Social Standards at Risk: Making the case for Labour Citizenship in Europe

Part 1:

Liability and co-responsibility in subcontracting chains

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"Testing EU Citizenship as Labour Citizenship: From Cases of Labour Rights Violations to a Strengthened Labour-Rights Regime" (LABCIT) project is co-funded by the Europe for Citizens Programme of the European Union. We start from the position that a decent wage and working conditions are necessary for promoting full citizenship and the democratic participation of all European Union citizens. As such, the project aims to "test" the ability of European citizenship to be extended to work, favoring the respect of social and labor rights which form labour citizenship. We perform the testing through analyzing "extreme" cases of labour violations and exploitation in several EU countries, aiming to understand which existing and new instruments can be used for strengthening the protection of workers' labour rights.

1. Rationales behind subcontracting chains and outsourcing

In various industries and the public sector, business tasks or even complete generic business functions – such as facility services, construction activities, specialized accounting, logistics services, and IT service provision among others – have been reshaped into value chains and networks of production and service provision that cross organizational and national boundaries (e.g. Huws et al. 2009; Flecker 2012; Taylor 2010). In addition, companies use temporary work agencies or informal intermediaries to supplement or replace directly employed workforces with workers on flexible agency contracts (e.g. Holst et al. 2009; Drahokoupil 2015). Wills (2009, 444) even speaks of a "capitalism where subcontracted employment relations are becoming paradigmatic". An increasing number of workers are no longer directly employed by the organization where and/or for whom they work, but by third party firms subcontracted by the lead firm, resulting in fragmented employment relations and working conditions (Meil et.al. 2009, Flecker 2010). Here, the distinction between market transactions and employment relationships becomes blurred, with labour processes under the control of both the employer and the employer's client organization (Marchington et al. 2005). Hence, workers face difficulties to develop relations with their 'real' employer. This undermines union representation and drives the creation of segmented labour markets (Wills 2009).

Nathan Lillie (2012) stresses the increased possibilities for *transnational* subcontracting in the context of intra-EU worker mobility. This occurs due to high east-west wage differentials, and due to regulatory structures on the EU-level and between member states that contain loopholes for regulatory arbitrage and facilitate the circumvention of labour protection (Berntsen and Lillie 2015). An Austrian study on wage and social dumping shows that between 2011 and 2014, three quarters of convictions under the law to combat wage and social dumping were foreign firms (Schmatz and Wetzel 2014, 67). In addition, the boundaries between legal and illegal employer practices to save costs by using a cheap work force are not clear-cut. This is because regulations for transnational labour mobility are complex and are transposed differently into national law from member state to member state. Neither inspectorates nor workers have the power or the knowledge to control and uncover breaches of law and to enforce labour rights following transnational service provision and labour mobility (Wagner 2015).

This section will discuss the regulations in place that serve to inhibit employer/contractor practices from devolving business risks and liability issues to subcontractors, as well as the regulations that rebuild the responsibility of contractors for working conditions on their sites and plants.

2. Forms of subcontracting: examples from the Labour Citizenship (LABCIT) project

Empirical evidence from the LABCIT project and elsewhere suggests that cost reductions in subcontracting chains take place through non-compliance with working time or health and safety regulations; through wage and social insurance contribution fraud; through dubious firms structures (such as bogus firms, subcontracting, non-compliant employment, bogus self-employment) as well as by relying on posted workers, migrant workers and (transnational) agency work.

The case studies from ***Italy*** found that a common feature of business practices in warehouses is outsourcing. Express delivery companies (TNT, Bartolini) and supermarkets subcontract labour to cooperatives (see Italian country report). Client companies use a low-cost service via the intermediating cooperative, transfer the risks to a third party, and consequently workers find it more difficult to identify a counterpart for their claims. Many of them are migrant workers. Cases of labour disputes and strikes in this sector show that companies and cooperatives try to shift the responsibility to each other: client companies claim that human resource management is the responsibility of subcontractors whereas cooperatives blame client firms for imposing too tight economic conditions. Hence, one main demand from the workers who would like to see labour rights enforced in this sector is the reduction of the subcontracting chain and changes in the rules on the deployment of cooperatives as a cost-saving and intermediation strategy.

The case of ***Romanian*** workers at the Mall of Berlin in **Germany** represents a typical mechanism of exploitation via transnational labour recruitment for the construction sector (see Romanian country report). A client company engaged various subcontractors, without taking the responsibility of checking their activity or the legal aspects regarding contract, salaries, work days/hours, safety measures, etc. Subcontractors were key players in the abuse of workers, while the main construction company was aware of the 'activities' of its subcontractors.

The ***Czech*** case studies found examples of extreme forms of labour exploitation in subcontracting chains in the welding and the computer industries. Workers were recruited mainly from Romania, Bulgaria and Poland via intermediaries and temporary work agencies that function as subcontractors. In the first case, workers did not receive employment contracts, they were without health and social insurance despite performing highly dangerous tasks such as welding, cutting, and grinding or filing metal. They were deprived of wages negotiated orally, of free food and accommodation. Finally, they were threatened when protesting against these unbearable conditions. Communication problems not only came up due to language barriers but also because of the unclear responsibilities in the chain of several subcontracting entities. It was not always clear who must be the addressee of their protest, and who was responsible for what.

In the second case, job agencies that in fact acted as subcontractors hired workers in Bulgaria, Romania, Poland, Slovakia and other EU countries for mainly low-qualified, monotonous work on the assembly line for computer parts. The recruitment and employment of workers was highly volatile owing to the company's flexible production regime. It was organized on a 'just-in-time' basis and depended on fluctuating orders by customers. The combination of indirect employment (through job agencies/ subcontractors), with the use of worker hostels where foreign workers waited to be assigned shifts, are important elements of the flexible employment system and employer control. Most agencies providing staff to the contractor company did not provide workers within the usual tripartite employee – job agency – user relationship, but through a subcontracting relationship. By working with agencies in this way, the contractor makes itself exempt from liability for the workers' wages and labour conditions.

Apart from the collected cases in the LABCIT project, Cremers (2014) for instance gives evidence about the systematic use of bogus and letter box companies and bogus self-employment when posting workers or providing services transnationally. When such constructions come into play, it is highly difficult and improbable to detect breaches of labour law. Hence, Cremers strongly advocates for definite rules with respect to liability in such company constructions in order to uphold the *lex loci laboris* principle in the field of labour law and pay.

3. Approaches to liability regulations

Liability in subcontracting chains can be defined as co-responsibility or liability of actors other than the direct employer for ensuring some or all labour and social rights of workers employed in the supply chain. This is to be achieved through soft and hard law measures (Jorens et al. 2012).

Soft law measures include responsible supply chain management (CSR) practices, International Framework Agreements between Multi-national Enterprises and global union federations (especially on a transnational level) (Davies et al. 2011) or joint regulations across supply chains between unions and contractors (Wright and Brown 2013). Here, the voluntary commitment of firms or social partner agreements) to take over responsibility for labour and social standards in contracting chains, enforced through the social partners themselves, are paramount.

Hard law measures encompass legislative regulations on joint, limited or chain liability. Joint or multiple liability induces that the contractor together with the subcontractor can be held liable for workers' withheld wages, social insurance contributions, tax debts etc. This means that – regardless of whose fault or responsibility the debt is – both parties are made liable and are obliged to sort out their respective contributions between themselves. With (joint or multiple) chain liability regulations, liability not only applies to the contracting party but also to the whole chain, e.g. not only to the contractor but also to the principal contractor of an order.

3.1 Liability regulations in "hard law" – examples from Austria

In Austria, legislative liability rules for various aspects of labour and social law exist, with particular emphasis on regulating subcontracting in the construction and building-cleaning sectors.

Legislative regulations for contractor liability can be found for instance in the *Social Insurance Act*, Art. 67a-67d; 112a, that stipulates liability regulations (with exceptions) for the payment of social security contributions in construction and cleaning for up to 20% of paid compensation of work performed (*Werklohn*). Contractors can be relieved from liability when their subcontractors appear on a list of liability-exempt firms (*Haftungsfreigestellte Unternehmen*) or if the liability amount is pre-paid to the regional health insurance funds (for details STGG 2015). In addition, the *Employment Contract Law Adaptation Act,* Art. 7a-7n, stipulates liability regulations for minimum remuneration of workers employed in subcontracted firms of a contractor or principal contractor (*Generalunternehmer*) as a deficiency guarantor.

Further, liability regulations exist with respect to the employment of third country nationals *(Foreign Worker Employment Act,* Art. 26, Par.6) in case of their incorrect registration, and for temporary agency workers (*Temporary Work Act*, Art. 14) with respect to health and safety protection, wage and social insurance contributions (Burger 2013; Bartos 2015).

The financial police, regional health insurance funds, the construction workers fund (*BUAK*), as well as the *competence center for combating wage and social dumping* are in charge of the enforcement of and consultation about these rules. Recently (January 2015) regulations of this law have been refined and penal provisions tightened.

All in all, this particular field of law is very intricate and the Austrian legislation is particularly complex compared to other European legislations (Jorens et al. 2012). The respective literature (Burger 2013; Schmatz and Wetzel 2014; Holley 2014 for a general assessment) refers to problems in enforcing regulations. For instance, the employee has to prove that the principal contractor was *aware* of an unreliable subcontractor some levels further down in the chain in order for the respective contractor to be held liable for withheld wages – a difficult task to accomplish. Additionally, workers have to sue for their wages on their own; and in this context, expiry periods of entitlements are crucial. Provisions also do not apply in case of a subcontractor's bankruptcy**.** The tedious enforcement of rights in cross-border constellations must be mentioned in cases when migrant workers are suing for their wages.

In a comprehensive study about the Austrian wage and social dumping combating law, Schmatz and Wetzel (2014, 60) summarize critical points in the implementation of the law. Experts interviewed call for a reduction of possibilities of subcontracting and a stricter control of subcontracting practices, e.g. via calculating minimum prices for contracts. In addition, experts recommended more comprehensive liability regulations with respect to chain liability as well as with respect to sectors other than just construction and cleaning of buildings. Particularly, subcontracting practices, including those applied in temporary work agencies, should be better monitored. Finally, more personnel and financial resources should be dedicated to inspectorates and controlling bodies.

In the same vein, many cases from the LABCIT project stated insufficient staffing levels for labour inspectorates who face a seemingly infinite number of labour right violations in transnational subcontracting chains. Labour inspectorates are overburdened: tasks and regulations are becoming ever more complex due to fragmented employment regulations and unclear employer responsibilities for health, safety and labour law protection. These developments weaken the efficiency of controlling bodies. Hence, Weil (2008) suggests a "strategic enforcement„ policy for health and safety protection regulations and labour law. Among other components, he stresses the importance of inspectorates' close cooperation with key third parties (trade unions, third-party advocates and other labour market intermediaries) whose activities at the workplace and industry levels are natural complements to government efforts.

3.2 Soft law measures and joint regulations

A comparative study (Jorens 2012) about liability regulations in several EU member states explains – next to the above mentioned *hard law* measures – several *soft law* approaches to combat wage and social dumping practices in subcontracting chains. In the Nordic countries, trade unions play a central part in preventing and controlling (fraudulent) subcontracting practices. In Sweden and Finland, for instance, trade unions have the right to be informed about contract and working conditions of a potential subcontracting partner; they have the right to be consulted when tasks are contracted out and the right to object to an unreliable subcontracting firm. Such co-determination rights are partly enshrined in laws (e.g. Co-Determination Act, Sweden), and partly in collective agreements (Netherlands). In addition, some collective agreements stipulate quality criteria of subcontracts with respect to wage and social standards (social clauses). However, difficulties in enforcing such agreements come up in transnational subcontracting since working conditions of subcontracting firms residing abroad can hardly be evaluated and controlled in advance.

In Sweden, a country with a strong trade union legacy, the enforcement of liability regulations is mainly in the hands of social partners themselves and rather in the forerun of outsourcing processes than ex-post and on individual basis when dubious employment relations are already in place:

> "Hence, the objective of the rules on the right to negotiate and veto the engagement of a certain contractor is to give the trade unions an instrument which could help prevent contract practices which aim at depriving workers from the protection they should have according to labour legislation and collective agreements, especially the use of bogus self-employment.„ (Jorens et al 2012, 79)

Another strategy to regulate supply chains and prevent wage and social dumping via subcontracting and outsourcing processes are so called joint regulations. Here again trade unions keep a vital role for regulating and controlling outsourcing and subcontracting processes. Together with powerful lead firms, trade unions coordinate the labour management practices of subcontracted firms. Wright and Brown (2013, 25) identify "distinct yet overlapping interests of worker organisations and lead firms indicate the potential for sustainable sourcing as a regulatory mechanism in the context of segmented production." Unions seek to prevent labour standards from eroding among subcontracted firms. Lead firms, conversely, aim to increase control over the production and management practices of their suppliers and are interested in a 'clean image'.

Wright and Brown (2013) refer to examples from the construction industry in the UK. For construction site projects – such as the building of a nuclear power plant (UCATT 2013) – framework agreements between unions, the client and the principal contractor are signed. They stipulate working conditions, health and safety standards and terms of industrial relations that subcontractors have to comply with as a condition of commercial contract. Principal contractors are also responsible for ensuring that their subcontractors comply with these provisions.

Sites generally have a *health and safetyman* and/or *site convenor* who accompanies the whole construction process as an "employment relations problem solver". This strategy of union-led coordination can improve the coordination and monitoring of industrial relations

and employment relations when a group of subcontractors is involved and should counter problems arising from industrial disputes and safety hazards that could impede the efficient completion of major projects. In addition, lead firms are often aware of their image and not interested to fall into disrepute due to the dubious practices of their subcontractors. This is particularly important if public procurement comes into play. In many European countries and following recent EU legislation on public procurement, candidates can be disregarded in the tendering process if they have been found guilty of wage and social dumping – including in their subcontracting chains (Haidinger 2015).

Lillie (2012) provides evidence from Finland where the site convenor's task is to ensure the cooperation in the shop steward network in the entire construction site. This is vital for implementing the union's most important tactic to enforce the collective bargaining agreement: the 'boycott' of a fraudulent or non-abiding firm. Boycotts put pressure on the main contractors, who end their ties with boycotted firms because of the possibility of solidarity strikes and worries about their own reputation. Principal contractors accept the boycott as a union strategy to combat semi-illegal transnational contractors.

3.3 European trade unions and 'atypical' workers in subcontracting chains

As the LABCIT project shows, many of those at the lower ties of subcontracting chains and in precarious employment are migrant workers, arriving to the destination country as individual migrants or as posted workers. In construction, cleaning, tourism, agency work, and in logistics sectors, those who have limited access to information about labour and social law are to be found in the most precarious employment relations. Frequently, it has been criticized (e.g. Gumbrell-McCormick 2011; Danaj and Sippola 2015; Berntsen 2015; Cranford 2014; Stern 2012) that unions have difficulties or are reluctant to approach and organize migrant colleagues, especially in 'atypical' employment relations. However, there are many successful examples of migrant workers becoming involved in union movements in spite of their work in allegedly 'un-organizable' spheres of labour such as non-standard employment and fragmented employment structures.

Unions in the Netherlands are often referred to as open-minded and innovative in their approach to atypical workers in general. Gumbrell-McCormick (2011) for instance describes the organization of seasonal workers in the Dutch agricultural sector or campaigns and strikes launched by the multi-industrial union *FNV Bondgenoten* against the precarious working conditions that migrant workers from Eastern Europe faced in facility services outsourced by the Dutch railway company or in the Schiphol airport . Berntsen (2015) refers to the endeavors of Dutch unions to approach Polish agency workers in super market distribution centres and to fight together with directly employed staff for continuous employment relations and better working conditions.

Other successful examples and campaigns have been described in the LABCIT project: on the one hand, the Mall of Shame campaign made the abusive practices of German construction firm networks visible when Romanian workers were deprived of wages and basic labour rights. Workers organized a huge protest and boycott campaign known under the name *Mall of Shame* (FAU Berlin 2015); they sued subcontractors and are planning to sue the main contractor. On the other hand, the Italian rank and file union COBAS placed emphasis on

direct actions against abusive employers in the logistics sector and succeeded not only in organizing multiple logistics workers but also in improving their contracts and working conditions.

In many of these examples, the scaling up of interest representation beyond the workplace level by moving from enterprise unionism to industrial and occupational unionism is stressed (Berntsen 2015). This includes the development of organizing strategies that have a flexible and worker-centred approach and function across companies and for the whole sector. They must consider outsourced or subcontracted workers such as agency workers, posted workers, self-employed or seasonal workers.

4. Policy discussions and further conclusions

The issue of liability regulations in fragmented production networks is of paramount political and economic importance. Employment relations are replaced by inter-firm relations; intermediaries function as employers but have little room for manoeuvre to shape employment relations; costs, risks and flexibility are transferred to the lower ends of the subcontracting chains. Principal contractors shift responsibility for working conditions and for the compliance with labour and social law to their subcontractors who are often either not willing or unable to bear this responsibility. Throughout the LABCIT project, it was shown that cost reductions in subcontracting chains take place through non-compliance with working time or health and safety regulations; through wage and social insurance contribution fraud; through dubious firms structures (such as bogus firms, subcontracting, non-compliant employment, bogus self-employment) as well as by resorting posted workers, migrant workers and (transnational) agency work. Often it is unclear who is the 'real employer' and who can be held responsible for employees' decent working conditions in subcontracting chains and correct employment.

In some European countries, legislative measures have been initiated in order to make the 'real' employers again liable for labour relations and working conditions in 'their' subcontracting chains. Reports (e.g. Jorens et al. 2012) claim that such regulations are necessary but often not sufficient to combat abusive subcontracting practices.

Key problems exist in the very costly and complicated controlling and examination activities (language, time of control, etc) conducted by authorities and inspectorates. This is even more difficult if cross-border subcontracting comes into play. In such cases, the application of penalties on foreign sub-contractors/ firms is deficient, very seldom penalties can be executed transnationally.

Frequently, no liability chain regulations are in place, therefore only direct contractors can be made liable. This is particularly problematic if intermediaries/subcontractors 'vanish' and the next link in the chain does not assume this responsibility.

Literature, experts and 'good practices' put forward suggestions for stricter regulations of chain and joint liability, notification systems for cross-border subcontracting and posted work (like in Belgium or Austria), the inclusion of social clauses into public procurement and

the expulsion of contractors convicted of labour and social law breaches or the introduction of calculated minimum prices for subcontracts.

We saw that **even where liability regulations for subcontracting are in place the main problem is the enforcement of rights.** Hence, attempts that are more promising emphasize worker-centred approaches and the role of unions in regulating supply and subcontracting chains. As was exemplified in this section, Nordic countries but also the UK (in the construction sector) pursue joint regulations providing binding agreements about labour relations and working conditions among the 'triangle' of contractor, client and subcontractor; with unions and shop stewards as important guardians of these agreements. In addition, the rights for workers' representatives to co-decide or to be consulted about the engagement of subcontractors can be an option. However, here again the issue of cross-border subcontracting might inhibit an effective inspection and cooperation.

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