘Flexible employment, economic insecurity and social policy preferences in Europe’. *Journal of European Social Policy*, 20 (2): 126– 41.
- Burroni, L. and Carrieri, M. (2013). *Bargaining for Social Rights (Barsori). Country Report: Italy*. University of Teramo, unpublished.
- Cappelli, P. and Neumark, D. (2004). ‘External churning and internal flexibility: evidence on the functional flexibility and core-periphery hypotheses’. *Industrial Relations*, 43 (1): 148– 82.
- Carré, F. J., duRivage, V. L. and Tilly, C. (1995). ‘Piecing together the fragmented workplace: unions and public policy on flexible employment’. In L. G. Flood (ed.), *Union and Public Policy*. Westport, CT: Greenwood Press, pp. 13–34.

Doellgast, V. and Berg, P. (2014). 'Negotiating flexibility: external contracting and internal working time control in German and Danish telecommunications firms'. Draft Unpublished Paper.

- , Sarmiento-Mirwaldt, K. and Benassi, C. (2013).
Alternative routes to good jobs in the service economy. Final
Project Report ESRC-Grant RES-061-25-0444.
- Eichhorst, W. (2015). ‘The unexpected appearance of a new
German model’. *British Journal of Industrial Relations*, 53
(1): 49–69.
- Godard, J. (2009). ‘The exceptional decline of the American
labor movement’.
Industrial and Labor Relations Review, 63 (1): 82–108.
- Greer, I. and Hauptmeier, M. (2008). ‘Political entrepreneurs
and co-managers: labourtransnationalism at four multinational
auto companies’. *British Journal of Industrial Relations*, 46
(1): 76–97.
- Gumbrell-McCormick, R. (2011). ‘European trade unions and
“atypical” workers’.
Industrial Relations Journal, 42 (3): 293–310.
- Holst, H. (2014). ‘Commodifying institutions: vertical
disintegration and institutional change in German labour
relations’. *Work, Employment and Society*, 28 (1): 3–20.
- and Dö rre, K. (2013). ‘The revival of the German
model? De-standardization of employment and work and the
new labour market regime’. In M. Koch and M. Fritz (eds.),
*Non-Standard Employment in Europe: Paradigms, Prevalence
and Policy Responses*. Basingstoke: Palgrave Macmillan, pp.
132–49.
- Holtgrewe, U. and Doellgast, V. (2012). ‘A service union’s
innovation dilemma: limitations on creative action in German

- industrial relations'. *Work, Employment and Society*, 26 (2): 314–30.
- Jaehrling, K. and Méhaut, P. (2013). 'Varieties of institutional avoidance: employers' strategies in low-waged service sector occupations in France and Germany'. *Socio- Economic Review*, 11 (4): 687–710.
- Kahn, L. M. (2010). 'Employment protection reforms, employment and the incidence of temporary jobs in Europe: 1996–2001'. *Labour Economics*, 17 (1): 1–15.
- Kalleberg, A. L. (2003). 'Flexible firms and labour market segmentation: effects of workplace restructuring on jobs and workers'. *Work and Occupations*, 30 (2): 154–75.
- Katz, H. and Darbishire, O. (2000). *Converging Divergences: Worldwide Changes in Employment Systems*. Ithaca, NY: Cornell University Press.
- Lautsch, B. A. (2002). 'Uncovering and explaining variance in the features and outcomes of contingent work within firms'. *Industrial and Labor Relations Review*, 56 (1): 23–43.
- Lillie, N. (2012). 'Subcontracting, posted migrants and labour market segmentation in Finland'. *British Journal of Industrial Relations*, 50 (1): 148–67.
- Lindbeck, A. and Snower, D. J. (1988). *The Insider-Outsider Theory of Employment and Unemployment*. Cambridge, MA: MIT Press.
- MacKenzie, R. (2009). 'Union responses to restructuring and the growth of contingent labour in the Irish telecommunications sector'. *Economic and Industrial Democracy*, 30 (4): 539–63.

———, Forde, C., Robinson, A., Cook, H., Eriksson, B., Larsson, P. and Bergman,

A. (2010). 'Contingent work in the UK and Sweden: evidence from the construction industry'. *Industrial Relations Journal*, 41 (6): 603–21.

Marsden, D. (1999). *Theory of Employment Systems: Micro-Foundations of Societal Diversity*. Oxford: Oxford University Press.

——— and Belfield, R. (2010). 'Institutions and the management of human resources: incentive pay systems in France and Great Britain'. *British Journal of Industrial Relations*, 48 (2): 235–83.

- Mitlacher, W. L. (2007). 'The role of temporary agency work in different industrial relations systems – a comparison between Germany and the USA'. *British Journal of Industrial Relations*, 45 (3): 581–606.
- Pulignano, V. and Doerflinger, N. (2013). 'A head with two tales: trade unions' influence on temporary agency work in Belgian and German workplaces'. *The International Journal of Human Resource Management*, 24 (22):4149–65.
- and Keune, M. (2015). 'Understanding varieties of flexibility and security in multinationals: product markets, institutions variation and local bargaining'. *European Journal of Industrial Relations*, 21 (1): 5–21.
- Shire, K. A., Mottweiler, H., Schö nauer, A. and Valverde, M. (2009). 'Temporary work in coordinated market economies: evidence from front-line service workplaces'. *Industrial and Labor Relations Review*, 62 (4): 602–17.
- Signoretti, A. (2014). *Fabbriche globali. Un confronto fra Torino e Detroit*. Bologna: ilMulino.
- Stone, V. W. (2006). 'Legal protections for atypical employees: employment laws for workers without workplaces and employees with employers'. *Berkeley Journal of Employment and Labour Law*, 27, UCLA School of Law, Law-Econ Research PaperNo. 06-12.
- Streeck, W. (1997). 'Beneficial constraints: on the economic limits of rational voluntarism'. In J. R. Hollingsworth and R. Boyer (eds.), *Contemporary Capitalism: The Embeddedness of Institutions*. Cambridge: Cambridge University Press, pp. 197–

- (2009). *Re-Forming Capitalism: Institutional Change in the German Political Economy*. Oxford: Oxford University Press.
- Taylor, P., Cunningham, I., Newsome, K. and Scholarios, D. (2010). “‘Too scared to go sick’ – reformulating the research agenda on sickness absence’. *Industrial Relations Journal*, 41 (4): 270–88.
- Turner, L. (2009). ‘Institutions and activism: crisis and opportunity for a German labor movement in decline’. *Industrial and Labor Relations Review*, 62 (3): 294–312.
- van Jaarsveld, D. (2004). ‘Collective representation among high-tech workers at Microsoft and beyond: lessons from WashTech/CWA’. *Industrial Relations*, 43 (2): 364–85.
- , De Grip, A. and Sieben, I. (2009). ‘Industrial relations and labour market segmentation in Dutch call centres’. *European Journal of Industrial Relations*, 15 (4): 417–35.
- Vidal, M. and Tigges, L. (2009). ‘Temporary employment and strategic staffing in the manufacturing sector’. *Industrial Relations*, 48 (1): 55–72.
- Vlandas T. (2013). ‘The politics of temporary work deregulation in Europe: solving the French puzzle’. *Politics & Society*, 41 (3): 425–60.