

# **Unions between national politics and transnational migration: A comparison of Germany, UK and France**

Guglielmo Meardi

Paper for the SASE Annual Meeting, Milan, 2013

## **Abstract**

The paper compares the evolution of union responses to immigration in the three largest EU countries, representing different state traditions. It stresses how common pressures in terms of vulnerability and precarity of temporary immigrants are dealt with by unions in ways that are framed by national political traditions with regard to citizenship and industrial relations. There are similarities across countries with regard to a general, pan-European openness to migration, but the ways unions deal with mobilisation, diversity and migration policies differ substantially and are shaped, directly or indirectly, by national political traditions.

## **Introduction**

Despite traditional views of unions as restrictive ‘insiders’, in both North America and Europe unions have increasingly taken on an advocacy role for migrants. Increasing similarities in this general trend have been noticed between US, UK, France and Germany (Turner et al. 2013). The agreement between AFL-CIO union confederation and the Chamber of Commerce on proposals for the regularisation of up to 11m undocumented migrants in the US in March 2013 shows strong similarities with concerted migration policies in continental European countries. However, a closer look shows enduring national differences on the ways unions engage with immigrant workforces: it is only in some of the European countries, in particular, that they have explicitly campaigned for regularisation.

The paper discusses about the implications of migration, and in particular recent transnational migration, for trade unions, and how national traditions may mediate them. It will then describe recent developments in the three largest European Union (EU) countries (Germany, UK, France) in union response to labour migration. It is argued that, on this topic, the often highlighted and praised union agency, revitalisation and transnationalism are in fact still framed by national political traditions.

## **Unions and migrants in Europe**

Over the last twenty years, debates on labour market reforms in Europe have often referred to an ‘insider-outsider’ divide. According to this perspective, western European trade unions, and in particular protecting their role in centralised collective bargaining, as well as maintaining and enforcing employment protection of their members, acts as potential obstacles to the employment opportunities available to ‘outsiders’ such as migrants. This divide was reflected in legal rulings by the European Court of Justice in 2007 and 2008 on four seminal cases: the so-called ‘quartet’ of Laval, Viking, Ruffert and Luxembourg. The outcome of these was that to make illegal industrial action or collective agreements reached by unions if they affected the freedom of movement of services from new EU member states.

However, Palier and Thelen (2000) have argued that dualisation between secure and insecure workforce stems from the weakening of trade unions, rather than from their intentional protection of insiders. In fact, the major European trade union organisations proactively support the rights of migrant workers and are generally in favour of the free movement of labour. Their official openness may be explained by a number of factors: their process of internationalisation; the risk that restrictions may lead to undocumented immigration and the rise of illegal and informal work; the entrenchment of the human rights discourse; the need to recruit new members (Pennix and Rosbald, 2000; Avci and McDonald, 2000; Haus, 2002; Watts, 2002; Erne, 2008). However, these commitments take different forms in practice, depending on the intersection between these issues and local factors.

Some have opposed the opening of unions to the free movement of intra-EU migrants in the 'Liberal Market Economies' of UK and Ireland to the caution of their counterparts in Germany and Austria (Krings, 2009; Menz, 2008; Crul and Vermeulen, 2006). Yet the relationship between Varieties of Capitalisms and migration is not simple, and conflicting interpretations have emerged. Menz (2008) proposes that Bismarckian welfare states (more reliant on employment-related funding) face more serious challenges from migration than liberal and Mediterranean welfare states, which are more reliant on taxation and therefore 'pool' financial uncertainty better. However, Messina et al. (1992) expect liberal labour markets and welfare states to foster the development of solidarity along national lines and therefore ethnic conflict.

Over the last decade, new migration has been associated with additional labour market flexibility, turning often into precarity and vulnerability (Raess and Burgoon 2013). In 2007, before the global financial crisis, immigrant employees in the EU were more than twice as likely to be in temporary contract than nationals (EC, 2008, 71) and suffered from a 4-point higher unemployment rate (EC, 2008: 67). With the crisis, immigrants have also suffered more frequently from job losses, especially in Ireland, UK and Spain.

The link between flexibility and migration is also made at the policy level. Tamar Jacoby, President of the pro-immigration lobbying group 'Immigration Works USA', visited Germany in 2010 and advised Angela Merkel that migration is only beneficial if combined with labour market flexibility (especially wage downward flexibility) and restrictions to welfare entitlements (Akrap, 2010). From this perspective, the increase of new immigration can be seen as a factor for the 'Americanization' of European labour markets. It is therefore likely that trade union reactions will differ depending on the kind of labour market regulations and welfare state provisions that prevails in their country.

A similar argument is made by Marino (2012), in a Netherlands-Italy comparison. Marino suggests an inverse relation between union institutional 'embeddedness' (and therefore security) and propensity to organise migrants, which is broadly consistent with the established idea that organising is a necessity in countries like the USA but not in corporatist countries. In addition, according to Marino 'class', social movement and Social Catholic orientations of unions in Latin countries translate in a political commitment to the whole workforce. However, data from the European Social Survey indicate that the gap of unionisation between immigrants and natives in corporatist countries is actually smaller than in those with weaker workplace rights and less encompassing sectoral structures, although this also reflects the different migration cycle (age) in each country (Gorodzeisky and Richards, 2013). Secondly, ideological commitment to internationalism and class unity in Southern Europe has often coexisted with particularly deep labour market segmentation and migrant segregation, raising the question of how ideals are translated into practice.

Overall, there is still no clear historical confirmation of a link between welfare states, varieties of capitalism and union approaches to migration (Penninx and Roosbald, 2000). Recent comparative research has struggled to account for national differences, stressing instead similarities (Turner et al, 2013) or variation by sector more than by country (Hardy et al., 2012). Migration's inherently political definition, though, is intimately linked to the political traditions of each country, and the terms of the debate display significant differences.

In this paper, the link between European national traditions and union responses to immigration is tested in a more systematic way, combining two sides of the labour migration issue: state traditions of labour relations, and state traditions of citizenship and immigration.

### **States traditions of industrial relations and citizenship**

In terms of labour relations, the role of state traditions has been best analysed by Crouch (1993). Crouch argues that where pre-industrialisation traditions of guilds' adopting a regulatory role has not been interrupted (mostly in Central Europe), corporatism still prevails, in contrast to countries where guilds never existed or have been disrupted by the State (as in France) or by free trade (as in Britain). Secondly, in countries where the State has engaged in a struggle with the Catholic Church in particular, deep ideological divisions and pluralism of competing trade union organisations subsequently emerge in the labour movement.

In terms of immigration and citizenship regimes, the authors who stress the existence of national models (e.g. Brubaker, 1992; Schnapper, 1992) distinguish between states based on the idea of community, in particular blood and language bonds, and those based on an individual contract. Three 'models' have been identified; these are represented, even if not completely, by France, Germany and the UK (or in some cases the USA). The relatively young German state was created in 1866-70 and is based on a pre-existing concept of nation defined by language (*das Volk*); as a result, citizenship has long been defined (since the Delbrück Law of 1912) by *ius sanguinis* (right of blood): ethnic Germans have right to citizenship even if from communities that have lived in Romania or Russia for centuries, while children of immigrants, born in Germany, have no automatic right to German citizenship (Hoffmann, 1990). The French state, by contrast, is rooted in the Revolution of 1789 and the Republican ideals of equality and freedom: the French people are therefore defined by politics, rather than by language or ethnicity, and *ius soli* (right of soil) has prevailed since 1889 to define citizens. The French *République* has an ontological priority over the people in France, as the French people itself, as citizenship, is constructed by the 'Republic' and the act of the Revolution, in contrast to the German state, ontologically secondary to *das Volk* (Hobsbawm, 1991). In other words, one is a *citoyen* and therefore French, while one is German and therefore a German citizen. The UK has a community basis for citizenship, but unlike the unitary conceptualization in Germany, it has an inherently multiple construct, given the four constituting nations (England, Scotland, Wales and Ireland) and the colonial past that included 'Home rule' for the colonies. Citizenship is here rather loosely defined, in negative (individual freedoms) rather than positive (share in sovereignty) terms, and with a greater recognition of a variety of ethnic groups.

According to Brubaker and Schnapper, different immigration regimes stem from these traditions. The German state has theoretically no space for immigration, as expressed in the still frequent political slogan 'Deutschland ist kein Einwanderungsland' ('Germany is no immigration country'). The presence of foreigners is ideally temporary and subject to the country needs, as for the workforce during times of war or during post-war reconstruction

through the *Gastarbeiter* ('guest worker') scheme of 1950s-60s. Foreign workers are entitled to equal social rights, in order not to threaten the entitlements of nationals through unfair competition, but encounter significant obstacles to acquiring nationality and political rights. The social conditions of migrants in post-war Germany were seen as a responsibility of employers, trade unions and social welfare associations, which for instance resulted in a high degree of residential segregation.

In France, by contrast, immigrants, and especially their children, have easier access to nationality, but state-led integration occurs at an individual level: the French Republic is made of equal citizens and housing policies have explicitly aimed at dispersing national groups (an aim often betrayed in practice). It is for loyalty to this concept of republican equality and to avoid any risk of communitarian particularisms, that the French census still forbids any collection of information on ethnicity and race.

Finally, in the UK, access to citizenship is relatively easy but it is not accompanied with a major change in status as in France. Integration occurs not just at an individual level, but as groups: people from former colonies, in particular, are clearly visible as communities and are geographically segregated. The existence of 'black and ethnic minority' groups is officially recognised and results in specific anti-racist policies, including affirmative action programmes aimed at dispelling racism.

The characterisation of distinct 'regimes' as coherent may be criticised: no country is actually 'pure' in its model and change occurs over time. Germany, in particular, after World War 2 clearly departed from previous history with regard to the respect of minorities, reduced its reliance on *ius sanguinis* after reunification in 1990, and loosened naturalisation rules in 1999 when a Social Democratic-Green coalition came to power. Moreover, immigrants are not merely receivers but also transformative actors who, over time, may undermine national models and even pave the way towards a post-national Europe (Soysal 1994).

While analytically distinct, the state traditions of industrial relations and of citizenship/migration display interesting associations (Table 1). The French Republican ideal translates into scepticism of the French state towards any particularism or group rights, whether cultural or social; and is visible in its opposition to the Muslim veil as well as in the strong rejection of corporatism. In the aftermath of the revolution, the Chapelier Law of 1791 had banned any trade union or economic association, as legacies of feudalism, potential sources of privilege and barriers to equality between citizens. Mistrust of organised groups remained the case in 2012, after freedom of association has long been established, when Nicolas Sarkozy, in his presidential candidature speech of the 16<sup>th</sup> February, attacked 'intermediary bodies' such as trade unions as 'shields' between government and people. Cultural particularism is seen with even more suspicion, in the name of the *laïcité* (secularism) of the Republic.

By contrast, in Germany functional associations are welcome in the sharing of sovereignty between central state and society, especially after the experience of totalitarianism; but the inclusion of associations is limited to the functional, integrative level, as in the ideology of 'social partnership' and codified collaboration between labour and capital, and does not extend to the ethnic/cultural level, which is potentially divisive. The Catholic and Lutheran Churches are officially recognised by the State (for instance through the existence of Church taxes) as traditional institutions of the German nations, but other ethnic and cultural identities are not given the same recognition: President Wulff was widely criticised when he stated, at the Reunification Day of 2010, that 'Islam too belongs to Germany'. Finally, in the case of the UK, industrial actors, ethnic and cultural associations share a generic 'pluralist' space, where groups are entitled to organise and act in defence of their interests, without a precise

hierarchy or codification. While the term ‘multiculturalism’ is strongly rejected by the political mainstream of Germany and France (e.g. Angela Merkel’s declaration that ‘multiculturalism has completely failed’ in October 2010), it is widely accepted and even praised in the UK.

The example of ‘diversity management’ has proved how the same original idea is interpreted differently depending on national histories and regulations (Tatli et al. 2012). National differences on cultural diversity do not prevent some converging trends, though, as in the last decade all these three countries have often engaged in introspective analysis and self-criticism, especially after crises such as the French riots and the London bombs of 2005, and leaders of all three countries criticised multi-culturalism between 2010 and 2012. Joppke (2007) argued that Europeanization involves convergence on the ways migrant associations are promoted, and therefore the decline of national models.

With regard to citizenship traditions, unions have to frame their action within their national frameworks, but are not mechanically determined by them. They need to express their strategies and ideological positions by reference to national debates, but as they tend to be oppositional movements, they often oppose the dominant discourse. In Gramsci’s (1975) terms, they can engage in ‘position wars’ over hegemony. On one side, therefore, the exposure to multi-culturalism at the national level increases the propensity to diversity, (e.g. on gender), and encourages self-organisation and special representation of specific groups (Colgan and Ledwith, 2002). But on the other side, unions can contest national policies. For instance, Wrench found symmetric dynamics of contestation between British and Danish unions on diversity management: in the UK, exactly because of the influence of diversity management, unions have developed a more radical critique, whereas Danish trade unions see the same as a potentially progressive development in relation to the anti-multiculturalism prevailing in their country (Wrench, 2004; Greene, Kirton and Wrench, 2005).

From the mentioned theories, it can be expected that citizenship and industrial relations traditions affect the extent and form of migrants’ integration in the unions, with very different weights given to organising and diversity (higher in liberal countries), labour market regulations (higher in the corporatist ones) and to the legal migration status (higher in statist ones). This link is apparent for instance on union density. Where access to citizenship is simpler, differences in unionisation rates between nationals and foreigners are larger, because many long-term immigrants (the most unionised) are included in the ‘nationals’ category. This is confirmed in statistics in Table 2 of unionisation rates between nationals and foreigners according to the European Social Survey (which is likely, methodologically, to underestimate union membership and migrants): they reveal a higher rates of unionisation for immigrants in Germany versus the UK (also due to the fact that the UK has also witnessed more recent immigration than Germany) (Gorodzeisky and Richards, 2013). For an assessment of the forms of migrants’ integration, a more-in depth look is required.

[Table 1 about here]

### **A three-country comparison**

There are both similarities and differences in the way immigration has affected EU countries in the last twenty years in terms of employment (see Table 2). Increases in immigration in the last decade have been strongest in the UK, Ireland and Spain, and weakest in Germany. Countries are also affected to different degrees by the cross-border movement of services and ‘posted workers’ (employees temporarily transferred by their employers to another EU

country): those such as Germany bordering lower-wage regions, are more exposed to this phenomenon than those more distant, such as the UK. The quantitative weight of migration, however, is not directly related to its political weight: in fact, the xenophobic populist Right has been most active in France, despite a relatively low influx of foreign workers, and less visible in the UK despite the large numbers of incomers.

In Western Europe, labour force increases through immigration have been often perceived as increasing competition for jobs and therefore weakening workers status in the labour market. In fact, in most cases immigration has had a complementary function with positive spill-over effects on the labour market by increasing jobs for insiders, as in the UK in the mid-2000s (Dustmann *et al.*, 2008). In addition, in most countries, including Germany and the UK, foreign workers have also been (as from 2009) net contributors to the welfare state, with the exception of France, where they have been marginal welfare beneficiaries (Boeri, 2010).

In the three countries discussed here, foreign workers are overrepresented in the worst jobs, in terms of wages and skills. Recent immigrants, in particular, are characterised by high employment insecurity, although the specific forms of their insecurity vary depending on national regulations. The discussion draws on the main findings of a comparison of recent industrial relations developments with regard to immigration, based on documents and interviews in 2010-12. Interviews were conducted in the following trade unions, selected as largest and most concerned with immigration: DGB, IG Metall, Ver.di and IG BAU (Germany); Unison, Unite and Ucatt (UK); CGT and CFDT (France). The study also covered Italy, Spain and Poland, which are not included here for reason of space.

### *Germany*

Immigration in post-war Germany was first marked by the *Gastarbeiter* schemes of 1955-73, during which immigrants from Southern Europe found employment mostly in manufacturing and were typically unionised (Birsl, 2005). In this period trade unions defended equal treatment of foreign employees, and in particular the metalworking union IG Metall was very quick in organising, informing and servicing the large inflows of foreign workers, setting up specific departments for this purpose. At company level, exclusionary and discriminatory practices by works councils were initially frequent, but over time, foreign workers also started to make up an increasing share of union officers, representatives and works council members: by the mid-2000s, between 4.5 and 5% of works councils members are foreigners in the manufacturing sector's unions IG Metall, IG BCE (mining, chemical and energy), IG BAU (construction, agriculture and environment), and youth with an immigration background are now twice as likely to be unionised than Germans of the same age (DGB, 2008a).

However, the unions did not make the same effort to guarantee equal treatment in social security and housing: due to the contributions-based Bismarkian welfare state, this translated into more difficult access to social assistance and in housing segregation (Sainsbury, 2006). From the 1980s, the share of asylum-seekers increased, and in the last two decades immigration, often temporary, has been from Eastern Europe and developing countries. Recently, inflows have declined: since 2009 Germany is actually a net emigration country (data: Statistisches Bundesamt, 2012). Contrary to the expectation of the VoC approach that Germany should focus on attracting skilled migrants (e.g. Menz, 2008), immigrants have started filling new low-wage service sector jobs, which have been expanded by labour market reforms in 2004. Programs to attract skilled immigrants during the 2000s have largely failed, in part because of very high barriers in terms of administrative obstacles, for instance time-

delays of 2-3-years before recognition of foreign degrees. In 2009 only 169 non-EU foreigners entered as qualified worker immigrants, compared to 29,000 through generic work permits, 28,000 asylum seekers and 43,000 through family reunion (data: BMI, 2010). Immigrants have predominantly occupied low-skilled positions: foreigners and naturalised citizens, who constitute 16% of the total workforce, occupy 27% of unqualified jobs but only 11% of higher education jobs (data: Mikrozensus, 2007).

German trade unions repeatedly stress that they are not opposed to foreign employees and permanent immigration, but strongly oppose the employment forms of many immigrants. They resist the idea of temporary immigration, especially if through posting, agencies and movement of services, as disruptive to the labour market, and prefer instead integration initiatives (especially training) for foreigners already in Germany, as well as stronger regulation of the labour market. The introduction of minimum wages in a number of sectors, such as construction, cleaning, temporary agencies, care and postal service, in 2010-11 in concomitance with the opening of the labour market to the new member states, proved the enduring importance of corporatist consensus for immigration policy making, although a shrinking one given that in other sectors, such as hotels and catering, no agreement could be reached. At the same time, German unions are aware that with the shift of immigration policy from the national to the European level, their political influence may become less effective.

With regard to multi-culturalism, trade unions argue that Germany has to improve its image towards foreigners by providing more opportunities to foreigners who already live in the country, but they are aware that among members xenophobic views, for example by the former social-democratic member of the Bundesbank board Thilo Sarrazin (2010), find considerable echo. Although, unlike in much of Europe, there is currently no explicitly xenophobic, anti-immigration party in the German parliament, according to the Eurobarometer surveys, German public opinion is among the most anti-immigration in Europe.

The German corporatist pattern is visible in the elaboration of migration policy reforms since 2000, which was discussed through a specifically created independent commission (the Süßmuth commission), in which employers and trade unions were represented. Although the commission was eventually unable to produce viable reform, it was decisive in framing the debates and the definition of the issues, and in particular in prioritising social consensus over economic rationality as the main decision factor (Menz, 2008; Schneider, 2009).

In the same framework of national consensus, German trade unions tacitly supported transitional arrangements to limit the employment of workers from the new EU member states in 2004, and supported their prolongation in 2006 and 2008 until the last possible term of 2011. The union position was based on the need to prioritise equal treatment over free movement, which required time given that Germany in 2004 had no minimum wages, although in its argument the DGB (union peak federation) also mentioned public opinion and fear of criminality (DGB, 2008b: 17).

The transitional arrangements appear to have had some negative consequences in terms of channelling foreign workers to even more vulnerable forms of work (such as fictitious self-employment). Fictitious Polish self-employed were found in 2007 to be working in inhumane conditions, for as little as 2€/hour, for the large meat processing company Tönnies (*Gazeta Wyborcza*, 30<sup>th</sup> April 2007), and in 2010, on a large building site ironically in front of the DGB headquarters in Berlin: in both cases the unions had no access to these workers. The restrictions also caused resentment amongst Central Eastern European workers and trade unions. However, over time mutual understanding and collaboration between German unions and their eastern counterparts have developed, paving the way to a rather smooth removal of restrictions in 2011. The number of employees from the new member states increased by

82,000 between May and December 2011, less than 300,000/year that had been feared in 2004 (data: Statistisches Bundesamt, 2012).

German unions, for obvious historical reasons, have a strong anti-fascist and anti-racist stance, but have generally avoided campaigning for immigrants as a specific group or as communities: there are specific structures for immigration issues as well as immigrants' committees (*Migrationsausschüsse*, mostly in IG Metall but also some in IG BAU and in service-sector union Ver.di), but no community-based organisation nor self-organisation or quotas. A sector-specific exception of interest in multi-culturalism is the 'committee for multicultural affairs' created by the education sector union GEW. German unions react also negatively to the idea of diversity management, perceived as a mere self-interested strategy by the employers (Stringfellow, 2012).

German unions' involvement in the elaboration of national policies makes them reluctant to come forward in defence of undocumented immigrants, although all workers are entitled to unionise, regardless of their immigration status. According to Hassel (2007), German unions' sectoral organisations make them badly positioned to organise atypical workers and employees (especially female but increasingly foreign) outside the traditional manufacturing sector. Although there has been in recent years an increasing active curiosity in the 'organising model' from US and UK, campaigning efforts in difficult sectors such as retail (Turner, 2009) have had limited success, and in sectors with large immigrant workforces, such as agriculture, food industry, tourism and catering, unions' collective bargaining power has been undermined by low coverage and lack of extension mechanisms.

Even core sectors such as manufacturing have faced disruptive issues such as the unequal treatment of temporary and agency workers, among whom immigrants are overrepresented (according to IG Metall, 70% of agency workers in manufacturing are foreign or have an immigration background). Temporary workers suffered most of the job losses of 2009, and in the new metalworking agreement of 2012 the IG Metall union, while reaching the highest wage increase of the last twenty years for the core workforce, after strong employer resistance failed in its demand of equal pay and of placing agency workers' employment under co-determination powers of works councils. It managed nonetheless to sign a collective agreement for temporary agency workers in the metalworking sector, to introduce some guarantees on their conditions, wage increases for the lowest earners, and, crucially, a works council entitlement to negotiate workplace agreements on their use. As a result of the collective bargaining campaign, the issue of agency work reached a high profile in the political agenda and public opinion.

A specific concern has been expressed for posted workers, whose abuse in Germany has been widely reported (Cremers, 2011). In 2010, the DGB organised its first 'advice bureau' for posted workers in Berlin. The initiative was funded by the regional government with the aim of informing posted workers of their rights before their arrival, through collaboration with foreign embassies (especially Polish), foreign trade unions, NGOs, employer associations, and the use of the internet. The bureau disseminates information widely, but the project did not include legal representation and was not directly aimed at organising. In the first five months of operation, only sixteen foreign workers, of whom only six actually posted, made physical contact with the Centre, and its advisors recognise the difficulty of organising transient workers in the German context:

Some unions [...] don't really want this kind of members. They don't only want members that just join in order to solve their legal problem, which is expensive. [...]



In order to receive this legal advice [...] they have to pay their fee for the last three or six months [...] There are trade unions who say you know what, he's going to pay his 50, 60 Euros and we have to invest our work which is at least 700, 800 Euros worth, so it's not a deal for us. And we know this person is going to move back to their country so [...] we won't have anything from it than the cost and the problems. [DGB advisor, 2010]

Similarly, in Köln Ver.di organise a hotline for foreign care workers: a form of help, but at a distance. The most visible union effort for new foreign workers was the creation of a 'European Migrant Workers' Union' (EMWU) by IG BAU in 2004. This originally had an organising aim (Kahmann, 2006) but quickly downsized to information and legal representation services, faced not only with the difficulty of unionising foreign workers but also with disagreement from Central Eastern European trade unions as to whose constituency these workers were: only the Polish agriculture workers ZZPR joined the EMWU project (Greer et al., 2013). This does not mean that the initiative failed: while few posted workers are organised within Germany, the EMWU office in Warsaw deals with about 1,000 worker cases per year (mostly unpaid wages), as Polish posted workers in Germany find it more natural to call, possibly through their family, an office in Warsaw than one in the country in which they are working, but where they may not know the language. Like the DGB information office, the EMWU is supported not by members' fees, but through publically funded projects (especially with the German Labour Ministry), collaboration with the bipartite construction sector social-security fund SOKA-BAU (which is driven by the need to enforce the payment of social contributions), and from a share in legal compensations won, in a sort of legal firm model. Social partnership practices still prevail: IG BAU's main efforts were not on the EMWU, but on making SOKA-BAU and the employers' association responsible for monitoring the use of posted workers. But despite the EMWU shift to servicing, IG BAU is actually, due to the sector specificity, one of the most-organising prone unions in Germany, also with regard to foreigners.

Our IG-BAU workers are all the time on building sites and industrial-cleaning sites, and they talk actively to workers. Over 80% of our new members come this way, in contrast to the other German unions; in the other unions most members come through the works councils, but to IG BAU directly through *Organiser* [English term in the original], and these have always with them the phone numbers of colleagues who speak in the different languages, and leaflets are also in Polish, Romanian, Ukrainian... [IG BAU officer, 2010]

Yet these models do not prevent experiments and conflicts, including on organising and new forms of regulations such as minimum wages.

## UK

In contrast to the German and French experiences, immigration in the UK was, during the 1950s and 1960s, of a post-colonial nature and channelled towards the service rather than manufacturing industry. This history frames trade union responses and the overall social definition of the issue. Given that most new-comers were or had been Commonwealth citizens and had access to British citizenship, rather than being defined as immigrants, they

were viewed as racial or ethnic minorities – terms that are avoided in Germany and explicitly rejected in France. The trade unions most involved were not manufacturing, but public sector, transport, retail and construction. On the other side, the voluntaristic industrial relations system directed union action, rather than towards political and social security responses, towards collective bargaining and, subsequently, organising approaches.

The Trades Union Congress (TUC), formally on the side of immigrants, did not actually challenge the introduction of immigration controls in 1968 and 1971 (Wrench, 2000). After some cases of exclusionary practices in the 1950s -60s, especially in transport and docks, and of patronising practices in manufacturing, unions stepped up their anti-racist activities and were able to organise foreigners. During the 1970s a wave of Asian and Blacks activists came to the fore, and employees of Afro-Caribbean and Indian descent still have higher unionisation rates than average.

The TUC also initially opposed the introduction of anti-discrimination laws, arguing that collective bargaining was a better strategy that was more in line with British customs (Wrench, 2000). Collective bargaining is still considered as more responsive to the diversity of needs than political/legal action, and to have the advantage of including a ‘voice’ element for immigrants, rather than a top-down approach. However, with the decline of collective bargaining coverage since the 1980s, the effectiveness of this method has been questioned. Martínez-Lucio and Perrett (2010) speak of the bargaining approach as ‘Stick it on the Agenda as an Item’ to indicate the trend to pay lip service to equality issues, with little attention to the actual results.

With time, British trade unions have supported legislation, and enlarged their action to more forms of activity, including in particular education, community-based activities and organising. They do have little influence on migration policy, though: they supported the opening of the labour market to the new member states in 2004, but their opinion in favour of the same for Romanians and Bulgarians in 2007 was not listened to and the TUC, unlike the employer confederation CBI, failed to present evidence on this matter within the consultative Migration Impacts Forum.

Community organising, through ad hoc associations representing specific ethnic groups (e.g. Indians) and collaboration with cultural, national and religious bodies has often been tried since the 1980s and appears as a manifestation of the multi-cultural context of the British public space. It has nonetheless registered, besides successes, also difficulties and internal conflicts (Wrench, 2000), and still offers very varied outcomes (Martínez-Lucio and Perrett, 2009).

The exposure to diversity has led British unions to the apparent paradox of promoting diversity representation within their rank and file, but opposing the idea of ‘diversity management’, which has been diffused to the UK, from its North American origins, before other European countries. Diversity management is strongly criticised (e.g. by the TUC Black Workers Conference in 1997) as both a threat to equality and a distraction from the real, social problems of immigrants and ethnic minorities (Wrench, 2004; Greene, Kirton and Wrench, 2005). Internally, however, the union recognise and value a variety of identities, which is reflected in the space for special representation and self-organisation. In 2000/01, all largest fourteen British unions had race or ethnicity national committees, and six of the largest unions had reserved seats in the national executive council.

In contrast to the German case, it was the manufacturing unions (AEEU and TGWU, later merged into Amicus and then Unite) that had less developed structures of this kind, although, in part to compensate for the lower presence of ethnic minorities in their ranks, they had

reserved seats for ethnic minorities in the national executive committees (Colgan and Ledwith, 2002b).

Education as an area of activity received a boost under the New Labour governments (1997-2010), which within a policy in favour of lifelong learning funded union education activities through a 15m-pound Union Learning Fund. Much of these training and teaching activities have been devoted to ethnic minorities' needs and to immigrants, notably popular English-language courses. While these courses provide channels to organise workers and to promote their active participation, their servicing orientation and reliance on state-funding and at times employers' collaboration. Servicing through education appeared to be complementary, rather than alternative, to migrants' organisation (Heyes 2009). The experience shows how British trade unions have had to combine different forms of actions outside their own traditions.

In the 2000s, influenced by developments in North American unions and in response to falling collective bargaining coverage, British unions increased their interest in the 'organising model' (Simms et al., 2012). In many cases, this has focussed on poorest occupations in urban areas, where foreigners are over-represented. The campaign for a London Living Allowance has been one of the most visible cases, involving a sector where immigrants are predominant. More than strikes – very difficult to organise under British law – unions used public opinion tactics targeting large, visible employers. The campaign focussed on pay and avoided more political issues such as amnesty for undocumented immigrants. British trade unions, despite some official declaration in favour of regularisation, do not campaign for it openly, explaining this by fear of union members' disapproval, and lack of influence. The TUC prefers to concentrate on the principle that employment rights should cover all workers, including the undocumented ones (as it happens in most of the EU and many US states). Pressure for regularisation is left to NGOs, Churches and, from a business side, some politicians of the conservative and liberal parties.

Organising has also targeted recent waves of immigrants directly. The most prominent cases have been the Scotland Overseas Nurses Network set up by Unison in Glasgow, and the GMB Polish branch in Northampton. The 'Scotland Overseas Nurses Network' was created in 2003 in response to bad practice in the use of foreign agency nurses by a local hospital and organised up to 1,000 foreign nurses, especially from the Philippines but later also from Central Eastern Europe. It conducted important information campaigns, obtaining in particular the condemnation of agencies that charged nurses abroad illegal fees just for the promise of a job in the UK, and raising issues of discrimination in job definitions and in disciplinary processes. Over time, however, the network reduced its activity. This was due to the difficulty of organising employees who were particularly transient, changing place of employment frequently, but also to the declining need once the most urgent problems had been solved. At the time of research, in February 2011, the network's activity was limited to maintaining a contact list, and the unions could not satisfy demands for more servicing, but links to some communities were sustained.

Quite challenging. Because they are in some respects a transient population [...]. We have in the past managed to be very proactive with them. That's broken down a wee bit. And I think it's broken down a bit because actually things are okay at the moment [...]. For some workers I think there is a bit of a cultural misunderstanding about what trade unions are in the UK. Many people's first kind of engagement with us is quite often when people have a problem at work. They will ask us if we can find them another job. And obviously we don't do that. That's more of an American model. Yeah. And I think people find that quite disappointing [...]. There is a very strong

Polish community in Glasgow. So people from Poland and the Ukraine and from Eastern European countries again have that much more social network that they engage with in that way. So I think because that's a longstanding network, I think because it has strong links to the trade union movement, they're much easier to ... they find it much easier to integrate. Integrate is the wrong word. They find it easier to connect with us. [Unison officer, 2011]

The Polish Southampton branch of GMB received much attention. Despite the temporary success of organising over one hundred Polish workers in one area, the branch actually never developed into a real union branch offering traditional union support to collective bargaining or legal representation. Due to, again, the transient nature of the members and the solution of the most urgent issues, the branch closed within a couple of years (James and Karmowska, 2012). Community-based activity on Polish immigrants – arguably the largest group of immigrants in modern Britain - has been tried by unions also in other parts of the country, e.g. in Birmingham through co-operation between TUC and Polish Catholic Association, and through the employment of Polish organisers, also in collaboration with Polish trade unions (Hardy and Fitzgerald 2010). Overall these experiences show that organising is always precarious and extremely varied, but also that self-organisation does not threaten trade union unity: over time, foreign workers' issues start to be dealt with by the ordinary union structures, without the need for a special organisation.

A shifting focus to mainstream rather than focus on immigrant workers *per se* is visible in the fact that unions recently replaced programs targeted at immigrants with other targeted at 'vulnerable workers' in general – among which migrant workers are arguably the largest group. The TUC launched a Commission on Vulnerable Employment in 2007, and construction union UCATT, already employing Polish organisers and running a Migrant Workers' advice project, replaced it with a Vulnerable Workers' advice projects. The shift is grounded in the wish of integrating immigrants into the normal structures, but is also connected with some resentment among union members at devoting resources to foreign workers specifically. UCATT unionists also admit that, given low resources, servicing, especially if in part publicly funded, is more viable than organising.

### *France*

Immigration in France first took place in manufacturing in the 1950s-60s, as in Germany, but mostly through colonial and post-colonial channels, as in the UK. Trade unions combined a concern with equal treatment and an ideological commitment to international solidarity, whether in a communist (CGT) or Christian (CFTC) understanding, with restrictive attitudes and requests for immigration controls, and a belief that immigration was temporary. The relations with immigrants changed in the early 1970s, once trade unions had obtained more mobilisation power and workplace rights. During that period of increased militancy immigrants emerged as union activists, and unions moved away from a 'colonial attitude of helping immigrants to emancipate, but in their own country' [interview with CFDT officer, 2011] to full integration into union structures. Foreigners obtained in 1972 the right to vote and to be elected to works councils, and in 1982, after the Left came to power, also to social security bipartite management bodies. French unionism combines these two apparently contradictory sides: a militant side excluded from both co-determination in the company and policy making, and integration in bipartite social security funds, which indirectly provide resources for the unions and compensate for their very low membership levels. Foreigners are

allowed to vote for the *conseils des prud'hommes* (industrial tribunals), but cannot be elected to them because jury functions are performed 'in the name of the French people' and there is no political consensus on opening them to non-citizens, despite union demands. Some exclusion survived for a long time in social security: in 2003 the European Court of Human Rights condemned France for excluding non-citizens from disability allowances, which had been conceived as a form of 'national solidarity'.

In the 1980s and 1990s, facing the rise of the extreme Right, trade unions stepped up their commitment against racism and discrimination (Bataille, 1997). The French context remained however very wary of institutionalising any form of diversity. The French State does not collect any data on race and religion, exactly to safeguard the principle of equality among citizens and avoid the entrenchment of differentiations. Even trade unions themselves have little or no data on the ethnic composition of their members, and no forms of ethnic self-organisation. According to an officer of the CFDT union (our interview, 2011), only 2% of union officers are immigrants or have an immigration background.

The idea of diversity management only reached France in the 2000s especially through large enterprises such as Total, Casino and Oréal, but also in state-owned companies (Wieviorka, 2008). Large enterprises proposals included the sensitive issue of collecting data on employee ethnicity (Bébéar, 2004). The unions, faced with the novelty, did not directly oppose diversity management ideas, as their British and German counterparts did, and signed agreements over it both at company level and, in 2006, at the national level with the national employer association MEDEF. The penetration of diversity management coincides with a growing criticism of this 'Republican' conception of unity, which is blamed for being 'blind' to inequalities and although it had been most lively and effective with respect to gender, is also increasing on race and nationality (Weil, 2005).

The most visible form of union action on immigration in recent years has been the occupation strikes for the *sans-papiers* (undocumented workers) in 2008-10 (Barron et al, 2011). These were organised in particular by the CGT in the Paris region, often in collaboration with CFDT and other NGOs. Following a Law in 2007 that allowed exceptional regularisation of undocumented immigrants employed in sectors with labour shortages, unionists decided to use strikes to force employers to require the regularisation of their workers. The strikes could only achieve their impact through a strong public opinion effect, and visible workplaces like city-centre restaurants were initially targeted, before extending the action to laundries, construction sites and temporary work agencies. The CFDT in particular extended the action to home cleaners. At its peak in 2009, the campaign involved 3,200 strikers. Employers were most often forced to ask for regularisation of their employees, and the employer federation MEDEF also had to intervene in favour of them, forcing the government to loosen the requirements. The 'regularisation through strike' strategy required extensive union commitment both in mobilising and then accompanying the immigrants through the legal procedures in the Ministry of Interior's offices – a close combination of organising and servicing. The choice of occupation strike was due to French legislation protecting the right of strike of all workers, and not allowing the police to enter a workplace where a strike is in course, even if the strikers are undocumented immigrants.

The action was not without contradictions and internal conflict. Relations amongst unions, and between unions and associations, became very tense on strategic and tactical ways to proceed. In 2008, some of the most radical activists demanded that the CGT engage to obtain the regularisation of all *sans-papiers*, but both CFDT and CGT protested that they were only able to organise workplaces where workers were ready to go on strike, and that as a union its role is to defend undocumented *workers*, and not undocumented immigrants in general. In

2009, disaffected activists occupied a trade union office in Paris in protest, leaving only when, after months, unionists reluctantly asked the police to intervene. While during the whole mobilisation the main CGT organisers were French, in 2009 and 2010 demands for self-organisation of immigrants within the union also emerged.

The strikes achieved considerable success: 1,800 regularisations, out of 3,500 demands, were obtained in the first year of mobilisation, and after over two years, in June 2010, the Ministry had to publish new regulations, accepting some criteria for automatic regularisation. They also had a strong effect on public opinion, raising both sympathy for undocumented workers and support for trade unions. However, they did not achieve radical legislative change (although they might have contributed to a shift to the Left and to more pro-immigrant policies in 2012) and had partial effects in terms of unionisation (1,500 new members for the CGT). French trade unions, thanks to indirect state support and use of works councils and *preud-hommes* elections as measure of their strength, do not prioritise unionisation as a goal (France has the lowest unionisation level in the EU). Low membership levels mean also that unions are less concerned than their British and German counterparts with the political opinions of the majority of workers on immigration, and express the views of a smaller radical minority. French unions do not even need to require membership to act on behalf of a worker, and this is something unionists stress as a difference from other European unions. Especially during the strikes, the CGT resisted the idea of requiring membership because of exacerbating the risk of being perceived as an agency offering regularisation services, and combining a political union tradition with the subordination of ethnic and demographic differences.

In the CGT, and I think it's the same for the other French unions, we don't look at nationality. Who cares if they are immigrants, men, women, we don't give a toss! (...) We don't ask if you are a member: you are a worker, we defend you. Maybe we're mad... but it's like that. [CGT officer, 2011]

It would be incorrect to explain the mobilisation of French unions only on the basis of organisational issues, though. Italian unions, which do have a relatively high number of members (35% density, and an additional 5m retired members), and whose citizenship traditions are similar to the French while in industrial relations there are corporatist elements as well, unions have mobilised even more for general, unconditional amnesties of undocumented immigrants.

Although France has not been affected by recent temporary immigration as much as the UK, unions have been active on the issue of posted workers as well. In a high-profile case, at an Alstom building site in 2006, the CGT, in collaboration with Solidarity, managed to obtain the payment of equal salaries for Polish posted workers. In this context French unions benefit from the statist industrial relations system, whose legally generally binding agreements, unlike the voluntaristic ones of the UK and the corporatist ones of Germany, cannot be challenged by the European Court of Justice. French unions were also prominent in the opposition to the proposed Bolkenstein Directive that would have liberalised the movement of services in 2005-06 with the application of country-of-origin labour law. Although that movement of opposition coincided with the phenomenon of public fear of the so-called 'Polish plumber', personifying unregulated social dumping by foreign service providers, French unions were not hostile to the free movement of workers from the new member states, and supported the removal of restrictions, including for Romanians and Bulgarians. France

opened the labour market to citizens of the new member states in 2008, and to Romanians and Bulgarians in 2012.

## Conclusion

The comparison of the three largest EU countries confirms that there are common structural pressures in contemporary advanced capitalism with regard to migration, low-wage work and vulnerability: no 'variety' of capitalism is exempt. However, trade unions react in different ways to this transnational challenge, and in general try to 'embed' transnational labour in their national arrangements (Lillie and Greer 2007). At a general level, in all countries trade unions have avoided exclusionary temptations and, by and large, increased their efforts in favour of migrant workers. Once we move from such an abstract level to a more practical level, however, sharp differences emerge.

The paper has suggested a link between differences in union activities and State traditions in industrial relations and citizenship conceptions, which are in turn interconnected. In terms of the former, corporatism is visible in the German unions involvement in national migration policy, and in their focus on extending collectively agreed minimum wages; voluntarism is visible in the variety of union company-level practices in the UK, and in their specific interest in organising. In France, state regulations appear related to the *erga omnes* coverage of collective agreements and the importance of the political level, but also in the constitutional protection of the right of strike.

From the point of view of citizenship conceptions, the British exposure to multi-culturalism is reflected in more organisational space for diversity in British unions, whereas the national community conception in Germany is reflected in unions' paramount concern with avoiding disruptions to established standards and practices and their lack of enthusiasm for open borders or regularisations of undocumented workers. In France, the political conception of citizenship corresponds to the weakest development of diversity within unions, and the focus given to the issue of right to stay and work in the country.

In all countries, then, national traditions shape the debate and frame responses. This does not mean that unions necessarily *conform* with national contexts: they can also engage with them by contesting them. They all have different strategic options (Gumbrell-McCormick and Hyman, 2013). Organising is practiced not only in the US and the UK, but also in France and Germany. But equally general are the options of servicing and collaboration with the State, which are taken up also in the UK. What changes between countries is the intensity and meaning of each form. Community organising finds much more legitimation in the UK, class action (the undocumented migrant redefined as 'undocumented worker') is more understandable in France, and policy involvement in Germany. The mobilisations of London and Paris are therefore different: on one side, a focus on community, public opinion, and wages; on the other, strikes, institutional resources and regularisation. The meaning of union membership is itself very different, with German and British unions paying much more attention to it: organising is aimed at gaining members in the UK, but at gaining political effectiveness in France. Moreover, unions also contest their national dominant models, as in the case of diversity management in the UK, or, symmetrically, the extreme undifferentiated republican model in France.

Political traditions matter, then, for the analysis of union responses. To the point that national differences are interiorised and perpetuated in unionists' everyday discourse:

When the European Metalworker Federation tried to do a working group on migration, at the first meeting very few came. No French, no British, from IG Metall some replacement who knew nothing, and then the Scandinavians, who have a completely different approach, they just want young skilled immigrants, and the Spanish from CCOO [*Comisiones Obreras*, leftist union confederation], the only one we could have some understanding with. And at the following meeting, it was only me and him. [Italian leftist metalworker union FIOM officer, 2012]

## References

- Akrup D (2010) Der Markt reguliert die Einwanderung. *Die Tageszeitung*, 12th November.
- Avcı C and McDonald C (2000) Chipping away at the fortress: Unions, immigration and the transnational labour market. *International Migration*, 38 (2): 191-213.
- Barron P, Bory A, Chauvin S and Tourette L (2011) *On bosse ici, on reste ici!* Paris: La Découverte.
- Bataille P (1997) *Le racisme au travail*. Paris: La Découverte.
- Bébéar C (2004) *Des entreprises aux couleurs de la France - Minorités visibles : relever le défi de l'accès à l'emploi et de l'intégration dans l'entreprise*. Paris: La Documentation Française.
- Birsl U (2005) *Migration und Migrationspolitik im Prozess der europäischen Integration?* Opladen: Barbara Budrich.
- Boeri T (2010) Immigration to the land of redistribution. *Economica*, 77: 651-687.
- Brubaker R (1992) *Citizenship and Nationhood in France and Germany*. Cambridge MA: Harvard University Press.
- Colgan F and Ledwith S (eds) (2002a) *Gender, Diversity and Trade Unions. International Perspectives*. London: Routledge.
- Colgan F and Ledwith S (2002) Gender, diversity and mobilisation in UK trade unions. In Colgan F and Ledwith S (eds), *Gender, Diversity and Trade Unions. International Perspectives*. London: Routledge, 154-185.
- Cremens I (2011) *In Search of Cheap Labour. Working and Living Conditions of Posted Workers*. Bruxelles: CLR.
- Crouch C (1993) *Industrial Relations and European State Traditions*. Oxford: Oxford University Press.
- Crul M and Vermeulen H (2006) Immigration, education and the Turkish second generation in five European nations: a comparative study. In Parsons C and Smeeding T (eds), *Immigration and the Transformation of Europe*. Cambridge: Cambridge University Press, 235-50.
- DGB (2008a) *Arbeitnehmerfreizügigkeit und Dienstleistungsfreiheit – Begleitmaßnahmen für die zweite Phase der Übergangsfristen*. Berlin: Beschluss des Bundesvorstandes des DGB vom 4. März 2008.
- DGB (2008b) *Partizipation statt Ausgrenzung*. Berlin: Bundesvorstand, Zwischenbericht.
- Dustmann C, Glitz A and Frattini T (2008) The labour market impact of immigration. *Oxford Review of Economic Policy*, 24 (3): 477-404.
- EC (2008) *Employment in Europe Report 2008*. Brussels.
- Erne R (2008) *European Unions. Labor's Quest for a Transnational Democracy*. Ithaca: ILR Press.
- Gorodzeisky A and Richards A (2013) Trade unions and migrant workers in Western Europe, *European Journal of Industrial Relations*, 19(3).
- Gramsci A (1975) *Quaderni dal carcere*. Torino: Einaudi.



- Greene A, Kirton G and Wrench J (2005) Trade union perspectives on diversity management: A comparison of the UK and Denmark. *European Journal of Industrial Relations*, 11(2): 179-196.
- Greer I, Ciupijus Z and Lillie N (2013) The European Migrant Workers Union and the barriers to transnational industrial citizenship. *European Journal of Industrial Relations*, 19(1): 5-20.
- Gumbrell-McCormick R and Hyman R (2013) *Trade Unions in Western Europe. Hard Times, Hard Choices*. Oxford: Oxford University Press.
- Hardy J, Eldring L and Schulten T (2012) Trade unions responses to migrant workers from the 'new Europe': A three-sector comparison in the UK, Norway and Germany. *European Journal of Industrial Relations*, 18(4): 347-363.
- Hardy J and Fitzgerald I (2010) Negotiating 'Solidarity' and internationalism: The response of Polish trade unions to migration, *Industrial Relations Journal*, 41 (4): 367-381.
- Hassel A (2007) The curse of institutional security: The erosion of German trade unionism. *Industrielle Beziehungen*, 14 (2): 176-91.
- Haus L (2002) *Unions, Immigration and Internationalization: New Challenges and Changing Coalition in the United States and France*. New York: Palgrave MacMillian.
- Heyes J (2009) Recruiting and organising migrant workers through education and training: A comparison of Community and the GMB, *Industrial Relations Journal*, 40(4), 182-197.
- Hobsbawm E (1990) *Nations and Nationalism since 1780: Programme, Myth, Reality*. Cambridge: Cambridge University Press.
- Hoffmann L (1990) *Die unvollendete Republik, zwischen Einwanderungsland und deutsche Nationalstaat*. Cologne: Papyrossa.
- James P and Karmowska J (2012) Accommodating difference? British trade unions and Polish migrant workers. *Journal of Workplace Rights*, 15 (2): 169-189.
- Joppke, C. (2007) Beyond National Models: Civic Integration Policies for Immigrants in Western Europe. *West European Politics*, 30(1): 1-22.
- Kahmann M (2006) The posting of workers in the German construction industry: Responses and problems of trade union action. *Transfer*, 12(2): 183-196.
- Krings T (2009) A race to the bottom? Trade unions, EU enlargement and the free movement of labour. *European Journal of Industrial Relations* 15(1): 49-69.
- Lillie N and Greer I (2007) Industrial relations, migration, and neoliberal politics: The case of the European construction sector. *Politics and Society*, 35(4): 551-581.
- Marino S (2012) Trade union inclusion of migrant and ethnic minority workers: Comparing Italy and the Netherlands. *European Journal of Industrial Relations*, 18(1): 5-20.
- Martinez-Lucio M and Perrett R (2009) The Diversity and Politics of Trade Unions' Responses to Minority Ethnic and Migrant Workers: The Context of the UK. *Economic and Industrial Democracy*, 30(3): 324-347.
- Martínez-Lucio M and Perrett R (2010) Meanings and dilemmas in community unionism: Trade union community initiatives and black and minority ethnic groups in the UK. *Work, Employment and Society*, 23(4): 693-710.
- Menz G (2008) *The Political Economy of Managed Migration*. Oxford: Oxford University Press.
- Messina A, Fraga L, Rhodebeck L and Wright F (eds.) (1992) *Ethnic and Racial Minorities in Advanced Industrial Democracies*, Westport, CT: Greenwood Press.
- Palier B and Thelen K (2010) Institutionalizing Dualism: Complementarities and Change in France and Germany. *Politics & Society*, 38(1): 119-148.
- Raess D and Burgoon B (2013) Flexible work and immigration in Europe. *British Journal of Industrial Relations* (forthcoming)

- Sainsbury D (2006) Immigrants' social rights in comparative perspective: Welfare state regimes, forms of immigration and immigration policy regimes. *Journal of European Social Policy*, 16(3): 229-244.
- Sarrazin T (2010) *Deutschland schafft sich ab*. München: DVA.
- Schnapper D (1992) *L'Europe des immigrés, essai sur les politiques d'immigration*. Paris: Francois Bourin.
- Schneider J (2009) *Modernes Regieren und Konsens*. Wiesbaden: VS Verlag.
- Simms M, Holgate J and Heery E (2012) *Union Voices: Tactics and Tensions in UK Organizing*. Ithaca: Cornell University Press.
- Soysal Y (1994) *Limits to Citizenship*. Chicago: Chicago University Press.
- Stringfellow E (2012) Trade unions and discourses of diversity management: A comparison of Sweden and Germany, *European Journal of Industrial Relations*, 18 (4): 329-345.
- Tatli A, Vassilopoulou J, Al Ariss A and Özbilgin M (2012) The role of regulatory and temporary context in the construction of diversity discourses: The cases of the UK, France and Germany. *European Journal of Industrial Relations* 18(4): 293-308.
- Turner L (2009) Institutions and Activism: Crisis and Opportunity for a German Labor Movement in Decline. *Industrial & Labor Relations Review*, 62 (3): 294-310.
- Turner L, Tapia M and Adler, L (eds) (2013) *Mobilizing Against Inequality: Unions, Immigrant Workers, and the Crisis of Capitalism*. Cornell: ILR Press.
- Watts J (2002) *Immigration Policy and the Challenge of Globalization: Unions and Employers in Unlikely Alliance*. Ithaca: Cornell University Press.
- Weil P (2005) *La République et sa diversité*. Paris: Seuil.
- Wieviorka M (2008) *La diversité*. Paris: Laffont.
- Wrench J (2000) British unions and racism: Organisational dilemmas in an unsympathetic climate. In: Penninx R and Roosblad J (eds) *Trade Unions, Immigration and Immigrants in Europe 1960-1993*. New York: Berghahn Books, 133-155.
- Wrench J (2004) Trade union responses to immigrants and ethnic inequality in Denmark and the UK: The context of consensus and conflict. *European Journal of Industrial Relations*, 10(1): 7-30.

**Table 1 – State traditions in IR and citizenship**

IR traditions Citizenship traditions	Corporatist	Statist	Liberal
Community	Germany		
Republican		France	
Multi-cultural			UK

**Table 2 – Importance of migration in the labour market**

	% of foreign-born in the population	% of foreign-born in new employment (2000-07)	% of posted workers in the total workforce	Unionisation	
				Nationals	Foreigners
Germany	15	19*	0.5	20	18
France	12	12	0.5	n.d.	n.d.
UK	13	65	0.2	28	9

Data: EU Labour Force Survey, 2007; E101 Certificates; European Social Survey 2008.

\* 2000-11.