

# **When trade unions learn to innovate**

Case study evidence  
from across Europe

Edited by

**Kurt Vandaele and Bianca Luna Fabris**

**etui.**







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Cite this publication: Vandaele K. and Fabris B.L. (2025) When trade unions learn to innovate.  
Case study evidence from across Europe, ETUI.

© Publisher: ETUI aisbl, Brussels, 2025

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Print: ETUI Printshop, Brussels

D/2025/10.574/23

ISBN: 978-2-87452-773-9 (print version)

ISBN: 978-2-87452-774-6 (electronic version)



The ETUI is co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the ETUI. Neither the European Union nor the ETUI can be held responsible for them.

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# Chapter 1

## Scaling and spreading innovation in trade unions. Understanding union revitalisation through capacity, transfer and learning

Kurt Vandaele and Bianca Luna Fabris

Many trade unions within Europe are today finding themselves in a state of limbo (Visser 2024). In several countries, they are experiencing a steady loss of relevance in both the labour market and the political arena. Alternatively, some unions have become narrowly focused on representing a shrinking segment of the workforce, most notably public sector employees and the remnants of traditional manufacturing industries, while struggling to engage with low-unionised economic sectors. These two trajectories in unionism, ‘marginalisation’ and ‘dualisation’, are increasingly evident, not least in Central Eastern European (CEE) countries (Waddington et al. 2023).<sup>1</sup> While a few national contexts, in particular those with institutional support structures like the ‘Ghent system’,<sup>2</sup> offer trade unions relative stability (Ebbinghaus et al. 2011), even they remain vulnerable to stagnation if unions fail to anticipate and adapt to a changing socioeconomic and political landscape.

An increasingly established body of research, focusing on ‘union rejuvenation’, ‘union renewal’ or ‘union revitalisation’, counters the prevailing pessimism about unions’ future by emphasising their agency and resilience as collective actors (Bernaciak and Trif 2023; Fairbrother 2015; Ibsen and Tapia 2017; Murray 2017). Within this literature, some contributions highlight how trade unions are engaging in forms of ‘democratic experimentation’ to revitalise internal practices and member engagement (Laroche and Murray 2024c). Unions are thus harnessing their internal democratic processes to develop innovative responses to challenges and disruptions in work and employment regulation, thereby aiming to refresh themselves as organisations. This inward-looking ‘organisational experimentation’ seeking to alter and reinvigorate unions may transit into external broader ‘institutional experimentation’ that ‘brings them into confrontation with other actors defending existing institutions or aiming to reshape them in different ways’ (Murray et al. 2020: 143-144). In this framework for understanding union revitalisation, union agency is thus seen as aiming for institutional embeddedness as a means of stabilising organisational change. However, there is less understanding of the dynamics and processes between small-scale, local organisational experimentation and large-scale, regional or national institutional responses. This volume therefore focuses on a rather underexplored question in the union literature: *what happens after democratic experimentation for union revitalisation?*

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1. It is acknowledged that some unions stand as exceptions to these dynamics.

2. The Ghent system involves unions to varying degrees in the administration of unemployment benefits. The term originates from the Belgian city of Ghent, where the system was first successfully implemented in the early twentieth century.

## 1. Anchoring and scaling innovation: a key challenge

Union innovations may originate internally or be borrowed from other (union) organisations. These innovations are rarely one-size-fits-all solutions, nor are they typically transformative on their own. Instead, what might be considered ‘innovative’ is context-dependent and often emerges through bricolage; that is, the creative blending of new ideas, knowledge and policies with established ones (see also Mrozowicki and Maciejewska 2017). Innovations may initially appear at the margins, but their potential for broader organisational impact raises significant challenges (Fletcher and Hurd 2001). Understanding how such innovations spread within trade unions and how they are sustained over time is critical. This volume thus explores to what extent such context-dependent ‘union experiments’ can be scaled out and up (Laroche and Murray 2024b: 232), and how they can be organisationally anchored and maintained.

The core research question, therefore, is one of how local, small-scale initiatives might evolve into large-scale revitalisation efforts within trade unions. Union revitalisation is not an end in itself, however. Revitalisation serves the foundational mission of unionism: to defend and advance workers’ interests which, in turn, are expressed through goals of an economic, social and political nature (Gall and Fiorito 2016; Hyman 2001b). In this context, the challenge of the horizontal and vertical diffusion of union revitalisation efforts – that is, how they are scaled outwards and upwards – might be thought especially salient in CEE countries, where innovative initiatives often emerge on the fringes of established labour movements (Bernaciak and Kahancová 2017b: 233). While these local experiments may be effective, unions in CEE countries often lack the organisational resources or political will to extend them more broadly (Bernaciak and Trif 2023). Yet, similar challenges may also surface in trade unions in western European countries, despite them generally being more resource rich.

Empirically, this volume draws on case studies which examine how innovative policies, methods and tactics are transferred and diffused within and across union organisations. Confirming earlier research, the case studies show that the interplay between union resources and capabilities – that is, trade unions’ strategic capacity, which includes organisational learning – plays a decisive role in determining whether innovations can be successfully transferred and embedded (Hyman 2007; Lévesque and Murray 2010). Moreover, effective adoption tends to trigger further experimentation, potentially generating a self-reinforcing cycle of innovation.

These case study findings echo with Jelle Visser’s observation in his article on the future scenarios for unions. Visser suggests that ‘[t]heories of diffusion of innovations’ offer a promising avenue for ‘moving beyond the current emphasis on scattered case studies’ within the ‘vibrant academic literature of the past 30 years on union organising and revitalisation’ (Visser 2024: 641). Inspired by this vision, this volume adopts an eclectic but integrative approach to understanding innovations for union revitalisation, combining insights from policy transfer, strategic capacity and organisational learning. These conceptual lenses help explain how revitalisation efforts gain traction or otherwise falter. By examining how ideas, knowledge and practices travel within and between unions, the volume provides a snapshot of what may come after democratic

experimentation in union revitalisation, offering a framework within which to analyse the dynamics of union innovation. This framework is further developed in the next section.

## **2. Connecting strategic capacity, policy transfer and organisational learning**

To analyse how trade unions transform local innovations into broader revitalisation strategies, this section pairs two complementary concepts: the strategic capacity of trade unions; and the policy transfer of innovations in a non-state, organisational context. Originating in the sociology of trade unionism, strategic capacity refers to a union's internal ability to tap into and coordinate various resources (Hyman 2007; Lévesque and Murray 2010);<sup>3</sup> whereas policy transfer, drawn from political science, examines how ideas, knowledge and practices travel across organisational and institutional contexts (Dolowitz and Marsh 1996, 2000). Strategic capacity focuses on the internal, enabling conditions that influence how unions process innovations; policy transfer, in turn, offers a lens to understand on a systematic basis where these innovations come from and how they are adopted. These two concepts largely intersect through organisational learning: the process by which unions absorb innovations, assess their relevance, and embed and scale them within their organisational structures. Organisational learning is therefore both an expression of strategic capacity and a prerequisite for effective policy transfer.

The concept of strategic capacity in trade unions emphasises internal governance and organisational structures. It is assumed that unions with stronger capacity will be better equipped to facilitate the diffusion of ideas, knowledge and practices within the organisation than those with less of it (see also Gall and Fiorito 2014). Unions' strategic capacity relates to their capabilities to mobilise resources effectively in adapting to changing environments and possible revitalisation (Lévesque and Murray 2010). Four power resources are of relevance for gauging this capacity: internal union solidarity, characterised by cohesive collective identities and mechanisms and procedures for fostering unions' 'deliberative vitality' – that is, the participation of members in union life; network embeddedness, defined as robust horizontal and vertical links with other unions and associated organisations; narrative resources; and infrastructural resources include material support, staff, and organisational practices, policies and programmes including training and education.

Leveraging power resources requires a range of capabilities within trade unions, including the ability to mediate between competing interests to foster collaboration and activate networks; to provide an overarching narrative through framing; to articulate actions across time and space; and to engage in adaptive, organisational learning (Lévesque and Murray 2010). Among these, organisational learning plays a pivotal role

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3. Although various case studies in this volume also engage with the power resource approach (see Arnholtz and Refslund 2024), this primarily focuses on explaining the strategic choices made by trade unions and their outcomes through combining power resources that are sometimes external to them and thus largely beyond their control. This approach is, however, less concerned with examining internal dynamics within unions.

in the transfer of new policies, methods and tactics (Hyman 2007). It enables unions to absorb and internalise innovations and to disseminate these across internal structures. This process involves the development of unions' 'systems for information sharing and education' (Ibsen 2024: 64), ensuring that innovations are disseminated broadly and uniformly across their structures. It is through organisational learning that unions can not only adopt new practices but also develop the 'ability to learn and act upon its organisational self' (Laroche and Murray 2024b: 233). In this way, organisational learning bridges a union's strategic capacity with the broader process of policy transfer.

The concept of policy transfer refers to the process by which ideas, knowledge and practices are borrowed and adapted from one context to another, across time or space, to address specific challenges or policy problems. Initially developed within political science in the mid-1990s (however, see Dussauge-Laguna 2012), the concept aimed to assess whether, and to what extent, nation states could learn from one another in areas such as economic governance, labour market regulation and welfare reform (Dolowitz and Marsh 1996, 2000). At its analytical core, policy transfer examines how and why specific public policies are adopted and adapted across different institutions, levels of government and political systems, both within and across countries. However, its broad scope has drawn criticism, in particular for blurring the boundaries between distinct forms of policymaking (James and Lodge 2003: 189) and for expressing an overly pluralistic view of power and the policy process.

Policy transfer is also linked to related concepts such as 'institutional isomorphism' (DiMaggio and Powell 1983), 'lesson drawing' (James and Lodge 2003), 'policy diffusion' (McAdam and Rucht 1993; Strang and Soule 1998; Wejnert 2002; Rogers 2003) and 'policy mobilities' (Haupt 2023). These frameworks share a concern with how policies circulate, adapt and embed themselves in new environments (Dussauge-Laguna 2012). In this volume, the terms policy transfer, being more intentional, and policy diffusion, being more spontaneous, are employed interchangeably, reflecting their overlapping conceptual terrain and mutual interest in the movement of innovations (Marsh and Sharman 2009: 271). While originally solely centred on intergovernmental learning, the scope of policy transfer has broadened over time to incorporate the EU's multi-level governance architecture, international organisations, epistemic communities and non-state actors, all of which influence public policy (Benson and Jordan 2011; see, however, Minkman et al. 2018).

Notwithstanding its shifting prominence (Benson and Jordan 2011), policy transfer remains a valuable analytical lens, including when applied from a less state-centric perspective within the field of industrial relations (see Andersen and Wright 2025). When reoriented toward organisational and actor-level dynamics, the concept enables a more nuanced process-tracing of how innovations are mobilised and institutionalised beyond formal state structures. In this context, a concept originally developed to study intergovernmental learning can be fruitfully applied to the empirical analysis of non-state actors such as trade unions. Being bureaucratic in structure to varying degrees, unions are internally differentiated and shaped by the influence of 'dominant coalitions' (Gall and Fiorito 2016: 198). This perspective directly addresses the critique that the concept of policy transfer often adopts an overly pluralistic view of policymaking.

Put differently, unions' internal power constellations condition which efforts for revitalisation are legitimised, prioritised and ultimately disseminated. Accordingly, policy transfer within and between unions is not a neutral or evenly distributed process, but one structured by internal dynamics that condition the trajectory and outcomes of those efforts.

In evaluating how policy transfer operates within trade unions, their power resources are likely to play a pivotal role in facilitating or constraining the diffusion of new ideas, knowledge and practices. For example, it can be assumed that union members are more likely to support innovations that resonate with their collective identity, shared goals and organisational culture, in particular when these are perceived as familiar or grounded in prior practice (Wejnert 2002). Similarly, network embeddedness can further promote the circulation and legitimisation of innovations, while narrative resources probably help foster shared understanding and member buy-in. Finally, infrastructural resources are essential for the practical implementation and organisational anchoring of innovative practices. Collectively, these resources are likely to determine both the likelihood and the sustainability of successful policy transfer within union contexts.

To illustrate the above, the 'organising turn' within trade unions over the past couple of decades stands out as a quintessential example of a soft, intentional or voluntary policy transfer often based on 'organisational consulting' (Givan and Eaton 2021: 620; see also Aguiar 2023; Mundlak 2017; Vandaele and Leschke 2010). The organising model or, better put, the organising approach is arguably the most prominent and extensively studied example of policy transfer and diffusion among union organisations in the Global North. First tested in the US cleaning sector in the 1990s (Erickson et al. 2002), the approach later spread to the English-speaking world (e.g. Geary and Gamwell 2019; Heery et al. 2000; Simms et al. 2013) and subsequently to several continental European countries like Austria, Germany and the Netherlands (Connolly et al. 2017; Greven and Schwetz 2008; Knotter 2017; Mundlak 2017; Nicklich and Helfen 2018; Thomas 2016; Vandaele and Leschke 2010). It also reached CEE countries like Estonia (Kall 2024; Kall et al. 2019) and Poland (Czarzasty 2014; Krzywdzinski 2010), where trade unionism is of low density, as well as others in northern Europe in which density is higher such as Denmark (Arnholtz et al. 2014) and Norway (Bergene and Mamelund 2015).

The degree of transferability of the organising approach is often implicitly interpreted as contingent upon the strategic capacity of the trade unions involved. For instance, in relation to internal diffusion processes and organisational learning, the approach entails not only the enhancement of skills through training but also a broader organisational and cultural transformation (Simms and Holgate 2010; Simms et al. 2013). Such a transformation is necessary for unions to comprehend the approach and embed it within their structures via developmental and educational programmes (Brown 2007). Similarly, much of the research into the approach is implicitly guided by the core research questions associated with the concept of policy transfer. For example, when examining the sources of its diffusion, studies indicate that the transmission of the organising approach can occur both horizontally and vertically, emphasising the importance of the network embeddedness of the trade unions engaged in the transfer process. A case of horizontal transfer includes the transnational connections between

union activists fostering broader awareness of the organising approach and who share experiences related to its implementation (see, for example, Arnholtz et al. 2014; Connolly et al. 2017). Vertically, the organising model is actively promoted by European or global trade union federations as part of a broader shift towards union revitalisation (Ford and Gillan 2024). This vertical policy transfer also occurs through specialised transnational institutions, such as the Baltic Organising Academy (Kall 2024; Kall et al. 2019), a consortium comprising national union confederations from the Nordic and Baltic countries, or the Central European Organising Centre (COZZ), along with similar centres established by UNI Europa, the European services workers union (De Spiegelaere and Egan 2024).

In short, as a heuristic tool, policy transfer facilitates the integration of other concepts, the strategic capacity of trade unions and organisational learning, for a deeper understanding of the processes of scaling up and scaling out in relation to union revitalisation experiments. The concept provides a valuable framework for analysing non-state diffusion, whether innovations are endogenously rooted within the union organisation itself or externally borrowed from other (union) organisations (abroad). In the first case, policy transfer fosters internal adaptation and the evolution of existing policies, methods or tactics; while in the second, the transfer from the ‘transmitter’ leads to innovation within the ‘adopter’ and its possible expansion and long-term sustainability in the organisation.

All the case studies in this volume therefore interpret the horizontal and vertical diffusion of innovative ways towards union revitalisation through the lens of the policy transfer concept. They pragmatically adhere to a template that includes several guiding questions related to the heuristic framework. These questions include:

- What are the drivers of policy innovation and its diffusion within the union organisation?
- What is the content of the policy transfer?
- What are the sources of inspiration for the policy transfer?
- What mechanisms facilitate the policy transfer?
- To what extent has the policy transfer process been successful?

To ground the framework in real-world experiences, the volume draws on eleven case studies from nine union organisations across eight EU Member States: Belgium, Czechia, Denmark, France, Hungary, Italy, Poland and Slovenia. The selection of cases, research methods and data sources are discussed in detail in the following section.

### **3. Case selection, method and data**

This volume builds on a qualitative case study approach within the field of work and employment relations (Hyman 2001a). Regarding the case selection and scope, researchers from selected countries were tasked with identifying and analysing ‘critical cases’ of innovation and their (potential) policy transfer within individual union



organisations of their choosing.<sup>4</sup> In total, nine organisations were selected: one grassroots union from Poland; six mainstream unions from Belgium, Czechia, Denmark, Hungary and Italy; and two union confederations from France and Slovenia.<sup>5</sup> The chapters from Denmark, France and Hungary each examine two cases of policy transfer. As a result, there are five case studies from CEE countries and six from western Europe.<sup>6</sup> There is thus a balanced coverage of policy transfers from different regions and countries. Table 1 outlines the nine organisations and their respective organising domains.

Table 1 **Union organisations studied and their organising domains**

Industry	Trade union organisations
Commerce and retail	General Confederation of Labour (Confédération Générale du Travail) in France (Chapter 3); Trade Union of Commerce Employees (Kereskedelmi Alkalmazottak Szakszervezete) in Hungary (Chapter 8); Workers' Initiative (Ogólnopolski Związek Zawodowy Inicjatywa Pracownicza) in Poland (Chapter 6)
Health and social work	Trade Union of Social Care Workers (Szociális Ágazatban Dolgozók Szakszervezete) in Hungary (Chapter 8)
Hotels and restaurants; tourism	3F in Denmark (Chapter 7); Italian Federation of Commerce, Hotel and Service Workers (Federazione Italiana Lavoratori Commercio, Alberghi, Mense e Servizi) (Chapter 5)
Metal	Metalworkers' Union (Odborové sdružení KOVO) in Czechia (Chapter 2)
Transport	3F in Denmark (Chapter 7); Belgian Union of Transport Workers (Belgische Transportbond/ Union Belge du Transport) (Chapter 4)
Worker category	Trade union organisations
Isolated workers	General Confederation of Labour (Confédération Générale du Travail) in France (Chapter 3)
Young and precarious workers	Association of Free Trade Unions of Slovenia (Zveza svobodnih sindikatov Slovenije) (Chapter 9)

Source: authors' elaboration.

The majority of the cases focus on union organisations active in the private services sector. The Czech and Slovenian case studies, as well as one of the French ones, are exceptions. The Czech case explores innovation and policy transfer in a union within the metalworking sector, while the French and Slovenian studies focus on issues faced by precarious workers. Additionally, the analytical focus is the company in one of the Danish and one of the French cases, as well as in the Polish case, whereas the industry level is central to all the other case studies. The distribution of cases across different industrial relations regimes outside CEE countries is as follows (Visser 2009): one case from central-western Europe (Belgium), two from Nordic Europe (Denmark) and three cases from southern Europe (France and Italy).

The inclusion of trade union organisations operating across a diverse range of industries and industrial relations regimes demonstrates the variation in their institutional

4. The editors have made a conscious effort to achieve gender balance among the contributing researchers.
5. Potential instances of policy transfer within Bulgarian and Lithuanian trade unions were also identified in the early stages of this project. However, these cases were ultimately deemed unsuitable due to limitations in the available data.
6. Given the dynamics in its industrial relations regime, Slovenia is considered here to be part of the centre-east and not the centre-west (see Stanojević and Poje 2019; Stanojević et al. 2023).

embeddedness (Gumbrell-McCormick and Hyman 2013; Waddington et al. 2023). These differing institutional contexts not only allude to how external challenges could be framed differently according to union identities (Frege and Kelly 2003; Hodder and Edwards 2015; Hyman 2001b); they are likely also to influence the availability of external, institutional power resources for unions which, in turn, might have an impact on unions' strategies for revitalisation. For example, it has been postulated that the relatively strong institutional protections for union security in western Europe may explain why unions in this region are less inclined to strengthen workers' associational power through innovative organising campaigns compared to their counterparts in English-speaking countries like the UK (Heery and Adler 2004). Accordingly, the appetite for revitalisation experiments might equally be contingent on the institutional context.

This volume does not seek to determine whether specific (institutional) contexts inhibit or facilitate innovations for union revitalisation, however. Such an inquiry would require a different research design. Rather, the case studies presented in this volume offer a snapshot of innovations in union revitalisation and their potential diffusion. As such, no definitive conclusions can be drawn regarding the breadth and impact of these transfers across union organisations in Europe. Nevertheless, the inclusion of several successful transfers from CEE countries challenges the assumption that innovation is only confined to union organisations in western Europe, where infrastructural resources are typically stronger (see also Bernaciak and Kahancová 2017b). This shows the potential for innovation and policy transfer to occur irrespective of unions' financial or organisational strength, emphasising instead the importance of strategic capacity in mobilising power resources (Lévesque and Murray 2010) as well as the key role played by 'policy entrepreneurs' within union organisations.

All the case studies engage with and contribute to the extensive literature on union revitalisation, focused on building workers' power in the workplace and society. While this literature tends to emphasise outcomes, and attempts to measure the success of revitalisation efforts, this collection shifts the focus to processes of union revitalisation, thereby highlighting agency over structure in those processes. The authors have intentionally kept references to the revitalisation literature to a minimum, opting instead to provide a contextual analysis of the cases and a thorough examination of the policy transfers involved. In addition to demonstrating deep, context-specific knowledge, the authors have been observing the selected union organisations over extended periods of time. Thus, drawing on a 'slow' comparative research approach in work and employment relations (Almond and Connolly 2020), they have developed long-standing personal relationships with the union organisations under study, some being actively involved in their internal operations. Indeed, some chapters represent embedded research collaborations between researchers and practitioners.

In terms of methodology, a similar systems design is adopted in respect of three countries – Denmark, France and Hungary – allowing for meaningful cross-case comparisons in those chapters. The remaining chapters focus on single case studies. Yet, the shared use of the heuristic framework across all the chapters does enable cross-case comparisons, synthesised in the concluding chapter (see Chapter 10). The research design considers



qualitative case studies and most chapters, explicitly or implicitly, adopt an abductive research strategy to understand policy transfer and diffusion. This approach involves an iterative process of moving between existing theoretical insights and emerging empirical findings to generate new understandings. Furthermore, a union-centred perspective underpins all the case studies, the union organisation serving as the primary unit of analysis. Exceptions include the Belgian, Czech and Slovenian cases which focus on other internal union structures; these specifically being, respectively, union sections, regional offices and a set-up aimed at representing young and precarious workers.

Finally, regarding data collection, the findings in the case studies are based on a combination of participatory observation, primary documentation, 41 interviews with key officials within the union organisations, or others offering insider knowledge, and the secondary literature.<sup>7</sup> Each chapter includes a brief, separate section detailing the research methods and data collected, thereby enhancing the readability of the main text. Beyond this method section, authors were free to structure their case studies as they deemed appropriate although they were encouraged, through the review process, to engage as fully as possible with the concept of policy transfer.

## **4. Structure and chapter overview**

This section provides a concise overview of the ideas, knowledge and practices that have been intended for policy transfer and diffused within the union organisations under consideration (see also Chapter 10). In total, eleven context-sensitive policy transfers are explored and analysed, listed in Table 2, these entailing both successful and less effective examples. While the Danish, Hungarian and Italian chapters examine the transfer of more recent innovations, the Belgian, Czech and Polish cases, along with one of the French ones, explore processes of policy transfer over the course of a decade or longer. For instance, the ‘grouping of members’ within the Metalworkers’ Union (OS KOVO, Odborové sdružení KOVO) in Czechia serves as a follow-up study, critically analysing prior claims regarding the potential of this innovation to reverse membership decline (see Martišková and Sedláková 2017). Similarly, the case study of Trade Union Youth Plus (MP, Sindikat Mladi plus) in Slovenia and its impact on diffusing ‘proactive fieldwork’ across the union organisation builds upon earlier research on this particular union structure (see Samaluk 2017; Samaluk and Kall 2023).

The volume is organised thematically in four parts. These include: adapting union structures through new organisational forms (Part I: chapters 2 and 3); modifying repertoires of collective action via new outreach methods and union campaigns targeting (potential) union members (Part II: chapters 4, 5 and 6); initiating organising efforts aimed at increasing union membership and activating members in union work (Part III: chapters 7, 8 and 9); and the concluding chapter and the afterwords, the latter written by Melanie Simms and by Mélanie Laroche and Gregor Murray (Part IV).

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7. In the main text of the respective case studies, interview references are indicated by INTVW1, INTVW2 and so on.

Table 2    **Categorising union policy transfers into strategies (N=11)**

<b>Re-engineering organisational forms</b>
'grouping of members' (Chapter 2); 'site union' and 'inter-company union' (Chapter 3)
<b>Modifying repertoires of collective action</b>
'roadshows' (Chapter 4); 'outreach methods and tactics' (Chapter 5); 'knowledge about work safety standards' (Chapter 6)
<b>Launching organising initiatives</b>
'member-only benefits' and 'methods and tactics for engaging young people in collective bargaining' (Chapter 7); 'participatory organising' in two unions (Chapter 8); 'proactive fieldwork' (Chapter 9)

Source: authors' elaboration.

Parts I to III thus comprise the empirical case studies exploring specific examples of policy transfer and organisational learning across European trade unions. The processes and outcomes of those transfers may analytically be categorised into three overlapping union strategies (see Murray 2017, 2024). While union revitalisation is multi-dimensional, it is apparent that the innovations considered in the case studies are primarily focused on the organisational and membership-related aspects of revitalisation (Behrens et al. 2004a).<sup>8</sup> In the conceptualisation of the power resource approach, the ideas, knowledge and practices that are transferred primarily seek to strengthen the associational power of workers (see Ibsen 2024). That policy transfers here are largely associated with union strategies in the membership and organisational dimension of revitalisation may not be coincidental; after all, to varying degrees, trade unions are membership-based organisations.

Furthermore, innovative efforts associated with other union strategies, such as social partnership, coalition-building with progressive movements or political advocacy or action, could be more limited or are perhaps less likely to be transferred: the institutional environment may play a more decisive factor in this regard and uncertainties are more likely given the interactive nature of those strategies. Nevertheless, while the initial and central analytical focus of the case studies is on a single policy transfer, it becomes clear that successful transfers often inspire and trigger additional experimentation and innovation, either related to the same strategy or extending to others. Consequently, the strategies and policy transfers associated with the economic and political dimensions of union revitalisation (Behrens et al. 2004a) also come into focus in some of the case studies, showing how power resources interact and overlap (see Chapter 10). Finally, the very process of policy transfers between union organisations from different countries serves as an example of transnational union cooperation, itself seen as a union strategy for revitalisation (Lillie and Martínez Lucio 2003). Put differently, transnational union cooperation is likely to be an integral part of any union revitalisation experiment if a policy transfer from abroad is involved.

While the concluding chapter (Chapter 10) synthesises how each case contributes to answering the volume's core research question (how small-scale innovations scale up

8. What is labelled here as the 'organisational dimension' is referred to as the 'institutional dimension' in the original conceptualisation of union revitalisation. This relabelling is intended to avoid confusion with the concept of 'institutional resources' as used in the power resources approach.

and diffuse within and across larger union structures), the following subsections provide a descriptive overview of the case studies, presenting the themes and sectors covered.

## **5. Part I - Re-engineering organisational forms (chapters 2 and 3)**

While union mergers are often examined within the literature on organisational change and restructuring in unions, in particular in western Europe (see, for instance, Behrens et al. 2004b; Gumbrell-McCormick and Hyman 2013), internal union structures and governance seldom take centre stage in research on union revitalisation. Part I of this volume addresses that gap by focusing on three cases from Czechia and France that involve the re-engineering of union structures, exploring how new organisational forms can serve as alternatives to traditional models of representation. Recent union mergers are rare in Czechia, as in other CEE countries (Bernaciak and Kahancová 2017a), where the adaptation of union structures tends to focus on addressing basic organisations; that is, the primary unit of representation within the organisational structures of unions (Waddington et al. 2023). While union mergers are not uncommon in France, the structure of the General Confederation of Labour (CGT, *Confédération Générale du Travail*) in France remains, almost equally, founded on basic units that are relatively small in terms of membership (Rehfeldt and Vincent 2023).

In Chapter 2, Monika Martišková and Adam Šumichrast explore the policy transfer of the ‘grouping of members’ model within the regional centres of OS KOVO, the largest trade union in Czechia, representing workers in the metalworking sector. This model can be characterised as a comprehensive union structure that serves as an alternative to the traditional basic union organisation at company level. Formally enshrined in union statutes and operational since 2013, the grouping of members emerged as an innovative response to the union-busting tactics employed by multinational corporations and to the country’s changing legal environment. While the transfer of this model within OS KOVO has been relatively limited so far, it presents several advantages. Notably, it anonymises union membership, shielding workers from employer scrutiny, and has the potential to strengthen collective bargaining by allowing for greater coordination and professionalisation through full-time officers (FTOs). The authors argue that the limited and uneven policy transfer can largely be attributed to prolonged legal battles with employers, ongoing internal debates about the implications of the model for financial resources and union decision-making structures, and insufficient vertical coordination between regional centres and the central union body of OS KOVO. Despite these challenges, the authors remain cautiously optimistic, suggesting that, if OS KOVO takes on a more active role in promoting and coordinating this model, its impact could be far-reaching.

In Chapter 3, Sophie Bérout and Saphia Doumenc critically assess two newly launched local union organisational forms within CGT in France. These forms were designed to cater better to a fragmented and precarious workforce than traditional company unions. The ‘site union’ format, launched in 2008, organises employees within a large urban shopping centre in Lyon which hosts over 300 shops, while the more recent ‘inter-company union’ model, initiated in 2020, seeks to engage isolated union members in

the Paris region – workers who are union members but not represented within their respective companies. These novel organisational structures, based on geographical and inter-occupational grounds rather than being company-specific, aim to address the needs of workers in precarious employment and in fissured workplaces (Weil 2014). Both have struggled to gain traction, however: the company union model continues to dominate within CGT and the new structures remain largely experimental. Internally, there has been insufficient support for developing the skills of policy entrepreneurs who need to navigate existing union structures. Additionally, these structures face a risk-averse mentality, causing hesitancy towards the adoption of new forms of organisation. Externally, the lack of institutional recognition from employers further exacerbates the financial challenges these new structures face.

To conclude, the three examples in Part I, of new bottom-up organisational forms for representation, present largely negative cases of policy transfer. Despite formal recognition within union decision-making structures, the diffusion of the innovations has been limited. The Czech case shows more advanced replication within the union, but diffusion within CGT in France remains partial at best. The reasons behind these incomplete policy transfers stem not only from internal union-related dynamics but are also shaped by external, contextual factors.

## **6. Part II - Modifying repertoires of collective action (chapters 4, 5 and 6)**

Part II centres on new forms and strategies of action within the broader collective action repertoire of trade unions. The case studies from Belgium, Italy and Poland explore how innovations aimed at reaching both existing and potential members have been transferred.

In Chapter 4, Kurt Vandaele examines the policy transfer of ‘roadshows’ within the Belgian Union of Transport Workers (BTB/UBT, Belgische Transportbond/Union Belge du Transport). BTB/UBT stands out as one of the few trade unions in Belgium to experience consistent membership growth over the past two decades. This growth has taken place within a generally favourable context, including a relatively stable, ‘labour-friendly’ industrial relations system and continuous employment growth in road transport and logistics. However, these external conditions alone do not explain the union’s success; union agency has been equally crucial. A revitalised relationship between the union and its members in the early 2000s, followed by a generational leadership shift, paved the way for democratic experimentation and innovation within BTB/UBT’s collective action repertoire. Central to this development are the roadshows, launched in 2008, which enable the union to engage with the largely mobile workforce in transport and logistics through a combination of organising methods and tactics and service provision. Facilitated by lead organisers, newly created union positions responsible for coordinating these efforts, the roadshows have expanded across various transport and logistics subsectors, demonstrating their adaptability. Beyond their success in member recruitment and retention, the roadshows have also contributed to broader innovations in BTB/UBT’s campaigning strategies.

In Chapter 5, Arianna Tassinari and Alex Girolamo present an Italian case, examining the ‘Tourism Upside Down’ (‘Turismo Sottosopra’) campaign launched by the Italian Federation of Commerce, Hotels, Catering and Services Workers (FILCAMS CGIL, Federazione Italiana Lavoratori Commercio, Alberghi, Mense e Servizi). This campaign emerged as a response to labour shortages in the tourism and hospitality sectors in the wake of the Covid-19 pandemic. The success of grassroots unions in organising precarious workers led the FILCAMS CGIL leadership to reconsider and diversify its strategies. Traditional approaches, which primarily relied on collective bargaining, had proved insufficient in addressing the needs of a seasonal and temporary workforce, in particular within the fragmented employment landscape of tourism and hospitality. Drawing inspiration from US-style organising methods but, more especially, from domestic outreach efforts in agriculture, the union initiated a mobile, proactive summer campaign via campervans in 2022 and which has continued since. This new approach has expanded FILCAMS CGIL’s action repertoire, incorporating innovative outreach tactics and methods. Reflecting organisational learning, the campaign has grown over time, benefiting from resources transferred from national to local union structures. Today, Tourism Upside Down combines grassroots activities, mobile service provision, public engagement with stakeholders and entertainment, with the aim of raising awareness about workers’ issues and enhancing the union’s visibility within the sector.

In Chapter 6, Katarzyna Rakowska focuses on policy transfer within Workers’ Initiative (OZZIP, Ogólnopolski Związek Zawodowy Inicjatywa Pracownicza), a grassroots union at the forefront of organising Amazon workers in Poland. OZZIP’s experience reveals two distinct union strategies adopted after a failed strike attempt and the blocking of mediation talks by the e-commerce giant. The first strategy is defensive, centring on litigation related to unlawful dismissals and other workplace issues, which also serves as a testing ground for broader union campaigns. One key such campaign focuses on reducing physical workloads and improving work safety regulations within Amazon. Rakowska argues that strategic litigation, coupled with the union’s growth, has led to bureaucratic structuring within OZZIP, such as the establishment of a union office and the hiring of FTOs to manage administrative and legal tasks. The second strategy, which puts the union on the offensive, aims to improve work safety standards and has inspired similar worker-led initiatives at transnational level. This example demonstrates how local union actions can have broader European and global resonance, illustrating the transnational potential of domestic policy experiences.

The outreach efforts regarding both potential and existing members, as well as the union campaigning methods and tactics explored in these three case studies, show successful instances of policy transfer and organisational learning. They have allowed trade unions in Belgium, Italy and Poland to renew and diversify their collective action repertoires. In Belgium and Italy, the focus on outreach has enabled unions to engage previously hard to reach mobile or seasonable workers; in Poland, the emphasis on work safety regulations has infused union campaigns with new insights, strengthening both union strategies and effectiveness.

These cases also emphasise how innovative policies, methods and tactics can transform traditional models of representation. For example, both the roadshows and the summer

outreach campaigns present informal alternative forms of union representation that go beyond traditional workplace-based models. While these new forms give voice to precarious workers in sectors like transport and tourism, they also mark a shift towards more flexible, proactive approaches within mainstream union confederations. In contrast to the formal structural adaptations observed in the Czech and French cases, these Belgian and Italian examples present a more optimistic outlook. This positive trend is echoed in the Polish case that centralises the repertoire of a grassroots union.

## **7. Part III - Launching organising initiatives (chapters 7, 8 and 9)**

As mentioned earlier, one of the most significant policy transfers in trade unions over the past three decades or so has been the adoption of the US-style organising approach to recruit and organise new members. Part III illustrates the export of this approach with five case studies exploring its implementation in Denmark, Hungary and Slovenia.

In Chapter 7, Christian Lyhne Ibsen investigates two innovations in the organising approach of 3F, Denmark's largest trade union. The first case focuses on 3F's efforts to engage the management of Billund Airport, Denmark's second-largest airport, in collective bargaining to secure member-only benefits for 3F members and those of other unions affiliated with the Danish Trade Union Confederation (Fagbevægelsens Hovedorganisation). 3F shop stewards framed these benefits as a way of fostering a less adversarial relationship with employers which would benefit both sides. Moreover, they argued that such benefits would also incentivise membership and improve retention, thus strengthening their mandate to negotiate health and safety and other issues with management. While local shop stewards drove the policy transfer of negotiating member-only benefits in collective agreements, progress at industry level has been impeded for various reasons. Member-only benefits clash with the fundamental principles of the Danish bargaining system, in particular the non-discriminatory principle of collective agreements, and face scepticism and resistance both from senior 3F leadership and from employer associations.

The second Danish study, however, has been more successful, with 3F seeking to involve young people in the collective bargaining process within the hospitality sector. The union campaign, at Copenhagen's primary vocational education and training school, has been beneficial not least because employers supported the initiative, while it led to increased membership and better collective agreements. Both top-down and bottom-up policy transfers played a role, with other Danish unions now adopting similar youth-oriented, transparent bargaining practices.

In Chapter 8, Imre Gergely Szabó and Eszter Turai delve into the policy transfer of 'participatory organising' within Hungarian trade unions, a term coined by union actors themselves to draw parallels with the 'deep organising' approach conceptualised by the late Jane McAlevey (2016; see also Holgate et al. 2018). This approach differs from strategies focused primarily on mobilising already unionised workers or simply recruiting new members. The authors compare a small, new union with a larger, more established one, both operating in sectors with low union presence. The study stresses



how participatory organising has been transferred through transnational networks, such as Germany's IG Metall and UNI Europa's COZZ, and domestic networks like the Budapest Solidarity Economy Centre (Szolidáris Gazdaság Központ). This transfer has led to membership gains for both unions. Apart from the gradual introduction of participatory organising, the authors underscore the importance of activists' autonomy as well as a union leadership that is open to experimentation and innovation. The success of these unions is also tied to their embeddedness in both horizontal and vertical networks which provide sustained financial support.

Last but not least, Chapter 9, by Barbara Samaluk, explores the role of MP in transferring innovative policies within the Association of Free Trade Unions of Slovenia (ZSSS, Zveza svobodnih sindikatov Slovenije), the country's main union confederation. Founded by young activists in 2011, MP initially operated as an independent structure connecting young and precarious workers with ZSSS-affiliated unions, while also representing their interests in Slovenia's social dialogue institutions and by engagement with various bodies responsible for youth policy.<sup>9</sup> Over time, MP has successfully transferred policies, methods and tactics for engaging young workers across various ZSSS affiliates, while also influencing union communication strategies and securing external sources of project funding. This funding has not only sustained MP's activities but has also delivered infrastructural resources to the union's affiliates, enabling them to tackle new issues affecting workers. The impact of MP's innovations extends beyond Slovenia, demonstrating the potential for local successes to be reproduced transnationally.

Together, these five case studies highlight the 'travel' of ideas, knowledge and practices within supportive transnational and national activist networks. However, the Danish case study on member-only benefits also underscores a key challenge (and which also features in the Czech and French cases): the importance of union leadership in fostering and sustaining such innovations (see Chapter 10). This challenge is compounded in that, even in high-density countries like Denmark, trade unions continue to grapple with declining membership, mirroring the challenges faced in lower-density contexts such as Hungary and Slovenia. This suggests that, despite differing institutional settings, unions across these countries confront similar organisational hurdles such as engaging younger workers, demonstrating relevance in precarious labour markets and building sustainable organising models.

## **8. Part IV - Concluding thoughts (Chapter 10 and Afterwords)**

This volume aims to move beyond isolated case studies of union revitalisation by offering a systematic cross-case comparison in the concluding chapter. Grounded primarily in the heuristic framework outlined earlier, this comparative analysis sheds light on both the differences and the commonalities in how innovations diffuse and how organisational learning unfolds within trade unions. In addition to the conclusions presented by the editors in Chapter 10, Part IV includes afterwords by Melanie Simms

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9. MP became part of the confederation in 2021.

and Mélanie Laroche and Gregor Murray, offering further insights into the issues and themes discussed throughout the case studies.

Laroche and Murray, editors of ‘Experimenting for union renewal: challenges, illustrations and lessons’, published by the European Trade Union Institute (2024c), which served as a major inspiration for this volume, write: ‘(...) this collection should be understood as an invitation to document more cases, expanding their thematic and geographical range, integrating both successes and failures, and replicating types of experimentation to better understand the dynamics and conditioning factors of their relative success or failure’ (Laroche and Murray 2024a: 39).

This volume responds in part to that call. It gathers a new set of cases, reflecting both successful and less successful examples of union revitalisation. It confirms that such experimentation is taking place not only within grassroots unions but also in established, mainstream union organisations. At the same time, the global perspective of ‘Experimenting for union renewal’ is narrowed here to focus specifically on selected trade unions in Europe. The issues and themes explored converge around a shared set of challenges and objectives: above all, strengthening workers’ associational power and building organisational capacity within unions. As noted throughout, however, this volume also adopts a distinct research focus. Rather than examining the experiments themselves in isolation, it turns attention to what happens in their wake; that is, the extent to which these innovations are transferred and diffused within and across union organisations.

## **9. Conclusions**

Trade unions across Europe face a shared set of challenges, both internally and within the broader labour market and political landscape (Visser 2024; Waddington et al. 2023). At the same time, many unions are more determined than ever to identify and apply best practice in revitalisation. They are increasingly looking to learn from others, whether these be fellow union organisations, community associations or social movements (see, for example, Connolly 2024), both within national contexts and across borders. However, when new and innovative approaches adopted from elsewhere fail to deliver immediate results, it is essential to question whether external contextual differences can fully explain these outcomes.

While institutional settings, state and employer strategies and political opportunity structures – the external conditions shaping the possibilities of movement – certainly influence union revitalisation efforts, they cannot alone account for the uneven outcomes observed. Trade unions must also look at themselves. The case studies in this volume shift the focus to internal governance and organisational structures, being recognised as ‘crucial for union revitalisation, yet simultaneously difficult to target’ (Behrens et al. 2004a: 23). This volume contributes to the literature on experimental approaches and innovations in union revitalisation. Moreover, it also engages with the scholarship on emerging forms of labour internationalism and acknowledges the



transnational dynamics of some revitalisation efforts such as those embodied in the organising approach (Aguiar 2023; Givan and Eaton 2021; McCallum 2013).

These case studies demonstrate the importance of introspection. The findings suggest that the failure of some efforts to adopt and adapt best practice stems as much from internal dynamics as from external factors. This should come as no surprise: internal barriers to organisational change are not unique to trade unions. This collection offers a complementary, inwards-looking perspective on why the transfer and diffusion of ideas, knowledge and practices within and between unions sometimes succeed and sometimes fall short. It encourages unions and their allies to reflect not only on what to adopt but also on how internal capacities can either enable or constrain meaningful change.

The framework guiding this volume brings together three key concepts: strategic capacity, policy transfer and organisational learning. Together, these illuminate how innovation occurs within unions and, crucially, what happens after democratic experimentation. While trade unions are often portrayed in policy and media discourse as stagnant or resistant to change, these case studies challenge that narrative, showing that innovation is indeed taking place. However, the internal dynamics that follow are just as important as the innovation itself. Policy transfer, while seeming initially to be narrow in scope, raises vital questions about internal bureaucracy and union culture, union democracy and organisational effectiveness; issues that are central to both academic inquiry and practical reform.

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Cite this chapter: Vandaele K. and Fabris B.L. (2025) Scaling and spreading innovation in trade unions. Understanding union revitalisation through capacity, transfer and learning, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Abbreviations

<b>BTB/UBT</b>	Belgische Transportbond/Union Belge du Transport (Belgian Union of Transport Workers)
<b>CEE</b>	Central and eastern Europe
<b>CGIL</b>	Confederazione Generale Italiana del Lavoro (General Confederation of Labour)
<b>CGT</b>	Confédération Générale du Travail (General Confederation of Labour)
<b>COZZ</b>	Central European Organising Centre
<b>EU</b>	European Union
<b>FILCAMS CGIL</b>	Federazione Italiana Lavoratori Commercio, Alberghi, Mense e Servizi (Italian Federation of Commerce, Hotels, Catering and Services Workers)
<b>FTO</b>	Full-time officer
<b>MP</b>	Sindikat Mladi plus (Trade Union Youth Plus)
<b>OS KOVO</b>	Odborové sdružení KOVO (Metalworkers’ Union)
<b>OZZIP</b>	Ogólnopolski Związek Zawodowy Inicjatywa Pracownicza (Workers’ Initiative)
<b>ZSSS</b>	Zveza svobodnih sindikatov Slovenije (Association of Free Trade Unions of Slovenia)

## **Part I**

### **Re-engineering organisational structures**





## Chapter 2

### **Czechia – The grouping of trade union members revisited: slow policy transfer arising from external barriers and internal controversies**

Monika Martišková and Adam Šumichrast

Like other countries in Central and Eastern Europe (CEE), the union movement in Czechia has experienced a continuous decline in membership since the 1990s and an associated decrease in collective bargaining coverage. Whereas this decline has come to a stop in recent years, stabilising membership density at around 11%, the high extent of decentralisation and dominant company-level bargaining developed across this period further complicated efforts towards wage increases and improvements in working conditions. Therefore, when in 2013 a new policy regarding the organisational form of union membership was introduced within the largest sector-level trade union in Czechia, the metalworkers' union OS KOVO (Odborové sdružení KOVO), dubbed the 'grouping of members' (seskupení členů), it attracted significant attention. OS KOVO is the largest union in Czechia and one of the most influential, representing workers primarily in metalworking, mechanical engineering, electrical engineering, automotives, and related technical industries. It had a membership of around 100,000 workers in 2024. OS KOVO is a member of the largest confederation, the Czech-Moravian Confederation of Trade Unions (ČMKOS, Českomoravská konfederace odborových svazů) and a member of the international union organisations IndustriAll Europe and IndustriAll Global.

The grouping of members has been assessed as one of the most interesting policy innovations in CEE countries in terms of the changing nature of unions' organisational structures, having the potential to increase membership as it is expected to reduce union-busting practices at workplace level (Bernaciak and Kahancová 2017).

Based on newspaper articles, union documentation and semi-structured interviews, this chapter traces back the policy of the grouping of members and assesses how and to what extent this policy has been transferred and diffused in OS KOVO during the last decade and the impact it has had on the union's organising efforts. Despite expectations and some anecdotal evidence of stabilising union membership (eSondy 2017), its transfer during these ten years has been limited. Nevertheless, it has not been abandoned; on the contrary, more and more proponents of it in the regional offices of OS KOVO are applying this policy innovation. Therefore the chapter revisits its transfer and understanding within OS KOVO; and asks what impact it has had on union power resources and, if positive, why the policy has not transferred more intensively, including to other trade unions.

The changes are interpreted in the context of the union revitalisation literature which is interested in the effects of internal organisational structure change on unions' power resources (Gumbrell-McCormick and Hyman 2013; Kelly and Frege 2003). This case study focuses on associational power resources in terms of the membership base but also

in terms of internal restructuring and increasing collective bargaining coordination (see also Trif et al. 2023). In other words, it aims to see if the initial optimism of researchers and observers has been relevant and if the grouping of members has improved workers' associational power.

The chapter builds on the policy innovation literature (Benson and Jordan 2011; Givan and Eaton 2021) and examines policy transfer in OS KOVO and within the union movement in Czechia, assessing in the process the channels of transfer and their drivers. For the purpose of the analysis, the regional offices of OS KOVO are treated as separate analytical units that recognise (or not) the suitability of the grouping of members for their practice in the region. The argument is developed that, while regional centres are sufficiently similar to inspire one another, satisfying the condition of similarity between transmitters and adopters, the second condition – the abstraction of the innovation and its recreation in local conditions – is not fully satisfied. The reason is that the grouping of members as a policy lacks coordination at central level as well as within the regional offices of OS KOVO, and it is not recognised by each regional office as sound. Therefore, what is observed here is a mode of horizontal learning from one regional centre to another without vertical coordination at the level of the OS KOVO leadership. As the text explains, the result is that policy transfer is limited and unevenly spread across the regional offices, which is attributed to the high level of decentralisation and autonomy within OS KOVO.

## **1. What is the 'grouping of members'?**

Two important features of the Czech industrial relations system and the internal structures of OS KOVO and their functioning need to be introduced for understanding the concept of the grouping of members.

The first important feature is that it is *basic organisations* (základní organizace) that are the most important building blocks of trade unionism in Czechia, associating members at company level and leading collective bargaining with the employer. Basic organisations can associate within sector-level unions, but they can also operate independently; that is, only at company or establishment level. Each basic organisation is a self-standing organisational unit with its own legal statute and legal obligations. Basic organisations are important structures because the articulation of workers' rights is channelled through them in company-level collective bargaining. Given the low bargaining coverage of multi-employer agreements at around 10%, company-level bargaining, with 31% coverage, remains the most important channel through which working conditions can be improved. For those workers who are not covered by collective bargaining, which is the majority of employees, legislative improvements or individual negotiation are the only ways of improving working conditions (Kahancová and Martišková 2023).

The second feature is the check-off system. This implies that employers deduct membership fees directly from the monthly wage at the request of the union member, paying these to the union account. Although the employer has no obligation to provide

this service, it is the most common form of the payment of membership fees in Czechia.<sup>1</sup> While union membership is formally anonymous in relation to the employer, in practice check-off means that the employer effectively knows who the union members are. Trade unions (nevertheless) prefer check-off due to the stability of payments, even though it does not guarantee the anonymity of union membership. Moreover, check-off also means that, when an employee leaves a job, union membership is simply left behind and is not always renewed at another employer.

Similar organisational forms to the grouping of members (also known in the literature as ‘anonymous membership’) exist in other countries as well, such as in Lithuania (Bernaciak and Kahancová 2017:221), although the Czech version was inspired by German practices in IG Metall (INTVW1). The grouping of members implied the introduction of a new form of organisational unit in the OS KOVO statutes. Initially, it operated solely within the regional centre of OS KOVO in Brno, where the roots of practising this form of member organisation date back to 2011. The Brno centre took on the initiative of including it in the OS KOVO statutes, and it was formally implemented following amendments to the statutes at the VI congress of OS KOVO in Hradec Králové in June 2013. According to the union’s online chronicle, the most significant changes adopted was ‘the revolutionary idea of expanding OS KOVO’s scope through the creation of an organisational unit without legal personality, referred to as the grouping of members’ (OS KOVO 2018; own translation). The grouping of members has sparked interest in the public and media space. After its introduction, headlines such as ‘Revolution in the Unions: Anonymous Membership in Companies’ or ‘Secret Unions in Companies, Professionals Act for Employees’ began to appear in the media (Šrámková 2016).

The grouping of members is different from the more common basic organisation. This operates at one or several employers and self-organises as a separate legal entity; legally, it is a non-governmental organisation specifically established to protect the interests of employees based on the civil code (Vácha 2013). There are three ways in which the grouping of members system differs to that of the traditional basic organisation.

First, it guarantees that rank-and-file members are, in principle, not known by management or the employer because check-off does not apply. It is telling that the grouping of members is often referred to as ‘anonymous membership’.

Second, a grouping of members, contrary to a basic organisation, is not a legal entity but directly associated with OS KOVO and managed through its regional centres. This means the administrative burden for company-level unions is less demanding. OS KOVO runs ten regional centres that cover all 14 geographical regions of Czechia. The regional centres can be considered as main contact points, offering support in collective bargaining to basic organisations and groupings of members alike, as well as legal services to all members. Each centre employs four to six specialists such as

1. Basic organisations also offer the possibility to choose if the member wants a direct deduction transferred by the employer or if the membership fee is paid directly by the member, thus not revealing membership to the employer.

lawyers, economists and health and safety specialists who have a significant degree of autonomy. Out of all the unions affiliated to ČMKOS, OS KOVO has the highest number of regional centres; in other affiliates, with shrinking membership and thus resources, regional offices have been reduced and, in some cases, it is the central office alone that administers all services to members.

Third, union dues are set lower in the groupings model and paid directly by the member to the trade union. Under the widespread practice of check-off, the employer deducts 1% of the net wage; that is, around 300 Czech koruna (CZK) per month (12 euros). Of this amount, 75% stays in the basic organisation and 25% is transferred to the OS KOVO headquarters. The grouping of members operates on the basis of a flat fee of 100 CZK (4 euros) per month. This is also paid directly to OS KOVO headquarters which then distributes the income between the regional offices on the basis of need (operating costs – salaries and rent), not on the basis of affiliated members/groupings. Because of the substantial difference in membership fee between the two forms, they are comprehended as competing forms of membership, with the grouping of members being significantly cheaper for members. This is one reason why the grouping of members remains controversial in OS KOVO internal debates even though, from an OS KOVO perspective, the amount is similar (75 CZK from the median wage under the check-off system and 100 CZK under the groupings). On the other hand, groupings might demand greater capacity from OS KOVO professionals in the centres and thus the fee might well not cover all the costs associated with this form of membership. A detailed cost-benefit analysis from the OS KOVO perspective is missing.

## **2. Drivers to introduce the grouping of members**

The two main reasons for the introduction of the grouping of members, according to internal union materials and interviews, are union-busting practices and legal changes which increased the administrative burden for basic union organisations.

OS KOVO representatives experienced union-busting during the period of the mushrooming of the manufacturing plants of multinational corporations associated with the expansion of production capacities, mostly in the automotive industry in the 2000s and after. Recognition of unions in the workplace was low, and many managers began either firing people who were attempting to establish a union organisation or offering them generous severance payments to persuade them to leave (INTVW2). As the union magazine eSondy explained in 2015, OS KOVO statistics highlight that fear of employer reprisal is the most common reason for not forming new trade unions. This is confirmed by one respondent interviewed for this research: ‘The primary motivation for the formation of a grouping of members is employee fear’ (INTVW2). The creation of the grouping of members was a response to this issue, with the aim of expanding the membership base (eSondy 2015).

A second motivation was the changes to the Czech Civil Code in 2013. From the point of view of the trade unions, these complicated the functioning of basic organisations because the new legislation redefined them as associations. This introduced new legal

obligations such as court registration and the requirement to have a chair, treasurer, supervisory and audit committees and a liquidator in case of the organisation being dissolved. This all made the functioning of union organisations more complicated and demanding. Given that the majority of leaders in basic organisations at company level are not professionals – very often they are volunteers and perform their functions only in their after-work time – this represents a significant obstacle to the establishment and continuation of basic organisations (INTVW1; INTVW3). In the case of a grouping of members, these administrative tasks are not required, while the relevant union office provides professional support in collective bargaining at company level (INTVW1; INTVW2; INTVW4).

The law also introduced stricter requirements, mandating that a union must have at least three members employed at the same employer to be recognised and for the employer to be obliged to negotiate with it. Previously, a union could operate if just one member was employed at the company (Kahancová and Martišková 2023; Vozábová 2014). At OS KOVO, internal requirements are that at least five people must be present for a union organisation to be established.

The process of forming the grouping of members was challenging at the outset, however, in particular due to legal struggles.

### **3. Legal struggles to preserve the policy innovation in the period 2015-2023**

Legal disputes which ran between 2015 and 2023 questioned whether the practice of the grouping of members was legal. Some employers regarded it as controversial, and two cases were submitted on it. The main controversial point was that just three members at a workplace could establish a right for collective bargaining at company level and yet there be no legal entity involved. Employers found this low threshold inadequate, particularly in view of the absence of a legal form, and some refused to participate in collective bargaining. They interpreted the grouping of members as a form of union existing outside the legislation; in other words, they expected trade union organisations to be established as independent entities according to the civil code.

In 2015, a Korean company, Deachang Seat, a supplier in the automotive industry, sued OS KOVO for announcing the presence of trade unions under the regime of the grouping of members. A Supreme Court ruling from 2017 stated that unions must demonstrate their presence to the employer, but that the law did not clearly specify the required form of proof, thus confirming that the announcement of three employees as union members was enough (MPSV 2017). ‘They claimed that the grouping of members is not a trade union organisation and refused to negotiate with us. Now the court has ruled in our favour,’ commented the chair of OS KOVO, Jaroslav Souček, at the time (eSondy 2018).

The legal dispute over the alignment of this practice with the Czech legislation continued until 2023 when the Supreme Court definitively confirmed the legitimacy of having multiple trade union organisations operating simultaneously within the same

workplace. This landmark decision clarified that each union (including those formed through a grouping of members) could independently represent its members provided they met the legal requirements for recognition. The ruling, which arose from a dispute within the company DEZA, also emphasised the employer's obligation to engage with all unions in collective bargaining processes, as stipulated by Czech labour regulations (Odbory info 2024).

The decision further confirmed the plurality of trade unions at the workplace, although this complicates collective bargaining and social dialogue at company level. The problem is that a veto principle applies and thus, where multiple union organisations are present, all are part of social dialogue in the company and all must agree on one collective agreement. In 76% of workplaces, there is one union organisation and at 11.6% there are two, a slight increase on 2021 when it was 10%. Almost 5% of workplaces have three union organisations, 1.7% have four and 5.5% have five, mostly accounted for in large employers with several branches (Trexima 2023). Although the growth in plurality is not precipitous, employers, along with large and established unions such as OS KOVO, complain that social dialogue is led with several union organisations, which is complicated and costly. As a result, the veto principle was replaced in 2024 by the majority principle, implying that collective agreement at the company level can be concluded with the trade union organisation having the most members, or group of union organisations representing the most members.

Confirmation of the legality of the grouping of members as a valid form of worker organisation was also regarded as controversial because it established easier access to company information for third parties. Anecdotal evidence suggests that some artificially established trade unions, in the form of a grouping of members, had abused employees' right to information, allowing third parties access to internal company information (Veverková 2021). The common feature of such specifically established unions is that they function solely in the virtual space without entering collective bargaining (Vejvodová 2019). In contrast, OS KOVO has mostly used the grouping of members to enter collective bargaining in companies without union representation.

OS KOVO announced that a trade union would function in a company in the form of a grouping of members where at least three employees joined and were willing to form a committee composed of employees and representatives from the regional centre. The union's preference was for more members due to the possibility of staff turnover. These three members are known to the employer and are afforded union protection under the labour code; they cannot be fired without consultation with a union organisation. The remaining members are unknown to the employer and registered directly with OS KOVO.

#### **4. Policy transfer and diffusion within OS KOVO after 2019**

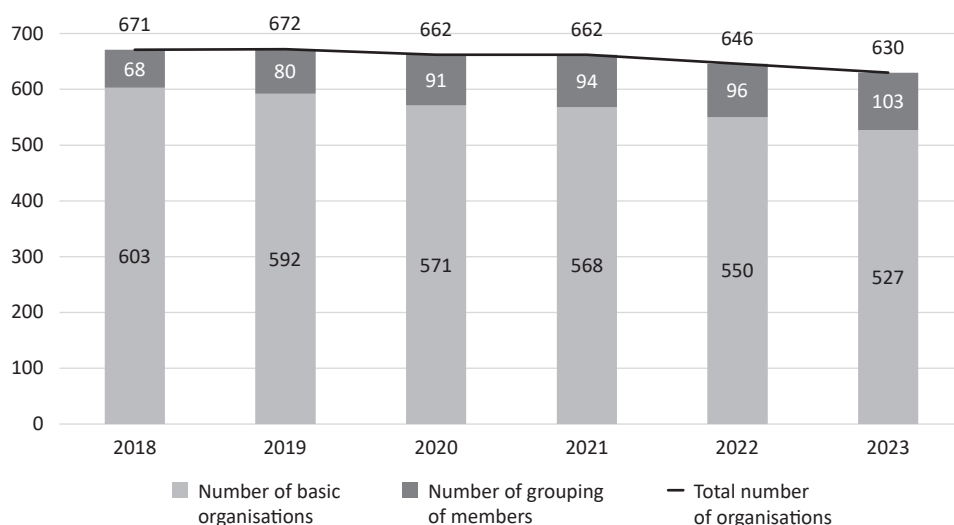
What was originally expected by OS KOVO internally was that the grouping of members would function as a stepping stone to the establishment of basic organisations. Thus, the practice would be used solely for new members (INTVW2). The statutes stipulate that a transition from a grouping to a basic organisation is possible after one year, the

assumption being that support from the regional centre would stop at some point and members would form a regular, basic union organisation. This projection was built on the expectation that experience formed under the auspices of the union's regional professionals would lead to members having the ability to take on the administrative burden but, most importantly, to lead collective bargaining in the company. Practice, after more than ten years of functioning, proves that this assumption has not been fulfilled and that most groupings do not transform. Furthermore, in some cases, the dissolution of a basic organisation due to a leader retiring or leaving a company has led to groupings being established simply to ensure the continuation of collective bargaining in the company (INTVW1).

In addition, the formation of a trade union can, in general, be a shock to employers, regardless of whether it is a grouping of members or a basic organisation (INTVW1). In most cases, it takes one to two years for the situation to stabilise and for a well-functioning social dialogue to be established between management and the committee representing the grouping. This prolongs the period in which the grouping does not transform into a basic organisation (INTVW2).

Thus, what is observed is that the number of groupings is increasing, whereas the absolute number of basic organisations is decreasing despite remaining the prevalent form of trade union unit – see Figure 1. The share of member groupings in the overall number of reported organisations was 10% in 2018 but 16% in 2023. Data on the number of members, disaggregated between basic organisations and groupings, is not available but it is reasonable to assume that the majority of members are still associated in basic organisations. Basic organisations also associate, on average, a larger number of workers.

Figure 1 **Number of basic organisations and groupings of members between 2018 and 2023**



Source: own compilation based on data provided by OS KOVO.



Brno, as the pioneering regional centre involved in introducing the grouping of members, was followed by the Southern Bohemia regional office in České Budějovice. The regional centre in Zlín joined later, helping to expand the initiative to several other regions, particularly Northern Moravia (Ostrava) and Plzeň in the west, with the Praha region joining afterward. Consequently there was no specific geographical pattern to policy transfer; it was mostly dependent on the individual decisions of regional representatives and the informal sharing of experience. Regional reports nevertheless highlight that the number of union members in OS KOVO had stabilised after a long period of decline, and that this could be ascribed to the grouping of members (Deník 2016). In 2017, the chair of OS KOVO confirmed this: ‘Thanks to this way of organising members and thanks to the daily hard work of the officials of our basic organisations, in 2016, we stopped the decline in the membership base for the first time since 1993’.

The upward trend in the formation of groupings of members has been consistently confirmed in regional reports (Parlamentní Listy 2018). Yet this number has been increasing in particular only in recent years and only in some regional centres. Table 1 shows the unequal spread of the practice across the 10 regional centres, with Brno, Zlín and České Budějovice reporting that between 28% and 43% of the overall number of registered organisations are groupings while Ústí nad Labem, Hradec Králové and Jihlava report figures of between 2 and 5%.

Table 1 **Number of basic organisations and groupings of members registered by regional centres, 2018 and 2023**

	2018			2023		
	Basic organisations	Grouping of members	Share of groupings (%)	Basic organisations	Grouping of members	Share of groupings (%)
Praha and Central Bohemia	88	3	3%	71	15	17%
České Budějovice (Southern Bohemia)	36	10	22%	33	13	28%
Plzeň and Karlovy Vary	63	5	7%	49	11	18%
Ústí nad Labem and Liberec	81	0	0%	75	4	5%
Hradec Králové and Pardubice	86	6	7%	77	4	5%
Brno	49	21	30%	37	24	39%
Ostrava	88	9	9%	81	16	16%
Olomouc	34	0	0%	32	0	0%
Jihlava	51	2	4%	52	1	2%
Zlín	27	12	31%	20	15	43%
<b>TOTAL</b>	<b>603</b>	<b>68</b>	<b>10%</b>	<b>527</b>	<b>103</b>	<b>16%</b>

Source: OS KOVO.



Partially, the limited nature of policy transfer might be attributed to the lengthy judicial processes that finally confirmed the legality of the practice only recently. Other reasons are, however, diverse. Controversies related to union plurality in the workplace and to low membership fees might also play a role, while implementation is mostly dependent on the individual decisions of regional representatives to promote this form of membership since groupings of members does increase the burden on regional employees.

There is no pattern in spreading the policy innovation between the regional centres. Due to the absence of an internal OS KOVO strategy for working with groupings of members, it is mostly up to the leadership of the regional centres to decide when and how this should take place and differences are therefore visible. For instance, in one region the policy is very often used in cases where a basic union organisation has been dissolved, while in another there have been significant efforts to provide training to groupings of members aimed at motivating them to form a basic union organisation. At the same time, such systematic efforts are not observed in other regional centres.

In other cases, increases in the grouping of members is attributed mostly to demand from new members who, when asked by regional representatives which form of union organisation they want to establish in the workplace, mostly select this option rather than a traditional basic organisation (INTVW4). As such, the policy of the grouping of members is spreading rather through bottom-up demand. The lower administrative burden and membership fees act to increase the attractiveness of this form to new members. One regional respondent admitted that, at first, they did not favour this model but eventually recognised it as a functional approach in the interest of union formation in companies (INTVW4).

The higher preference of this form for new members indicates that further policy transfer might be expected. A membership fee that is lower and flat rate, not being tied to collective bargaining gains, further increases its attractiveness. Trade unionists often mention the reverse effect of wage increases negotiated in collective bargaining on membership where the membership fee is based on 1% of the wage: the more successful the collective bargaining, the higher the wage and, thus, the higher the membership fee. In some cases, this leads to members leaving the union and engaging in free-riding.

At the same time, low membership fees are slowing down the process of policy transfer as groupings of members require much greater capacity on the part of the regional centres. Thus, a significant increase in the number of groupings would also require an increase in regional centre resources, which might not be possible due to financial constraints (INTVW4).

There is an effort to increase the membership fee for groupings of members, as the current amount is considered very low (INTVW4), in particular in the light of the growing number of groupings and the associated demands on the workload of regional representatives. This interviewee regarded that the flat rate principle should, however, remain preserved.

## 5. Unintended effects: coordination and the professionalisation of collective bargaining

One important feature, which can be considered as a positive and unintended spillover of the grouping of members, is the informal coordination and professionalisation of collective bargaining through the involvement of the staff of OS KOVO with expertise in negotiations across several companies, rather than solely relying on trade union members from one company. This might represent a new approach to collective bargaining in the context of the heavily decentralised collective bargaining system in Czechia.

The high level of decentralisation is illustrated by the large number of company-level collective agreements and the low and decreasing number of agreements at sectoral level. ČMKOS data suggests that there are around 3,700 union organisations concluding company-level agreements, while there are only 17 sector-level ones, covering around 10% of employees whereas the company level covers 31% (Veverková 2021). This indicates that sector-level agreements are not particularly large and that there are likely to be at least three thousand separate sets of negotiations for collective agreements in the private sector. Where sector-level agreements are not concluded, union organisations embark on informal coordination, proposing a template collective agreement or setting an ideal target for wage increases in collective bargaining (Martišková et al. 2021). None of these, however, guarantees any specific coordination of the results and final collective agreements are primarily the result of company-level negotiations.

Leading collective bargaining and concluding a collective agreement requires a certain level of knowledge and professionalism. In this respect, trade unionists might be disadvantaged at company level, especially if they have unrelated professional backgrounds. In such a case, they can rely on support from the professional staff of the sector-level organisation if the union is associated in one. This is the most common form of support and the principal reason why OS KOVO continues to run regional centres. Involving the latter fosters a degree of coordination as negotiators gain a comprehensive understanding of the economic conditions of companies in the region, enabling them to formulate demands within the collective bargaining process more effectively (INTVW1; INTVW2; INTVW3). Nevertheless, data which would confirm different quality or a more standard content for agreements is missing: 'I think the collective agreements negotiated by professionals from our office might provide better results than those negotiated by basic organisations themselves, but we do not collect the data to confirm it' (INTVW1). Even without such confirmation, having several professionals involved in collective bargaining negotiations in various companies might increase bargaining coordination and contribute to better bargaining outcomes in general.

Another important positive aspect of the professionalisation of collective bargaining is the involvement of someone from outside the company without the burden of a personal history with their opposite number. This might also contribute to better bargaining results (INTVW1). In the case of disputes, employers realise that they face not only internal employees, who may hold influence, but also independent professionals from

outside, reducing their leverage in terms of the potential for intimidation or putting pressure on negotiators (Odbory info 2022).

The grouping of members thus delivers satisfactory results in collective bargaining thanks to the professional services provided by the OS KOVO regional office and without placing a significant burden on company-level members. Alongside collective bargaining, however, there is also the issue of everyday life in the company, in which regional office professionals are absent. Social dialogue here falls to union members within the company, which implies a good opportunity for the three members of the committee representing the grouping of members to execute the role of employee representative. Social dialogue might thus differ from one company to another, depending on the issues that fall to consultation and information sharing. In one regional centre, there is an effort to encourage union members to participate in this dialogue and actively establish ties with their employer counterparts. Educational courses provided by OS KOVO might improve members' skills and their knowledge of their rights and the legislation, and members are regularly invited to participate which they can do in working time thanks to the stipulations of the labour code.

To sum up, the grouping of members allows OS KOVO professionals to provide support in company-level negotiations and thus coordinate bargaining results across companies. This is an important aspect in a highly decentralised bargaining system in which coordination in the absence of the sector level is difficult and replaced only by informal processes, as in the automotive sector in Czechia (Kahancová and Martišková 2023). Nevertheless, this is not supported as a systematic practice in OS KOVO, nor has it spread to other sector-level organisations. Within OS KOVO, it does increase the importance of the regional centres but, if not coordinated, it yields results only at regional level and thus has a limited impact on overall collective bargaining coordination.

## **6. Internal debate about the policy innovation and the barriers to policy transfer**

The channels of policy transfer and policy learning are mostly dependent on personal experience and are partially formed by the level of demand from members. However, three main conditions are missing for a more formalised policy transfer. First of all, there is little cooperation between the regional centres in sharing good experience. Second, a stronger role for OS KOVO nationally is required to formalise the policy across the regional centres, for example in the form of guiding principles or the sharing of best practice. Third, and most importantly, internal debate and discussion about the effects of the grouping of members within OS KOVO continues to be absent.

Proponents of the policy emphasise the decreased barriers for starting negotiations for a company-level collective agreement. It also allows the professionalisation of collective bargaining, leading to significant improvements in working conditions. The lower membership fees and because membership is not bounded to a specific company implies that member retention has increased, especially among those leaving a company for a job in another. The latter is indeed far less a reason to leave the union if union members

are organised via the grouping of members; withdrawal from the union is then more marked by reasons of retirement (INTVW2).

Opponents within OS KOVO view the grouping of members as competition to regular membership in basic organisations, primarily due to its significantly lower membership fee (INTVW3). While both models grant access to core benefits, such as support from specialists in the regional centre and legal assistance, additional benefits like recreational activities or the various gifts made available to the members of basic organisations are typically excluded for those organised under the grouping of members model. Even so, such additional benefits are sometimes questioned, as they place additional responsibility on leaders at the base level to develop and manage them, further increasing their workload (INTVW2; INTVW3; INTVW4).

Transfer is thus constrained by a lack of coordination from the centre and an absence of consensus over the positive impacts of this policy innovation on OS KOVO. In addition, in terms of how the grouping of members operates, a theoretical tension arises between democratisation and centralisation. This model is conceived as highly centralised, granting significant authority to representatives from the regional centres; thus, outside company frameworks (INTVW1; INTVW2). For example, the chair of a grouping of members, typically a representative from the regional centre, is responsible for signing several collective agreements in different companies and union members have a more limited impact on the agreement being signed.

The result of this lack of internal debate is that, currently, the grouping of members is mostly being driven by the individual efforts of regional representatives and partially by demand from new members on the grounds that it is a less demanding and cheaper alternative to the establishment of a union organisation. Greater personal capacities and resources would be needed to set this practice in place across all regional offices.

Policy transfer outside OS KOVO has hardly occurred either. A key reason is that other union organisations lack, or have only a limited number of, regional centres on which hinges the implementation of the grouping of members model. Moreover, a lack of analysis of the benefits and drawbacks on the side of OS KOVO itself is also preventing its further spread outside the union; the only known external transfer is recorded within the Trade Union of Agricultural and Food Workers (Odborový svaz zemědělských a potravinářských pracovníků), an affiliate of the second union confederation, the Association of Independent Trade Unions (Asociace samostatných odborů) (INTVW1; INTVW3).

## **7. Conclusions**

When OS KOVO introduced the grouping of members as a policy innovation in 2013, it was primarily a reaction to union-busting practices in companies in Czechia and the legal changes brought about by an amendment to the civil code. Policy transfer has been limited, which can be attributed to the legal disputes questioning the practice which were resolved only in 2019. Since then, a slight increase in the number of groupings of

members can be observed. This therefore suggests that the policy innovation is still not settled. However, further developments can be expected as it has, in part, contributed to a stabilisation of the membership base and the prevention of union busting in the workplace. The grouping of members is not used, however, as a specific policy of systematically addressing the challenges associated with a decentralised system of collective bargaining and low membership rates within OS KOVO. The grouping of members thus remains applied only in some regions and only in some specific companies.

This case study suggests that, despite the potential to improve internal power resources, the policy has not transferred evenly within the organisation, nor has it been extended outside OS KOVO. Policy transfer can thus be assessed as rather unsuccessful because of the limited number of groupings and the different levels of application between regional centres. Even so, there is unused potential for its transfer. For this to happen, several conditions would have to be satisfied.

First, policy transfer would have to be formalised within the organisation through knowledge sharing and a common institutional approach towards the grouping of members model. In other words, effective policy implementation requires strong leadership. This means the policy must be acknowledged at OS KOVO level and assigned to a dedicated leader or advocate – someone who takes ownership, actively supports it, and drives its adoption both within the organisation and externally. Only then would a more unified form of policy learning between regional centres be possible.

Second, there would have to be a debate about the effect of the policy on membership levels. Since its introduction, trade unionists have articulated the positive impact on membership as one of its most important advantages. In terms of organising, the policy deserves the attention of the union leadership: a flat rate membership fee paid directly by the employee to OS KOVO could indicate that a relatively low monthly payment may be able to attract members while allowing the union to maintain its services and structures. Overcoming the disadvantage of the check-off system, the grouping of members can ensure that members remain organised when changing jobs.

Third, the policy would have to be analysed from the broader perspective of its potential to contribute to a higher degree of coordination and centralisation of collective bargaining in Czechia. This would mean an increased role for the regional centres. Equally, an increase in collective bargaining coverage could be expected at the expense of the loss of the high autonomy of company-level basic organisations. However, these two organisational forms can coexist, as they do already.

Finally, there would have to be a debate within OS KOVO as to what extent coordination from the regional centre should be applied. These findings suggest that, where the grouping of members is applied, there is evidence of better collective bargaining results, albeit that this is rather anecdotal. This is achieved by regional professionals participating in several collective negotiations at company level in geographically close establishments. The decentralised form of collective bargaining is questioned as least efficient when it comes to efforts to increase coverage to at least 80%, as envisaged

in the EU Adequate Minimum Wages Directive. This may require alternative forms of coordination, understood as different governance structures to traditional single-employer bargaining. The grouping of members could thus play a role in efforts to increase collective bargaining coverage in line with the implementation of the Directive in Czechia.

This innovative policy represents as yet unexploited potential for enhancing union effectiveness. Despite being applied over ten years, a profound review and internal debate on the model remains absent. For now, if and how the grouping of members is applied is up to regional representatives to determine; moreover, debate about its overall positive and negative effects is non-existent within the wider union movement. Despite observing only a partial policy transfer, were the channels of transfer to be better established, it could play a much more important role in the revitalisation of the Czech trade union movement.

The model remains attractive to members because of the low membership fee, the anonymity of membership that it assures and protection against union busting, which can decrease the barriers to joining a union. Other advantages relate to its efficiency in addressing the issue of labour market flexibilisation, offering the possibility at individual level to retain union membership outside a specific workplace as well as, collectively, the potential to improve the coordination of decentralised collective bargaining, a topic which is relevant in the light of the implementation of the Adequate Minimum Wages Directive. The professionalisation of collective bargaining and union servicing may, furthermore, contribute to the stabilisation of the union's image in society. Thus, there is potential to improve unions' organisational resources as well as strengthen their associational power resources.

Internal debate should also encompass the disadvantages associated with a more centralised form of collective bargaining, mostly in terms of the decreased level of workers' participation in collective bargaining. Nevertheless, this can be compensated by effective articulation mechanisms between company-level groupings or basic organisations and specialists in the regional centres.

Strategic use of the grouping of members should become a part of the debate as well. Should it be maintained as a policy merely to decrease entry barriers with the perspective of being eventually transformed into a regular organisation, or should the model prevail over that of the basic organisation? If the former is the answer, then a clear strategy on how to train members associated with groupings should be followed in each regional centre; if the latter, more in-depth organisational changes are required to enable the internal transformation.

As for now, these dilemmas are not being addressed in internal debate, although this chapter might be comprehended as a first attempt to name the directions in which the grouping of members might be further developed. The absence of reflection can be interpreted as evidence that the policy is simply unsuccessful but, in the chapter, several positive or theoretical effects on unions' power resources are highlighted. Consequently

it argues instead that it is the lack of reflection on the experience of the grouping of members that is the cause of its limited application.

## Note on method and data

The evidence in this chapter is based on long-term observations and research in the area of industrial relations and social dialogue in CEE countries, in line with the ‘slow research’ approach (Almond and Connolly 2020). The grouping of members model was described as a policy innovation in (Martišková and Sedláková 2017). The preparation of this chapter was mostly achieved via newspaper articles, court decisions and the archive of eSondy, the fortnightly journal of OS KOVO, 130 issues of which were examined to put together data on the use of the grouping of members. In addition, four interviews were conducted with regional centre leaders within OS KOVO (INTVW1, INTVW2, INTVW3, INTVW4) – see Table 2. This sample of respondents mostly covers those who have applied the policy innovation, as the intention was to understand its application in various centres within the union. Interviews were conducted during August–November 2024; three were conducted online and one in person; interviews lasted between 50 to 80 minutes and were transcribed.

Table 2 Conducted interviews

Identifier	Date	Function
INTVW1	01/8/2024	Regional centre leader
INTVW2	17/9/2024	Regional centre leader
INTVW3	05/9/2024	Regional centre leader
INTVW4	10/9/2024	Regional centre leader

Source: authors’ elaboration.

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Cite this chapter: Martišková M. and Šumichrast A. (2025) Czechia – The grouping of trade union members revisited: slow policy transfer arising from external barriers and internal controversies, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Abbreviations

CEE	Central and eastern Europe
ČMKOS	Českomoravská konfederace odborových svazů (Czech-Moravian Confederation of Trade Unions)
OS KOVO	Odborové sdružení KOVO (metalworkers' union)



## Chapter 3

### **France – A shift in organisational structures within the CGT? New union strategies for precarious and dissociated workers**

Sophie Béroud and Saphia Doumenc

This chapter analyses two cases of policy innovation involving novel types of union-building projects within the General Confederation of Labour (CGT, Confédération Générale du Travail), the second largest union confederation in France. The two cases serve as examples of efforts to break away from the CGT's traditional approach to organising workers, i.e. by establishing trade unions at company level. The first case study relates to establishing a 'site union' designed to organise all employees working at a large urban shopping centre in Lyon with over 300 shops. The objective pursued by means of this site union is not only to create a common structure incorporating the small number of CGT unions already established within the larger shops at the centre but also, and more importantly, to offer an innovative structure for employees without union representatives. This site union, which commenced its activities in 2008, was one of the first initiatives implemented by a local team from the CGT with a view to bringing about a shift in the organisation's union-building methods. The second case relates to establishing an 'inter-company union' in the Paris region, once again with a view to tackling the challenges involved in establishing company unions in sectors of the economy where most employees are isolated at their workplaces. In 2020, a local team launched an experiment by establishing a union that drew its members from a geographical area rather than limiting itself to a single company, as had previously been the norm.

A factor common to both these experiments is that they demonstrate a clear link between the challenges of organising and the barriers of reinventing union structures (Murray 2017) with the aim of becoming more in tune with modern forms of employment and business configurations. The two experiments also point to some of France's trade unions making proactive outreach attempts regarding the vast majority of employees who are not organised, despite these unions often being regarded as in decline and gripped by a type of inertia (Andolfatto and Labbé 2021). The rate of union membership in France, which is estimated at 11%, has remained one of the lowest in western countries for almost four decades. That French unions are mentioned rarely in research carried out into renewal strategies is, therefore, unsurprising and primarily a consequence of them being not particularly open to such strategies (Ibsen and Tapia 2017). French unionists are largely unfamiliar with the debates that have happened within unions in the English-speaking world and the experiments that they have conducted, despite research studies seeking to bring them to a larger audience (see, for instance, Thomas 2011; Nizzoli 2017), although certain union campaigns, particularly those in support of undocumented workers, have nevertheless been comparable to organising ones (Tapia and Turner 2013). French researchers have thus had to rely on the contributions of those working on union renewal in the United States and Europe when contesting certain

French unions' attempts to transform their practices, particularly regarding workers in precarious employment (Bérout 2009; Nizzoli 2015; Doumenc 2023). On the whole, however, French trade unionism appears to be characterised by the continuation of existing structural solutions, the shortcomings of prevailing organising strategies and a lack of earmarked funding.

This situation, where trade unions remain relatively inactive despite their low influence on the world of work, is generally explained by two main factors. The first of these is the way in which they are financed. Unions are mainly financed from national government funds rather than from membership fees (Andolfatto and Labbé 2021: 119–135). The second is the level of institutional resources at their disposal: unions remain involved in the management of several joint social protection bodies, such as those for unemployment and supplementary pensions, which provides them with additional financial and logistical resources. This made it possible for Chris Howell (2003, 2009) to coin the term 'virtual trade unionism' to refer to the situation in France, on the grounds that it is characterised by a high level of dependence on the state. Howell also emphasises the state's role in building the system of industrial relations and then subjecting it to a major overhaul over the past three decades with a view to bringing it into line with labour market flexibility policies.

Although French unions continue to be largely unreceptive to organising strategies, the objective of this chapter is to show that, in terms of policy innovation, such strategies are not only being conducted but are also being copied and reinterpreted in a variety of different settings. Largely based on observation, union documentation and interviews with union secretaries, the two case studies in question provide insights into the context within which teams of union activists are mobilised within the CGT and the procedures that are followed, and also into the way in which these bottom-up innovations are perceived by the organisation's upper echelons and the factors limiting their transfer and diffusion. It highlights the barriers to the dissemination of the lessons learned from these innovations, despite their enormous revitalising potential, starting with a certain pervasive and culturally entrenched reluctance within the CGT to move away from the doctrine of company unionism.

## **1. Company unions as the basic structure in the CGT**

For many years, the CGT was the leading French confederation in terms of both member numbers and elections of public and private sector employee representatives (Dreyfus and Pigenet 2019).<sup>1</sup> It has played an ever-present and crucial role in the mass social movements that have succeeded each other in opposing the dismantling of the welfare state since 1995 (Bérout 2018; Bérout and Péliisse 2023). After the period between 1995 and 2010, however, when the CGT successfully halted the negative trend

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1. Employees are able to elect representatives to a 'social and economic committee' in private sector firms with more than 11 employees. These elections, which take place every four years in each individual firm, help to guarantee trade union representativeness. Elections also take place every four years in the three civil service branches (central government, local government and the public hospital service), but are held on a single day.

of declining member numbers, it started to lose members again.<sup>2</sup> According to its own official publications, membership dropped in 2021 below the symbolic threshold of 600,000.<sup>3</sup> The CGT also dropped from first to second place in terms of the seats gained in the elections that took place in 2017, which the French Democratic Confederation of Labour (CFDT, *Confédération Française Démocratique du Travail*) has held ever since in terms of votes for employee representatives in private sector firms.

This drop to second place merely exacerbated concerns that were already very much present within the organisation and that relate to various issues, such as the challenges involved in retaining the 30,000-40,000 new members who join the CGT each year. Although this number is not enough to offset the departure of older retiring members, a significant share of these new recruits leave the union very quickly after joining it, prompting internal debates on the capacity of the union's existing structures to provide a place for these new members. A second but related concern pertains to the profile of the CGT's members, most of whom are men aged between 40 and 60 working in government bodies or large companies with over 500 employees (Bérout 2019). This means that the CGT is struggling to organise not only younger workers (Bérout et al. 2019), but also those in precarious employment and in small companies, these two categories often overlapping. A final concern relates to the rising proportion of members within the CGT who are the only members of the union within their companies and who cannot therefore participate in workplace union activities.<sup>4</sup>

The share of these dissociated members has increased steadily over the past 20 years and, in 2021, they accounted for 16% of all members according to the union's official data. To understand this phenomenon, it should be noted that the CGT – like other unions in the Global North (Murray 2017) – is still heavily reliant on a union-building strategy aimed at large industrial companies employing thousands of people at a single site. Consequently, the union is structured around company unions that belong to federations, often linked to an industry or a sector of the economy, but sometimes also linked to a trade, and local 'territorial' unions.<sup>5</sup> Its standard approach is to establish a union as soon as 10 or so employees of a company have become CGT members, as opposed to putting in place a branch with a broader geographical scope (i.e. at *département* level) where members could associate before membership has reached that level. The company union thus continues to be the basic organisational building block of the CGT, although there are some branches that have been set up at *département* level in certain

2. The French Democratic Confederation of Labour (CFDT, *Confédération Française Démocratique du Travail*) faces fewer acute challenges in terms of member numbers, even though yearly increases are very small. The CFDT had 634,000 members in 2023. The other French union confederations have seen an ongoing decline in member numbers for over three decades, although these cannot be quantified accurately owing to a lack of transparency on their part.

3. Based on data from the 'Vie syndicale' ('Union life') section of the CGT website.

4. Different terms have been used over time to refer to this category. 'Isolated union members' was initially preferred in the 2010s but then replaced a decade later by 'individual union members', which has less negative connotations. In this chapter, we use the term 'dissociated', to emphasise such members' lack of association, while also frequently extending this to 'dissociated membership' to underline that the problem is not the members themselves but the circumstances in which they find themselves.

5. There are 33 professional federations within the CGT, which results in a rather fragmented framework. The territorial unions include local unions, *département* unions and regional committees, with the latter two corresponding to the administrative and political tiers in France.

economic sectors such as healthcare. Company unions must have officers, chiefly a general secretary and a treasurer, and must hold regular general meetings. They are conceived as the foundation of union life and democracy within the organisation.

When a company union has not been successfully established but one or two employees have joined the CGT, it follows that the link between these employees and the broader organisation is, in practice, very weak; they pay their dues each month and receive the union's magazines, but are not invited to take part in union activities in the proper sense of the term like attending meetings, handing out leaflets and so on. A link can be drawn between this phenomenon and the problems of establishing unions in small and medium-sized enterprises (SMEs). Conversely, it also has to do with 74% of CGT members belonging to a union that brings together over 50 employees.<sup>6</sup> The picture sketched out by these few details tells us that union life is lived out on the one hand in a concentrated fashion reflecting large unions in big companies and, on the other, in smaller firms in situations of dissociated membership.

## **2. Internal debates about modernising union structures**

A study into dissociated membership carried out in 2011 by the CGT's Drôme département union revealed that all its members falling under this heading worked in the private sector, that they were more likely to be female or younger than the average département member, and that they were also more likely to be blue collar than white collar workers. About 45% were in precarious employment (Bérout 2019). By calling attention to the distinctive characteristics of this sub-group, this study highlighted the link that exists between the challenge of building the union while also taking responsibility for those in the most precarious sectors of the labour market. The list of professional federations with a very high percentage of dissociated membership (> 20%) is long and includes the Temporary Staff Union (CGT Intérim) and the federations for employees working in, for instance, commerce, sales, consultancy or construction. Other federations, such as the Health and Social Protection Federation (Fédération de la Santé) and the National Federation of Staff of Social Organisations (Fédération des Organismes sociaux), have a smaller percentage of dissociated membership (around 12%), but this conceals a major division within these professional organisations between large unions established within social security bodies and individual union members carrying out domestic work, for example.

The phenomenon of dissociated membership thus sheds light on the tasks faced by the CGT in terms of the long-term and collective organisation of employees in SMEs and those in precarious employment.

It was in the early 2000s that the CGT started to debate the issue of modernising its basic structures and conceiving alternatives to the default option of the company union. One point worth noting is that this issue was approached from the perspective not only of recruitment and organising, but also from that of a 'union for life' approach,

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6. Based on data from the 'Vie syndicale' ['Union life'] section of the CGT.

stemming from a realisation of the need to offer a different organisational framework for employees who would no longer spend their entire career in the same company and who might hold a succession of precarious jobs in the same sector of the economy. At the same time, however, it also involved ensuring that these same employees could find a home within the CGT and become active. Unlike other organisations in France (Bévort 1994), the CGT decided not to prioritise unionism among members but, instead, to continue to advocate unionism among activists eligible to take on responsibilities and functions. In 2003, the 47th Confederal Congress adopted the first ‘Charter for Union Life’, reaffirming the need for members to become ‘actors in union life’ and for unions to become genuine forums for activity by holding a general meeting at least once a year. This established a clear relationship between the challenges of organising workers and the CGT’s ability to retain new members by offering them a home within the organisation. The charter also highlighted the urgent need to experiment with new organisational forms other than the company union; that is, those more suited to the lived experience of workers in precarious employment and in SMEs. Six years later, during the 49<sup>th</sup> Confederal Congress held in 2009, CGT delegates adopted the slogan ‘No union member without a union’, reasserting the principle that it must be possible for any union member to enrol in a collective framework and participate in the union’s democracy.

That the organisational union-building approach which prevails within the CGT, and which was inherited from industrial capitalism, is out of sync with the contemporary reality of a more fragmented and precarious wage-earning class was therefore identified over 20 years ago. The texts adopted by the congresses held since then refer continually to the need to modernise the CGT’s structures. The two case studies analysed below, in particular the first about establishing a site union in Lyon, fall under the heading of initiatives undertaken in the aftermath of these congress resolutions. The shared features of these two experiments include a multi-occupational and geographical approach to tackling the phenomena of dissociated membership and precarious employment. Each represents an alternative to the company union and has garnered a positive response within the CGT, leading to knowledge transfer either through the establishment of other site unions in other shopping centres and in railway stations, or through the establishment of multi-occupational unions in a small number of administrative areas. These novel union-building approaches have not, however, become embedded at institutional level; the company union continues to be the default option for the CGT.

These two case studies are reviewed below with the additional aim of highlighting the many obstacles encountered, not least the misgivings that, even now, prevent their uptake becoming more widespread and which can be attributed to the organisational culture that prevails within the CGT.

### **3. A site union organising all employees in a shopping centre**

The first case study relates to the establishment of a site union at one of Europe’s largest urban shopping centres (Part-Dieu in Lyon). The trade union was officially launched by activists from the CGT’s commerce federation in February 2008, against the backdrop

of the lively internal debate going on at the time concerning what the CGT's basic structures might look like in the future.

Interestingly, this approach was aimed at tackling a number of issues simultaneously, including the fragmentation of the workforce, the rise in precarious employment and the problem of dissociated membership. The shopping centre in question was opened in 1975 and was not therefore new but, even back in 2008, most of the people working there were female and in atypical employment relationships. A survey of press articles from the time reveals two problems that were a particular source of discontent among employees: a lack of shared facilities or services; and opening hours. No provision has indeed ever been made for staff amenities within the shopping centre and, 50 years after it opened, there are still no daycare centres, canteens or lockers for employees. No thought was given to the shopping centre functioning as a place of work; commercial considerations ruled and all that mattered was maximising profitability.

Despite the age of the shopping centre and the recurring nature of disputes over these particular issues, there is little collective memory of attempts to organise the workforce. During the 1980s, for example, trade unions did park a caravan at the exit of the shopping centre as a base for informing employees about their rights, since it was then, and still is, effectively impossible to set up a base inside it owing to the cost of renting a unit. This amnesia, which relates not only to previous organising experience but also to the knowledge built up over many years regarding the flow of money and decision-making processes within the shopping centre, is attributable to factors including the fragile nature of the union presence and, in particular, the very high turnover not only of employees but also of the few union representatives at the site. Although over 3,000 individuals are employed, the situation is vastly different to a factory where activists belonging to the various union branches would pass on to each other not only knowledge, whether complete or incomplete, about the company's history and its past social relations and struggles, but also practical know-how.

The Part-Dieu shopping centre is owned by Unibail-Rodanco-Westfield, a multinational real estate company which sells or rents property to other companies whilst remaining in charge of a whole series of decisions like 'house rules', opening hours, safety, maintenance, interior design and upgrades, and communications. From the time when the shopping centre first opened, unions have been caught on the back foot by this decision-making model, which is both pyramidal and relatively opaque.

Strictly speaking, the shopping centre is not a trade union desert: union representatives have gradually gained a foothold at its larger stores like Carrefour or Fnac via their employee representative bodies.<sup>7</sup> Yet these bodies are absent from the smaller shops belonging to the chains, most of which are run as franchises by local managers with limited autonomy. There is, therefore, a disconnect between employees working in

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7. Prior to the 2017 reform, employee representative bodies included elected staff representatives (who could also be union members), works councils (which were also elected) and the health, safety and working conditions committees. Following President Macron's executive orders in 2017, these three bodies were merged into a single entity (the social and economic committee). It should be noted that the presence of unions within companies is primarily manifested through these bodies.



the large stores where union branches or (potentially) company unions have been established, and the employees of small franchises or independent shops who lack elected representatives and unions, but some of whom may still be CGT members.

The establishment of a site union by the CGT was aimed in part at responding to this challenge of providing a common organisational framework for union members at the shopping centre regardless of whether they already belonged to a branch, and was initially made possible thanks to the institutional resources at the CGT's disposal and the support of certain political players. From the mid-2000s onwards, the regional political authorities, which were led by a left-wing alliance (Parti Socialiste, Parti Communiste Français and Les Écologistes – Europe Écologie Les Verts (the Greens)), had lent their backing to territorial social dialogue and had provided sources of funding earmarked for related measures.

Meanwhile, in 2006, the CGT's regional committee had been awarded a grant for a project relating to health and safety at work in the shopping centre. The original objective of this project was the establishment of a health, safety and working conditions committee at the site, with two different approaches being followed: the first involved the regional committee commissioning a study from a consultancy firm on working conditions at the centre; the second involved stepping up union activities by establishing a representative office whose remit would cover the entire centre – a goal achieved when the CGT's site union was officially launched in 2008.

The site union is designed to serve as a cross-sectional entity bringing together the company unions established within the centre's larger stores while, at the same time, offering employees the option of direct membership. To begin with, the site union based its demands on the report drawn up by the consultancy firm. In so doing, it pursued the goal of calling attention to issues – such as the working conditions that are an unfortunate side effect of employment in a shopping centre (noise, high footfall, artificial light) – which affected not only employees working at the centre but also their union representatives within the various stores. This was intended to allow it to speak on behalf of everyone working there.

However, the site union faced leadership-related problems from its very inception. Although the money allocated by the political players provided a source of funding for the consultancy report, there were no institutional resources to finance a union secretary position. Union funding in France is strictly linked to company-based positions and there are no sources of financing for inter-company or territorial activities. This meant that it was up to the activists who already held union roles within their own companies to take the helm of the new site union as well. For the first two years (2008-2010), the secretary role was held by a manager at the shopping centre's bowling alley who was already a union representative for the latter. In 2010, a union activist working in a large book and music store took on the task and remains in the role today (2024); she is a graduate who started her career as a designer in an advertising agency before working in Fnac stores in Paris and then in Lyon. For the past 14 years, this activist has held multiple union roles at company level, both as a union delegate and as an elected member of the social and economic committee, as well as being active within the CGT's commerce federation

and negotiating sectoral collective agreements. The company allows a certain number of hours each week to be spent on non-working duties, meaning that she could also find the time to run the site union.

This experimental project has now been running for 16 years, allowing longitudinal tracking of the resources available to and effectively leveraged by the site union (Lévesque and Murray 2010). During the first few years of its existence, the leadership planned to make use of its institutional resources and waged a legal battle for the right to establish a health, safety and working conditions committee for the shopping centre as a whole on the basis that the shopping centre would thus demonstrably be a single social and economic entity, and that its future representatives should be directly granted time off from their work duties. The leadership also attempted to secure 'ideological resources' on the basis of a survey by one of the consultancy firms, which sent out a questionnaire to the shopping centre's employees to canvas their opinions on cross-cutting problems. The data from this survey proved useful in terms of attracting the attention of the media and public authorities and highlighting the lack of any response from the shopping centre's management.

Finally, after the legal battle to get the site union recognised, followed by investigations into working conditions, the third goal was to gain strength in numbers by encouraging employees to join the site union. With this in mind, the secretary launched a newsletter for employees. Together with the site union's remaining officials – another Fnac employee and a Carrefour employee – and assisted by several local CGT activists, cross-cutting problems affecting the shopping centre have been highlighted not only by the shop-by-shop distribution of leaflets but also by strike days.

In 2013, five years after its establishment, the site union had 100 or so members, spread across 37 stores at the shopping centre. Over the course of its existence, this strength in numbers has become its most important resource. The legal battle to establish a site-based health, safety and working conditions committee was effectively lost in the mid-2010s due to amendments to the legislation and then the 2017 reforms instituted by President Macron which restructured employee representative bodies (see footnote 7). This lack of institutional resources has meant that the site union's survival rests on the activism of its leaders, who are few in number. Currently, in 2024, it still has 100 or so members, but turnover is very high due to the precarious nature of employment at the centre and the high rate of shop closures and openings. The site union therefore acts first and foremost as a resource hub for the small number of elected officials representing the CGT in some of the larger stores at the shopping centre; that is, those union members who have roles as union officers. The site union's secretary and treasurer make a point of ensuring that they are available to provide legal advice whenever there is conflict between these elected officers and the management of their companies. According to the secretary, her role looks something like this:

Broadly speaking, I'm the main point of reference for the CGT's elected representatives in the stores at the shopping centre. Whenever they come up against problems which they don't know how to handle, I help them to prepare for meetings with the management. Take Carrefour as an example. There's a female manager of that store

who has a rather – how shall I put it? – authoritarian approach. Yes, that's probably the most diplomatic way of describing her. And C&A as well, we sadly see a lot of discrimination against union members there. So there's a lot of pressure on elected officers, and it's important to build close relations with them, because we elect them, we train them and we try to boost their efforts as activists. If we abandon them as soon as they hit a minor roadblock, we'll lose them. (INTVW1)

In contrast, the site union's efforts in terms of organising dissociated members have been overshadowed by them being reluctant for their employer to find out that they are members for fear of direct repression or discriminatory practices. In particular, they rarely wish to attend training days organised by the site union since a request to do so would need to be logged in an official email.

This site union was at first heavily promoted within the union since the CGT's executive committee wished to showcase new union-building approaches in response to the congress resolutions adopted during the 2000s. There were actually two examples cited by many in the union press and in debates held between national officers during congresses: a site union at the shipyards in Saint-Nazaire, intended to organise employees of contractors and subcontractors within a single entity (Pernot 2008); and the site union at the Part-Dieu shopping centre. Although the Saint-Nazaire site union was established several years before that in the centre, they were conducted as parallel and unrelated experiments since they related to very different sectors of the economy.

The site union in the shopping centre has gone on directly to inspire the establishment of other site unions – one at a large shopping centre in the Paris region, and others at railway stations. One of these was set up at the Part-Dieu railway station, located opposite the shopping centre, in the early 2010s, CGT Cheminots (the CGT Railway Workers' Federation) having the aim of bringing together dissociated members working in shops at the station as well as any cleaning staff. Geographical and physical proximity worked as a motivating factor in this instance, alongside the CGT's promotion of the shopping centre experiment. Although the site union at the Part-Dieu railway station is still operating in 2024, it is not very active, since any industrial action on the part of the railway workers is primarily focused on industrial relations with the company that employs them. The presence of two site unions has, however, made it possible for employees at branch of a bakery chain located in the railway station to join the union at the shopping centre, where there are other branches of the same chain.

Enthusiasm for the site union at the Part-Dieu shopping centre has become more muted as the years have passed. This gradual loss of interest is undoubtedly attributable in part to the failure to secure agreement from the centre management for a site-based health, safety and working conditions committee, since this has meant that there is no institutional framework for labour relations at the level of the centre. Meanwhile, the CGT has turned instead to other union-building approaches as an alternative to company unions. A closer look at the stumbling blocks that could limit the transfer of knowledge from this experimental project is included later in this chapter.

#### **4. An inter-company union as a home for dissociated union members**

The second case study relates to the establishment in 2020 of an inter-company union covering three suburban neighbourhoods and surrounding areas in Paris: Malakoff, Montrouge and Vanves. The establishment of a union operating on a territorial basis with the aim of bringing together workers from a range of different professions and companies was a genuine challenge for the CGT, not least because the task was to establish a joint union framework not merely for workers from the same sector, but for individuals working in potentially very diverse ones. This raises challenges that are much more acute in terms of the long-term retention of new (and dissociated) members than in the case of the site union at the retail shopping centre. A key factor which, alternatively, brings together the two experiments covered in this chapter is that they were both aimed at integrating those with individual CGT membership into its democratic life.

The employee who initiated this project was an isolated union member herself before setting up the inter-company union. Since she played a very active role within the group of employees who had organised themselves with the aim of making their voices heard, she gradually took on the role of spokesperson. Following her father's advice, a former metalworker and CGT staff representative, she contacted the CGT's local union for support. The activists within this local union proved to be an enormous source of support in the fight waged by the employees of the consulting firm, who succeeded in establishing a union branch and persuading the management to set up employee representative bodies. This union mobilisation gained the employees some time, but the company was ultimately liquidated one year later. After being laid off, she registered with the employment centre to find a new job but decided to leave management. At the same time, she was volunteering with the local union where she had made friends, and where the organisational set-up suited her. This period of unemployment ended when the head of the 'labour centre'<sup>8</sup> offered her a job that would involve not only working for this organisation, but also drawing up a report on the current status of the CGT's local unions at département level, leading her to becoming a union member but in a dissociated situation immediately prior to the inter-company union being set up.

It should be noted that local trade unions<sup>9</sup> are interprofessional structures which operate under the aegis of the CGT, and which are supposed to offer a shared framework, meetings and events for the company unions present within the territory where they are based. The CGT had around 850 local unions across the whole of France in 2024. These entities have very little in the way of funding, since they receive only a very small percentage of the dues paid by each union member, the precise amount depending on decisions taken within their parent structures, the département unions. Even though

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8. The labour centres (*bourse du travail*) are entities that date back to the very early days of the trade union movement in France. Nowadays the term is used to refer to the building that houses various trade unions present in a town or city. In the case at hand, the premises are managed by an associative inter-union body that also carries out related activities, such as organising performances, exhibitions and training courses in the district of Malakoff.

9. See also footnote 5.

they lack financial and organisational resources, these local unions serve as a gateway to the CGT for employees without a union representative in their companies (Berthonneau 2017). Since there is no provision under French law for the election of representatives in such cases, however, it is mostly retired union activists who take on the leadership of the local unions on a voluntary basis although, in reality, the majority are not particularly active.

Breathing fresh life into them is viewed by the CGT as a worthy challenge: they can serve as vital sources of support for organising efforts, are often the most suitable platform for providing training to new CGT members and also allow individual union members or elected officials who are isolated within their companies to associate with other members (Biaggi 2020). These various factors go some way towards explaining why the challenge of reinvigorating local unions is sometimes prioritised by département unions over the promotion of new union-building approaches. One of the problems faced in this respect is finding union activists – whether active employees or retirees – who can volunteer their time in order to take on responsibility for them. Moreover, since union rights are attached to companies, the CGT's federations are often reluctant to pool their funding and are more open to organisational innovations within their own field of activity.

In the first few months, the union activist responsible for setting up the inter-company union visited all the existing local unions within the relevant part of the territory to explore ways of strengthening these structures. Carrying out this assessment allowed her to connect with CGT members who were in dissociated membership positions. Even though she was given opportunities to rise within the CGT, she realised that there was a fundamental problem with the organisation's democratic processes since there was no union to back her application: the CGT's rules state that activists cannot stand for election as individuals but must instead be put forward by a union. Having experienced this problem at first hand, and having furthermore observed the state of collapse of many local unions, she joined forces with other activists to consider possible solutions.

The idea of establishing an inter-company union was developed so as to bring together those in a dissociated membership situation, regardless of their employment status or the sector of the economy in which they were working, and which was also open to retired and unemployed people living in the area. Several different objectives were pursued in setting up this new structure: one was naturally to establish links between dissociated members while another was to bring together, within a single union, workers in both stable and precarious employment. Finally, the intention was for this union to be treated on an equal footing with the company unions already belonging and to have the same powers and rights; for example, the right to appoint delegates to the département union's congress and the right to participate in votes.

More than two years then went by before the activists were ready to hold the founding congress of this new inter-company union. Although the CGT has a database of members, it is widely regarded as not fit for purpose and incomplete, particularly in the case of union members who do not conform to the norm of a stable job in a large company:

We embarked on a survey of dissociated union members – there were 200 of them, out of a total of 1,000 members of the local union. The survey was really quite challenging... We sent out emails, we made calls. Some had never really had any interactions with the CGT at all after joining, and most of them had joined when voting in company elections, or as a quid pro quo for the assistance they received in building a legal case. (INTVW2)

The founding congress, which took place on 20 February 2020, was attended by 50 or so members; for some, this was the first time that they had ever been to a meeting on the CGT's premises. The members came mainly from retail and healthcare (nursing homes), but also from metalworking companies, both small and large. The congress elected officers who began their work including, in particular, on the publication of a newsletter 'in a format which employees can read on their mobile phones if they have a spare minute or two, written in the kind of language they can understand' (INTVW2). The secretary of this inter-company union is delighted with this new practice of union communication and hopes that it will lead to a better understanding of the issues:

These union members previously had access to little or no information, and now they have the union newsletter. They get all the key updates that the CGT sends out. They know when demos are going to take place, why the CGT is running a campaign on this or that subject... (INTVW2)

Retired activists hold weekly walk-in surgeries where union members can obtain legal or organisational assistance. The inter-company union's officers also organise and facilitate access to basic training courses for union members on union history and the functioning of the CGT. 'Most of our members are not elected representatives, and even if they are, they were elected by the employees of a very small company, and so they have very little in the way of funding.' Special emphasis is therefore placed on meetings with individuals to make them aware of their right to union education, and to put them in contact with other union members in a similar situation. This aim – providing as much support as possible for those in a dissociated membership situation – is also pursued in the run-up to the union's general meetings. Several weeks beforehand, the leadership team contacts members to remind them of the date and to run through the items on the agenda. To ensure that as many members as possible can attend, general meetings are held at the end of the working day.

This extra support for members has helped to make the inter-company union one of the most dynamic in the département. In particular, it has led campaigns in support of undocumented workers and has identified activists who want to play a bigger role within the local union, right up to its highest levels.

Like the site union at the Part-Dieu shopping centre, this inter-company union has been widely promoted within the CGT, in particular through articles in the union magazine. Knowledge transfer thus took place as other local activists became aware of the experiment and were interested in copying it. A similar trade union structure was established in Nantes, and multi-occupational unions were set up in other locations; these operate along the same lines to exploit the potential of bringing together, in a



single union, members working in different companies and sectors of the economy. Inter-company unions of this kind have subsequently been established within other département unions in which a significant number of local unions were no longer operational, specifically so that individual members could be integrated into an established trade union framework. This experiment has therefore been utilised to a greater extent locally than the site union at the shopping centre, and its impact has been more widespread. One key factor that might explain this is that the establishment of an inter-company union is regarded as a solution to the problem of those with dissociated membership which is rooted in the internal streamlining of existing structures rather than conscious union-building efforts, but still in line with the same underlying aim of 'No union member without a union'.

Versions of this experiment have also varied in line with local circumstances, although the experience has not been entirely positive. According to the founder of the first inter-company union:

Different approaches were taken from one administrative département to another. Some established structures that were merely hollow shells, and some set up true unions. In my opinion, what's missing is backing at federal level. They could provide us with an outline constitution, for example. There's no standard model. (INTVW2)

In certain département unions, inter-company unions are run not by (inexperienced) union members who had been dissociated members up until that point, but by officials from the département union who shouldered this task on top of their usual remit. These unions hold annual general meetings but attendance figures are low and they do not organise any training courses, hold walk-in surgeries or provide support for members in the form of internal communications. In these cases, the lessons learned from the experiment only allow the new organisational structure to be implemented in a minimal fashion, without foregrounding the challenge of involving dissociated members in the democratic life of the organisation.

## **5. Barriers to policy transfer**

At least three major factors limiting the policy transfer from these experiments can be identified as reasons for the lack of institutional recognition for site unions and inter-company trade unions in the CGT. The first relates to the localised nature of these experiments. The structures in these two case studies were implemented by a tiny number of union activists, with very little in the way of funding. Even though it was established 16 years ago, the site union at the shopping centre is still unable to support itself using institutional resources and the centre management has rejected any attempts at negotiation. The lack of funding and other resources for activism means that it has not succeeded in significantly increasing its membership. Neither experiment has resulted in a coordinated, organisation-wide policy that might lead to funding being set aside. During the last term of office of General Secretary Philippe Martinez (2019-2023), a joint assessment of these local experiments was initiated but did not come to fruition.

The second factor relates to the hesitation, or even outright refusal, of those in charge of the existing local CGT structures – the local unions and professional federations – to engage with organisational innovations and their marked preference for sticking to what is known, tried and tested (Murray 2017). The leaders of the inter-company union who advocated the establishment of inter-company unions elsewhere sometimes met with a frosty welcome, which explains why the concept has not become more widespread across the CGT's département unions. This reluctance is motivated by major financial headaches linked to the way in which members' dues are redistributed; the share that is normally paid to a company union reverts to the local union where there is no company union, and so local unions, which have access to very little funding, have a direct interest in gathering as many dissociated members as possible within their own structures. Financial considerations thus win out over the possibility of getting these members genuinely involved in union life.

Yet it is the professional federations, which are the structures that hold the most internal decision-making power within the CGT, that are the main source of hesitation. For example, the commerce federation is extremely wedded to the idea of company unions as the basic organisational unit of the entire CGT structure, which accounts for its lack of enthusiasm for helping to disseminate the lessons from the site union experiment. The determining arguments are thus more political than financial. Those in charge of the site union came up against these misgivings on a daily basis in the course of their activism, for example when they struggled to obtain the details of union representatives of the main CGT company unions present within the large stores at the shopping centre. The leaderships of the professional federations regard these new union-building efforts not as an opportunity to attract new members and provide them with a more welcoming space, but instead as a breach in the existing organisational culture and structure (Ibsen and Tapia 2017).

The third limiting factor relates to the specific capabilities and skills required by the union activists responsible for establishing and running these new organisational structures. The hurdles that must be overcome before such a structure can be put in place are both technical (how to use the internal software on membership lists, for example) and political in nature; and it is necessary to get to grips very quickly with the internal machinations of the CGT, including those forces that might seek to undermine all such efforts, and how these may be neutralised. Thanks to support provided by more experienced activists within the local union – which is not systemic – the new leaders of the inter-company union were able to mobilise resources, which played a decisive role. For her part, the general secretary of the site union performs this task at the same time as holding several mandates within her own company. It is clear that policy innovation of this kind can be demanding and difficult to maintain in the long run if support is not provided by the top level of the organisation.



## 6. Conclusions

These two case studies shed light not only on the CGT's efforts to tackle the challenges of organising individual union members and workers in precarious employment, but also on the structural fragility of the policy innovations in place.

One feature shared by the two experiments described in this chapter is that they both hold great potential for union renewal and representing the non-standard workforce employed in small companies. By putting a different union-building approach into practice, they have shown themselves to be better suited to employees working in economic sectors where precarious employment dominates and it is extremely difficult to establish a company union. These experiments fit into a broader debate within the CGT on the modernisation of its union-building efforts in workplaces and also feed into internal discussions by prompting the transfer of the lessons learned, albeit to a more limited extent in the case of the site union. It is undoubtedly a bottom-up rather than a top-down initiative, with local activists leading the way rather than the organisation's upper echelons.

Nevertheless, it cannot be claimed that these experiments have been long-term successes, or that they have resulted in organisational embeddedness. The CGT remains locked in a debate over the 'right' type of union-building efforts that should be undertaken, but the idea of introducing more département unions and local inter-company collectives for 'new' occupations that are still not integrated into a professional federation is gaining in popularity.

### Note on method and data

The examination of the two case studies in this chapter is based on an analysis of internal CGT documents, two semi-structured interviews (INTVW1 and INTVW2) and the observation of a number of meetings (in the case of the site union) and of union congresses. Our approach is unique in that one of the authors has been able to monitor the progress of the experimental site union at the Part-Dieu shopping centre ever since its inception in 2008 and has spoken to its leaders on several occasions over the past 16 years. This long-term follow-up has made it possible to collect the findings of this experiment and fill the gaps in the data published by the CGT on the relevant challenges. The authors also had the opportunity to hold a further meeting with the secretary of the site union in the course of joint research recently carried out into organising within the CGT.

Table 1 Conducted interviews

Identifier	Date	Function
INTVW1	4/12/2024	Secretary of the site union
INTVW2	29/8/2024	Secretary of the inter-company union

Source: authors' elaboration.

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Cite this chapter: Bérout S. and Doumenc S. (2025) France – a shift in organisational structures within the CGT? New union strategies for precarious and dissociated workers, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Abbreviations

CFDT	Confédération Française Démocratique du Travail (French Democratic Confederation of Labour)
CGT	Confédération Générale du Travail (General Confederation of Labour)
SMEs	Small and medium-sized enterprises



## **Part II**

### **Modifying the action repertoire**



## Chapter 4<sup>1</sup>

### Belgium – On the road again. Explaining membership growth in the socialist transport union

Kurt Vandaele

Belgium has been a longstanding exception when it comes to weakening trade union density. While most countries in Europe have seen dwindling unionisation rates, Belgian density has stayed at an almost unchanged level of 55% since the mid-1990s (Vandaele 2023). This stability has staggered, however: the two main union confederations are overall losing members and union density dropped below the symbolic 50% level in 2019.<sup>2</sup> The Confederation of Christian Trade Unions (ACV/CSC, Algemeen Christelijk Vakverbond/Confédération des syndicats chrétiens) has been confronted with falling membership since 2011 and number decline started in the socialist General Federation of Belgian Labour (ABVV/FGTB, Algemeen Belgisch Vakverbond/Fédération générale du travail de Belgique) in 2014.

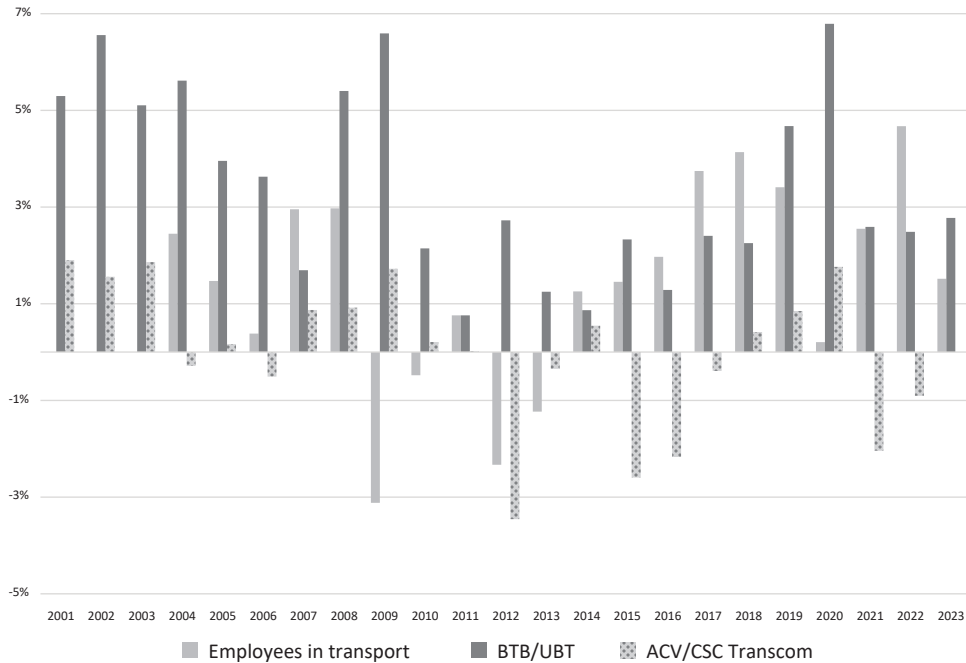
Of the six unions affiliated to this latter confederation, which had 1,460,732 members in 2023, two smaller affiliates have been marked by almost continuous membership increases since the early 2000s.<sup>3</sup> One of them is Horval, a trade union organising in hotels, restaurants and catering, but this union has also lost members in the last couple of years. The strongest member progress is recorded by the smallest ABVV/FGTB affiliate, the Belgian Union of Transport Workers (BTB/UBT, Belgische Transportbond/Union Belge du Transport), organising in transport in the private sector. Its membership has more than doubled in the last twenty years: from 29,423 members in 2000 to 63,835 in 2023, which almost renders BTB/UBT as a Belgian ‘union unicorn’.<sup>4</sup> Accordingly, its membership share within ABVV/FGTB has risen: from 2.5% to 4.4% in the same period.

BTB/UBT is thus an interesting, salient case in the Belgian union landscape as a trade union which is becoming more powerful, at least along the membership dimension of

1. An earlier version of this chapter was published in French as Vandaele K. (2024) On the road again... ou comment expliquer la croissance des effectifs du syndicat socialiste des transports en Belgique, in Fabris B.L. et Vandaele K. (dir.) (2024) Syndicats en action en Europe. Études de cas en Allemagne, Belgique, Danemark, Espagne, Italie et au niveau européen, ETUI, 43–64. The text and data have been rearranged and updated here.
2. ACV/CSC counts 1,466,388 members in 2022 if students and first-time jobseekers are excluded. Their number stands at 23,003 members. The General Confederation of Liberal Trade Unions of Belgium (Algemene Centrale der Liberale Vakbonden van België/Centrale Générale des Syndicats Libéraux de Belgique) is the third confederation, with 308,737 members in 2022 which includes students and first-time jobseekers. This much smaller confederation has enjoyed ongoing membership growth but increases have slowed down in recent years.
3. The total excludes the members of the confederation’s youth organisation for students and first-time jobseekers for which membership is free in Flanders and reduced in Brussels and Wallonia. Their number stands at 37,386 in 2023.
4. The only ACV/CSC affiliate that shows constant growth is the trade union organising in education in the French-speaking community in Belgium, CSC Enseignement. Its yearly average growth rate stands at 0.8% in the period 2000–2022, while this rate is 3.4% for BTB/UBT in the years 2000–2023.

union revitalisation (see Behrens et al. 2004). Largely based on union documentation and interviews with union officials, this chapter therefore focuses on this relatively small, male-dominated union organising blue collar workers in transport, which celebrated its hundredth year of existence in 2013 (Weber 2013a).

Figure 1 **Growth rates of trade union members and employment in transport, 2001-2023 (%)**



Note: members include the unemployed, early retirees and pensioners for both unions.

Source: ABVV/FGTB (2000-2023), ACV/CSC (2000-2022) and RSZ/ONSS (2003-2023). Author's own calculation.

Assessing the membership development of BTB/UBT in more detail from Figure 1, then three observations can be made. First, the growth rate was stronger in the 2000s than in the next decade, although there was a remarkable upsurge in 2020. The latter can be explained by the furlough scheme during the Covid-19 pandemic in which trade unions were involved in the administration of unemployment-related benefits, which provided incentives for unionisation (for details, see Van Rie et al. 2011; Vandaele 2023). Second, as Belgium is a global logistics hub, owing to the Port of Antwerp and Brussels Airport, employment in several of the industries organised by BTB/UBT has been expanding. Only 2009, 2010, 2012 and 2013 are exceptions, this being the period after the crisis of the finance-led accumulation regime in 2007-2008. Third, given the context of union competition in Belgium, the membership development of ACV/CSC Transcom, BTB/UBT's main competitor, should be considered. Yet a one-to-one comparison is not possible: the membership domain of the ACV/CSC affiliate goes beyond transport in the private sector, including public transport and industries like culture, postal services and telecommunications. ACV/CSC Transcom is seemingly less appealing than its socialist counterpart and has even lost members in several years. If



BTB/UBT is mainly attracting members at the expense of its Christian competitor, then the overall associational power of transport workers is not being strengthened. It looks like this interpretation is, at best, only half true, however, as BTB/UBT has consistently managed to gain a foothold in non-unionised companies (BTB 2002, 2007, 2013, 2023; INTVW2). The growth rates of both unions are also only moderately correlated in the period from 2001 to 2022 ( $r=0.57$ ), and they are not reversed.

The reasons why BTB/UBT has been able to expand its membership in such a solid fashion have not been studied hitherto. This single, context-sensitive case study can therefore only be exploratory. Three arguments run through the chapter. First, employment growth, especially in road transport and logistics, has generated a favourable context for rising membership in BTB/UBT.<sup>5</sup> But the business cycle cannot be considered a cause *ipso facto*: individual decisions by transport workers about union membership do not simply follow automatically from developments in employment. Trade unions' capacity to revitalise along the membership dimension (or otherwise) should be brought into the equation, this being dependent on their power resources and strategic, collective capabilities (Lévesque and Murray 2010). Hence, second, unfolding recruitment, mobilising and organising methods and tactics over time are at least equally important, with some successful ones being transferred from one industry to others in which BTB/UBT is active. In particular, roadshows have been considered a successful outreach tactic whereby the union meets (potential) members where they are working: hence, like in the early days of unionism, BTB/UBT organisers and activists are going on the road again to meet (potential) members. Third, importantly, resonating with the argument for 'democratic experimentation' (Murray 2017) for achieving union revitalisation, a transitional process strategically reconsidering the relationship between BTB/UBT and its activists has been crucial in nourishing grassroots creativity for policy innovation and stimulating policy transfer and organisational learning over time.

To contextualise those achievements, it is first necessary to take a step back through an analysis of BTB/UBT's power resources and putting its organisational structures in historical perspective.

## 1. Assessing the power resources of BTB/UBT

In portraying BTB/UBT, this section seeks to understand its power resources by first outlining them in terms of the union's quality of internal democracy ('deliberative vitality'), its financial, personal and other resources ('infrastructural resources') and its embeddedness in horizontal and vertical networks ('network embeddedness') (for details about those concepts, see Lévesque and Murray 2010).

Regarding the deliberative vitality of BTB/UBT, then internal processes are geared towards the procedures of indirect democracy which are in place for membership

5. The growth rate of BTB/UBT and the growth rate in employment lagged by one year are moderately correlated in the period from 2003 to 2023 ( $r=0.60$ ). BTB/UBT membership figures include members who are not in employment.

participation in Belgian trade unions in general. As a rule, every decision-making level chooses its representatives at higher levels based on membership size. Like in other ABVV/FGTB affiliates, the decision-making structures of BTB/UBT also provide room for workplace activists via bottom-up processes of interest aggregation and agenda setting. There are over 2,000 activists in BTB/UBT today (INTVW3). Their average age is considered quite high, however, and this has inspired the union to start ‘youth days’ together with Horval, the union organising in hospitality, and the Flemish metal union.<sup>6</sup> Overall, decision-making structures are seen as less hierarchical in BTB/UBT as they are based relatively more on activists from below becoming paid full-time officers in combination with professional staff (INTVW4). This particular mixture, together with the union’s relatively small size, are considered influential in explaining the internal dynamics and agility towards external challenges (INTVW2; INTVW3).

Turning to infrastructural resources, apart from the monthly collection of membership fees, BTB/UBT can profit from several material and human resources that are fairly general in Belgium’s industrial relations system (for details, see Vandaele 2023). Thus, for instance, facility time (the right to time off for union representatives) is common in large companies. Also, financed by the employers, bipartite welfare funds at industry level provide skills-based training for workers and support union education. Those funds could additionally pay out an annual ‘union premium’, which is an additional benefit for union members only, (substantially) reducing the cost of membership.

Finally, network embeddedness is characterised by rather exceptional horizontal links in the Belgian context as BTB/UBT cooperates with the (weakening) metal union in Flanders, one of the only industrial unions left within the ABVV/FGTB. As a relatively small union, BTB/UBT started to combine forces with this union in 2017 (BTB 2023). Their cooperation was renewed in 2018 and structurally reinforced two years later.<sup>7</sup> At organisational level, this inter-union anchoring entails joint ICT investments; organising common educational activities for union activists; running joint communication campaigns, such as for social elections<sup>8</sup> or against the far right; and jointly promoting union membership benefits and upscaling service provision (BTB 2020; INTVW2). BTB/UBT favours intensifying this cooperation, also encompassing the metal union in Wallonia and Horval (Moreels 2018, 2022). Importantly, with this cooperation, apart from sharing resources for increased efficiency, BTB/UBT is also aiming to strengthen its influence at confederal level as a counterbalance to the larger unions and as a response to ongoing debates in ABVV/FGTB about its future organisational structure.

6. Likewise, while there are no specific identity structures formally established in BTB/UBT, a group ‘BTB Youth Movement Antwerp Dockers’ was established in early 2017 aiming to foster a youth network through cultural and social activities (INTVW3; BTB 2018, 2023). A similar network started later on in the maritime sectors (INTVW3; INTVW4).
7. (anon.) Samenwerkingsakkoord ABVV-Metaal en BTB, be► motion, December 2018, p. 20; (anon.) BTB en ABVV-Metaal bundelen krachten, be► motion, September 2020, 18–21; (anon.) We hebben elkaar gevonden in het voluntarisme om deze samenwerking waar te maken, be► motion, September 2021, 24–27.
8. Social elections take place in the private sector every four years, whereby employees choose from the candidate lists their representatives in the committees for prevention and protection at work and works councils at company level. Elections should be organised in companies with at least 50 employees for the committee and with 100 employees for the councils. Only trade unions can submit their list of candidates.

Furthermore, national network density is further enhanced via personal relations with social democratic politicians for political advocacy, including at European level. Lastly, although opposing racism and the far right appears prominent in union discourse, horizontal connections with non-labour actors like civil society organisations seems limited (INTVW1; INTVW2; INTVW3; INTVW4). This alludes to a lower appetite for building and maintaining external links given the relatively strong structural and associational power of transport workers (Vandaele 2024a).

The fairly homogeneous network embeddedness at national level is supplemented with resilient vertical links. The cross-border nature of many transport jobs explains the strong integration of BTB/UBT with supranational union federations. As one of the founders of the European and international transport unions, the BTB/UBT leadership also has a tradition of taking up positions in their governance structures (BTB 2013, 2018, 2023; INTVW3; INTVW4). This engagement is nevertheless sometimes puzzling for its members due to the liberalisation and deregulation policies in transport stimulated by the European Commission (INTVW2; Moreels 2019, 2023). Yet it is exactly those policies that require close cooperation with the European Transport Workers' Federation (ETF) and the International Transport Workers' Federation (ITF), in which BTB/UBT is considered part of the 'lefties'. Favouring a more powerful ETF, Frank Moreels, federal secretary of the BTB/UBT road transport and logistics section since 2007 and chair of BTB/UBT since 2016, was elected ETF president in 2017 and re-elected five years later. He resigned in May 2025 to take up the position of ITF president. Paddy Crumlin was re-elected president at the 46th ITF Congress in 2024, on a combined ticket with Moreels, who is scheduled to take over the full roll in January 2027.

## **2. Collective cohesion within BTB/UBT and the changed membership distribution**

In further assessing the power resources of BTB/UBT, this section analyses collective cohesion as a dimension of internal union solidarity (Lévesque and Murray 2010). The union's members have historically developed strong occupational identities promoting cohesion (INTVW4; Weber 2013b), with the dockworkers as the quintessential example (INTVW1; INTVW4; Vanfraechem 2001, 2005). The latter's reputation for militancy has fed into the public image of BTB/UBT and its narrative resources: for example, when the union celebrated its hundred years of existence in 2013, it is not surprising that the promotional brochure highlighted historical memories of industrial action and what was achieved – though workers on strike have not necessarily always been backed by their union (Weber 2013a; Vanfraechem 2005). Transport workers nonetheless theoretically possess considerable workplace bargaining power (Silver 2003: 97–103) as they are able to access the choke points in supply chains and logistics, boosting their disruptive capacity (Alimahomed-Wilson and Ness 2018).

Although part of the private services sector, yet close to manufacturing industries, some workers in transport also hold quite considerable marketplace bargaining power in Belgium, underpinned by institutional arrangements enabling unions to have a large

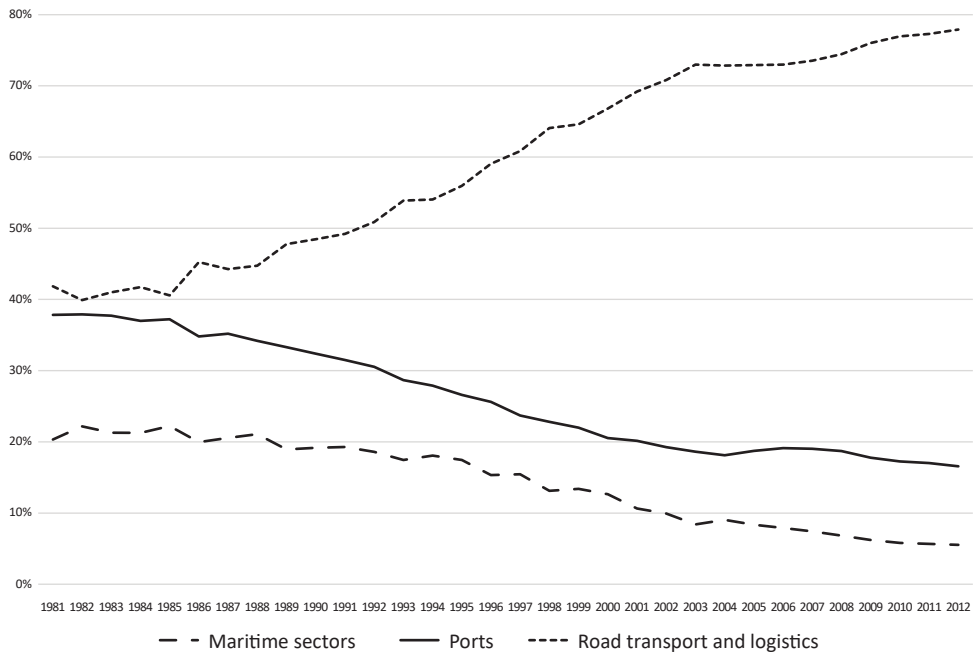
element of control of the labour supply. This applies par excellence to the hiring system for dockworkers in the main ports, legally institutionalised in 1972, putting an end to their casualisation (Vanfraechem 2005).<sup>9</sup> This system has repeatedly been challenged by the European Commission and by the judgements of the Court of Justice of the European Union. It is therefore an almost enduring concern for BTB/UBT (BTB 2007, 2013, 2018, 2023).<sup>10</sup>

Both workplace and marketplace bargaining power provide significant structural leverage for transport workers to take industrial action, or at least mount a credible threat.<sup>11</sup> This leverage can explain why BTB/UBT tends towards a labour repertoire, with workers' grievances framed in terms of the violation or expansion of their individual and collective rights, with a lesser emphasis on their social rights as citizens in the context of advancing a civil rights repertoire (Gentile and Tarrow 2009). This dominance of a labour repertoire is reflected in Belgium's strike statistics as transport and logistics is overall the most strike-prone industry (Vandaele 2024b). This is not only the result of actions at company or industrial level: BTB/UBT claims to be at the forefront of union-led demonstrations and national 24-hour strikes against government (austerity) policies conceived as detrimental to the trade union agenda (BTB 2007, 2013, 2018).

Regarding its organisational division, dating back to its establishment in 1913, BTB/UBT is today still structured in three professional groups or sections: 'ports', entailing the ports of Antwerp and Ghent, and the coastal ports; 'maritime sectors', which includes dredging, fisheries, inland waterways, merchant shipping and vessel towing; and 'road transport and logistics' (henceforth: RTL section). The latter incorporates a diverse range of subsectors: airports; bus and coach transport; fuel transport; freight transport; logistics; the moving industry; self-employed drivers; and taxis.<sup>12</sup> The three sections are all male-dominated and they are nearly entirely comprised of workers with blue collar employment status.<sup>13</sup> Although being established in the city of Ghent, its headquarters in Antwerp reflects BTB/UBT's strongholds in the main port of Flanders, which is the second main port in Europe after Rotterdam in the Netherlands. Indeed, historically, the union has de facto been closely associated with the (Antwerp) dockworkers, the largest section until the late 1970s (INTVW1; Vanfraechem 2004). This predominance is no longer the case: Figure 2 demonstrates that the share of 'ports' and 'maritime sectors' in membership has undoubtedly declined over time.

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9. A similar pool system is in place for fishers and day labourers for unloading and sorting fish (BTB 2023; INTVW4).
  10. Effective protests and political advocacy against the Port Directive and the Services Directive, putting pressure on the hiring system, marked the early 2000s (BTB 2022; Leiren and Parks 2014). An overall majority of BTB/UBT dockworkers accepted, via a ballot, an adapted system as negotiated with the European Commission in 2016. Yet its modalities were successfully challenged in court by one of the main employers in the Port of Antwerp soon after. Political advocacy was again required in late 2022 to update the modalities while keeping the hiring system intact (BTB 2023).
  11. There are obviously differences between industries: for instance, willingness to act is considered lower in freight transport.
  12. Railways and other public transport (bus, metro and trams) are organised by the public sector union within ABVV/FGTB.
  13. It is nevertheless stated that about 45% of organisers and full-time union officials are women (in 2016) (Moreels 2017).

Figure 2 Membership share of BTB/UBT sections, 1981-2012 (%)



Note: data are no longer publicly available after 2012. Membership in road transport and logistics includes the unemployed and pensioners whose share stood, on average, at 16% in the period 1996-2012.

Source: BTB (2002, 2007, 2013). Author's own calculation.

BTB/UBT counted nearly 33,000 members in the late 1950s – a historical peak – but membership decrease started a few years later before slowly recovering to a similar level in the early 1990s (BTB 2013b). From then on, the union has been expanding again, with member wins being strongly concentrated in the RTL section (INTVW1; Weber 2013b). This heterogeneous section is nowadays comfortably the largest in BTB/UBT, although the shifted membership shares between the sections are considered not to have had a fundamental impact on membership cohesion (INTVW2; INTVW3; INTVW4). In addition, employment growth in road transport and logistics in Brussels and Wallonia accounts for why the distribution between Dutch-speaking and French-speaking members is now slightly more in balance than before (Weber 2013a; INTVW1; INTVW2; INTVW4). About two-thirds of members nevertheless live in Flanders, but BTB/UBT embraces a strong Belgian identity stressing class-based worker solidarity. It is estimated that about two-thirds of members in the RTL section are today employed in road transport and the remaining third in logistics. While workers' workplace bargaining power in both industries underpins their associational power, marketplace bargaining power is nowhere near as institutionalised as with the dockworkers. In fact, employment relations in road transport and logistics are often marked by undeclared work and unlawful employment, unfair competition and social security fraud, workplace fissuring and labour market deregulation (INTVW1). Therefore, in one way, after having achieved 'labour-friendly' arrangements and thus institutional power upon

which workers in the ports and maritime sections could rely, BTB/UBT has to start all over again. The union has been confronted with a struggle to tackle low wages and poor employment terms and conditions in the expanding industries of road transport and logistics since the 2000s, if not earlier.

### **3. RTL section: a renewed union-member relationship and the introduction of lead organisers**

The ‘logistics revolution’ (Danyluk 2018: 630) in capitalism and Belgium’s central geographical position in logistical chains has stimulated employment growth in road transport and logistics. Yet this is in itself not a sufficient condition for member gains. Union agency also matters in recruiting members (Heery and Adler 2004): like in other industries, forces which are unfavourable to unionisation are in place in road transport and logistics, especially since 2005 due to the enlargement of the European Union (EU) (BTB 2007, 2013). Employment growth nonetheless stimulated the RTL section to rethink its relationship with activists and members in the early 2000s. The motives for this are rooted in the uncertainty of the RTL section about managing member retention, especially in the context of the imminent liberalisation and deregulation of markets in road transport and logistics which will instigate stronger competition pressures in the market. Regional, internal bottom-up influence lies at the origin of this self-reflection over future policies on union-member relationships.

A resolution on union education in the RTL section in the county of Limburg in 1999 is considered significant in strengthening union governance and member engagement (BTB 2002, 2007). Following national congress resolutions, an extraordinary congress and study day were held in 2001 for supporting and steering a transformative vision of the relationship between the RTL section and its activists and members. Table 1 shows that this renewed union-member relationship entails three main pillars: (1) stimulating educational activities among workplace activists; (2) a better, more open information flow between the RTL section, activists and union members; and (3) a stronger involvement of activists (and members) in union agenda setting and policies, shifting away from a unilateral top-down approach. None of the proposed policies that stem from these pillars are particularly novel in themselves (INTVW1; INTVW2), as they build on and interweave with existing practices. Their mutual integration has contributed, however, to reinforcing deliberative mechanisms in the internal governance of the RTL section (INTVW3). In its turn, the renewed union-member relationship has opened space for democratic experimentation, advancing a spiral of new, innovative tactics which have been especially boosted since 2007 (BTB 2013a; INTVW1; INTVW2; INTVW3). This transitional process has gone hand-in-hand with generational renewal within the RTL section and its strategic leadership, stimulating ideas for widening the union repertoire via outreach activities and comprehensive campaigning.

**Table 1 The three pillars of the renewed union-member relationship and their policy initiatives**

Pillar	Policy initiatives
Education	Strengthening training and educational activities and launching tailor-made educational programmes
Information	Initiating regular newsletters and restyling the member magazine
Involvement	Increasing the frequency of meetings; broadening union decision-making by involving activists; fostering social networks among activists

Source: author's own elaboration.

Analysing the pillars in more detail, educational activities addressing workplace activists were intensified first, also in cooperation with the metal unions (BTB 2002, 2007; INTVW3). Union education is traditionally delivered at confederal level (i.e. by ABVV/FGTB), but the RTL section has launched its own, tailor-made programmes which have been in place since 2008 (BTB 2013; INTVW2; INTVW3). Two reasons can be identified for this additional educational layer. First, in terms of substance, the programmes consider in particular the (regulatory) specificities and challenges of those subsectors organised by the RTL section.<sup>14</sup> They also include the upgrading of the skills of union activists, for example in communications, and they aim to provide a wider perspective on union work beyond the company in which activists are operating by emphasising the transnational character of the deregulation of markets and the role that European and international union levels can play in addressing this (INTVW2). Second, union education is no longer ad hoc but has been structured to be in tune with the quadrennial social elections (BTB 2013). Educational modules thus run over a four-year cycle, with a difference in modules made since 2012 between newly elected candidates on social election lists and ones that have been re-elected (BTB 2013). Facility time is crucial so that educational activities can ideally take place during working days and not during holidays or over the weekend.<sup>15</sup>

To conclude, since workplace activists are less likely to contact professional servicing staff to deal with workers' grievances in their workplace, the educational pillar is seen as having contributed to their self-empowerment and thus to building organising power (INTVW2; INTVW3).

Turning to the information pillar, emphasis has been put since 2001 on launching regular newsletters to workplace activists in addition to the quarterly membership magazine (BTB 2002, 2007). In contrast to traditional union communications, 'flash' newsletters inform activists in a fast and flexible way, especially during negotiations on a collective agreement, infusing their mobilising power if necessary. Furthermore, the quarterly membership magazine was restyled in colour in 2007 (BTB 2013) and rebranded in 2016 (BTB 2018). Educational activities targeting workplace activists, outreach actions and union campaigns have taken greater prominence in the magazine over time. A lasting union concern is to keep the contacts database up to date. Finally,

14. Some of those programmes have also been aimed at RTL professional staff.

15. Non-elected candidates have no right to time off for union duties or activities.



apart from renewing its website, BTB/UBT has built up its presence on social media, the latter especially targeted to attract young people.

Reviving educational programmes and improving information flows were perceived to be insufficient on their own to strengthen member engagement; the union's deliberative governance mechanisms needed to be tackled as well to strengthen involvement, the third of the pillars (BTB 2002). The renewed union-member relationship has thus also implied an adaptation of internal structures and processes for advancing a more 'participative unionism' (Heery and Kelly 1994).

Meetings of the federal committee of the RTL section have increased from, on average, bi-monthly to monthly since 2001 (BTB 2002, 2007). Furthermore, meetings organised around all the establishments of one company have, since 2006, been steered towards increasing the density of social networks among workplace activists (BTB 2013; INTVW2). The latter primarily comprise union representatives and members of health and safety bodies and works councils, although meetings are open to anyone, including non-elected candidates on social election lists. While involving workplace activists in union meetings has already been practised in various regions, though marked by different traditions, a federal group was established in 2006 aiming to meet at least twice a year.<sup>16</sup> This group was institutionalised two years later to advise the federal committee of the RTL section in such a way as to lessen top-down decision-making (BTB 2013).<sup>17</sup> Demonstrating intermediation capabilities, the committee has facilitated collective reflection and dialogue about grievances and demands in the diverse subsectors as well as engaging in consensus-building regarding the collective bargaining agenda and negotiations (INTVW2; INTVW3; INTVW4). In addition, regional secretaries and lead organisers in the federal committee provide voice to the grassroots level.

Lead organisers were initiated as a specialist function in the structures of the RTL section in 2008.<sup>18</sup> Implying a shift in resources towards an organising approach, yet adapted to Belgian union structures and practices, their introduction is far more the result of endogenous organisational experimentation than being externally influenced by trade unions from, for instance, English-speaking countries.<sup>19</sup> Interestingly, lead organisers are termed 'propagandist' in Dutch or 'propagandiste' in French. Historically, both labels refer to those who collected union membership fees in the early days of unionism, although it is clear that today's organisers have been converted from this role. While lead organisers could also be involved in processing casework for members, their main function is distinctive from other professional union staff (INTVW3). Acting in close concert with union activists at workplace level, and more than often themselves having an activist background, lead organisers are principally responsible for coordinating and steering policies, methods and tactics for revitalisation along the membership dimension, in which roadshows are the quintessential example. Indeed, above all,

16. (anon.) Eerste bijeenkomst Federale Militantengroep Wegvervoer & Logistiek, in: Wegwijs, 2006 (1), 13–15. Sixteen meetings were organised between 2006 and 2012 (BTB 2013).

17. (anon.) Militanten krijgen het woord: de Femira, in: Wegwijs, 2008 (4), 30–31.

18. (anon.) Logistics paradise?, in: Wegwijs, 2008 (1), 4–5.

19. Ideas on organising methods and tactics have nevertheless also been influenced by, for instance, the Teamsters union in the United States (INTVW3).



enlarging the union repertoire from 2007 onwards via roadshows has been considered by the RTL section as a key policy innovation for reaching out to (potential) members (INTVW2; INTVW3).

#### **4. Experimenting with the union repertoire via roadshows and its diffusion**

Roadshows are not rocket science. They denote that lead organisers, sometimes together with workplace activists, are proactively seeking outreach with (potential) members instead of having (unionised) workers reactively approach the union for assistance. Using a bus, mobile home or a pop-up party tent, visually featuring the union's logo, (potential) members are visited by the RTL section at their (mobile) workplace and offered coffees, etc. Such roadshows facilitate the provision of decentralised services, often outside office hours, to members in road transport or logistics who are frequently mobile due to the nature of their job. Simultaneously, they make it possible to monitor developments in employment terms and conditions more closely, to map workers' needs and issues, and to inform (potential) members about union work. In short, roadshows entail aspects of servicing and organising approaches, targeting both existing and future trade union members.

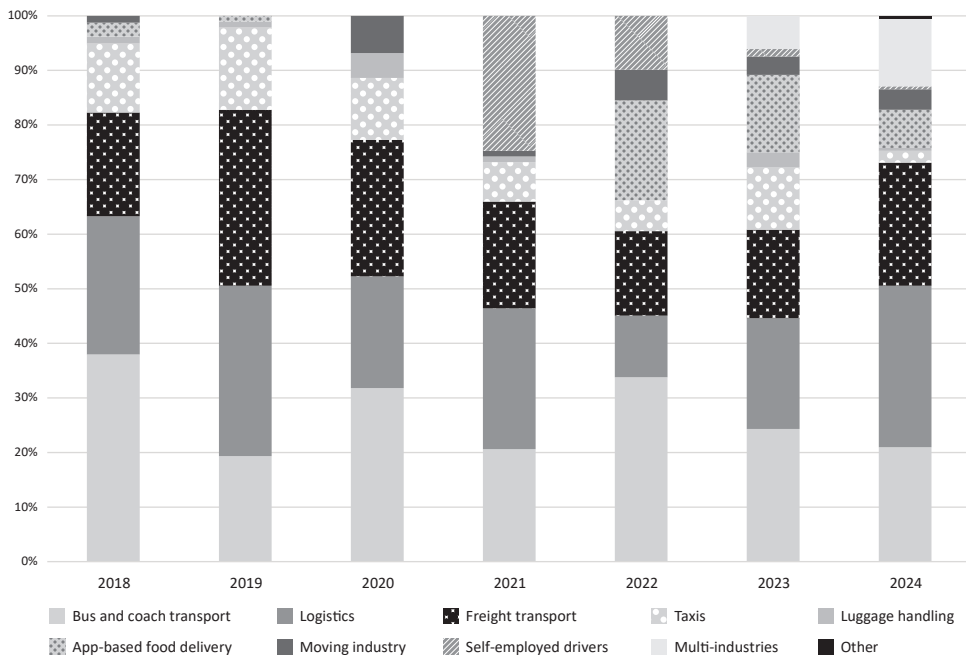
Roadshows should be differentiated from the recruitment campaigns which BTB/UBT has also been undertaking since 2009 (BTB 2013); these could simply be associated with the notion of economic exchange between the union and its members (Snape and Redman 2004) as the campaigns merely underline the financial benefits of union membership (BTB 2013).<sup>20</sup> In comparison, roadshows demonstrate a better connection with the organising approach to member recruitment and the building of workers' power, and this for several reasons.

First, at a practical level, access to company premises is in principle not needed for setting up roadshows. Their use can circumvent access questions as they are often located in the public spaces where transport workers gather to start or end the working day, wait or take a break. Accordingly, they overcome the placelessness of certain occupations in road transport and logistics which lack a fixed workplace. Second, roadshows enable the union to meet many workers at the same time, even if they are employed by different companies, and in an inclusive way: roadshows allow contact with workers irrespective of employment status, company size or nationality. Third, while union work is often associated with specific problems in the workplace, roadshows help shape a positive union image as they are launched irrespective of probable members' concerns or grievances (INTVW2). Workplace representatives feel supported by roadshows, where BTB/UBT is active in the company, and they make the union visible to (potential) union members and also the general public. Fourth, while trade unions in Belgium are especially active in the run-up to the quadrennial social elections in terms of seeking possible candidates, roadshows break this four-yearly pattern. The RTL section

<sup>20</sup>. See also <https://www.btb-abvv.be/ledenvoordeel>

organises roadshows between elections, making it possible to identify possible social election candidates as organic workplace leaders at an early stage. Fifth, compared to issue-based recruitment drives, typically targeting large companies with a partial union presence, roadshows are relatively cheap and entail few risks for unions (INTVW3). They can be set up for brown and greenfield organising, with the latter being especially important concerning the social elections.<sup>21</sup> Employment growth in road transport and logistics has meant that several new companies are largely non-unionised. Workers are reluctant to take up a role as a union representative due to managerial pressure, while social elections might simply not take place due to a lack of candidates. Although this is not their only goal, roadshows provide an original response to this as they allow for greenfield organising in a cost-efficient way.

Figure 3 BTB/UBT roadshows by subsectors, 2018-2024



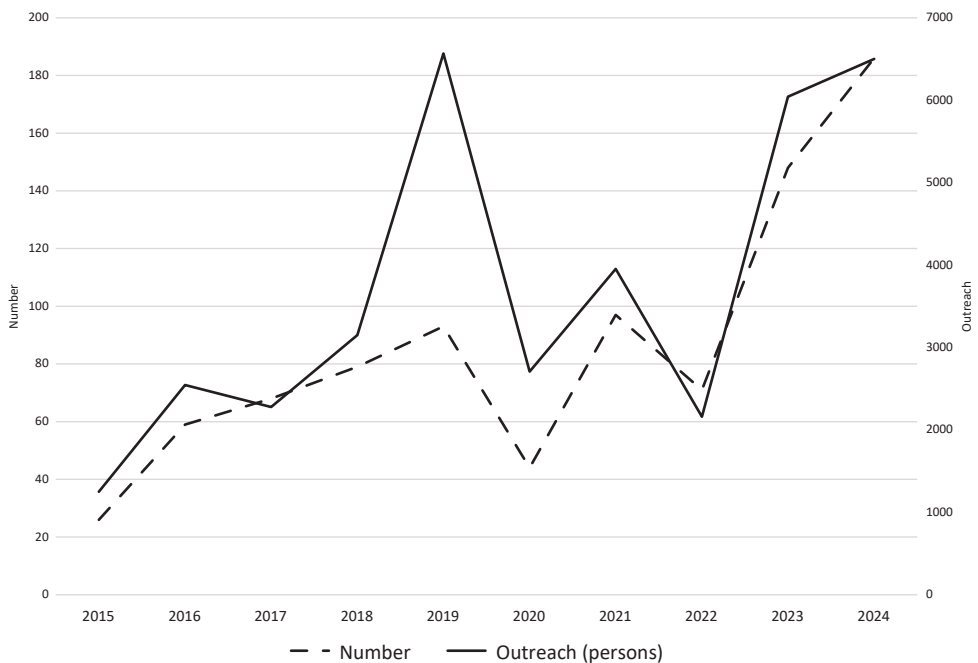
Source: BTB/UBT.

Roadshows as a policy innovation were first launched in bus and coach transport in the Flemish city of Ghent in October 2007 by a regional union official (BTB 2013; INTVW2). They were born out of necessity as a tactical response to a mobile workforce. Initially perceived as a rather odd idea, the positive response of (unionised) workers and workplace activists to roadshows in bus and coach transport facilitated a voluntary transfer to other industries organised by the RTL section, such as logistics, freight

21. Greenfield organising refers to running organising campaigns in companies or industries where trade unions are weakly present. It stands in contrast with brownfield organising that is targeted at sites with stronger union presences.

transport, the taxi sector and luggage handling – see Figure 3.<sup>22</sup> Later on, roadshows also inspired tactics to make contact with platform workers like couriers in app-based food delivery (Vandaele 2020) and Uber drivers.<sup>23</sup> While the concept of roadshows remains the same across industries in the RTL section, its malleability adds to further diffusion. Indeed, roadshows sometimes require a certain spatiotemporal adaptation to the labour process, which has been a learning process of trial and error (INTVW2; INTVW3).<sup>24</sup> For instance, baggage handlers, dockworkers or truckers often begin their working day in the early morning, while food delivery couriers could best be approached around mealtimes. Equally, roadshows make use of public spaces like car parks or waiting zones for contact with bus and coach drivers or taxi drivers, while access to company sites might be needed for logistics workers, although not necessarily.

Figure 4 Number and outreach of BTB/UBT roadshows, 2015-2024



Source: BTB/UBT.

Given the reinforced deliberative mechanisms within the RTL section, union activists, lead organisers, regional union officials and the union leadership might all be considered

22. (anon.) Een schot in de roos. Mobiel kantoor BTB, in: Wegwijs, 2007 (4), 4–5; (anon.) On the road to victory, in: Wegwijs, 2008 (1), 4–5; (anon.) Als onze leden taxichauffeurs niet tot bij ons geraken, gaan wij tot bij hen, in: Wegwijs, 2011 (1), 7.

23. Following agreement between the ITF and Uber, similar to GMB in the United Kingdom, BTB/UBT finalised an agreement with the management of Uber in Belgium in 2022 for starting social dialogue in order to improve working conditions in the transport company.

24. How organisers or workplace activists make sense of roadshows is unknown as only full-time officers have been interviewed.

policy entrepreneurs for the diffusion of roadshows across industries, although the influence of each cannot be verified (at this stage of the research). Especially younger unionists have been enthusiastic at being involved in the policy transfer of roadshows, although more experienced union staff have shown a reluctance to engage with this unfamiliar tactic (INTVW3). In addition, being attached to a new union position and role, it is clear that lead organisers have been instrumental in institutionalising roadshows into the union repertoire and in scaling them out across different subsectors in road transport and logistics.

A total of 549 roadshows had already been organised in the period between 2007 and 2011 (BTB 2013). Figure 4 provides further information about the number of roadshows (left-hand Y-axis) and the number of workers they have reached (right-hand Y-axis) in the period 2015–2024, with (obviously) a strong degree of correlation between them ( $r=0.85$ ).<sup>25</sup> Their number already indicates that roadshows are considered by the RTL section as an important tactic in the collective repertoire for reaching out to (potential) members, on which the next section provides further detail.

## **5. Roadshow successes, union campaigning and progress beyond the RTL section**

In further analysing the success of roadshows in the RTL section, three indicators can be identified. First, the direct success of the policy in recruiting, organising and retaining members and providing them with union services. Second, the roadshows' initial influence on other outreach activities like union campaigning which, in its turn, has provided better collective bargaining outcomes and strengthened the union's institutional security. Third, the policy transfer of roadshows or related methods and tactics to other BTB/UBT sections and beyond this particular trade union.

First of all, outreach to workers and potential workplace activists via roadshows seems to have translated into almost consecutive wins in social elections in those industries organised by the RTL section (BTB 2002, 2007, 2013, 2023). One of the most recent and telling examples of this is Amazon. The e-commerce giant launched a first 'fulfilment centre' in Antwerp, the first and only one so far in Belgium, in November 2022. Preceding the social elections of 2024, the RTL section identified three Amazon workers willing to stand as a candidate for the health and safety body (that could be installed where there are at least 50 employees). All three candidates were elected, making BTB/UBT the only Belgian union with elected workplace activists in Amazon (so far), and social dialogue on health and safety issues should now start in the company.

Workers in logistics are seen as crucial to the associational power of members in the RTL section (INTVW2).<sup>26</sup> Connecting workers in logistics and road transport through

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<sup>25</sup> The number of roadshows and workers reached is underestimated because they are not always registered.

<sup>26</sup> Since company size is, on average, larger in logistics, union density tends to be higher here than in road transport, as structures for worker representation are associated with larger companies (for details, see Vandaele 2019). In turn, union representatives and union members on the health and safety bodies and works councils are instrumental in installing and maintaining a social norm of union membership in the workplace.

organising drives to lift workers' associational power has not yet been undertaken, however.

Given that better achievements in social elections result in more workplace activists, who could recruit and organise more workers, it is no surprise that BTB/UBT identifies a causal logic between roadshows and membership growth (BTB 2023; INTVW2; INTVW3). Equally, while the roadshows have been introduced as a result of organising methods and tactics, they are also directed towards servicing existing and potential members. Indeed, offering individual services is seen as at least equally important in explaining continued member inflow into the RTL section and BTB/UBT in general (BTB 2013, 2023; INTVW2; INTVW3). Membership increases have instigated a virtuous circle for servicing: more members imply greater financial and human resources in the longer term so that service provision could be improved in the workplace either via activists, roadshows or extending the network of service centres – all helping to maintain and strengthen the social norm of union membership. In its turn, stronger workers' associational power has been a prerequisite for improving collective agreements in road transport and logistics (BTB 2002, 2007; INTVW3). Put differently, manifested via roadshows, organising and service provision are seen as two sides of the same coin.

Second, illustrating how one policy innovation can (experientially) lead to others, the roadshows have also been coupled with union days setting a particular occupation in the spotlight, such as parcel delivery workers during 'Black Friday' or food delivery couriers in the platform economy (BTB 2023). They have also fed into the launch of 'black books' since 2007 and (cross-border) comprehensive campaigns in freight transport (BTB 2013, 2018, 2023; INTVW3). The books monitor parking areas and roadside facilities for truck drivers and denounce 'social dumping' in freight transport or e-commerce, targeting companies like IKEA.<sup>27</sup> They entail extensive strategic corporate research via, for instance, compiling knowledge from truckers themselves, member surveys, inspections of motorway service stations and physical travel to countries in central and eastern Europe, such as Slovakia, to map the companies facilitating social dumping (INTVW1; Van Brempt and Moreels 2020). Comprehensive campaigning based on these books, alongside proposing other solutions to social dumping in freight transport, has generated considerable press and media attention, positively influencing the public image of BTB/UBT over time (INTVW2; INTVW3).

Given its transnational nature, social dumping has also increasingly stimulated BTB/UBT to articulate actions at multiple levels and to mobilise its horizontal and vertical embeddedness in union networks around cross-border campaigns. Although the union initially criticised the ETF in the early 2000s as being merely a lobby group and lacking internal consensus about strategies in freight transport (BTB 2007), BTB/UBT today stands unequivocally alongside the ETF and other European trade unions in the attempt to halt exploitation, unfair competition and social dumping in the EU internal market, welcoming the recent mobility package adopted by the European Parliament in 2020 (ETF 2020). Moreover, the renewed relationship between the RTL section and its members has also been aimed at reconciling (quantitative) bread-and-butter

27. For an overview, see <https://www.btb-abvv.be/wegvervoer-logistiek/wegwijs-publicatie>

demands and concerns about employment within a broader union agenda (BTB 2002, 2007; INTVW3). In this way, the RTL section has been able to build discursive power through framing those demands and concerns in terms, for instance, of road safety or (environmental) sustainability, which has been perceived as instrumental in gaining influence in the policy field and for making a better connection with public opinion (INTVW2). As such, apart from the membership dimension, the RTL section regards the renewed union-member relationship as successful in two other dimensions of union revitalisation (see Behrens et al. 2004), namely in bargaining power (relative to management and the employer associations) and political advocacy.

Finally, intentional policy convergence regarding roadshows is apparent in the RTL section, but progress has been rather slow, or they have been far less scaled-out, beyond this section of the union. The maritime sector is simply marked by non-transfer: members here are obviously less often ashore and are far more dispersed (INTVW4), with member recruitment and retention predominantly based on individual (digital) member services for coping with complex (tax) cases and dedicated regulation (BTB 2018, 2023). Likewise, roadshows are less important in the ports section, especially where greenfield organising is concerned. The hiring system provides union control over the labour supply, with almost all employees being in the union, and social elections are not organised in the ports. Nevertheless, because it has been difficult to make contact with dockworkers due to mobility issues around the city of Antwerp, roadshows have been deployed in the Port of Antwerp since 2017, ten years after the first roadshow in the RTL section, although here they are predominantly service-oriented.<sup>28</sup>

The intra-union policy transfer of roadshows is thus rather partial, while the same accounts for inter-union transfer. The latter does seem limited to examples of cooperation with the ABVV/FGTB metal union in Flanders: this union and BTB/UBT jointly set up a roadshow for bus and coach manufacturing workers and drivers in 2021 as the Covid-19 pandemic hit the tourism economy hard.<sup>29</sup> Following the possible policy transfer of roadshows beyond BTB/UBT and ABVV/FGTB lies out with the research aims of this chapter, but ACV/CSC Transcom has a fairly similar initiative running – ‘le solobus’ – at the Liège Airport for outreach to (potential) members, while other ACV/CSC affiliates – notably, ACV Puls, the union organising white-collar workers in Flanders – have become increasingly inspired by organising methods and tactics.

## 6. Conclusions

The continuous membership increase in BTB/UBT is today (almost) exceptional in Belgium. This success is obviously context-sensitive. Relative institutional stability in Belgian employment relations (Vandaele 2019, 2023) and employment growth have both underwritten relatively favourable circumstances for membership strength and member gains. Yet the liberalisation and deregulation of markets, especially since EU

28. See <https://www.btb-abvv.be/nieuws/37-haven-nieuws/413-btb-vakgroep-haven-komt-naar-je-toe>

29. See <https://www.btb-abvv.be/nieuws/54-wegvervoer-en-logistiek-nieuws/1208-abvv-metaal-en-btb-geven-buzz-voor-hun-busbouwers-en-busbestuurders>

enlargement to central and eastern Europe, has also created uncertainty regarding member retention, in particular in road transport and logistics, as enlargement has raised competition pressures in the market.

This has instigated a transitional process within the union's RTL section towards a renewed union-member relationship, laying fertile ground for democratic experimentation resulting in the aggregation of methods and tactics and their policy transfer, with roadshows being the quintessential example. This renewed relationship has nevertheless only partially altered the union repertoire as policy innovation is layered upon existing traditions and routines. Roadshows reveal how policy transfer has been interpreted and developed within the particular model of unionism in Belgium which, at workplace level, relies strongly on union activists acting interchangeably as needed between being service providers and mobilising facilitators around collective action (Vandaele 2023). Echoing earlier findings that organising and servicing are not oppositional to each other, roadshows combine servicing existing members and approaching new ones. Moreover, they are instrumental in identifying new activists and (re-)connecting with existing ones, with educational modules for both types institutionally synchronised with the quadrennial social elections in the RTL section.

Educational modules are strongly oriented towards empowering workplace activists; this implies, in all likelihood, that the rank-and-file remains (largely) passive. Similar to all other Belgian unions, BTB/UBT remains strongly reliant on its activists, albeit coordinated and supported by lead organisers in the RTL section. 'Deep organising' in the sense of promoting worker self-activity, often acclaimed as the ideal for real transformative change in unions (Holgate et al. 2018; Holgate 2021a; McAlevey 2016), is thus not really being stimulated.

Showing (remarkable) stability in its organisational structure, BTB/UBT diverges from two other strategies or findings propagated in the union revitalisation literature. First, whereas the literature on community unionism highlights the importance of alliance-building with non-labour actors in union revitalisation (Holgate 2021b; McAlevey 2016), this is nearly absent in BTB/UBT given its reliance on a labour repertoire based on solid collective cohesion. Second, this case study confronts research emphasising that small, independent unions are better equipped for union revitalisation, allowing for bottom-up, participatory unionism advancing their deliberative vitality (Però 2019). Size seems relative: even though from a Belgian perspective BTB/UBT is a small affiliate of ABVV/FGTB, with its over 60,000 members this is not necessarily the case in European perspective. Irrespective of an appreciation of its size, this does not prevent the union from rejuvenating its internal dynamics. This hints at other explanatory variables than union size as such.

Democratic experimentation in the RTL section appears to tick many boxes of the power resources and strategic capabilities identified by the union revitalisation literature (Laroche and Murray 2024; Lévesque and Murray 2010; Murray et al. 2020). It has been built on strong collective identities and BTB/UBT's robust horizontal and vertical network embeddedness, together with articulation. In combination, these



have sheltered the union from the undermining of its institutionalised labour market power, such as the hiring system of dockworkers, while they have also facilitated generational renewal and forward-thinking leadership in the RTL section. This has, for example, resulted in the launch of a transitional process towards revitalisation; the production of infrastructural resources for installing lead organisers and starting tailor-made educational modules oriented to workplace activists, with union education, in turn, likely to foster social network density among activists; the creation of structures for deliberative vitality, bolstering bottom-up ideas and innovation like roadshows and comprehensive campaigning; and the development of narrative resources broadening the union agenda by framing it in terms of road safety and (environmental) sustainability. Finally, the intra-union diffusion of roadshows reflects organisational learning concerning the aggregation of organising methods and tactics over time.

A caveat is warranted here: the findings in this case study hinge on desk-based research examining publicly available union documents and on interviews with union leaders; the voice of lead organisers and workplace activists is thus missing in terms of linking strategic aims and policy objectives with (measurable) effectiveness and outcomes. The case study illustrates that union revitalisation still looks a rather slow process as the roots of the renewed union-member relationship in the RTL section go back to the early 2000s, while the successful roadshows started about seven years later. Equally, the aggregation of methods and tactics is part of a much larger story; these should be understood in conjunction with the various strategic capabilities of BTB/UBT for activating its power resources. In all likelihood, the cherry-picking of innovative policies for union revitalisation is therefore unlikely to be successful where it is not anchored within a firm longer-term vision of union strategies, or where immediate success is expected. Whether through roadshows or other policy innovations in the union repertoire, this case study has nevertheless made clear that proactively approaching workers where they are and engaging in a process which involves actively listening to them is certainly a promising start for union revitalisation.

## **Note on method and data**

The research undertaken in this chapter is not based on a priori hypotheses. Instead, an abductive dialogue is undertaken between the emerging evidence of innovative policy initiatives and conceptual insights. The latter are borrowed from policy transfer theory rooted in political science (Benson and Jordan 2011; Dolowitz and Marsh 1996; Dussauge-Laguna 2012; Evans 2009) and from approaches highlighting democratic experimentation within trade unions based on their strategic capabilities (Laroche and Murray 2023; Lévesque and Murray 2010; Murray et al. 2020). The case study offers a disaggregated account: the main professional groups or sections within BTB/UBT are the primary unit of analysis. Methodologically, inspired by the appeal for ‘slow’ comparative research in employment relations (Almond and Connolly 2020), data has been collected via an iterative process considering concepts, empirical findings and ongoing analysis for understanding the causal logics between policy transfer and membership growth. More than 200 union documents (108 issues of the member magazine, 100 opinion articles, 20 studies and other documents and five congress reports), together with social



media sources and secondary literature, have been examined. Simultaneously insider knowledge was retrieved from four semi-structured interviews – see Table 2. These were conducted in Dutch between August and October 2023 with an average duration of 67 minutes. The interviewees were all men: one labour historian and three paid full-time BTB/UBT officers in union leadership positions (INTVW1, INTVW2, INTVW3 and INTVW4). The interviews were recorded and anonymised to preserve the identity of interviewees. Requests for interviewing lead organisers have been declined by the BTB/UBT leadership, for reasons unknown, while the time span of the study has not made it possible to contact selected workplace activists. Follow-up personal communication has allowed the gathering of additional data, information and meaning as well as an update of the original French text.

Table 2 **Conducted interviews**

Identifier	Date	Function
INTVW1	04/8/2023	Historian
INTVW2	10/8/2023	Full-time union official
INTVW3	05/9/2023	Full-time union official
INTVW4	26/9/2023	Full-time union official

Source: author's elaboration.

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Cite this chapter: Vandaele K. (2025) Belgium – On the road again. Explaining membership growth in the socialist transport union, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Abbreviations

<b>ABVV/FGTB</b>	Algemeen Belgisch Vakverbond/Fédération générale du travail de Belgique (General Federation of Belgian Labour)
<b>ACV/CSC</b>	Algemeen Christelijk Vakverbond/Confédération des syndicats chrétiens (Confederation of Christian Trade Unions)
<b>BTB/UBT</b>	Belgische Transportbond/Union Belge du Transport (Belgian Union of Transport Workers)
<b>ETF</b>	European Transport Workers' Federation
<b>EU</b>	European Union
<b>RSZ/ONSS</b>	Rijksdienst voor Sociale Zekerheid/Office nationale de sécurité sociale (National Office for Social Security)
<b>RTL section</b>	Road transport and logistics section (of BTB/UBT)

## Chapter 5

### Italy – Turning tourism upside down: campaigning to organise precarious workers

Arianna Tassinari and Alex Girolamo

This chapter<sup>1</sup> analyses and discusses a case of innovative campaigning undertaken by an Italian trade union targeting segments of especially vulnerable workers in tourism and hospitality. The Italian tourism sector is characterised by high rates of informality or precarity, frequently illegal practices of labour contracting and limited regulatory reach and application of agreements reached through collective bargaining. The analysis aims to identify the drivers, obstacles and dynamics of innovation in union activity and, in particular, the transfer of those practices within the union and across different organisations, actors and sectors.

The case under examination is the ‘Tourism Upside Down’ (‘Turismo Sottosopra’) campaign undertaken by the Italian Federation of Commerce, Hotels, Catering and Services Workers (FILCAMS CGIL, Federazione Italiana Lavoratori Commercio, Alberghi, Mense e Servizi), affiliated to the Italian General Confederation of Labour (CGIL, Confederazione Generale Italiana del Lavoro) which organises workers in hospitality and commerce. The campaign, which has been running for three consecutive years since the summer of 2022, has involved setting up an itinerant outreach summer tour of tourism hotspots with a fleet of union-branded vans and campervans – acting as a kind of mobile ‘workers centre’ – to raise awareness of labour rights in the sector and bring the union closer to workers in their workplaces.

Based on fieldwork data and participant observation, and union documentation and semi-structured interviews with key stakeholders and union representatives, the chapter argues that Tourism Upside Down represents a concrete example of how strategic capacity in unions can be enhanced through internal organisational learning and processes of policy transfer, enabling experimentation with innovative outreach and organising repertoires. By analysing the campaign’s objectives and activities, and the updates made to it over its first three years, we show how a large confederal union stepped outside its conventional repertoire of action to reach and engage a dispersed, precarious and often informal workforce in the Italian tourism and hospitality sector – an environment historically characterised by regulatory fragmentation and weak union presence.

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1. An earlier version of this chapter was published in French as Tassinari A., Mangiacotti L. et Girolamo A. (2024) Actions et innovation syndicales dans le contexte italien : examen de deux initiatives dans le secteur manufacturier et celui des services, in Fabris B.L. et Vandaele K. (dir.) (2024) Syndicats en action en Europe. Études de cas en Allemagne, Belgique, Danemark, Espagne, Italie et au niveau européen, ETUI, 109–131. The text has been rearranged and updated here.

The chapter highlights how the post-pandemic conjuncture – marked by severe labour shortages and growing public awareness of exploitative working conditions in tourism – prompted FILCAMS CGIL to seize a window of opportunity to innovate and project a renewed organising presence in the sector. In the face of informality, wage stagnation and worsening working conditions in tourism and hospitality in the post-Covid 19 period, the union perceived the necessity of innovating repertoires of action to build membership and power resources among these precarious and often informalised segments of the workforce. The impetus for this process of innovation came also from shifts in the surrounding, broader eco-system of Italian unionism, where rank and file unions in several sectors have for a few years been undertaking successful strategies of grassroots organising to revive workers' bargaining power.

In tracing the development and implementation of the campaign, the chapter argues that its success and durability rest on two interlinked dynamics: first, the transfer of campaigning practices from other sectors and unions (notably, the use of itinerant outreach developed in the agricultural labour context); and second, a process of internal organisational learning in which campaign strategies have been incrementally refined and adapted through experimentation and feedback loops involving both national and local union structures.

Tourism Upside Down thus exemplifies how a confederal union can strengthen its associational and societal power resources in hard-to-reach labour market segments through a deliberate mobilisation of its strategic capacity. This capacity is underpinned not only by material resources and central coordination, but also by the union's ability to learn from both internal and external experiences, reinterpret them creatively and translate them into an effective, context-sensitive campaign format. As such, this case contributes to debates on union innovation, policy diffusion and transfer, as well as the strategic renewal of union repertoires under conditions of labour market fragmentation and precarity.

## **1. The challenging landscape of labour relations in the Italian tourism sector**

The Italian trade union movement has, in the last two decades, encountered increasing challenges to its power resources. The legacies of the 2008-09 crisis, and of the liberalisation of the labour market and reform of the industrial relations system implemented in its wake, have left the Italian system of employment regulation with lower levels of employment protection overall but continuing and significant segmentation in terms of working conditions, wages and levels of decommodification vis-à-vis social risks (Ferragina and Arrighi 2021). An overall change in the political climate away from social concertation and social pacts has reduced the political influence of Italian unions in policymaking (Tassinari and Sacchi 2021). Various observers (cf. Leonardi and Pedersini 2023; Regalia and Regini 2018) have nonetheless argued that the power resources of Italian unions have remained comparatively more resilient than, for instance, those in other south European countries. Various factors are usually cited to substantiate this point: trade union membership is still comparatively

high, at around 32%; collective bargaining coverage remains – at least on paper – as high as 80% (Leonardi and Pedersini 2023); and unions have been able to defend the formal autonomy and overall set-up of the collective bargaining system against attempts at unilateral disorganised decentralisation during the Eurozone crisis and beyond (Bulfone and Afonso 2020). However, unions' role in the governance of recent points of crisis – from Covid-19 (Meardi and Tassinari 2022) to the recent cost of living crisis (Maccarrone 2023; Tassinari et al. 2025) – has been marginal at best. Moreover, persisting wage stagnation (Cirillo et al. 2023) and the increasing incidence of in-work poverty (Filandri 2022) in the Italian labour market point to the significant difficulties of the collective bargaining system in delivering wage increases and influencing distributional dynamics in a progressive fashion (Tassinari et al. 2025).

The erosion of the capacity of Italian trade unions to secure wage and working conditions improvements across the board has several complex causes. Some of them have to do with the institutional set-up of collective bargaining and the institutionalisation of the logic of wage moderation following accession to European Monetary Union (cf. Maccarrone 2023). However, an additional source of challenges lies in the increasing vertical and horizontal disintegration of the Italian productive system and labour market – driven largely by the attempts of firms inserted in low value added segments of the productive system to maintain their margins of competitiveness through wage and social dumping in the context of productivity stagnation (Bagnardi et al. 2022; Dorigatti and Mori 2016; Hadjimichalis 2006). The growth of numerous forms of atypical and hyper precarious employment forms; the enduring, high incidence of informal or 'grey' (i.e. partially informalised) employment, especially in low value added sectors; the increasing diffusion of complex subcontracting and outsourcing arrangements in the organisation of value chains across several sectors – all contribute to maintaining large pockets of the labour market where workers are hard to reach and organise, and where the protective capacity of the collective bargaining system, and occasionally even of labour law, is limited. The high incidence of micro and small enterprises in the Italian productive fabric compounds the organising and bargaining challenges that Italian unions face.

Over the last twenty years, Italian trade unions have made considerable efforts to recruit young, migrant and atypical workers and to include them in their bargaining agendas (Durazzi 2017). These efforts have proven more effective in sectors with a well-established union presence and strong platforms to support efforts at inclusive bargaining (e.g. metalworking and large-scale manufacturing – see Benassi and Dorigatti 2020). In other sectors, however – especially the low value added segments of services and manufacturing – there is still considerable ground to cover; and some labour market constituencies, especially migrant workers and young workers entering the labour market for the first time, continue to represent particularly hard-to-reach ones, vulnerable to labour market exploitation.

Labour relations in Italian tourism exemplify such challenges as they are characterised by a number of parallel 'fragmentations' (Girolamo 2023; Iannuzzi 2017): an absolute predominance of small or very small enterprises, thus leading to a wide range of employers; a segmented labour force heavily featuring feminised, young or migrant



labour, as well as seasonal workers with high levels of turnover and very short contract duration; and a patchy regulatory landscape both in terms of labour legislation and collective bargaining.

Due to its economic importance to the Italian economy (see Bürgisser and Di Carlo 2023), tourism has received over the years several derogations and exemptions from national legislation. These have contributed to further segmentation in employment relations, with diverse contract types and social security institutes for seasonal workers and a widespread liberalisation of various forms of fixed-term contracts.

Furthermore, the sector presents an uneven collective bargaining landscape: alongside the 'legitimate' collective agreements signed by trade unions affiliated to the confederations (which, however, were not renewed for many years), there are multiple 'smaller' collective agreements negotiated by organisations with questionable representativeness on the part of both employers and labour contribute to social dumping in the sector by setting wages and working conditions at lower standards than the 'representative' collective agreements. Moreover, the predominance of small firms in the sector poses obstacles to union presence as companies with fewer than 15 employees are exempt from the obligation to institute a company-level union representative.

These contextual features – workforce heterogeneity, high levels of turnover and the absence of a company-level union representative structure – make union organising difficult and have thus assisted the perpetuation of regulatory fragmentation over time on top of low levels of union density (Girolamo 2023; Iannuzzi 2021).

Informal or semi-informal labour practices are pervasive in the sector. The most common informalised labour contracting practice is that of 'envelope wages' under which workers are hired through a regular – usually fixed-term and part-time – contract for a portion of their working hours, calculated and remunerated in such a way as to appear 'legal' according to the relevant collective agreement in place, with the rest of the remuneration for the remaining hours paid in cash 'under the table', at a lower rate. This allows employers to pay lower social security contributions as well as lower wage rates for the 'envelope' part of the wage, and to circumvent regulations on maximum working hours. This type of informality has become so normalised that workers themselves are often unable or unwilling to problematise it – a circumstance facilitated by the widespread absence of awareness of labour rights among seasonal and temporary workers among whom turnover is high (Girolamo 2023).

## **2. The 'organising turn' of FILCAMS CGIL in tourism**

FILCAMS CGIL organises workers across a wide range of subsectors in services, among which tourism is the third most prominent. In 2019, the organisation reported a total of 578,000 members, 22% of whom worked in tourism compared to 42% in commerce and 36% in services, amounting to roughly 123,000 members set against a national sectoral workforce that, in 2019, reached around 1.5 million workers (FILCAMS CGIL 2019). FILCAMS CGIL is signatory to the main collective bargaining agreements in force in



the sector. These include the national collective agreement covering hotels and other tourist accommodation establishments, negotiated alongside the services and tourism branches of the other two main confederal unions – the Italian Federation of Unions for Workers in Commercial, Tourism and Other Services (*Federazione Italiana Sindacati Addetti Servizi Commerciali, Affini e del Turismo*, affiliated to the Italian Confederation of Workers' Unions (*Confederazione Italiana Sindacati Lavoratori*) and the Italian Union of Workers in Tourism, Commerce and Services (*Unione italiana lavoratori turismo commercio e servizi*, affiliated to the Italian Labour Union (*Unione Italiana del Lavoro*)). This agreement, to which the employer organisations *Federalberghi*, *Faita* and *Confcommercio* are party, expired in 2018 but it was, eventually, renewed in July 2024. Furthermore, *FILCAMS CGIL* is party to two national agreements covering hospitality and restaurants, although these have also expired, respectively in 2018 and 2021.

In line with the practices of Italian confederal unionism, *CGIL* attributes primacy to collective bargaining as the main avenue for the improvement of working conditions and rights at work. However, in response to the increasing erosion of the protective reach of collective agreements and the difficulties encountered in renewing expired ones, *FILCAMS CGIL* has, for over a decade, displayed increasing awareness of the importance of updating its strategies, tools and campaigning approaches, increasingly adopting practices that can be interpreted as being in line with the 'organising model' of trade unionism (Gasparri and Dorigatti 2017). Since the 2010s, the union has embraced strategies inspired by the organising model of unionism that has powered the wave of union revitalisation efforts in the United States (US) and United Kingdom since the 1990s and which has also gained increasing traction in Italy since the mid-2000s (Gasparri and Dorigatti 2017).

The shift towards a greater emphasis on organising, as a complement to more traditional collective bargaining activities, can be interpreted as the result of a lengthy process of learning internal to the confederation. *CGIL* has gained awareness over time of the importance of direct organising activities to complement its institutional power resources and reach vulnerable constituencies of precarious workers in those pockets of the labour market where the union has traditionally been absent.

According to union officials, this innovative effort towards organising was already part of the confederation's internal strategic thinking prior to the onset of Covid-19: difficulties on the collective bargaining front had been manifest since the early 2010s as the sectors' main unions struggled to renew expired collective agreements and bring employers to the negotiating table. These difficulties alerted union officials at both local and national levels to the importance of investing energies and resources in building up associational power resources in the sector. Over the years, organising initiatives across various sectors of *CGIL* have been numerous (see Di Nunzio et al. 2015 for an overview). *FILCAMS CGIL* in particular has, since 2015, launched a communications and outreach strategy across the whole organisation under the banner of 'We are where you are' ('*Siamo dove sei*'), encapsulating the union's renewed emphasis on being present and visible at workplace level; that is, in the dispersed locations where services work takes place, outside of union offices and local chambers of labour (*FILCAMS CGIL* 2021).

In line with this broad orientation, the national leadership of the federation, under General Secretary Maria Grazie Gabrielli (in office from 2014 until 2023), put in place various initiatives aimed at building up the capacity for organising at local/territorial level across different subsectors. This took place within a national coordination framework that offered both resources, support and coherence to the organising initiatives undertaken by regional and local union structures.

It is against the backdrop of this long-term turn towards a greater place for organising strategies that the innovation analysed here, the Tourism Upside Down campaign, has to be contextualised. This itinerant campaign's symbolic and media-friendly innovation is representative of, and follows in the same footsteps as, this broader approach, specifically embodying the strategy of taking the union physically to workers to overcome the dispersal and fragmentation that characterises work in the sector.

### **3. The post-Covid phase as a critical juncture for organising in tourism**

Public attention towards working conditions in tourism has grown in the post-pandemic period, contributing to focus the attention of FILCAMS CGIL on the sector and acting as a driver of policy experimentation and innovation. In the aftermath of the financial crisis of 2007-08, tourism played an important role in terms of employment creation and growth in Italy's gross domestic product (cf. Bürgisser and Di Carlo 2023). Awareness that collective agreements were losing their power right across services, but in hospitality in particular, on top of difficult wage dynamics, made increasingly clear to FILCAMS CGIL officials the necessity of returning to an activity of 'street unionism', de-bureaucratising union activity and approaching workers directly. At the same time, this realisation extended to the need to establish local associations to build some mobilising power as a means of increasing pressure for the renewal of those expired agreements.

Tourism was hit particularly hard by the Covid-19 pandemic of 2020-21, with a high level of employment destruction and collective dismissals that forced the sector's unions to adopt defensive positions, focused solely on guaranteeing income protection to the industry's workers via social shock absorbers. As tourism started tentatively recovering in 2021 and then more markedly in 2022, employment in the sector picked up, but employers began to lament a general difficulty in filling vacancies for seasonal work. Tourism employers frequently took to the national press to complain about the difficulties they encountered in securing an adequate labour supply,<sup>2</sup> which has, in turn, offered the opportunity for investigative journalists and trade unionists to respond by denouncing the poor working conditions, illegal working hours and low remuneration which are commonplace in the sector. According to 2023 data from the Italian Labour Inspectorate (Ispettorato Nazionale del Lavoro), reported by FILCAMS CGIL, over 70% of tourism establishments in Italy are in breach of regulations regarding labour contracting (workers either working without a contract, or with a contract that does

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2. See, for instance: <https://tg24.sky.it/economia/2022/05/14/turismo-italia-lavoratori#00>; <https://www.ilsole24ore.com/art/turismo-servono-387mila-lavoratori-ma-40percento-e-introvabile-AE8XdyXB>

not actually reflect the total of their working hours, or in breach of contractually-set standards on minimum pay, maximum working time and obligatory rest periods), while 26% of workers are completely informalised.<sup>3</sup>

This situation of apparent labour shortages provided space for the union to attempt to rebound from the defensive posture it had adopted during the Covid-19 period and shift towards a more offensive campaigning strategy. The aim was to build back lost power resources by denouncing exploitative working conditions in the sector and calling more broadly for a different model of more sustainable tourism, in contrast to employers' narratives. The renewed media attention on the sector thus acted as a further factor that facilitated innovation at this specific conjuncture – as it provided a focal point for a union campaign that raised visibility and was explicitly aimed at driving public opinion.

#### **4. External incentives to organisational innovation: the growth of rank and file unions in Italy's tourism sector**

Innovation in the action repertoire of FILCAMS CGIL has also been influenced by the emergence and growing activism of new labour actors. In recent years, grassroots unions have become increasingly visible in the tourism and hospitality sectors, as well as in other sectors of the Italian economy. A particularly prominent example in tourism is the Rank and File Unions Federation (USB, *Unione Sindacale di Base*), formally established in 2010 but rooted in a longer tradition of conflict-oriented unionism. USB originated in the convergence of various autonomous union formations – including *Rappresentanze di Base* and *Sindacato dei Lavoratori Intercategoriale* – which had emerged in the 1990s and 2000s in opposition to the perceived institutionalisation and compromise-oriented strategies of the main union confederations.

Today, USB counts approximately 250,000 members nationwide and operates across both the public and private sectors. It has become one of the largest independent unions in Italy, with a strong presence in highly fragmented and deregulated sectors such as logistics, public services and education. Its structure is decentralised and oriented toward action on the ground, combining traditional union tools with grassroots mobilisation and legal activism.

To address the specific needs of precarious workers, USB established a dedicated branch for non-standard and self-employed workers: the Union of Self-Employed Workers of the New Generation (*Slang-USB*, *Sindacato Lavoratori Autonomi Nuova Generazione*). *Slang-USB* focuses on categories often excluded from institutional bargaining processes, such as freelance, intermittent, seasonal and platform-based workers who typically lack access to standard employment contracts and national collective agreements (Girolamo 2023).

3. [https://www.filcams.cgil.it/article/homepage/\\_mettiamo\\_il\\_turismo\\_sottosopra\\_torna\\_la\\_campagna\\_filcams\\_cgil\\_dalla\\_parte\\_degli\\_stagionali](https://www.filcams.cgil.it/article/homepage/_mettiamo_il_turismo_sottosopra_torna_la_campagna_filcams_cgil_dalla_parte_degli_stagionali)

In line with USB's broader vision, Slang-USB adopts a conflictual and counter-institutional approach to industrial relations. It rejects the principles of social partnership and tripartite bargaining, viewing them as mechanisms that entrench labour precarity. Instead, it promotes a grassroots mobilisation strategy centred on collective action, legal support to workers and in-public denunciation of exploitative conditions. The organisation refrains from signing national-level collective agreements due in part to its exclusion from formal representativeness criteria but more particularly as a deliberate political stance against what it considers the legitimisation of substandard contracts.

A core focus of Slang-USB has been the protection of seasonal tourism workers. In this context, the union launched the 'Seeking a slave' ('Cercasi schiavo') campaign in the summer of 2022, at the same time as FILCAMS CGIL was launching Tourism Upside Down. This initiative critically exposed exploitative job advertisements – particularly those offering full-time work in exchange for food and accommodation – by reframing them through a provocative narrative highlighting the systemic normalisation of unpaid or grossly underpaid labour. Beyond raising public awareness, the campaign also functioned as a tool of grassroots monitoring, mapping exploitative practices in tourist hotspots across Tuscany, Emilia-Romagna and southern Italy. Workers were encouraged to report abuses, prompting union intervention through legal counselling, public pressure and collective disputes. The campaign further denounced the absence of effective labour inspection and questioned the role of institutional unions in addressing these dynamics.

Due to the highly fragmented and mobile nature of seasonal employment, and the decentralised structure of Slang-USB itself, there are currently no consolidated figures available on union membership among seasonal tourism workers. Nonetheless, evidence from recent campaigns and regional mobilisations suggests, according to union officials, growing engagement among this segment of the workforce.

There are several examples of Slang-USB's territorial mobilisations. In Livorno and Marina di Massa, the union supported hospitality and tourism workers through collective grievances and campaigns targeting subcontractors and informal employers. In Calabria, it organised seasonal workers in both the tourism and agricultural sectors, denouncing exploitative working conditions and advocating stronger enforcement of labour standards. In Rimini, one of Italy's major seaside tourism destinations, Slang-USB has developed a consistent presence through on-the-ground outreach and local alliance-building. The union launched its first campaigns in the area under the slogan 'No more seasonal exploitation' ('Mai più sfruttamento stagionale'), relying on the support of former seasonal workers and activists (Girolamo 2023). Slang-USB's activities in Rimini include leafletting outside hotels and restaurants, the creation of a labour advice desk for wage assessment and legal counselling, and public and media-oriented actions in highly visible city locations. A particularly high profile initiative was organised during the Notte Rosa, the region's most important summer festival, where Slang-USB staged a protest action to draw attention to the exploitation underlying the tourism boom.

These initiatives have been carried out in cooperation with local social movements which work on intersecting issues including housing rights and access to public spaces, reflecting Slang-USB's broader intersectional and territorial approach (Girolamo 2023).

More broadly, USB has also initiated the creation of the local monitoring of labour exploitation in tourism and hospitality, such as the recently launched efforts in Pavia and Catanzaro aimed at building permanent observatories on working conditions and employer practices in the restaurant and tourism sectors. These forums involve not only local public institutions but also representatives from employer associations, such as Confindustria, signalling a desire now to open up a space for dialogue and accountability extending across the labour market.<sup>4</sup>

FILCAMS CGIL officials interviewed for this research did not perceive the activities of Slang-USB in the tourism sector as constituting a threat. The confederal unions' de facto representative monopoly stems from their role as signatories to the main collective bargaining agreements in the sector and from their established role as the main social partners; that is, from their recognition by the main employer confederations. However, the growing mobilisation of rank and file unions has contributed to increasing the politicisation and the salience of working conditions in the tourism sector. In this way, it has created further incentives for FILCAMS CGIL, as the main confederal union in the sector, to put in place high-visibility campaign initiatives on these same issues.

## **5. Launching the Tourism Upside Down campaign**

Tourism Upside Down is a national campaign which was run by FILCAMS CGIL in the summers of 2022, 2023 and 2024, with plans to replicate it in 2025. At its core, Tourism Upside Down is aimed at seasonal workers in tourism as well as at the broader public (first and foremost, tourists and consumers themselves). In these three consecutive summers, union representatives conducted an itinerant tour across the whole of Italy, organised by the national confederation in partnership with regional and local sectoral FILCAMS structures. The tour stopped in the main tourist localities in every region, with several vans branded with the union logo, pictures of the faces of tourism workers – diverse in terms of age, gender and ethnicity – and campaign slogans such as: 'On the (right) side of tourism: protect your rights, defend your work' and 'We are here – if you respect our work' – see Figure 1.

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4. <https://www.lametino.it/Ultimora/lavoratori-stagionali-incontro-usb-alla-provincia-di-catanzaro.html>;  
<https://www.usb.it/leggi-notizia/pavia-tavolo-per-la-costruzione-e-la-definizione-di-un-osservatorio-permanente-di-contrasto-allo-sfruttamento-nella-ristorazione-1736-1.html>

Figure 1 One of the FILCAMS CIGL vans used in the Tourism Upside Down campaign



Source: <https://www.collettiva.it/copertine/lavoro/la-lunga-estate-per-i-diritti-dei-lavoratori-ys6b2oka>

Tourism Upside Down has three parallel objectives.

First, the campaign aims to increase awareness among seasonal workers in tourism of their rights at work and of the specific entitlements they have; equip them with the knowledge to understand their payslip and other aspects of their working arrangements; and more generally empower them to quit conditions of informality and exploitation in their workplaces.<sup>5</sup>

Second, it aims to increase the visibility of the union, its activities and its strategic demands for the tourism sector, among the sector's workers and the broader public, so as to increase its bargaining power with government and employers. The campaign also aims to promote 'Our tourism' ('Il nostro turismo'), the platform of demands which FILCAMS CGIL has drawn up for the sector. This includes a series of calls aimed both at the government and at the employer associations to reduce precarity and guarantee decent work, renew the expired sectoral agreements and promote a model of sustainable tourism through sectoral 'industrial policy'.<sup>6</sup>

Third, it has a broader communication goal aimed at promoting the union's vision of an alternative model of quality tourism, founded on decent working conditions rather than on exploitation, with the goal of challenging employers as well as public authorities to remove social dumping in the sector and contribute to a more sustainable model of economic development.

In this respect, 'We are here – if you respect our work' aims directly to build the union's narrative and discursive power resources and lessen the dominant narrative promoted

5. [https://www.filcams.cgil.it/article/5efbb8ff-1cc3-4ca7-8bc2-9b1944e91a45/campagna\\_turismo\\_2023](https://www.filcams.cgil.it/article/5efbb8ff-1cc3-4ca7-8bc2-9b1944e91a45/campagna_turismo_2023)

6. [https://filcams.cgil.it/page/il\\_nostro\\_turismo](https://filcams.cgil.it/page/il_nostro_turismo)



by employers in the sector, amplified by the Italian press, that attributes post-Covid labour shortages in tourism to workers' 'laziness', 'unwillingness to work' and that 'they would rather be on benefits'. In contrast, the slogan – reinforced by several videos shot during the campaign – highlights how young people are prepared to work in tourism as long as they receive decent remuneration, proper contracts and respect for their rights at work.

Wherever the van stopped, FILCAMS CGIL officials engaged in various activities – organised primarily by local union structures with the support of national, centralised campaign infrastructures and officers.

First, the campaign involved the organisation of various basic 'awareness raising' activities – such as leafletting and handing out information materials for the sector's workers; demonstrations/rallies with an open microphone; and outreach events such as information stalls in public places (beaches, bars, panoramic spots) and local workplaces (hotels, restaurants, beach lidos). In 2024, an itinerant street theatre show was launched, addressing in a creative way (through a re-elaboration of the story of the popular sci-fi TV show *Stranger Things*) the dark side of tourism in Italy – i.e. working conditions in the sector.

Second, the campaign vans acted as mobile centres where drop-in clinics were organised for workers to have their payroll or contracts checked and to receive support with various administrative issues (e.g. applying for unemployment benefits for seasonal workers at the end of the summer season).

Third, the campaign involved several high-profile, visibility-enhancing activities such as talks, debates and roundtables aimed at the wider public and often involving local stakeholders, including local authorities and, occasionally, local representatives of the sector's employer organisations.<sup>7</sup> All these activities were documented and made visible through the campaign's active presence on various social media channels and through CGIL's own central public communication platform/journalistic outlet, *Collettiva*.

As discussed above, the impetus to implement Tourism Upside Down came as part of a broader reflection within FILCAMS CGIL about the need to invest energies and resources in strengthening associational power, building visibility among workers and raising the capacity for mobilisation. In the post-Covid context, as tourism exited from a deep crisis with its deleterious impact on wages and working conditions, the urgency of interventions aimed at shoring up the union's power resources so as to be able to have a more effective impact on sectoral dynamics became even more pressing.

According to officials, the idea of setting up an itinerant campaign bringing the union to the workers, literally bridging the gap between these dispersed constituencies and union activities, was the result of a process of internal policy transfer within CGIL. Indeed, the use of touring vans as mobile offices to reach dispersed and hard-to-contact

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7. [https://filcams.cgil.it/article/il\\_nostro\\_turismo/\\_turismosottosopra\\_bilancio\\_positivo\\_per\\_la\\_campagna\\_filcams](https://filcams.cgil.it/article/il_nostro_turismo/_turismosottosopra_bilancio_positivo_per_la_campagna_filcams)

workers had been used in the past by the agricultural sector union affiliated to CGIL, the Federation of Agricultural Workers of Italy (Federazione Lavoratori Agro Industria), which faces similar issues of a dispersed and vulnerable workforce often experiencing extremely exploitative conditions.

The idea underpinning this strategy is that of building relationships with casualised, seasonal tourism workers through the provision of various bureaucratic and labour market services that can then act as a basis for building contacts and then, possibly, as an avenue to union membership. This plank of the campaign's activities, according to officials, was inspired by the broader turn towards service provision as a conduit for organising and membership building practised for instance by many worker centres and 'alt unions' in the US (see Fine 2006).

The impetus for setting up the campaign came from national union structures and was then further developed in partnership with local unions but with leadership and, most crucially, a substantial provision of resources from national level to support the local campaigning efforts. These resources involved the vans themselves (although some regional FILCAMS CGIL structures then proceeded to buy their own), campaign materials (leaflets, printed guides) and branded gadgets to hand out to workers, as well as communication support through the union's central webpages, social media channels and so on. The support offered by national union structures was pinpointed by some local union officials as an important factor facilitating the sustainability of the campaign and its national reach.

## **6. Updating and diversifying Tourism Upside Down**

The campaign has undergone continual revision and updating since its inception, and on various fronts.

First, given the predominance of young workers in the sector, FILCAMS CGIL started collaborating with the national student organisations Union of University Students (Unione degli Universitari) and the Network of High School Students (Rete degli Studenti Medi) to gather the input of young tourism workers who are also students, increase young people's ownership of the campaign's messaging and augment its reach among this constituency. Young workers' priorities were collected through dialogue with these organisations and included in the campaign's demands (which from 2024, for instance, included the issue of study leave for workers in the sector). In 2023, the launch video for that summer's campaign – featuring and targeting young workers – was designed and shot in partnership with these two student organisations. In 2024, several 'training seminars' were organised in partnership with student organisations in various localities across Italy at the beginning of the season to inform young workers of their rights at work. Information materials about these were also updated and re-designed with young people in mind – with leaner text and titles and QR codes linking to digital/video content.



Second, the logistical aspects of the campaign have been revised better to fit the needs of local geographies: the fleet of vehicles used in the itinerant campaign was both expanded, with the purchase of more vans, and also diversified (e.g. including pick-up trucks, scooters and Ape-style vans depending on the specificity of the local territories and landscapes).

Third, to diversify the format, the roundtables that had been organised in previous years with local stakeholders, policymakers and employers were replaced in 2024 with the street theatre tour – acting as a moment of involvement and awareness-raising for the broader public. Both the design of, and the specific activities involved in, the campaign are reviewed each year in order to retain its novelty whilst keeping the same brand and broadly recognisable format. Previously, in 2022, the campaign had been accompanied by those roundtables under the banner of ‘Our tourism – destination south’ (*‘Il nostro turismo – destinazione sud’*).<sup>8</sup> These aimed to generate broader public debate about the future of the sector and the interventions and changes necessary to achieve structural transformation towards upgrading and greater job quality. In 2023, similar initiatives centred around the issue of the development model of the Italian tourism sector were organised in all regions, not only in the south of the country.

Officials report that the campaign is, by now, well-known within FILCAMS CGIL and pinpointed as an important experience of innovative organising. It has not been replicated with the same format in other branches of the service sector, as it is strongly tailored to the specificities of tourism – especially with its emphasis on seasonality, on mobilising both workers and public opinion and by physically bringing the union to holiday localities recognised for relaxing and fun times where its presence would be unexpected and thus more likely to attract attention. However, some of the campaigning practices that are part of Tourism Upside Down have been adopted in other domains of the union’s activity. For instance, the use of ‘service provisioning’ as a channel of engagement for hard-to-reach workers has now become fairly commonplace across all organising domains within FILCAMS CGIL. Various campaigns aimed at mobilising public opinion in support of the political battles brought by the national confederation (most recently, a national referendum on the re-regulation of dismissal rules and subcontracting) have also used the touring van as a way of increasing the visibility of union activities among the general public and of bringing the union to workers and citizens.

## 7. Evaluating the campaign: outcomes and limits

As Tourism Upside Down is a general awareness-raising initiative, outcomes are not immediately tangible or easy to measure as the results of these kinds of initiatives are usually only observable in the long run (cf. Gumbrell-McCormick and Hyman 2013: 70). Nonetheless, experimentation with this novel campaigning method is considered positive by union officials, so much so that the original campaign has not only been repeated three years running, but that there are plans to continue it into the future.

8. [https://www.filcams.cgil.it/article/il\\_nostro\\_turismo/il\\_nostro\\_turismo\\_destinazione\\_sud\\_](https://www.filcams.cgil.it/article/il_nostro_turismo/il_nostro_turismo_destinazione_sud_)

With regard to the campaign's effectiveness in building up associational power resources, union officials report that the campaign has been well received by the workers with whom they made contact, who are generally happy to have the chance to talk to union officials face-to-face rather than interacting with the union via social media. Whilst the number of new members directly recruited as a result is difficult to quantify, officials are positive about its beneficial impact on the visibility of the union and of the services it offers for seasonal workers. They report that the number of workers that have signed up to the union with a 'services only' membership<sup>9</sup> has grown as a result of the campaign and that, in some localities, this has been an important first channel of engagement, building towards full membership or at least further participation in union-sponsored activities.

The campaign has also contributed a focal point for local organising efforts and follow-up campaigns by local branches from which other organising initiatives, more focused on specific local issues, could flow. Officials report that these efforts further contributed to putting pressure on the sector's employers to renew the sectoral collective bargaining agreement, which was eventually signed in the summer of 2024 following various mobilisation initiatives. Moreover, officials note that the campaign, through its media visibility, has been successful in taking advantage of the heightened level of attention that tourism has received in the post-Covid period, helping to locate FILCAMS CGIL as one of the actors participating in and shaping policy debate on sectoral development policy. For instance, officials in Veneto Region observe that, following the visibility of the union's activities in tourism, it now sits at the regional policy table on the tourism sector, in which it had previously not been a stakeholder.

The drive towards organising is, by the union's own admission, insufficient to turn the sector substantively upside down. This would require structural interventions to upgrade it, alongside a massive enforcement drive to uproot illegal contract practices. Levels of conflict and mobilisation remain comparatively low as, although workers' marketplace bargaining power did increase in the aftermath of the pandemic, the workforce remains nonetheless scarred by the massive job losses that hit the sector during that emergency. Consequently, a general climate of vulnerability and timidity vis-à-vis attempts at organising remains common and makes mobilisation difficult to orchestrate.

Within FILCAMS CGIL itself, there is also a general cautiousness around expressly adopting conflictual tactics that imitate those adopted by the rank and file unions, as it is believed that this could exacerbate tensions with employers and undermine efforts at keeping collective bargaining and social dialogue alive. Already the fairly 'soft'

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9. This form of union membership, known in Italy by the Latin term 'brevi manu' (literally 'short hand'), is obtained by paying dues directly to the union, rather than through automatic payroll deductions via the employer. It provides a more private and flexible means of affiliation, often favoured by workers without regular wages or contracts. This method grants access to the individual services offered by the union, such as legal, fiscal and bureaucratic assistance (e.g. with tax declarations), but is not tied to the worker's specific workplace. As a result, it does not contribute to the official count of union membership used to determine representativeness for workplace-level bargaining. Only memberships with payroll deductions are certified and counted in the formal calculation of a union's representativeness, which is crucial for electing workplace-level representatives and participating in collective bargaining processes.

organising and campaigning practices enacted as part of Tourism Upside Down have required officials at local level to step outside their established comfort zone and engage in the types of activities (e.g. using a megaphone, making themselves ‘annoying’ towards local employers...) that, in some cases, they had not practised in a long while and that will require time to become properly embedded in the repertoire of union action.

The process of the innovation of practices in trade unions affiliated to confederations like CGIL is thus still developing, but it is nonetheless noteworthy and shows a possible direction of travel for the renewal of unions’ associational power resources, starting from the grassroots up.

## 8. Conclusions

The Tourism Upside Down campaign represents one of several policy innovations that FILCAMS CGIL has been pursuing as part of its broader strategy. This has been aimed at addressing critical aspects of the tourism sector in Italy and achieving a structural transformation towards greater sustainability and the realisation of decent working conditions in this strategic growth driver of the Italian economy. Tourism Upside Down combines outreach to workers at grassroots level through a tour which brings the union into direct contact with tourism workers at their workplaces. The intention has been to increase the visibility of problematic working conditions in tourism as regards the broader public and, based on a strategy of direct interlocation with regional and local authorities, to push for the implementation of sectoral development policies and the enforcement of labour standards that could facilitate an upgrading of the sector.<sup>10</sup> The campaign has thus sought to strengthen the union’s associational power resources, by engaging workers in the sector, as well as its societal power, by building its visibility and legitimacy vis-à-vis society and policymakers and by presenting itself as an actor with a strategic vision for this sector’s development and upgrading.

Whilst the campaign outcomes are hard to measure directly, the renewal in 2024 of the sector’s main collective bargaining agreement after years of delay represents an important milestone in the regulation of working conditions in the sector. Furthermore, the campaign has now run for over three years and is being continually refreshed through a process of internal organisational learning and ongoing innovation and fine-tuning. Thus, it represents a promising example of the construction of organising ‘best practice’ that can become a lasting part of the union’s repertoire of action rather than a fleeting experiment.

## Note on method and data

This chapter draws extensively on original data collected through fieldwork and participant observation by one of the authors – Alex Girolamo – in the tourism and

10. <https://www.cgil.it/ufficio-stampa/cgil-e-filcams-occorre-tavolo-di-confronto-per-affrontare-trasformazione-settore-turismo-aib8zckw>

hospitality sector in the Romagna region over the period 2021–23. In Romagna, Girolamo conducted five qualitative interviews with key stakeholders and union representatives in the tourism sector, and gathered in-depth knowledge of tourism and of the case under analysis through direct experience as a seasonal worker in the sector and as a union activist. Girolamo's data was complemented with three additional interviews conducted with FILCAMS officials at national and regional level (in Veneto and Sicily) in January 2025 by Arianna Tassinari. These primary data have been complemented with a documentary analysis of union sources, web communications and a review of the secondary literature. Parts of this chapter draw extensively on research work in the sector conducted by Alex Girolamo and reported in his master's thesis, completed at the University of Bologna in 2023 (Girolamo 2023).

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Cite this chapter: Tassinari A. and Girolamo A. (2025) Italy – Turning tourism upside down: campaigning to organise precarious workers, in Vandaele K. and Fabris B.L. (eds.) When trade unions learn to innovate. Case study evidence from across Europe, ETUI.

## Abbreviations

<b>CGIL</b>	Confederazione Generale Italiana del Lavoro (Italian General Confederation of Labour)
<b>FILCAMS CGIL</b>	Federazione Italiana Lavoratori Commercio, Alberghi, Mense e Servizi (Italian Federation of Commerce, Hotels, Catering and Services Workers)
<b>US</b>	United States
<b>USB</b>	Unione Sindacale di Base (Rank and File Unions Federation)
<b>Slang-USB</b>	Slang-USB, Sindacato Lavoratori Autonomi Nuova Generazione (Union of Self-Employed Workers of the New Generation)

## Chapter 6

### **Poland – Being simultaneously defensive and offensive. The resistance to Amazon by Workers' Initiative**

Katarzyna Rakowska

Amazon globally has posed significant challenges to labour organising. The company's algorithmic management systems, anti-union strategies, high labour turnover, reliance on a temporary workforce and its ability to reroute orders across locations in the case of industrial action have challenged traditional union strategies. This chapter examines how Workers' Initiative (OZZIP, Ogólnopolski Związek Zawodowy Inicjatywa Pracownicza), a radical grassroots union in Poland, has responded to these challenges through innovative organising approaches and campaigns and their policy transfer. Drawing on extensive document analysis, which has been supplemented by interviews with union activists, the chapter explores how OZZIP's experience in organising Amazon workers from 2014-2024 led to significant strategic adaptations and policy transfer to other locals within the union and internationally, including with regard to its relationships with other union organisations.

The case study provides insight into how trade unions are adapting their strategies and policies when confronting multinational corporations in the digital economy. After an unsuccessful strike attempt in 2015 revealed the limitations of traditional industrial action, OZZIP developed a dual approach combining defensive litigation strategies with offensive international campaigns. This adaptation process generated several notable policy transfers: the strategic use of occupational health and safety regulations that spread to other union locals; new forms of international coordination through Amazon Workers International (AWI); and organisational innovations like electronic strike voting. However, these strategic shifts also created tensions between OZZIP's radical grassroots ideology and the practical demands of sustained engagement with legal institutions and bureaucratisation.

Through analysing this case, the chapter contributes to our understanding of union revitalisation and policy transfer in three ways. First, it demonstrates how trade unions can productively combine defensive and offensive strategies when confronting powerful multinational employers. Second, it reveals the complex dynamics of policy transfer in union organisations, showing how practices can spread horizontally between union locals and allies as well as vertically, the latter affecting internal organisational structures. Finally, it highlights how strategic adaptation to new challenges can create productive tensions that drive organisational innovation while testing ideological commitment. The findings have implications for understanding labour organising in the platform economy and the evolution of radical unions as they engage with institutional structures.



## **1. The Polish industrial relations system and its challenges for trade unions**

Trade union policies cannot be analysed without understanding the broader context of industrial relations, union history and the economic system. Poland has faced a rapid decline in union membership since the end of state socialism (Ost 2005). In the twenty-first century, union density has dropped from 17% in 2000 (Wenzel 2000) to 10.5% in 2021 (Feliksiak 2021). Unions are weakest in the private sector, with density remaining at about 4% of employees, with a union presence in 16% of private companies (Feliksiak 2021). The Polish industrial relations system also contributes to union weakening. Most organised workers are associated in three main ‘union centrals’ – the unitary Independent Self-Governing Trade Union ‘Solidarity’ (Niezależny Samorządny Związek Zawodowy ‘Solidarność’) and the two federations: the All-Poland Alliance of Trade Unions (OPZZ, Ogólnopolskie Porozumienie Związków Zawodowych) and Federation of Trade Unions (FZZ, Federacja Związków Zawodowych). However, the legal system forces trade unions to operate primarily at the lower level, generating a company-based model of the union movement as opposed to an industry-based one (Czarnecki 2014). Together with a convoluted collective bargaining system, this results in a collective bargaining coverage of 18% (Czarzasty 2019). Furthermore, Polish union organisations lack political leverage, and the state, regardless of the political background of the government, shows an instrumental, voluntarist attitude toward workers’ organisations (Czarzasty 2020).

All these factors have resulted in the development of a system characterised by scholars as ‘imperfect pluralism’ (Kozek 2003) or ‘illusory corporatism’ (Ost 2000, 2010, 2011). Mrozowicki (2024) demonstrates that, in the past two decades, ‘authoritarian innovations’ have further marginalised trade unions, particularly under the right-wing Law and Justice Party (PiS, Prawo i Sprawiedliwość). Furthermore, PiS’s strategy of fostering bilateral alliances with select union organisations, like Solidarność, while side-lining others, has deepened mistrust between the social partners and reinforced the model of illusory corporatism (Ost 2000; Mrozowicki 2024). These systemic constraints and political dynamics have left Polish unions in a precarious position, unable to influence socioeconomic policymaking or reverse their declining relevance. The persistence of illusory corporatism reflects a broader trend of institutional drift, where weak labour institutions are maintained without meaningful reform, further entrenching the power imbalance in favour of employers (Mrozowicki 2024; Hacker et al. 2015). Declining membership, limited political leverage and restrictive legal frameworks have created a harsh environment for trade unions. The introduction of companies like Amazon to the Polish labour market has further increased the obstacles to unionisation.

## **2. Challenges for Amazon unions in Poland**

Amazon opened its first three ‘fulfilment centres’ in Poland in 2014. Over the next decade, Amazon’s number of warehouses increased to eleven and, according to the company, it created 70,000 direct and indirect jobs during this time (Amazon 2024). Amazon has



consistently resisted unionisation efforts and negotiations with worker representatives, which has posed significant challenges for trade unions in Poland and, indeed, globally. The company is known to use various tactics to prevent union formation, including union-busting strategies and the creation of a work environment that hinders collective bargaining (Birner 2015; Kassem 2022; Owczarek and Chelstowska 2016; Schulten and Boewe 2019; Surdykowska 2024). Amazon's use of digital surveillance and coercive labour controls further complicates unions' efforts. Such usage of automation technologies, including the robotisation of warehouse and picking processes to sort shipping orders and load delivery vehicles, has been referred to as digital Taylorism (Chesta 2021; Fuchs et al. 2022; Henaway 2023). This surveillance system increases managerial control and makes it difficult for unions to organise workers who are constantly monitored (Vallas et al. 2022; Vallas and Kronberg 2023).

The high turnover rate and precarious employment in Amazon warehouses poses additional challenges. In the United States, turnover is estimated at 3% weekly (Chen 2023) and 150% per year, twice the average (Segal 2022). In Poland, an occupational health and safety court expert estimated that a person's average work duration is about one year (OZZIP 2018c). Right from the beginning of its operations in Poland, Amazon itself confirmed its colossal turnover – in 2016, half of its 4,500 employees had worked for it for less than six months, and only 22% of people had done so for more than one year (OZZIP 2016b).

Additionally, Amazon's strategy of rerouting orders to other fulfilment centres, even abroad, reduces the impact of strikes or disruptions at an individual location. Zenoni and Miszczyński (2024) claim that Amazon in Poland was established in the first place in response to union activity in Germany while, in its very first year of operation in Poland, Amazon moved part of its operations to a warehouse in Poznań in June 2015 in response to the protests of German trade unions (Owczarek and Chelstowska 2016). Moreover, to date, the Polish warehouses operate mainly to service the German market.

Amazon uses the national legal system to aid union busting (Kassem 2022; Schulten and Boewe 2019). Amazon regularly files legal actions against unions in Poland questioning the rulings of the State Labour Inspectorate (PIP, Państwowa Inspekcja Pracy), unions' size and representative status and even their legality in the workplace (Kaszuba 2024). This strategy consumes union resources and is calculated to exhaust organisations. High turnover, surveillance, rerouting and the strategic questioning of the institutional system pose serious challenges for unionism.

The following section examines OZZIP's strategic presence at Amazon, analysing its origins, growth and initial tactics in the Polish Amazon warehouses.

### **3. Portraying OZZIP and its strategic presence in Amazon**

At present, there are four trade unions registered in Polish Amazon. This chapter focuses on OZZIP – the first and, to this day, dominant trade union founded a few months after the opening of the country's first warehouse. OZZIP is an independent

grassroots union established originally at the Cegielski factory in Poznań in 2004 as a result of workers' disillusionment with the major unions and their involvement in high-level politics (Mrozowicki and Antoniewicz 2014; Mrozowicki and Maciejewska 2017b; Urbański 2014). Over the past two decades, the union has experienced continuous growth, from a few dozen members in one factory at the beginning of its existence to around 6,500 members in 2024, with OZZIP in Amazon accounting in 2024 for up to one in five members – see Table 1. Amazon is the largest of OZZIP's structures in the country (INTVW4), having grown over the last nine years from 100 members in 2015 to over 1,200 in 2024 (OZZIP 2015b; INTVW2).

Table 1 **Membership of OZZIP in Amazon and OZZIP in general, 2015-2024**

	In Amazon	Overall	Percentage
2015	100	NA	NA
2016	400	1,500	26.7
2017	NA	NA	NA
2018	650	3,016	21.6
2019	700	3,525	19.9
2020	NA	4,072	NA
2021	900	4,739	19.0
2022	NA	5,194	NA
2023	1,000	5,903	16.9
2024	1,200	6,723	17.8

Source: estimates based on OZZIP online materials and interviews.

OZZIP has a cross-industry and democratic, 'flat' structure. There is no division between union activists, shop stewards and regional or national leaders. All union functions, including membership affiliations to national bodies, are carried out by shop stewards working part-time or full-time in their workplaces. It is union policy that its representatives never delegate a shop steward to full-time union duties.<sup>1</sup> In 2024, OZZIP had four part-time administrative staff, but contracted legal counsel and had no paid organisers. To promote democratic leadership and its flat structure further, the organisation operates an internet forum with representatives from all local union structures, lawyers and national committee members as a platform for free discussion and the exchange of experiences among unionists.

OZZIP is represented in both public and private sectors including culture, education, trade, services, production and logistics, and encompasses several Amazon warehouses. OZZIP's general strategies arise from its radical ideological background; the union

1. Depending on the size of the company-based organisation, trade unions in Poland are entitled to facility time; that is, to so-called 'union hours' or exemption from work for union duties. Once membership reaches 150 people, one union representative is entitled to full-time facility time; when it reaches 500 people, two representatives; when it reaches 1,000, three representatives; and thereafter one additional representative for every 1,000 further members above 2,000. Generally, facility time is not taken full-time in OZZIP, a policy which is supposed to counter the 'alienation' of union activists from workers and the production of a union bureaucracy.

identifies itself as militant and relies on the mobilisation of its members, the use of industrial action and class ideology (Kelly 1996; Mrozowicki and Antoniewicz 2014). The union's ideological statement reads:

We are independent of employers in our actions. Many of our works councils have decided that they will not use so-called union privileges because we see them as the cause of union enslavement. We do not want union posts, offices, telephones or fax machines from employers. (...) The union, of course, uses the laws but treats them as weapons, especially in cases of the employer oppressing workers and trade unionists. (OZZIP n.d; own translation)

The seven principles established by the union include mutual help, a union without 'bosses and bureaucrats' and inexorability (OZZIP n.d.). The ideological basis of OZZIP was reaffirmed in its new document 'Our Strategy of Action', adopted by the National Congress in 2024, which emphasises that it is a class-oriented, militant, democratic trade union and that direct action and internationalism are fundamental pillars of its conduct (OZZIP 2024b).

In line with its general identity rooted in traditions of anarcho-syndicalism, revolutionary syndicalism and social movement unionism, OZZIP's commitment to internationalism is expressed in its participation in two internationals: the International Confederation of Labour and the International Labour Network of Solidarity and Struggle (OZZIP 2024c). OZZIP represents a 'social unionism rooted in the community' (Dibben 2004; Waterman 1993) and engages in social justice struggles such as supporting women's fight for reproductive rights (Goldmann 2023; Grzebyk 2022; Kosińska 2020), tenant campaigns and urban activism (Pluciński 2014) and climate change (Dębińska 2021; Grupa d/s Klimatu OZZ Inicjatywa Pracownicza 2021). The union's focus on community unionism enables it successfully to organise new greenfield industries, precarious workers such as those employed under civil law contracts, the self-employed, temporary workers and migrant workers (Kubisa 2017; Mrozowicki and Maciejewska 2017a; Muszyński 2016; Pałęcka 2015; Pałęcka and Plucienniczak 2017). Because OZZIP is a young and developing union, it practises a 'bricolage unionism' (Mrozowicki and Maciejewska 2017a), combining old, traditional methods of action and engaging in union experimentation (Laroche and Murray 2024; Murray 2024).

Due to Amazon's global impact on labour relations and working conditions, Polish warehouses have become a 'space of engagement' for OZZIP (Cox 1998). Organising and expanding a union at Amazon was a strategic decision, seen as a means of influencing the physical and symbolic space of labour relations in the company's Polish warehouses and its labour relations worldwide (Mróz 2021). For ten years, OZZIP has been actively implementing various strategies to attract workers to the union and reduce workload and exploitation in Amazon warehouses, an engagement which originated in the union's general radical anti-capitalist policy.

OZZIP's activities in Amazon commenced in the Poznań warehouse on 16 December 2014, just a few months after Amazon began operations in Poland. In the next year, a company union affiliated to Solidarność was established in Amazon Wrocław. In addition, there

is Agrounia Pracownicza, which was registered in 2022, and Kontra, which has been present in Amazon since 2023. OZZIP, however, remains the most prominent and only representative union in the company, with over 1,200 unionised workers (Surdykowska 2024; INTVW2).<sup>2</sup> OZZIP and Solidarność, with around 500 members (INTVW2), are the two major unions in Amazon while the other two play a rather marginal role, each organising fewer than 100 members (INTVW2; Surdykowska 2024).

From the beginning, OZZIP and Solidarność differed greatly in their strategies. Solidarność is a large union centre that operates in many sectors, has historically been involved in parliamentary politics, including in cooperation with the right-wing government (Mrozowski and Czarzasty 2023), and represents a 'logic of influence' rather than the 'logic of action' represented by OZZIP (Offe and Wessenthal 1980). In line with this tradition, the Solidarność approach at Amazon was conciliatory in the early days, with the union beginning its activities by trying to establish good communications with the employer (Owczarek and Chelstowska 2016). As Owczarek and Chelstowska, who studied Amazon in the first years of its presence in Poland, put it: 'The strategy is far from confrontational, [Solidarność] in Wrocław does not resort to the threat of a strike, considering it unrealistic and not helpful' (2016: 73). At the beginning Solidarność was also opposed to OZZIP's strategy as well reflected in a statement from 2015:

We consider many demands [of OZZIP] to be correct. Nevertheless, the methods of industrial action and the confrontational attitude raise our doubts. The threat of a strike, at this stage of union work, is not the sole reasonable solution. (...) The company and the trade union should work together on a partnership basis to strive for the ever better functioning of the workplace and to strengthen the bonds between workers and the company in a spirit of mutual respect. (Solidarność 2015; own translation)

OZZIP, on the other hand, pushed for mobilisation and open conflict from the beginning. One of the union's earliest initiatives in Amazon was to organise a legal strike in 2015. However, this effort also revealed the complexities of labour struggle in a highly controlled and anti-union environment and complex institutional context, forcing the union to learn lessons regarding its future strategies.

#### 4. A failed strike action in 2015

One month after the trade union was founded, OZZIP began publishing its bulletin for workers: 'Głos Załogi Amazona' ('Voice of Amazon Workers'). In the first issue, the strategy was laid out:

2. A representative trade union in a workplace is an organisation of Solidarność, OPZZ or FZZ, provided that it organises at least 8% of employees in the company, or is an organisation [such as OZZIP] that does not belong to the above three unions but which organises at least 15% of employees. Moreover, if no company-based trade union meets these requirements, the representative trade union is the one with the most significant number of employees. Union representativeness is important when negotiating wage regulations and collective agreements. However, it is not crucial when initiating an industrial dispute. At Amazon, Solidarność has so far not reached the 8% threshold, and therefore OZZIP is the only representative organisation as it organises the most significant number of employees.

We are within the traditions of an authentic and militant labour movement. We avoid bureaucracy and have no 'full-time activists'. We perform all functions voluntarily without remuneration. We are independent of employers, government and political parties. We are building a self-governing labour movement without relying on support from party leaders or government teams. We do not enter into agreements with employers over the heads of the workforce. We have no interest in privileges for a few, nor do we want to seek 'social dialogue' by all means in the face of the ruthlessness of employers. We are not afraid to resort to protests and strikes when necessary to defend workers' rights. (OZZIP 2015a; own translation)

During 2015, OZZIP opened a collective dispute resolution procedure, a mandatory process preceding a legal strike. The procedure involves seven mandatory steps and one voluntary one, including negotiations, mediation and a referendum which requires 50% voter turnout and 50% support for the strike. Polish law states that the dispute must be brought against the direct employer. Since OZZIP, unlike *Solidarność*, also organises temporary agency workers, it had to conduct several procedures simultaneously – with Amazon for direct employees and with agencies for temporary workers. The demands of the dispute included higher wages, seniority bonuses, employee shares, longer schedules, realistic break times and contracts of no less than three months for temporary workers (OZZIP 2016a). Knowing that the unions could not complete the formal procedure to win a referendum, Amazon did not engage in bona fide negotiations and terminated mandatory mediation after the first of the planned three meetings (Owczarek and Chelstowska 2016). As one union member summed it: 'They are opening new warehouses faster than we can collect votes in the referendum'. Voter turnout in this first collective dispute referendum was 2,000 votes (OZZIP 2016a), but this was below 50% of workers (Zanoni and Miszczyński 2024). The union was unable to use the threat of a strike to gain negotiation leverage.

The policy of deploying the collective dispute resolution procedure failed because the company obstructed the negotiation process and because of the deficiencies in Polish collective dispute law (Surdykowska 2024). This failure forced OZZIP to reassess its approach and adapt to the limitations of the law, developing other strategies, in particular by engaging in legal disputes and campaigning. The first of these strategies, which can be described as defensive, was undertaken in response to the repressions and dismissals which, together with high employee turnover, threatened the union's existence in the workplace and contributed to the demobilisation of workers. The second, being offensive, has consisted of intensive campaigns focused on mobilising workers for everyday resistance.

## 5. On the defensive: pursuing a litigation strategy

Frequent dismissals due to algorithmic management based on opaque standards led OZZIP to pursue more than a dozen cases yearly (OZZIP 2018a, 2019a; Pałęcka 2019). The union decided to initiate legal action on behalf of workers dismissed unlawfully for reasons of negative feedback or absenteeism. Polish law allows employees to be represented in the labour court by a union representative, not necessarily by a practising

lawyer, and OZZIP has used these regulations for years to represent dismissed workers, including former Amazon employees (Majewski 2019). It views such cases as strategic litigation, although the rulings are made by regional courts, not the Supreme Court (Rozmysłowicz and Krzyżaniak 2023), assuming that winning sufficient cases will lead to desirable interpretations being upheld by the courts that will render dismissals based on algorithmically generated feedback unsustainable. So far, the union has achieved several successes in reinstating workers who have been dismissed for failing to comply with the norms, for performance assessment reasons or for taking too much sickness absence (Rozmysłowicz and Krzyżaniak 2023). OZZIP's focus is on cases which have an impact on collective working conditions:

...[the lawyer] not only represents a particular employee in court, but also tries to guide the case in some way, for example, by checking which cases are worth going to court, and which ones are not, which will have a collective impact and which will be exclusively individual. We try to learn something from every such case so that it is not the case that one employee goes to court, wins, receives compensation and is satisfied while other employees gain nothing. (Majewski 2019)

One result of strategic litigation is OZZIP's commitment to enforcing workplace health and safety regulations after the judge, in one 2018 case, ordered a health and safety expert to investigate workload, work performance and energy expenditure (Goldmann 2023; Majewski 2019).<sup>3</sup> The union then engaged a state laboratory to study workload in the workplace, while additional measurements were carried out by PIP (INTVW3). These showed that the legal standards were being significantly exceeded – in one case, a female employee's energy expenditure reached 12,000 kilojoules (Nowak 2020). According to the trial expert, working conditions at Amazon could cause 'psychological and physical trauma' (Rozwadowska 2018a). Amazon appealed the results of the assessment, as is usually the case with PIP findings (Majewski 2019), evaluating the report as 'contradicting reality' (Rozwadowska 2018b).

These measurements did not change the organisation of the work, but some workers were moved to other positions to reduce their workload (INTVW3). At the same time, thanks to the measurements, the court report and the intensive union campaign work, Amazon temporarily suspended its norms (OZZIP 2018c, 2018d; Ziomek 2018). More importantly, the results and experiences of this investigation have been used in other cases of workers dismissed for working too slowly; that is, below the norms set by the algorithm (Nowak 2020; INTVW1).

3. According to the Polish classification of physical burden, energy expenditure for men of up to 3,500 kilojoules (kJ) within an 8-hour shift is classified as light work, medium-heavy work corresponds to energy expenditure of 6,300kJ while heavy work corresponds to energy expenditure above 8,400kJ (Makowiec-Dąbrowska 2021). The corresponding reference values for women are 2,900kJ, 4,200kJ and over 5,000kJ. In addition, when work includes the manual handling of loads and other work involving physical effort, such as working in warehouses, there is a maximum per-shift value of 8,400kJ for men and 5,000kJ for women (Majer 2013). An employer carries out this assessment based on various voluntarily chosen methods, which has an impact on the employment conditions of pregnant women and minors as well as on the provision of supplementary meals for all employees.



The same policy was transferred to another OZZIP local, organising in Avon Distribution warehouses, resulting in shorter shifts and lower productivity requirements (Szymaniak 2023).

In 2022, one former Amazon employee – a member of the National Committee of OZZIP and a coordinator of the union's national office – was awarded the Landecker Democracy Fellowship (Humanity in Action 2022) for a project on the problem of physical work overload, which was inspired by these findings (Szymaniak 2023). The project led to a seminar at the Jagiellonian University in Kraków, Poland, attended by 45 workers including from Amazon, Avon and Jeremias warehouses, the Cooper Standard automotive parts factory, the Danfoss valve systems factory and the Valeo thermal management systems factory, as well as organisers from OZZIP and Sierpień '80<sup>4</sup> (Humanity in Action 2023). Knowledge about occupational safety standards regarding physical workload is being further transferred within OZZIP; while writing this chapter another OZZIP local at a metalworking factory is preparing for a similar measurement process.

Despite undoubted successes, intensive involvement in over a dozen court cases each year nevertheless burdens the union and consumes its human, time and financial resources. Furthermore, Amazon's strategy could be one of pushing OZZIP out of the workplace, shifting its activities into the courts: 'Even if the union wins court cases, it is less present on the shopfloor as long as it is busy [elsewhere]. We must not fall for this' (Ławnik and Krzyżaniak 2023).

While litigation has provided a defensive mechanism, particularly against exploitation and layoffs, OZZIP recognises the need to balance these efforts with offensive strategies to mobilise workers and challenge Amazon's exploitative practices on the shopfloor. The following section explores how OZZIP leveraged its militant ethos with campaigns that extended beyond Poland's borders.

## 6. On the offensive: campaigning internationally

Almost from the outset, OZZIP has tried to establish international contacts with organisations in other countries; internationalism has always been an important value for the union. In any case, how Amazon operates in the international market, including its ability to reroute orders between regions and countries, requires international cooperation between unions. The result of the policy of internationalism is Amazon Workers International (AWI), a transnational grassroots platform of trade unions based in Amazon warehouses around the world.

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4. A trade union organisation whose name commemorates the spirit of the incidences of industrial action which took place in Poland in August 1980, including at the Lenin Shipyard in Gdańsk. The union was formed in 1993 in response to disillusionment with the activities of Solidarity, which had departed from the demands of the workers' protests of the 1980s.

AWI was initiated in spring 2015 through mutual contacts between the German trade union Verdi and OZZIP (AWI 2015). The second meeting of the unions took place in the Polish city of Poznań in autumn 2015, when the two unions issued a joint final statement declaring the coordination of further actions alongside plans to expand the alliance to other European countries, including Czechia and Italy. By 2024, AWI had gathered at its meetings (which took place about twice a year) unions not only from Poland and Germany but also from Italy, France, Slovakia, the UK, Turkey and the USA (AWI 2022, 2023). AWI is an innovative alliance that organises shopfloor workers and shop stewards and has no formal organisational structures. This is different from another union coordination initiative in Amazon, the UNI Amazon Global Union Alliance, which brings together trade unions from over 20 countries belonging to the UNI Global Union international federation and which operates within the formal structures of affiliated organisations, including the participation of union leaders (for a detailed analysis of UNI Amazon Global Union Alliance, see Goldmann 2023).

AWI was a source of inspiration and of the international transfer of national union practices. For example, in April 2017, the alliance organised its first joint action at international level, the ‘Safe Package’ campaign, carried out simultaneously in France, Germany and Poland (AWI 2019b) and adopted from an action developed by the Polish unions (Goldmann 2023; OZZIP 2017, 2018a). Its diffusion included the translation of leaflets developed by the Polish unions, including tips on working slowly and safely, distributed to workers during Amazon’s peak season. Another example of diffusion is the ‘Stop the Rat Race’ campaign, developed in Poland against algorithmically-generated feedback and the high performance culture which AWI announced would be adopted in other countries (AWI 2019a). Both campaigns not only had an educational dimension but also called on ordinary workers to take action and engage in what can be described as everyday resistance. The campaigns included educational materials on occupational safety and applicable regulations and standards. They also encouraged workers to comply meticulously with these regulations, encouraging behaviour that could be described as a work to rule.

As a discussion platform, AWI is also an arena of inspiration for new policies and tactics and their transfer. Representatives of individual workplaces design subsequent campaigns at the semi-annual meetings and hold online suggestions-based discussions. One example of such joint, mutually inspired activities is the caravan of unionists from Germany and Poland which tours warehouses in both countries to recruit and inform workers about union activities.

Moreover, resulting from its work within AWI, OZZIP is recognised as a partner of UNI Global, even though it is not affiliated to the federation. Thus, representatives from both OZZIP and Solidarność are invited to UNI Amazon Global Union Alliance meetings. In addition, joint campaigns, demonstrations and meetings have given this informal coalition influence and recognition, leading to AWI participating in a broad global alliance against Amazon, the ‘Make Amazon Pay’ campaign. This annual day of action, launched in 2020, brings together over 80 partners including UNI Global Union and AWI affiliates as well as civil society organisations.



Simultaneously with OZZIP's defensive litigation strategy, becoming involved in campaigning activity showed the union's engagement in internationalism, fostering solidarity across borders. This dual strategy brought to the fore the need to adapt OZZIP's internal structures and its approach to inter-union collaboration to sustain its influence in Amazon.

## **7. Change within OZZIP and to its approach to inter-union cooperation**

Since the local at Amazon is the largest structure within OZZIP, its intense engagement in that company has an impact on the entire organisation. The failed labour dispute in 2015, as well as the legal cases and intensive campaigning, led to a bureaucratisation process within the union and triggered organisational changes, as well as innovations like electronic voting. One of the results of OZZIP activities was also a rapprochement with *Solidarność*, although this only applies to collaboration in Amazon and does not apply to the unions' national structures.

The union's two-fold strategy has had three clear impacts. First, OZZIP's small legal and administrative team is continuing to help individual dismissed workers. The union estimates the success rate of such individual cases at Amazon to be standing at 90-95% (INTVW2). The intensive court involvement has resulted in cases becoming experimental, with successful lines of defence explored in court being used against workers laid off from other workplaces. Through legal intervention, OZZIP is developing a line of case law to counter Amazon's practices; for example, in mid-2024, courts found in four out of five court rulings that the practice of dismissing employees for extended sickness absence was unlawful (OZZIP 2024d).

Second, the resource costs of this strategic involvement in litigation ultimately had an impact on the entire union, forcing it to undertake organisational reforms and to focus on building a union bureaucracy. OZZIP has, since 2019, been discussing reinforcements to the union's office and its administration. In 2019, a legal aid group was formed to meet the needs of 60 locals in 27 towns and cities, served by two lawyers (Sobol 2019). That same year, the union's National Congress voted to establish a union office and, for the first time in the union's history, to employ paid staff to 'ensure the legal stability' of the union (OZZIP 2019b).

Due to its dynamic growth, OZZIP is currently undergoing a further internal process of reform of the office, the National Commission and its sectoral and territorial structures to reduce the administrative burden on the central body of the union, the National Commission (Grzegorzczuk 2024; Jaskuła and Grzegorzczuk 2020; Rozmysłowicz and Grzegorzczuk 2020).

Third, the union is seeking innovations to address the shortcomings of the collective dispute resolution procedure, the only legal tool for conducting a legal strike. The first failed referendum in Amazon in 2015 forced policy innovations on OZZIP, and the union initiated another formal collective dispute resolution procedure in 2019 on the

basis of its revised policies. In particular, it introduced an option of online voting for the first time, hoping to gather more votes (OZZIP 2019c). This appears to be the second attempt by a union to hold an electronic referendum in Poland, the first being organised by Solidarność in the Polish division of JYSK, the Swedish brand (Zalewski 2012).

This time, the collective dispute resolution procedure was also implemented jointly between OZZIP and Solidarność. This marked an apparent change in the relationship between the two unions. The two organisations changed their stance in 2018 and, from 2019, entered into a joint industrial dispute with the employer on the basis of common demands, and it was Solidarność which refused to negotiate without OZZIP (Kassem 2023; Yon 2020).

Despite these changes, the second attempt also failed although, according to one OZZIP activist, the union had not expected to be successful the second time around, viewing the opportunity to access all the company's warehouses in the country as a means of holding a 'continuous picket line' (INTVW1). Even though the process was obstructed by the employer, the publicity, picketing, campaigning activity and parallel litigation led to significant wins during these conflicts, including wage increases awarded earlier than usual, the introduction of bonuses and work regulations being altered in favour of employees.

Moreover, the two unions have continued to work together and, again unsuccessfully, held yet another referendum in 2023. Amazon blocked the vote this time, denying the referendum committee access to its warehouses (Surdykowska 2024). The obstruction of the referendum led to a surprising turn of events as the joint dispute was supported by the left-wing party Razem, which filed a complaint with the public prosecutor's office for alleged offences against freedom of association (Razem 2023).

OZZIP members currently describe the relationship between the two main unions as 'correct'; there is still some tension between them, but this is more often due to personal rather than political or strategic factors (INTVW2). Despite some competition for members, the four unions represented in Amazon (OZZIP, Solidarność, Agrounia and Kontra) issue joint statements, petition the employer and negotiate cooperatively. Solidarność has also expressed support for an OZZIP union representative dismissed by Amazon on disciplinary grounds in 2021 (Solidarność Amazon Polska 2021).

This rapprochement represents a significant change in mutual relations compared to the initial period of their coexistence in Amazon when the two unions were hostile in their competition for members, issuing briefings and counter-briefings against each other. It furthermore increased their bargaining power, even though such a change had been forced upon them by Amazon's policies which may accurately be described as set out in the proverb: 'my enemy's enemy is my friend'.

## 8. Conclusions

The case of OZZIP's engagement with Amazon shows how trade unions can adapt in the face of powerful multinational private employers. The failure of the strike action in 2015 forced OZZIP to develop a dual approach combining defensive litigation with offensive international campaigns. Despite institutional constraints and the company's anti-union tactics, this dual strategy helped OZZIP sustain pressure on the company.

The experience generated several forms of policy transfer. Health and safety regulations and the result of the inspections on energy expenditure ordered by the court were used in cases of laid-off workers in Amazon and were spread among union locals. Electronic voting was also transferred to other structures of the union. Finally, campaigns like Safe Package were spread through AWI. This bottom-up, worker-led international coordination proved effective for sharing strategies and, at least to some extent, helped counter Amazon's ability to reroute work between facilities. It should be said that these transfers nevertheless emerged out of practical necessity rather than strategic planning.

Because of its size and engagement with Amazon, OZZIP was forced to initiate significant organisational changes. A legal team has been engaged to foster multiple legal cases and the union created paid staff positions. Moreover, it is undergoing structural reforms that aim at decentralisation and taking over some of the administrative burdens of the union office. Additionally, initial ideological differences between OZZIP and Solidarność gave way to practical cooperation, a partnership which increased unions' collective bargaining power despite continued tensions. The future will show how sustainable this alliance is but, due to the profound differences between them, it is already difficult to imagine that cooperation will go beyond Amazon.

This case shows that forced adaptation requires balancing ideological commitments with practical necessities if it is to be successful: building administrative and legal capacity does compromise a militant organising strategy. Nevertheless, the practical challenges posed by fighting on multiple fronts, combining offensive and defensive methods, have resulted in policy transfer. Although increased litigation and union growth has forced bureaucratisation, the policy transfer that has taken place both internally in OZZIP and internationally within AWI proves that extensive organisational structures are not needed for policy innovation and that transfer can take place horizontally at the level of shop stewards from different workplaces. This type of transfer through worker networks can be as effective as formal channels.

## Note on method and data

This chapter presents an exploratory study of trade union policy providing in-depth knowledge of the local setting gathered in line with the 'slow research' approach (Almond and Connolly 2020). The findings are mainly based on secondary data drawn from union materials, press releases and the media presence of the union and its members over a ten-year period (2014–2024). The research material was supplemented with four interviews with union activists (INTVW1, INTVW2, INTVW3, INTVW4) – see Table 2.

For the purpose of this analysis over 50 press articles were examined, including six newspaper and magazine interviews with the trade union lawyer, activists and National Committee members, 40 union releases and statements, 30 issues of union magazines and numerous social media sources. The results presented are the outcome of the author's longstanding personal interest and involvement in the activities of OZZIP, gained from being its member (now its university structures) since 2009 and subsequent participation in the work of the union. Personal involvement and the experience gained through discussions and activities allow for deeper insight and a fuller understanding of the organisation's policies and strategies in the spirit of engaged ethnography and critical dialogue (Mathers and Novelli 2007; Phyak et al. 2023). At the same time, since the author has never been part of the union structures at Amazon, this allows a certain distance from the documents and events analysed. The findings represent an abductive approach which recognises the role of the researcher by embracing prior experience as an inevitable and essential element in the relationship between the researcher, the object of study and the theory in a way that does not undermine, but rather enhances, the research (Conaty 2021). This longitudinal and deep approach (Almond and Connolly 2020) allows for a closer examination of unions' policy mobility granted by a 'follow the policy' research process which involves observation of the people, places and processes through which policy is first made and then moves (Lewis 2021).

Table 2 **Conducted interviews**

Identifier	Date	Function
INTVW1	24/5/2021	Union activist
INTVW2	24/4/2024	Union activist
INTVW3	06/7/2024	Union activist
INTVW4	10/7/2024	Union activist

Source: author's elaboration.

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Cite this chapter: Rakowska K. (2025) Poland – Being simultaneously defensive and offensive. The resistance to Amazon by Workers’ Initiative, in Vandaele K. and Fabris B.L. (eds.) When trade unions learn to innovate. Case study evidence from across Europe, ETUI.

## Abbreviations

<b>AWI</b>	Amazon Workers International
<b>FZZ</b>	Federacja Związków Zawodowych (Federation of Trade Unions)
<b>OPZZ</b>	Ogólnopolskie Porozumienie Związków Zawodowych (the All-Poland Alliance of Trade Unions)
<b>OZZIP</b>	Ogólnopolski Związek Zawodowy Inicjatywa Pracownicza (Workers’ Initiative)

## **Part III**

### **Launching organising initiatives**



## Chapter 7

### Denmark – Innovative organising strategies for engaging employers and young people

Christian Lyhne Ibsen

This chapter<sup>1</sup> analyses and discusses two innovative organising cases in 3F (the General Workers' Union), the largest trade union in Denmark. The two cases focus on member engagement, albeit in rather different ways. The first case – Billund Airport (BLL) – builds on a pioneering policy of engaging employers in an organising initiative. The airport shop steward negotiated a local collective agreement committing the employer automatically to pay the union dues of workers through a pay supplement that the individual worker can choose to receive. The second case – #ElevernesOK – builds on a novel approach to engaging young people in collective bargaining in the hotels and restaurants sector. The union targeted apprentices at a vocational school by involving them in formulating and presenting bargaining demands for the 2023 collective bargaining round. Here, 3F tried directly to empower this group's position internally within the union, and indirectly to attract more members to it.

These innovative policies, embedded in an organising strategy, came against a backdrop of membership decline in which one of the hardest hit unions has been 3F. Its membership has plummeted in recent times from over 400,000 members in 2007 – when the union was formed through a merger – to just over 200,000 in 2022 (Statistics Denmark 2025). 3F organises unskilled and skilled blue collar workers across industries and is the result of a long process of multiple mergers. The union plays a crucial role in safeguarding the coordinated collective bargaining system in Denmark as it represents some of the most vulnerable groups in the labour market. A recent report from the Danish Trade Union Confederation (FH, Fagbevægelsens Hovedorganisation), the main confederation in Denmark, showed that union density in some private sector industries had dropped below 30%, including some 3F-organised industries such as hotels and restaurants, cleaning and agriculture (FH 2022). As in other countries, these industries also employ high shares of low-paid and migrant workers, thus compounding the challenges for 3F.

The falling membership level in this union – and in others – has sparked an intense search during the last two decades for effective strategies with which to recruit and retain members. As in other countries, Danish unions – and especially 3F – looked first to the 'organising model' for inspiration, leading it to adopt many of the methods and tactics of workplace organising employed in the United States and the United Kingdom

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1. An earlier version of this chapter was published in French as Ibsen C.L. (2024) *Stratégies syndicales innovantes au Danemark : l'implication des employeurs et des jeunes*, in Fabris B.L. et Vandaele K. (dir.) (2024) *Syndicats en action en Europe. Études de cas en Allemagne, Belgique, Danemark, Espagne, Italie et au niveau européen*, ETUI, 65–85. The text has been re-arranged here.

(Arnholtz et al. 2016). Ten years on, however, it seems that the initial optimism surrounding the import of the model has waned, although some elements remain in the union's recruitment and retention efforts.

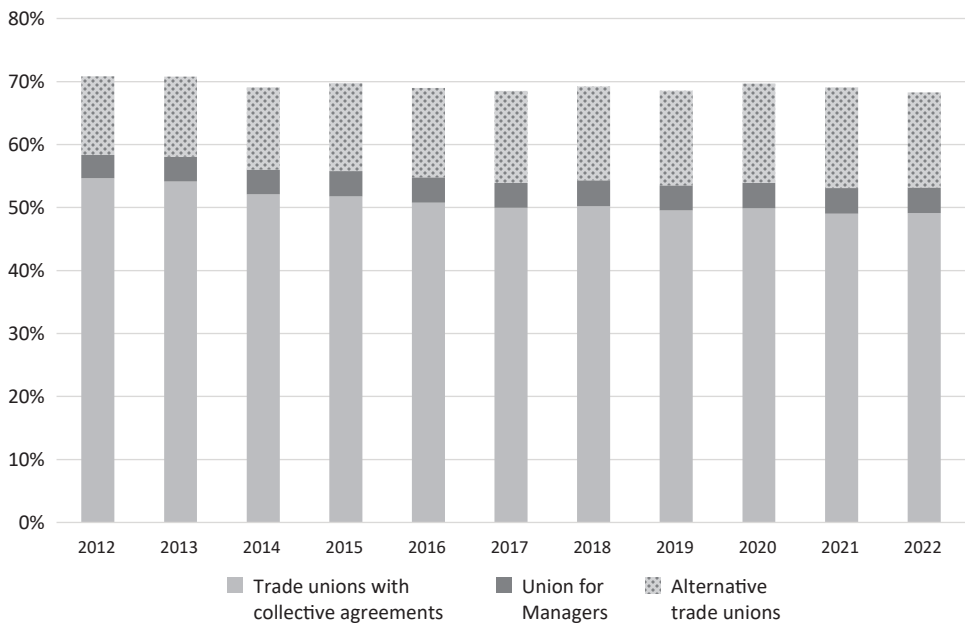
The chapter is structured as follows. The next section presents the context of the two cases, particularly the overall membership challenges of 3F, its power resources and its general approach to union revitalisation. Based on union documents and semi-structured interviews with union officials and a shop steward, the chapter then outlines a case study of Billund Airport, including an analysis of the process, the content, the actors involved and the policy outcomes, together with an assessment of the facilitators of and barriers to the transfer of the innovative policy to other parts of the union movement; it then does the same for #ElevernesOK. A comparison of the two policies in terms of their potential for union revitalisation along different dimensions, including their transferability, then precedes the chapter's conclusions.

## **1. Contextualising the cases**

In general, Danish unions enjoy some of the most favourable institutional conditions for organising workers. First, the 'Ghent system' of union-administered unemployment insurance means that workers have an incentive to join and remain in trade unions once they enter the labour market. Second, high collective bargaining coverage and strong shop steward presence mean that workers see the benefit of unions at the workplace. Third, unions and employer associations typically engage in a constructive relationship and union busting is rare. Fourth, unions have traditionally had a strong influence on policymakers, which has meant pro-worker policies. Fifth, vocational education and training (VET) is based on the dual training model with a large component of workplace learning. Employers and trade unions govern the VET system and unions have an important say in VET schools and in designing education for their core constituencies (Carstensen and Ibsen 2021). Together, these favourable conditions have contributed to more stable unionisation rates among Danish workers during the last three decades than is the case in other European countries (OECD/AIAS 2023).

Danish unions generally enjoy high levels of membership; union density was 68.3% of the workforce in 2022 (Statistics Denmark 2025). However, this overall figure conceals a substantial shift of members from trade unions that conduct collective bargaining to ones that do not. In recent years, alternative unions that do not participate in collective bargaining have grown in importance. Since they neither engage in collective bargaining nor administer collective agreements, but do provide unemployment insurance, they are able to offer a much lower combined union membership fee than traditional unions. Members of these alternative organisations now make up 15.1% of the workforce. In other words, subtracting their members drops the effective union density rate to 49.1% (see Figure 1). In 2000, members of alternative unions made up just 2.6% of the workforce (Ibsen et al. 2011a).

Figure 1 Union density split by type of union



Source: Statistics Denmark (2023).

Collective bargaining coverage is also high and the Confederation of Danish Employers (DA, Dansk Arbejdsgiverforening) estimated it to be around 80% of workers in 2018 (DA 2020). Coverage in the private sector is around 74%. Collective agreements apply to all workers in workplaces which are covered by the agreement – including workers who are not unionised – hence, the freerider problem is arguably present in Denmark (Ibsen et al. 2017). Erga omnes clauses do not apply, so bargaining coverage is voluntary and typically a result of unions asking or compelling employers into bargaining relations. Maintaining high union densities has thus become all the more important for the Danish collective bargaining system (Due et al. 1993).

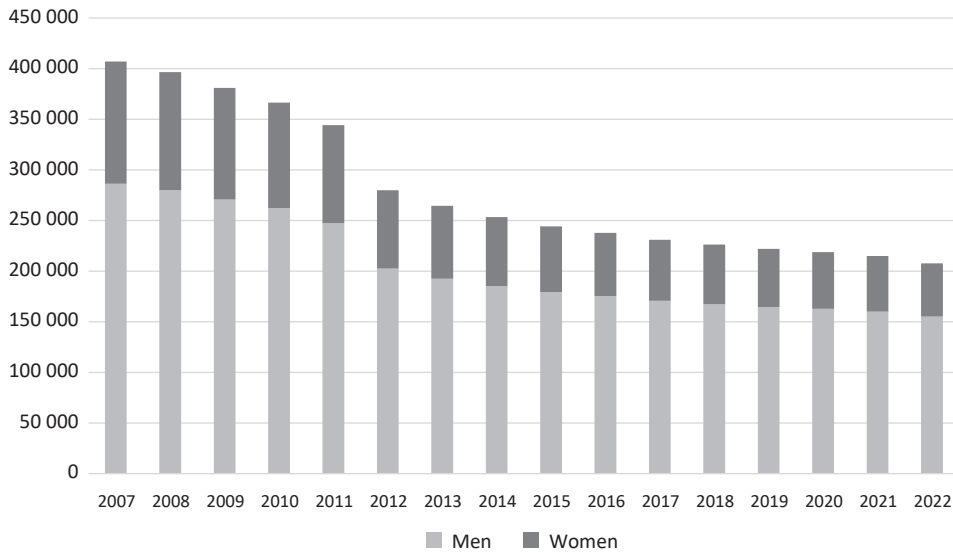
As noted, 3F is one of the unions hit hardest by membership decline (see Figure 2). Both men and women are choosing not to become members, many instead joining the alternative unions (Ibsen et al. 2011a).

Membership decline has led 3F to invest massively in organising – frequently inspired by the Anglo-American model that is based on a workplace focus. However, the manifestation in practice of the organising model, and its performance in recruitment and retention, has sparked criticism within the union for a number of reasons. First, many elected officials and shop stewards doubt that it is worth the enormous resource often needed to organise in 3F's industries which are characterised by high workforce turnover and short-lived businesses (Ibsen et al. 2011b). Second, large shares of the 3F workforce do not identify with the conflict language in the organising model, which often also antagonises employers. The union therefore has tried to optimise its



services to members, be aggressive in campaigns in traditional and social media and have a strong political agenda, for example on the national early retirement scheme for individuals with long employment histories (which 3F succeeded in restoring in 2022). Nonetheless, the falling membership rate is testament to 3F's struggle to revitalise.

Figure 2 **3F membership: men and women, 2007-2022**



Source: Statistics Denmark and 3F (2023).

## 2. Billund Airport: engaging the employer in organising

BLL is Denmark's second largest airport and is located close to Aarhus, the second largest city in the country. It handles up to 3.5 million passengers per year and has one terminal. The airport has 1,600-1,700 employees, of whom about 800 full-timers are employed directly by BLL with the rest employed by other companies with operations at the airport. BLL is publicly owned by seven municipalities – Vejle Kommune being the largest shareholder (34.4%) – but operates as a private company on market terms.

Employees working directly for BLL are covered by collective agreements and represented by eleven shop stewards from the signatory trade unions: 3F, the Service Workers Union (Serviceforbundet), the Danish Metalworkers Union (Dansk Metal), the Salaried and Clerical Workers Union (HK Privat), the Electricians Union (Dansk Elforbund), the Plumbers Union (Blik og Rør) and the Painters Union (Malerforbundet). These unions represent both blue and white collar workers and have elected a chief shop steward from 3F, who is the principal negotiator in local collective bargaining with management. The current chief shop steward, here labelled 'KPH' for reasons of confidentiality, has been in the position since 2013.

BLL is located in an area that has traditionally been hard to organise. In 2011, when KPH started as a regular shop steward, union density was around 35%. A new, more proactive approach to organising, coupled with a few high profile conflicts including with Ryanair in 2012-2015 over collective bargaining coverage, boosted union density to around 90% of the workforce. Frustrated by the reluctant last 10%, shop stewards probed the idea of benefits exclusively for union members as an incentive. Management was open to the idea. However, Covid-19 derailed local bargaining on the issue.

The pandemic was especially tough on airports and BLL had to reduce its workforce by up to 66% for some employee groups, including workers covered by 3F. The cutbacks proved tough for the workers made redundant; they also meant that the hard organising work undertaken before the pandemic was lost. As the air travel industry rebounded after Covid-19, BLL ramped up its hiring. However, trade unions struggled to recruit and retain members among new employees and union density dropped back to around 50-55%. Knowing how resource-intensive the previous organising campaigns had been, shop stewards decided to revisit the idea of member benefits, basing this on a pioneering policy that entailed engaging the employer.

The 2021 local bargaining round was conflictual. The trade unions came in with 15 demands, all designed to restore conditions and wages for BLL workers and bring wages into line with developments in the general economy. Management initially declined, resulting in an unlawful work stoppage which brought the airport to a very short (less than one day) halt, before quickly changing its approach and responding to the demands. This new – more constructive – approach paved the way for the 2022 deal on member benefits. Management, now aware of the unions' continued ability to halt its business, listened to the union argument that low density was a problem not only for the trade unions but also for the company as a whole.

The shop stewards argued that high density and thus a strong mandate to bargain ensured that they would be in a better position to negotiate agreements since this would be on the back of significant support from the rank-and-file. They also argued that having members in alternative unions created internal conflicts between workers that could hamper the work environment and thus productivity so, by agreeing to help support the organising of workers in traditional unions, management would actually gain a more productive and peaceful bargaining relationship. In speaking to management about the benefits to the company of having strong unions, shop stewards further pointed out that trade unions could be a partner to management in tackling health and safety issues and in negotiating flexible solutions on working time and work organisation.

Table 1 **Main strategic choices of unions at BLL**

Strategic choice 1	Strategic choice 2	Strategic choice 3
Shop stewards decide to focus on organising	Use work stoppages to show power as a platform for subsequent negotiations	Engage employer through deliberative negotiations to solve the problem of low union density

Source: author's elaboration.

This way of engaging management meant that local negotiations on member benefits assimilated problem-solving or ‘integrative’ bargaining rather than traditional ‘distributive’ bargaining, the latter implying a focus on fighting over the distribution of economic gains rather than solving problems at work (Walton and McKersie 1965).

In addressing the idea of member benefits in the local wage agreement, management first suggested including a pay supplement for ‘additional job functions’ paid only to members. Since this solution did not visibly specify on the pay slip that the supplement was for union members, it was not attractive to the shop stewards who wanted workers to see that the supplement was about their union membership. Next, management suggested a supplement for union members, including members of the alternative unions. As noted above, alternative unions that are not signatories to collective agreements are in direct competition with those who are and, since this results in them having lower operating costs, their membership dues are much lower. Shop stewards at BLL objected that this approach would defeat the purpose of the agreement; namely, to recruit and retain members for unions that actually do carry out collective bargaining. Finally, management wanted to introduce a clause stating that the agreement on member benefits would lapse if workers engaged in unlawful work stoppages. Again, the stewards objected, arguing that other local agreements did not include this kind of clause, a point which management conceded.

As an extra incentive for management, the shop stewards decided to make the membership payment individual rather than collective. Other companies – for example, Kastrup Airport in København – have instituted a collective payment which the union receives. At BLL, the pay supplement goes to individual workers, meaning that the total cost to the employer depends on union density at BLL. In other words, if union density drops, management would save money. However, the overall amount would not be sufficient to outweigh the value to the company of high union density and would not, therefore, give management an incentive to work against organising. The shop stewards also found it fair that management would keep the money if workers still choose not to become members. Management welcomed this strategic choice as it underlined that shop stewards still had to work to get members and not just rely on the presence of the member-based benefit.

After these initial deliberations, the parties agreed on a model that reserved part of the total wage increase at BLL – 1.6% – for a ‘membership pay supplement’ to be paid to members of a union that was a signatory to the collective agreement. Only union members would thus perceive this additional supplement on top of the normal wage increases negotiated for all employees. The nominal supplement is set at 450 DKK (60 euros). In addition, the supplement is voluntary, meaning that workers can opt out of the scheme, but only those who are members according to the official membership lists which unions send to management on a regular basis. The pay supplement is taxable, but it counts as regards the calculation of contributions for pensions purposes (i.e. as pensionable income), free-choice accounts, and vacation and leave entitlements. Together with the tax deduction for membership, the net worth of the pay supplement (after income tax) is roughly the same as the union membership subscription and thus BLL, the employer, now pays the cost of being a member of the union.

The negotiation process ended successfully for the shop stewards who not only won a member-based benefit in terms of the pay supplement but also engaged management in wholeheartedly supporting union organising and the Danish system of collective bargaining. In both material and symbolic ways, these were significant outcomes for the unions at BLL. Employees also reacted positively to the agreement, boosting union density to almost 100% in more or less every occupational group at BLL. Significantly, office workers in scope for membership of HK Privat – a group that was notoriously hard to organise – are now almost fully organised. The same is true for 3F-organised workers of which only two out of 144 workers remain outside the union.

### **3. Barriers to and facilitators for policy transfer in the BLL case**

The issue of member-based benefits in collective agreements is highly controversial; garnering support for the policy transfer of the BLL model has been difficult since key senior union actors are resistant to the concept of exclusive benefits in collective agreements. Danish collective agreements are ‘area agreements’ (område-overenskomster), meaning that they cover occupations or jobs in workplaces that belong to employers who are parties to the collective agreement. Therefore, a luggage handler at BLL, for instance, is covered by the collective agreement regardless of union membership status, so long as s/he is employed in a workplace which is subject to the agreement and in a job (luggage handler) specified in it. The upshot is that there is – in principle – no difference between members and non-members regarding terms and conditions of employment.

According to its proponents, the advantage for union members of this principle is that they are no more ‘costly’ to the employer than non-members who might otherwise compete members out of the workplace. Employers do not have any economic incentive to hire non-members; that is, wages are decommissioned as a factor between members and non-members. According to its critics, however, this means that there is no selective incentive for workers to join the union since collective agreements cover them whether they are members or not.

Studies suggest that union members do receive additional benefits in practice, however. For example, a study of trade union shop stewards showed that about half only bargain wage deals on behalf of members at their workplace (Larsen et al. 2010). Similarly, studies of the union wage premium in Denmark suggest that there is an additional membership premium on top of coverage (Chuan et al. 2023). The BLL case takes member-based benefits further as it formalises a pay supplement only for members and thus explicitly takes care of the freeriding issue: freeriders are exempt from the supplement and therefore do not save any money from being non-members.

At the 2022 3F congress, which assembled all elected representatives in the union, the topic of member-based benefits was discussed intensively. One group of representatives proposed that the union change its official policy on member-based benefits. This group wanted 3F actively to pursue member-based benefits in collective bargaining with employers both at industry and workplace level. The proposal linked benefits to the

ongoing struggle to recruit and retain members – especially members transferring to alternative trade unions as a result of the cost difference.

Critics of the proposal – among them the head of the 3F industrial group and the head of the 3F transportation group – argued forcefully against it, seeing it as a Pandora's Box for the Danish collective bargaining system for various reasons. First and foremost, they pointed out that, even though individual firms like BLL might agree to member-based benefits, the employer associations would never agree to them in collective agreements at industrial level, making the proposal moot. Second, they thought that, if trade unions pressed such demands, employers would begin to discriminate between members and non-members, preferring the latter for cost reasons. Third, they also argued that right-wing politicians would be quick to cry 'violation of freedom of association' and that they would be likely to push for legislative changes to outlaw member-based benefits. In the end, the proposal was rejected at Congress and 3F maintains an official policy of not pursuing it.

For its part, BLL faced criticism internally within the Federation of Danish Employers in Manufacturing Industry (DI, Dansk Industri), the employer association of which it is a member. DI vehemently opposes the introduction of member-based benefits in collective agreements, seeing it as interfering with managerial discretion in wage bargaining and as a breach of the 'area agreement' principle. As such, DI – alongside the other employer associations – will not engage in negotiations over member-based benefits in collective bargaining. Therefore, such provisions are only likely to be introduced more widely if trade unions make them a priority demand and a cause for industrial action. This is not likely, given the negative stance on the matter of senior elected union officials.

Shop stewards of course regularly interact through events, courses and other activities organised by trade unions. Through such interactions, word quickly spread about the agreement at BLL, and KPH became known as 'the guy who broke the mould' (INTVW1) on member-based benefits. In addition, *Fagbladet 3F*, the union's own magazine, wrote an article about the agreement, further disseminating knowledge about its process, outcomes and benefits (Keiding 2023). For shop stewards yearning for solutions to the organising struggle, the agreement became one to watch and multiple union officials, organisers and shop stewards who wanted more details about the agreement contacted KPH. This bottom-up transfer of knowledge concerning member-based benefits happened despite the resistance of the higher echelons of the union leadership. As such, it mobilised a large group – albeit a minority – in multiple unions wanting to break with the traditional stance on the matter.

Leading up to the 2023 collective bargaining round, over 200 shop stewards from 3F, Malerforbundet, HK Privat and Dansk Metal wrote an open letter to the lead union negotiators who were touring the country and meeting with members regarding their bargaining demands. In the letter, they demanded the establishment of a fund for member-based benefits. Established in the collective agreement, employers would pay an amount per working hour of all employees into a fund which would be exclusively spent on benefits or initiatives for union members. Lead negotiators responded to the

letter with a firm rejection on the grounds laid out above and the demand did not appear in the bargaining round.

Rather than entering collective agreements at industry or occupational level, the transfer of member-based benefits is thus a policy that will happen at local bargaining level – at least for now. Local union branches and shop stewards – especially those with some power vis-à-vis management – may take up the issue using existing examples (there are indeed a handful of others) as a guide. Aviator, a major aviation service company, has signed a similar agreement in Kastrup Lufthavn. Perhaps even more significantly, PostNord (postal services) has also introduced member-based benefits in a local agreement, showing that the model can travel to an industry other than airports or aviation. Finally, a trade union in building trades has taken up the idea in its preparations for the 2025 bargaining round, signifying that union leaderships are also catching on, albeit in the context of a small trade union.

In sum, bottom-up processes of policy transfer are – perhaps – pushing the needle on the matter. What is facilitating this is that union leaders have not yet produced any silver bullet solutions to the decline in membership. The proponents of member-based benefits are therefore bringing this point up repeatedly, pointing to positive cases, for example BLL, where union density has been restored or even increased on previous levels. At present, the policy transfer of member-only benefits is most likely at company level since success at BLL has hinged upon the union's decision to engage with management. This can only happen on a company-by-company basis, although some intra-industry spread (isomorphism) may occur when companies see their competitors signing agreements. Indeed, this does seem to be the case in airports or aviation services.

#### **4. #ElevernesOK: engaging young people in bargaining**

This section turns to #ElevernesOK (#StudentsOK), a case study in engaging young people in the collective bargaining process, thereby giving them a role and a stake in one of the core activities of the union. The case is exceptional because it succeeded in engaging students training for work in the hospitality industry, one of the hardest industries to organise. Hospitality has one of the lowest union density and collective bargaining coverage rates of all industries – well below 30% in each case (FH 2022). The collective agreements between 3F and the employer associations, HORESTA and Dansk Erhverv, have been under severe cost pressure regarding non-associated employers, particularly in cafes, bars and restaurants. However, the industry is split, with unions performing much better in hotels and catering than in the cafes, bars and restaurants sector. Part of this difference stems from company characteristics: employers in hotels and catering are much more stable, being both economically sound and larger employers. In conjunction, this sector more often employs trained staff who frequently encounter the union in vocational education and training schools. As hotels, restaurants and catering increasingly rely on unskilled (young) workers, however, the positive cycle between VET, unions and bargaining coverage is being undermined.

The Hotel and Restaurant School (HRS, Hotel og Restaurationsskolen) in København is the largest VET school for students in the hospitality industry in northern Europe. With around 800 VET agreements per year, it educates a large share of hospitality workers for the booming tourism industry of København and beyond. The main occupations are receptionists, waiters, cooks and catering workers – occupations that 3F represents. 3F has a specific collective agreement for students. Officials from the union's København branch (here labelled FT/NN for reasons of confidentiality) sit on the HRS board and regularly go into the school to meet students, teachers and management. The strong presence of 3F at HRS has enabled the union to organise a large share of students in a notoriously difficult sector, while membership retention rates after graduation from the school are as high as 75%.

HRS is given significant priority by the København branch of 3F and union officials are regularly present in the school, in classes and the canteen, and at graduation and other events. Before Covid-19, union density among students was at 80-90%. However, as the pandemic shut down physical teaching and transitioned online, membership plummeted from 700 members to 337. At the same time, hospitality was one of the industries most severely hit by the pandemic, with widespread company closures and redundancies. The economic context further exacerbated the pressure on unions in the industry.

The drop in density at HRS was, in large part, caused by the lack of physical interaction at the school during the pandemic. Students were not exposed to the union in the same way as before – something had to be done. When the school re-opened after the pandemic, FT/NN decided to engage students in relation to the upcoming 2023 bargaining round. They called the campaign 'the collective agreement for students', or #ElevernesOK to use its Danish hashtag.

Key to the success of the campaign was agility. FT/NN contacted HRS administrators, employer associations, company directors and 3F officials directly rather than through official channels. They thereby mobilised support quickly and did not lose momentum along the way. Reportedly, everybody wanted to be a part of the campaign once they learnt that 'something interesting was cooking over at 3F/København' (INTVW2). Evidently, this strategic choice by FT/NN could have backfired had either the school, or top officials in the union or the employer associations, vetoed the initiative. This was a risk that FT/NN were willing to take. While the initial ambition of the campaign was to engage students through intense social media activity (hence the hashtag), it quickly became clear that physical encounters and activities worked much better – not least because the campaign was likely to drown rather quickly in the tsunami of content otherwise available on social media. Moreover, officials argued that explaining collective bargaining and agreements was too complicated to be done on social media, seeing 'traditional' dialogue as more effective, albeit also more costly in terms of resources.



Table 2 Main strategic choices of 3F at HRS

Strategy choice 1	Strategy choice 2	Strategy choice 3
Union officials in local branch decide to engage students in collective bargaining process	Build support from employer associations, employers and union federation	Emphasis on the lived working experiences of young workers

Source: author's elaboration.

Consequently, FT/NN focused on an in-person format. The union had previously tried to collect written or oral bargaining demands from students, but with only modest success and very little participation from students. Therefore, FT/NN agreed that taking the actual collective agreement as the point of departure was a dead-end given that most students did not know the agreement and thus how they benefited. Instead, they decided to distribute postcards at the school with the simple question: 'What would you like to be different during your apprenticeship?' This focus on the lived experience of students during their apprenticeships was the key that unlocked their engagement. Students could speak to their own experiences rather than to the provisions and rights set down in a collective agreement. No fewer than 350 demands came in and provided substantial content for the other activities in #ElevernesOK.

FT/NN decided that getting employers on board was pivotal to the success of the campaign. Apart from struggling to defend their collective agreements against non-associated employers, both the associations have found it hard to attract skilled workers to the industry, which is often depicted in public media as one of the worst industries in terms of pay, working conditions and harassment. Thus, when FT/NN contacted them, they were quick to support the campaign, seeing it as a way to boost the image of the industry. Likewise, member companies agreed to be partners in the campaign, providing sponsored prizes at a conference scheduled as part of it.

The student conference gained traction: the president of 3F, Henning Overgaard, wanted to attend as did senior representatives from HORESTA and Dansk Erhverv. They were invited on the condition that they would not take the focus away from the conditions and bargaining demands of the students. The conference was a huge success, with over 200 students attending and discussing their demands based on their own work experiences in the hospitality industry. It became a chance for students to voice and share instances of bad managerial behaviour, but also to discuss solutions to the seemingly endemic problems of the industry.

FT/NN made a list of the top five demands focusing on basic rights regarding decent working conditions for apprentices: 1) a healthcare plan; 2) a higher basic salary; 3) an improved work environment; 4) payment of overtime; and 5) the enforcement of the collective agreement. Two of these five demands (points 3 and 5) were about the enforcement of existing regulations, highlighting the need to address poor managerial behaviour. One solution was the idea of harsher sanctions for employers who take on apprentices without being members of either HORESTA or Dansk Erhverv and thus not covered by the collective agreement. According to the law on apprentices, non-associated employers may take on apprentices but have to abide by the prevailing standards in



that agreement regarding apprentices' terms and conditions. As such, the law extends coverage of the agreement to these employers regarding apprentices. However, the sanctions for breaching these terms and conditions are not the same between associated and non-associated employers: the former must pay a fine and compensation to the apprentice in question; the latter only has to pay the compensation, not the fine. This discrepancy obviously makes it less costly for non-associated employers to breach the collective agreement and treat apprentices poorly. Students therefore argued that a major improvement would be a legislative change that would equalise sanctions for associated and non-associated employers alike.

Following the conference, FT/NN formed a student group that included students who wanted to continue with union activities at the school and beyond. Nine individuals joined and were introduced to and trained in union work. Some of these individuals have since become shop stewards or union officials. Moreover, a hotline for young workers was set up to document cases of underpayment. In general, many hitherto unreported cases came into the open from students – some of which have led to legal processes. In 2022, FT/NN were awarded the prestigious 'Stærkere sammen' prize (Stronger together) by the FH confederation for special strategies to organise, retain and engage workers in unions.

Besides garnering significant visibility and support for young workers' rights and concerns in the hospitality industry, union membership at HRS rose to over 80% after the campaign. The union had regained, and strengthened, its position at the school. Moreover, the campaign re-activated the union's role as a channel for students' lived work experiences. Rather than focusing on provisions in a collective agreement, the campaign focused on the students themselves – and it was 3F's task to translate these experiences into bargaining demands with employers.

## **5. Barriers to and facilitators for policy transfer in the #ElevernesOK case**

In contrast to the BLL case, #ElevernesOK received all the support and accolades possible from senior officials in both the trade unions and the employer associations.

On the union side, FT/NN not only won the FH 'Stærkere sammen' prize but became well-known in other FH unions, many of which have since contacted them to hear about their policy innovation. Clearly, top-down transfer is likely as virtually all unions are looking for solutions to the 'youth' problem in organising. Since the campaign, FT/NN have presented their approach on FH courses and to other groups within 3F. Other unions, such as the public services union FOA (Forbundet af Offentligt Ansatte) which organises social, healthcare, cleaning and childcare workers, are planning similar campaigns for students in the vocational schools in their industries. PSHR (3F's section which represents hospitality workers) is also planning to repeat the campaign for students nationwide in preparation for the 2025 bargaining round to engage students at other schools.

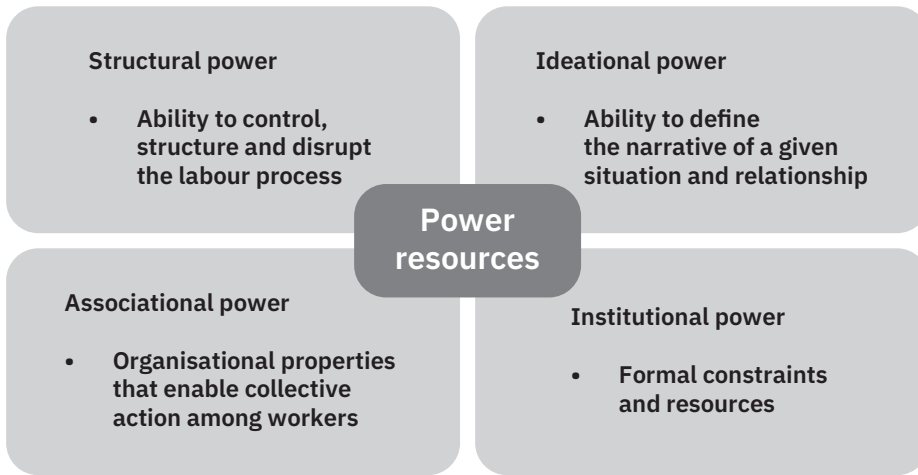
Regarding the employers, they have pledged to support the campaign in the future, albeit without specifying what that looks like, for example at national level. The employer associations have an incentive to support the campaign due to the tight labour market, while the industry suffers from a poor image which has a negative impact on recruitment efforts. While migration largely satisfies the demand for labour, it is not a long-term strategy because labour migration flows fluctuate. Moreover, the employer associations have a common interest with 3F in defending the collective agreement: if more workers join the union, there is a chance that collective bargaining coverage may recover somewhat, in turn making their own members more cost competitive.

FT/NN and 3F PSHR are now working on mobilising a coalition between the union and employers that can influence politicians to change the VET legislation to include harsher sanctions for non-associated employers who take apprentices and breach the collective agreement.

Bottom-up transfer is also happening, with union officials taking up the policy innovation in their work. For example, one union official for fast food workers has copied the idea of using postcards in another part of the industry that has traditionally been very hard to organise. Non-associated employers have contacted FT/NN to ask them to go through the collective agreement to ensure that they are complying with the rules. As apprentices – and the industry in general – are speaking about working conditions in a way they did not before, non-associated employers are having to wake up to the presence of a labour force that is much more articulate in its demands for decent treatment. FT/NN use these occasions to argue for collective bargaining coverage and employer association membership as a way to ensure compliance and as a recruitment tool. Once apprentices – and young workers – hear that employers pay and treat them well, this can be a competitive advantage for the employer in a tight labour market. As such, decent treatment may become a buzzword in the industry and release intra-industry spread, although this is yet to happen. The obvious barriers to bottom-up transfer are those same factors that make the industry so hard to organise: high labour and company churn; small companies; and large shares of unskilled and migrant labour.

## 6. Comparison of the case studies

As a means of comparing the two case studies, it is instructive to consider how both draw on and build the power resources of the union, defined as those resources that enable unions to make, receive or resist change on behalf of workers (Lévesque and Murray 2010; Refslund and Arnholtz 2022). These resources differ in nature (see Figure 3). Structural power resides in the ability to control, structure and disrupt the labour process, for example through strike action. Ideational power is the ability to define the narrative of a given situation and relationship. Associational power refers to the organisational properties that enable collective action among workers (Ibsen 2024). Finally, institutional power refers to the formal constraints and resources afforded to unions in a given context, for example, collective labour law.

Figure 3 **Power resources of trade unions**

Source: author's elaboration.

Both cases have succeeded in increasing union density. As such, they have boosted the associational power of the union. Likewise, both have managed to engage employers in their organising strategy. The latter point is impressive, but perhaps also context-specific owing to the less adversarial relationship that exists between unions and employers in Denmark compared to other countries (Andersen et al. 2014). However, while both strategies have succeeded in garnering support from employers, they have done so in different ways.

In BLL, employer engagement was not a given at first – it was won through work stoppages that ‘set the record straight’ regarding the structural power of the union. By stopping work, shop stewards brought the airport to a halt, adding financial costs to the employer. Thus, while the actual bargaining over member-based benefits was constructive and based on a problem-solving approach, when it came to management, this had initially to be fought for through the use of structural power. In the #ElevernesOK campaign, employers were much more constructive from the beginning. Employer associations and employers who are covered by the collective agreement have a common interest with 3F in engaging more young people in the industry and, ultimately, in defending their collective agreements from undercutting non-associated employers. Here, structural power was neither necessary nor wanted. Rather, FT/NN used ideational and associational power to frame the issue in terms of common interest.

In both cases, institutional power played a role. At BLL, the chief shop steward used an extensive mandate for negotiating local agreements to introduce member-based benefits – despite opposition from senior officials in both the trade unions and the employer associations. In the #ElevernesOK campaign, FT/NN used their privileged access to the school to speak to and listen to the students, and regarding the various campaign activities. Only in an institutional setting where unions are so heavily involved in VET could this be possible.

Perhaps the key difference between the cases lies in their access to associational power in terms of top-down support. At BLL, opposition from senior officials meant that transfer of the notion of member-based benefits had to happen in a bottom-up way – at least for the time being. Lack of support from the union federation was, nevertheless, not a problem in the specific BLL negotiations. However, the spread of the policy innovation to other companies may encounter problems without that support. For the #ElevernesOK campaign, access to associational power is vast and can be used to spread the policy innovation widely.

## 7. Conclusions

The two case studies illustrate different organising challenges and solutions. BLL used collective bargaining and the ‘powered’ engagement of the employer. By establishing and activating power resources, management went positively into a local bargaining scenario over member-based benefits. These benefits can be used to recruit and retain members. However, they may also become a double-edged sword for traditional unions if alternative unions – or workers – begin to push for politicians to legislate against this type of arrangement. Furthermore, senior officials have been very vocal in their opposition to the policy innovation, deeming it ‘the wrong way to go’ (INTVW1).

#ElevernesOK was much less controversial but aimed at a group of young people – students – who are probably the most difficult group to organise. Studies show that low union density among young generations of workers seems to persist; that is, they will continue to be non-members to a larger extent than older generations (FH 2022). The campaign to engage young people was therefore all the more popular in the union movement. It even garnered massive support from the employer associations who saw the benefit of promoting collective bargaining and education among young people. In addition, it underlined the continued relevance of in-person unionism at the school and in the local union organisation. At the outset of the campaign, union officials thought that digital content would work much better with the target audience. However, it was the in-person method and deeper dialogue regarding work experiences and collective bargaining that worked best while the digital elements faded into the background of the organising strategy.

Neither policy innovation will be a general ‘quick fix’ for organising as each was defined by their specific contexts. However, the policy innovation in BLL seems appropriate where the union has some bargaining power and/or a union-friendly employer. The policy innovation in #ElevernesOK appears most relevant where physical interactions with students or workers is possible – VET schools being the obvious example. However, other schools, for example lower secondary schools or workplaces where unions are present, may also be sites for creating bargaining-oriented dialogue around individuals’ lived work experiences.

It is fair to conclude that both strategies are seen by many as among the few positive sparks that may engender hope that 3F can revitalise.

## Note on method and data

The chapter is based on two case studies using both documents and semi-structured interviews. Documents included the original agreement at Billund Airport and campaign material for #ElevernesOK, while other reports provided by the trade unions involved, as well as media articles and social media posts regarding the two cases, were also consulted. The documents were primarily used to obtain facts about the process and outcomes as well as background information to inform the interviews. Finally, documentation was used to corroborate the information given during the interviews. Three semi-structured interviews were conducted in Danish with the male head shop steward at Billund Airport and the two female union officials 3F/København – see Table 3. The interviews were recorded, while the interviewees were contacted subsequently and given the chance to read the analysis for comments and corrections, if needed; none disagreed with the content of the analysis or had comments.

Table 3 Conducted interviews

Identifier	Date	Function
INTVW1	25/11/2023	Union official
INTVW2	25/11/2023	Union official
INTVW3	30/11/2023	Shop steward

Source: author's elaboration.

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Cite this chapter: Ibsen C.L. (2025) Denmark – Innovative organising strategies for engaging employers and young people, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Abbreviations

3F	General Workers' Union
BLL	Billund Airport
DA	Dansk Arbejdsgiverforening (Confederation of Danish Employers)
DI	Dansk Industri (Federation of Danish Employers in Manufacturing Industry)
FOA	Forbundet af Offentligt Ansatte (public services union)
PSHR	Privat Service, Hotel & Restauration (3F's section for hospitality workers)
VET	Vocational education and training



## Chapter 8

### **Hungary – What facilitates the policy transfer of participatory organising?**

Imre Gergely Szabó and Eszter Turai

This chapter presents research findings on policy innovation, transfer and learning by Hungarian trade unions in the late 2010s and early 2020s. The focus lies upon membership recruitment and organising, as these are key areas for the future of unions not only in central eastern Europe but also across the European continent. The aim is to investigate why and how ‘participatory organising’ has diffused among Hungarian unions. The participatory organising approach – often simply called ‘organising’ – is geared not only towards the recruitment of new members but also towards sustained rank and file participation in the work of unions and towards issue-based union campaigns to build collective power. This approach requires intensive fieldwork from union organisers whose main task is to facilitate and support union activity at workplace level. As its emphasis lies on policy transfer, the chapter assesses organising efforts not only in terms of membership gains or bargaining wins but also in terms of the development of long-term relationships of trust between organisers, (unionised) workers and union leaders that enable innovative practices to be reproduced and to become established policies.

The chapter’s research questions are the following: what facilitates experimenting with participatory organising in the Hungarian context? How can unions successfully integrate full-time organisers’ work in union structures? And how can the approach be applied to workplace-level campaigns? The argument is made that unions’ constantly declining membership and weakening institutional power has made them more open to policy innovations. It is also claimed that cooperative transnational union projects and a new generation of activists becoming engaged in participatory organising have been the main catalysts of the participatory organising approach. Furthermore, the chapter identifies organisers’ commitment, as well as trust and patience from the union leadership and the setting of ambitious but realistic goals, as the key conditions for the successful policy transfer of participatory organising.

The argument is illustrated with case studies from social care and retail in Hungary based on documentary evidence and semi-structured interviews with union officials and organisers. Two trade unions were early adopters of the approach: the Trade Union of Commerce Employees (KASZ, Kereskedelmi Alkalmazottak Szakszervezete), the largest union in commerce in Hungary, with a long history, and an affiliate of the National Confederation of Hungarian Trade Unions (MASZSZ, Magyar Szakszervezeti Szövetség); and the recently established Trade Union of Social Care Workers (SZÁD, Szociális Ágazatban Dolgozók Szakszervezete), an affiliate of the Trade Unions’ Cooperation Forum (SZEFE, Szakszervezetek Együttműködési Fóruma). These two were selected for analysis because they are both active in the service sector, with the



workforce they represent having similar structural features. At the same time, they have different historical and institutional backgrounds.

Most importantly, together with the metal union (Vasas) and printing union (NYDSZ), both are among the pioneers of engaging with participatory organising in Hungary. Both retail and social care have low union density rates, even in comparison with other segments of the Hungarian labour market (Meszmann and Szabó 2023: 556). Both employ a large and predominantly female labour force. Rapid turnover of employees and truncated career trajectories pose significant challenges for organisers in both (Albert et al. 2023; Meszmann 2023). An important contextual feature uniting the two sectors is that the Covid-19 pandemic brought increased workplace stress and health hazards for workers because social distancing was not at all, or only barely, possible for them; and in that they were also exposed to the frustration of consumers and clients in this emergency situation. By looking at these two sectors, the literature can be advanced with new findings, moving beyond the manufacturing sector where union revitalisation efforts initially focused and where a typically male workforce has relatively unidirectional employment trajectories.

Despite these similarities, the two sectors differ in institutional features and job content which matters for union organising. First, retail employers are private, often multinational companies. By contrast, most social work and care institutions in Hungary are operated by municipalities, churches or non-governmental organisations (NGOs). Due to the constrained fiscal autonomy of many of these providers, the central government also plays a pivotal role as a funder and as a regulator of standards, including labour standards. Both sectors are affected by labour shortages and resulting overwork, but in retail this exists on top of the risks of automation (Meszmann 2023: 101) whereas technological fixes have made minimal inroads into frontline social care. Due to the high responsibility job content of social care and its links with healthcare, employees are more likely to form professional communities there than in retail. These communities can serve as platforms for distributing information on trade unions and as springboards for organising efforts, as can be seen below. At the same time, small establishment size, dispersed work locations and an often irregular work schedule makes the coordination of organising efforts more challenging in social care. In retail, these challenges are less present, at least in the segment of the market dominated by multinationals with large store sizes.

## **1. Organisational decline, institutional disruption and economic transformation**

The analysis centres on the innovative strategies that Hungarian trade unions are utilising to rebuild their organisational strength. Ever since the regime change in 1989, trade union membership density has been declining in Hungary, standing at 20% in 2001 and at 7.4% in 2020 (Meszmann and Szabó 2023: 544; KSH 2020). We start by outlining the long-term context in which this organisational decline has taken place and which has interacted with changes in unions' institutional position and broader economic processes.

The labour relations emerging after the regime change led to a highly fragmented union landscape (Lux 2008) with six, often competing, national union confederations and without a system of industry-level collective agreements. Until 2010, Hungarian unions could partly counterbalance their organisational decline by relying on their institutional embeddedness as they could influence labour market policies (including minimum wage setting) in national-level tripartite forums (Meszmann and Szabó 2023). In addition, a labour code in the continental European tradition and widely accessible labour courts provided a relatively strong floor for individual and collective labour rights.

These institutions were already crumbling under the pressure of technocratic-neoliberal economic governance before 2010. They then suffered a fatal blow when the right-wing Orbán government came to power. The new regime abolished the encompassing tripartite institutions and introduced a new labour code flexibilising employment relations, thereby shifting the balance of power even more towards employer unilateralism in both the public and the private sector and bringing an end to relative institutional stability for unions. Complementing pre-existing research (Trif and Szabó 2023), this chapter argues that the loss of institutional power resources pressured union leaders to experiment with alternative strategies, including membership recruitment efforts, in a bid to recuperate workers' associational power.

Moving to the economic context, two recent developments may have influenced workers' attitudes to trade unions, including their decision to join a union: the tightening of the labour market from the mid-2010s; and the cost of living crisis after 2020. Following decades of underemployment, the 2010s brought in labour shortages as the main issue affecting the Hungarian labour market across the board. This strengthened the structural position of labour but also led to work intensification for several groups of employees – including retail and social care workers. Since 2020, rising inflation has led to a cost of living crisis in Hungary. The country had the highest inflation rate within the EU in 2021 and in 2023, peaking at 17% in 2023 (Eurostat 2023). The crisis has put pressure on workers and it may well have refocused unions' efforts into traditional issues of wage bargaining.

The impact of labour shortages and inflation on trade unions' (organisational) position is nevertheless ambiguous. A tight labour market may make it easier for workers to take the risk of joining a union and engage in collective action. At the same time, it can equally favour individualistic responses such as hopping between jobs in search of higher wages and better working conditions. High employee turnover rates suggest that individual responses have indeed been dominant in Hungary, while unions in general have not benefited from a tight labour market in terms of membership: there was a continuing decline in density figures between 2015 and 2020, from 9.0% to 7.4% (KSH 2015, 2020). Therefore, the takeaway message from these broad processes is that economic developments that strengthen workers' structural position do not automatically create easier terrain for unions. Proactive policies of organising are required to increase membership even in a relatively favourable economic context.

Such organising efforts may be facilitated by an improved image of Hungarian trade unions, public opinion having recently shifted in their favour. A friendlier attitude

towards unions was documented in Eurobarometer surveys over the late 2010s, although Eurobarometer stopped collecting data on this question after 2019 (Meszmann and Szabó 2023: 568). This change in public attitude is not the result of any conscious large-scale PR campaign, as unions do not have the financial resources for that. Instead, it is a combined effect of two other factors. First, the public is increasingly aware of the need to improve working conditions and it sees unions as necessary actors in this process. Second, the negative image of trade unions resulting from their association with the one-party state before 1989 (Crowley 2004) is slowly fading from public memory.

The crucial next step in this story is that attitudes towards unions are changing not only in the general public but also within civil society groupings. Several initiatives have emerged in Hungary in recent years whose purpose is to increase citizen engagement and achieve long-term social change outside the domain of electoral politics. One such initiative, the Solidarity Economy Centre in Budapest (SZGK, Szolidáris Gazdaság Központ), directly deals with union organising. SZGK is a partly voluntary, non-hierarchical organisation formed in 2019. Its main activities include the development of sustainable solidarity-based models in housing and green energy production, as well as participatory organising and jointly conducted cooperative projects with trade unions.

## **2. In need of new members and open to experimentation**

SZÁD is a small but dynamically expanding organisation that launched with 60 members in 2015 and had around 530 members in early 2025. It was founded by workers in an elderly and disabled care institution in Pécs, Hungary's fifth largest city situated in the southwest of the country, and a large homeless persons care institution in Budapest, the Methodological Centre of Social Policy and its Institutions (BMSZKI, Budapesti Módszertani Szociális Központ és Intézményei). The goal of the founders was to create an alternative to what they considered as the old-fashioned type of trade unionism. SZÁD's leadership is younger than is typically the case and it has a progressive attitude on social issues (INTVW1). SZÁD's officials are unpaid but they have started making use of facility time as guaranteed by the labour code to trade union representatives above a certain threshold of membership density. Only in late 2024 did they hire an employee, a part-time administrator (INTVW1; INTVW5).

As it is a new organisation whose survival depends on attracting new and active members, recruitment has always been a central element of SZÁD's activities. The union's organising efforts were boosted in 2019, when the first contact happened between it and a founding member of SZGK who was also just starting work as an organiser at UNI Europa's Central European Organising Centre (COZZ). The union leadership was supportive of the work of this first organiser throughout, as it has been for each succeeding one, and has placed its trust in them, including a high degree of autonomy in their everyday activities. This cooperation led to the adoption of a more systematic approach to organising by SZÁD, using new tools and also linking it more directly to collective bargaining. Introducing new methods of organising was considered a pilot project by both the SZÁD leadership and the COZZ/SZGK organisers as the small size, short history and flat structure of the union provided ample room for experimentation.

In comparison, KASZ provides insights into the policy transfer of the methods and tactics associated with participatory organising within a larger organisation that has a long history in Hungarian industrial relations. Organising in a trade union with these features is also complicated because the recruitment of new members has to be balanced by considerations of the retention of long-standing ones. KASZ counted 7,600 members countrywide in 2024, making it one of the larger unions in Hungary in terms of absolute numbers although union density in the sector is low. Similarly to most Hungarian unions, KASZ's membership is declining (INTVW2), even though the pace of decline seems to have slowed down in recent years. KASZ was founded in the early 1900s. It has a staff of 19 employees, a central office in Budapest and a network of regional representatives outside the capital who take part in recruitment and union campaigns. The union has a relatively large central office but this does not mean that the transfer of new policies within the organisation necessarily happens in a top-down, uniform manner; on the contrary, KASZ's company and store-level branches enjoy the high degree of financial and decision-making autonomy typical of industry-level unions in Hungary.

KASZ's leadership is generally more open to experimentation and innovation than most Hungarian unions (INTVW2; INTVW3). For example, it is a pioneer among Hungarian unions with its proactive and extensive use of social media and it also has an active youth programme.

One union official had already been planting the seeds of the participatory organising approach within KASZ for several years, combining organising with various other roles since 2012 including in the youth committee and international coordination. She never faced open rejection regarding the participatory organising approach but her ideas were, in the beginning, met with scepticism and disinterest in some parts of the union. She herself also went through a trial-and-error learning process, initially supporting methods that she would later reject. A turning point in this learning process was reached in 2017, when she participated in a UNI-IG Metall international conference on organising. This was also the year when leadership change in KASZ created more space for experimenting with new methods and tactics. As it was not possible to apply the approach wholesale across the entire union right away, the organiser diffused innovative practices gradually at both company level and at industry level. For the latter, KASZ obtained sponsorship from a western European (Danish) commerce union through COZZ and UNI Europa in 2019. This support enabled KASZ to hire one full-time organiser, set up an online enrolment system for new members – which has yielded hundreds of members – and launch an online and phone-based umbrella campaign. This was built around demands for more employee-friendly working time regulation and Covid-related demands of zero tolerance for verbal and physical abuse during work.

### **3. Transnational support and a new generation of union activists**

Due to institutional inertia and the absence of financial resources, policy innovation often comes from catalysts outside the institutional boundaries of unions in Hungary. This is a key point for understanding the processes of policy transfer in the Hungarian

context. Two of these catalysts are highlighted here: the efforts of transnational union cooperation; and the emergence of a group of young activists committed to advancing solidarity including the revival of trade unions. Both these factors played a crucial role in both the unions studied here.

East-west union cooperation in Europe institutionalised quickly after 1989, but transnational projects focusing explicitly on organising emerged only recently (Kall 2024; Silvia 2020). The first projects promoting organising funded by western European (union) donors started in the 2010s. The most influential in Hungary is the Transnational Partnership Initiative (TPI), started in 2016 by metal industry unions – the German IG Metall and Vasas, a MASZSZ affiliate – which set up legally independent consultancy offices on the sites of the largest German-owned car factories in Hungary, facilitating recruitment and organising by Hungarian unions (Dribbusch 2021). TPI operated in Hungary for eight years, fostering the participatory organising approach not only within Vasas but also in other Hungarian unions which frequently invited TPI organisers to present their work. In addition, between 2021 and 2023, IndustriAll Europe also had an organising project in eastern European countries, including Hungary, instigating a further promotion of the participatory organising approach.

The transnationalisation of employers is slower to advance in services. Trade unions here face a more scattered organisational landscape than in manufacturing, and this is something to which they need to tailor their efforts. Nevertheless, transnational initiatives for promoting and coordinating organising projects followed. COZZ was established at the initiative of the UNI Europa federation in 2016 and first covered Czechia and Poland, expanding to Hungary in 2019. Despite the later start, COZZ's activities have been catching up fast in Hungary.

COZZ is active in Hungary in several sectors, including graphic design (printing), retail and social care. European Union grants have played an increasingly significant role in supporting Hungarian unions' capacity building efforts, and such grants have notably been secured both by COZZ and by the trade unions it mentors. The collaborative processes facilitated by COZZ and its network of unions have a broader reach compared to TPI's efforts which are more focused on a single union. The organisers of these two initiatives have, however, been intensifying their collaboration, signalling the potential for the formation of a unified Hungarian organiser network in the future.

The organisers whose work is examined in this chapter are active in different sectors and their methods are always tailored to the specific workplace they are organising. At the same time, they all use the same broad framework based on Jane McAlevey's 'whole worker organising' model (McAlevey 2016). This model is adapted to the local context, rather than being applied in a one-size-fits-all manner, but the mobilisation of the entire local community is a less prominent element compared to the original McAlevey model, which accounts for why 'participatory organising' is used in the Hungarian context. The core of this approach is in building organisational strength from the bottom up and in enabling members to engage in collective action. In short, participatory organising is not only about recruiting members but also about building and maintaining an active membership base. The following elements are constitutive parts of the approach:

- issue-based campaigns focusing on the workplace
- the organiser is not an employee of the company and provides methodological support and coordination for the local branch
- the organiser and the elected union official work together with a group of rank and file activists and ‘organic leaders’; that is, workers respected by colleagues with many informal ties to them who are ready to mobilise these in support of common goals
- collective, participatory actions involve not only union members but potentially all workers of the company
- rank and file members are involved in the major decisions of the union as much as possible.

SZGK is an important domestic ally in facilitating the transfer or diffusion of participatory organising among Hungarian trade unions. Transnational cooperative projects created the space for hiring full-time union organisers, in the filling of which a group of young activists played a significant role. SZGK encouraged the spread of participatory organising by involving young, highly motivated activists not previously connected to union work but who wanted to be organisers. Indeed, the full-time organisers who feature in this chapter, and many others who have worked as organisers since the early days, would not have considered working in unions without the mediating role played by SZGK; their primary motivation is to work towards solidarity and social change, but they have found a route to this through trade unions.

For the work of many organisers, COZZ or their respective national unions provide the main framework, but this is complemented by the space which SZGK affords for the crucial background activities of additional learning, mentoring, motivation and peer support. As such, the participation of organisers in COZZ and SZGK lends their approach coherence. Peer support is essential for the prevention of burnout as organising comes with significant responsibility and requires intense personal interaction with workers who are often in highly precarious positions and reluctant to engage in collective action. Organisers face many high-risk situations and unavoidable setbacks due to employer resistance but also stemming from worker apathy. Where workers can initially be engaged, this may later dwindle due to changes in personal circumstances; again an emotional issue to which organisers may be exposed (Albert et al. 2023). Moreover, being a union organiser is a highly complex role consisting of managerial tasks and strategy-making, conflict-solving and other emotional work (Hochschild 1983) and the facilitation of meetings and training sessions. All of this requires a broad range of communication skills and stress resistance, as well as legal knowledge.

SZGK fosters networking events for organisers from Hungary and other eastern European countries, shares experiences at public events and involves new allies who are interested in issues of social solidarity. SZGK also facilitates participation in online training in English called ‘Organising4Power’. To summarise, these efforts suggest that SZGK acts as a significant vehicle for policy learning regarding the participatory union organising approach in Hungary.



#### **4. The nuts and bolts of participatory organising in retail and social care**

To understand how participatory organising methods and tactics are applied in practice, this section describes the steps towards issue-based organising campaigns undertaken by both SZÁD and KASZ. The pilot organising campaign of SZÁD started in 2020 at BMSZKI, the homeless care institution, alongside the biggest local branch of the union. BMSZKI is run by the Municipality of Budapest. The campaign's goal was to improve working conditions through collective agreement and to strengthen union structures on the way. The first step consisted of mapping the worker community and finding organic leaders and activists in each of the 21 local branches of BMSZKI's dispersed network of providers. Then the organiser had one-to-one, in-depth conversations with potential local union representatives, laying the groundwork for active local union branches. This preparatory work took about one year. From then on, the organiser worked together closely with the rank and file organising team, regularly involving the workers in participatory actions.

The next step was the distribution of a survey about working conditions that also included the collection of contact details with informed consent. The pre-existing engagement of BMSZKI's employees in social media groups around work-related and professional issues helped the distribution of the survey. The survey was not only an important step in the process of recruiting new members, but the union leadership also relied on its results to formulate specific bargaining demands. Organisers then moved to a phone campaign akin to that of a call centre, reaching out to contacts and leading to short agitational conversations. These calls targeted institutions with the highest response rate to the questionnaires. If the conversations were successful, in-person organising would start. As a result of these efforts, membership increased to 120-140 even before the start of collective bargaining talks.

A change in the Budapest mayor's office following local elections in 2019 created the conditions for collective bargaining on the employer side. Even so, talks proved difficult and the union needed to mount public pressure, including a social media photo campaign where workers held up placards with slogans reminding the municipal leadership of its promises to increase wages and improve working conditions in the sector. This action required courage from individual participants as their faces were shown; such an involvement may not have been possible without the building up beforehand of a relationship of trust between the union leadership, rank and file members and potential members.

The BMSZKI campaign successfully mobilised the majority of care workers and resulted in a collective agreement with several benefits and improved working conditions.<sup>1</sup> For example, workers at BMSZKI are now entitled to two to ten days of additional paid leave on top of the statutory minimum (between 20 and 37 per year), depending on their years of service. This is called 'recovery leave' (rekreációs pótszabadság) in the collective

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1. The bargaining outcome should be interpreted in the context of municipalities' shrinking fiscal space due to the increasing centralisation of public service management by the central government.

agreement and is especially important in an occupation where the risk of burnout is very high.

Independently of one another, the first participatory organising campaign at KASZ was rolled out through similar steps as the campaign at SZÁD, during almost the exact same period. A petition containing the union's core demands was distributed online and collected telephone contacts with explicit consent from those signing it. Subsequently, organisers, officials and shop stewards made around 3,000 phone calls, leading to the recruitment of 700 new members. The organisers trained the volunteers at call centres, running through conversational scripts with different scenarios and encompassing an email package that they could send to interested but hesitant potential members. These in-depth, one-on-one conversations served the goal of recruiting members conscious of their own role in the union, instead of offering the illusion that joining the union would only be about paying a fee for guaranteed services. The organisers planned several rounds of calls but this turned out to be too ambitious. While some volunteers were initially sceptical of a calls-based campaign, the main organiser saw the selection of this platform as appropriate as employees tended to be more open and honest when they were approached outside the workplace (INTVW3). An online and phone platform also had little alternative as the campaign took place during the years of Covid-19.

At company level, the innovative organising campaigns of KASZ first concentrated on a multinational hypermarket chain where the union could build on an active secretariat and a well-developed network of shop stewards in every store. The campaigns were linked to collective bargaining talks. The employer had not engaged in union busting in a strict sense, but it did have a sophisticated HR and PR apparatus deployed to avoid real negotiations with the union whenever possible. KASZ's campaigns in the company were preceded by the training of shop stewards and company-level officials in organising methods.

In the development of these campaigns, trust increased between the union leaders and rank and file and non-unionised workers. For example, in 2023, the union collected signatures from workers for a greetings card petition that wished 'Merry Christmas to the company management and decent wages for the workers'. This was described as a pivotal moment by one of the union officials because many employees signed proactively, without shop stewards having personally to persuade them (INTVW3). Employees gained courage and confidence as a result of their previous engagement with the union and signed the petition with great pleasure.

Similarly to SZÁD, one of the keys to building confidence and trust was constant communication between the rank and file and the union leadership. This included surveys about working conditions and wage demands, newsletters to members about the state of negotiations and online education outreach activities explaining the basic concepts used in wage negotiations.



## **5. Further embedding and transferring participatory organising**

After the conclusion of the first campaigns applying participatory organising principles, the promoters of the new policy needed to address the questions of how to sustain the commitment of the union leadership, how to embed organising practices in the organisational culture of the union and how to transfer policy innovation as broadly as possible across its local branches.

Encouraged by the successes in BMSZKI, SZÁD remained committed to collaboration with COZZ's organisers. Participatory organising campaigns increased membership in other local branches too, and new, greenfield branches at formerly unorganised workplaces were also created. In 2023, SZÁD and COZZ won an EU-funded grant in the framework of the 'Our Union Values Programme', which allowed COZZ to hire a new full-time organiser for two years. This success was remarkable as union projects rarely win civil society, European values-focused grants. The project's goal is the protection of workers' rights and human dignity in the social care sector and the expansion of the union's structures outside Budapest. As of 2024, SZÁD had succeeded in setting up five new local branches in elderly care institutions in Budapest as well as in smaller towns across the country.

SZÁD also learned lessons from the organising experience at BMSZKI that it can apply to its current activities. For example, organisers are more upfront about directly asking employees to form union branches when they first contact them through online surveys (INTVW1; INTVW5). Organisers are also more aware of the diverse attitudes of employers that influence the chances of organising and that do not map to pre-existing social cleavages: some social care employers in small towns are actually more open to union organising than others in large cities where less tight control by management of employees could be expected. This may result from the sense of urgency that managers in small towns feel due to labour shortages and from them viewing the union as a potential partner in finding local solutions to alleviate the problem (INTVW5). SZÁD's Budapest branch is also continuing to get involved in broader solidarity actions with other unions, as well as with NGOs through the facilitation of SZGK. For example, BMSZKI works together with the food cooperative Pécsi Kosár to offer social care workers the option to buy cheap, good quality, often organic products from small producers directly at the workplace.

Nevertheless, the union's organising efforts are being hindered by arbitrary changes in the regulatory environment at national level having an impact on the basics of union operation. A recent example is the collection of membership dues. Before 2023, public sector unions benefited from the check-off system which allowed members to authorise employers to deduct membership fees at source automatically from their salary. The government abolished this option in 2023, explicitly prohibiting employers' deductions, and putting additional administrative burdens on trade unions and individual employees. SZÁD, along with other public service unions, sees this as a significant setback to its efforts in recruiting and retaining fee-paying members.

To sum up, SZÁD's cooperation with COZZ-affiliated organisers, with a background in SZGK, allowed the union to launch a conscious, systematic and gradual plan of expansion. This involved professionalisation in the sense of building up organising structures, engaging in highly legalistic collective bargaining and relying on paid organisers and union officials' working time allowance instead of on completely voluntary work. At the same time, the participatory organising model preserved close and open communication between the leadership and the rank and file as well as participatory operation in the midst of expansion. The medium-term challenge is to make the basic functions of the union self-sustaining as external resources will still be needed for some time from which to pay organisers. The current momentum of these efforts gives a reason for cautious optimism, however.

In the case of KASZ, apart from the development and execution of online campaigns, the reform of the union's training system was another important change at the union centre related to participatory organising. The policy requires strong buy-in and engagement from company and store-level representatives. The central office of KASZ was able to enhance this engagement through offering training opportunities, including in participatory organising. Education activities are then also able to feed back into shop steward mentoring and serve as a starting point for building up the mechanisms of accountability between the union centre, local officials and shop stewards.

Previously, KASZ had not been active in training officials and members, having conducted its previous training sessions in 2016. A working group that was set up in response to a member survey on organisational development in 2022 designed a four-level training system to be launched at KASZ, with level two including organising. The union official-organiser in charge of this part of the curriculum translated the English word 'organising' into Hungarian as 'strategic recruitment', to make the concept more accessible to potentially sceptical colleagues. This was an instance in which the transfer of union policies across countries literally also meant translation.

In addition, the union official-organiser who was the early adopter of participatory organising also highlighted the importance of gradualism in the diffusion of new policies within KASZ (INTVW3). This means that she picked up one or two elements from the toolbox of participatory organising which could be intuitively attractive to colleagues at the outset. For example, petitions or surveys as awareness raising tactics were relatively widely accepted even by colleagues sceptical of participatory organising on the whole.

KASZ engaged with non-members to gain widespread support during collective bargaining, but the union also made it clear that union membership was a condition for being fully included in decision-making processes. Therefore, at the company level, the union opened a vote on one of the initial wage offers of the employer in which only union members were allowed to participate – in Hungary, union negotiators are not obliged by legislation or by internal rules to ballot members on collective agreements. This opening up in general is also in line with the McAlevey strategy of transparent and open bargaining (McAlevey 2016). A few new members did join in order to be able to vote but, even more importantly, only one member quit the union after the conclusion of the collective agreement. This was a major improvement compared to previous bargaining

rounds which often resulted in a wave of exits, a common experience of union work in Hungary (INTVW3). Members' loyalty may be related to their involvement in at least one stage of the bargaining process.

The next milestone in the transfer of participatory organising at KASZ was the recruitment of an organiser whose job only concerned workplace organising, as KASZ sought to use the experience of the campaign discussed in the previous section to experiment with organising companies where there was only a very small existing branch. This first attempt could be considered unsuccessful, as the new organiser did not turn out to be sufficiently motivated in the job and who left the union in short order. KASZ nevertheless stuck to its commitment to the approach of employing organisers.

COZZ supported the hiring process for a second time, supplying funding for a three-month internship programme by a part-time organiser. After the internship, she was hired by KASZ in the summer of 2023. She started participatory organising in a multinational store chain, first concentrating on two stores. Organising included many one-to-one conversations with workers, mapping the workers' community and identifying and recruiting organic leaders and worker activists (INTVW2). A few months later, a campaign was organised for an increase to non-wage benefits and the annual bonus in all Hungarian stores of the company. The most important participatory action was the collection of signatures which resulted in 150 signatures across four stores – meaning a 50-60% participation rate, which is an outstanding figure in the Hungarian context. Within one year, union membership at the company almost doubled, despite layoffs. Now it is one of the few companies covered by KASZ where union membership is not declining.<sup>2</sup>

As the organiser is the one who follows what is happening in the field on a daily basis, the job requires great autonomy, especially in that there is often a need for quick reaction in response to something new at the local branch. The organiser involved considers autonomy to be a basic precondition for this type of job. She was not required to work out of the central office, which would make no sense considering the nature of the job. Nevertheless, she regularly coordinated her activities with the KASZ leadership which takes the lead in negotiations and final strategic decisions (INTVW2). More generally, as organisers are constantly in touch with workers and monitor their attitudes, they are able to assess their willingness to participate in collective action in a particular situation. This case illustrates well a campaign being built around a specific workplace problem. Although several steps were planned ahead, in case agreement could not be reached with the employer, the extensive mobilisation of workers led to success after some replanning.

This case highlights the importance of leadership commitment and persistence, as well as the need for autonomy for organisers in their daily tasks. Gradualism matters here too as, after the organiser had proved her skills as a trainee, she was hired by KASZ. The organiser has a background in SZGK and was also successful in finding an organic

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2. For context, there have been layoffs or austerity measures, or both, at almost all companies in commerce in recent times, but the segment to which this chain belongs has been hit especially hard by the crisis.

leader at another multinational retail chain that was infamous for the union-busting attitude of a long-time manager.

## 6. The future of participatory organising in Hungary

Before concluding the findings of these two case studies, this section turns to some recent developments regarding the spread of participatory organising and reflects on the possibilities of further scaling out and scaling up. MASZSZ has recently started to play a key role in policy transfer.<sup>3</sup> Organising tactics became a core part of the confederation's basic training programme for union activists in 2024, covering two thirds of the curriculum. The training sessions were held by two COZZ organisers and were largely based on previous experience in NYDSZ, the printing union, as well as in KASZ and SZÁD. The publicity and the prestige of participatory organising has certainly grown significantly among the leadership of other unions affiliated to MASZSZ in the past few years, best practice in KASZ and NYDSZ playing a major role. Even though SZÁD is not a MASZSZ affiliate, SZÁD's experience with organising also informed the scaling-out and scaling up efforts of MASZSZ.

For policy transfer, it is crucial to have cases from the same country, as western European examples and best practices are not always convincing to Hungarian unions due to the different circumstances (INTVW6). Also, trade unions in different sectors having achieved success with participatory organising makes these examples even more powerful. Both the level of engagement and the depth of knowledge of participatory organising differs from union to union, however. Most union leaders are not deeply committed advocates of the policy but are starting to show interest in new recruitment tactics as a possible antidote to declining membership.

Even though the good publicity surrounding participatory organising campaigns illustrates the potential of this policy, future scaling up faces constraints. A full-time organiser has the capacity to organise one to five workplaces depending on the number of workers, meaning that it would need many more organisers to reverse the broader trend of union membership decline in MASZSZ-affiliated unions. The main limitation of the transfer of participatory organising is the lack of mentoring capacity in the field, alongside the availability of sufficient funding.

As for mentoring capacity, organisers in COZZ, SZGK and MASZSZ are constantly improving their system of training and mentoring and knowledge sharing. However, there are only a few organisers in Hungary who have more than five years of experience, which is creating a barrier to expansion. Another barrier is the recruitment of organisers themselves: it is hard for trade unions to find potential new organisers who have both the skills and the motivation necessary for this job. SZGK can play a big role in connecting unions with politically engaged young people, as unions often find it difficult to reach out to the youth.

3. Exploring viewpoints toward participatory organising by union confederations other than MASZSZ is beyond the scope of this chapter.

Turning to funding, in 2024 a large EU-funded grant through the Economic Development and Innovation Operational Programme (GINOP, Gazdaságfejlesztési és innovációs operatív program) was won for trade union capacity building, enabling six MASZSZ affiliates to employ 14 new full-time organisers and one part-time one for two years.<sup>4</sup> This is a major milestone. The recruitment and training of the new organisers was coordinated by MASZSZ, allowing the confederation to shape the strategic decisions of affiliates more actively than usual. A founding member of SZGK and senior organiser at COZZ was responsible for coordinating the recruitment and training process for MASZSZ.

At the same time, this doubling of the number of organisers is also generating challenges.<sup>5</sup> It is an open question as to what background infrastructure will be provided to organisers and to what extent their work can stay consistent methodologically, keeping participatory organising as the main policy for member recruitment. Whether the currently ‘organised’ sites stay isolated cases or if trade unions are able to broaden the scope of application of the policy to other branches is one that only future can tell. These questions remain open even for KASZ, also because those organisers who were the initial adopters of the approach had left the union’s central office by early 2025.

## 7. Conclusions

What can we learn from the experience of these two Hungarian trade unions venturing into new strategies regarding member recruitment and organising? The leaderships in both were open to trying out new ideas and this allowed them to tap into the resources of transnational union networks and a committed group of young organisers. While these resources are considered as external to the trade unions in question, in both cases the union leaderships also topped them up with internal resources, for example by re-hiring successful organisers after their initial, externally funded contract expired or by enabling colleagues already on the union payroll to experiment with organising methods and tactics in their work.

In terms of the persistence of these efforts, a key factor is the continuing commitment of the organisers themselves. Organisers have a similarly high level of motivation and persistence in both unions. Based on the interviews, the reasons for this are manifold. All have a deep conviction to fighting social injustice and promoting social change,

and they all think that collective action is the best route to achieving this. Higher education was important for all of them to gain a systemic attitude to social problems, especially for those who came from a working-class family. They all have strong internal motivation, but they also rely on the peer support network provided by SZGK to share

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4. The availability of this funding opportunity for public sector unions is rather limited. More broadly, it should be noted that, even though public sector unions started from higher membership figures overall than the private sector, they have recently become the targets of government interventions shrinking their resources. This includes the prohibition of collective bargaining, further limitations on their right to strike and the hurdles on the collection of membership fees described above.

5. The manuscript of this chapter was finalised during the hiring process in February 2025.

experiences and prevent burnout. Here, mentoring was key as it equipped the ‘second wave’ of organisers with some clues regarding a job whose job description is extremely complex, barely formalised, highly experimental and context-dependent. Organisers’ belief in workers’ struggle and grassroots activism is also nurtured by the community provided by SZGK, making the work less lonely. At the same time, their work was also aided by the high degree of autonomy they enjoyed within union structures even where the organiser was re-hired and their employment transferred from COZZ to the union.

What should also be highlighted is the role of patience in terms of both the organisers’ personal resilience and in the development of trust between them and the union leadership. Laying the groundwork for participatory organising, through workplace mapping, identifying organic leaders through in-depth conversations and initial actions, may take up to one year. No significant membership increase can be expected in this period. In the case of greenfield organising, the hurdles may be too high to establish a functioning union branch, but this may only become clear with the benefit of hindsight. The longtime horizon and the interpersonal and highly ambiguous logic of participatory organising<sup>6</sup> makes this activity extremely labour intensive, raising questions about scaling up.

The transfer of participatory organising requires the setting of ambitious but, at the same time, realistic goals and the use of appropriate tools to achieve them. In this way, organisers and union officials can prevent short-term campaign failure leading to disappointment and to the dropping of the entire approach. Union officials and organisers did not call a strike in either case, partly due to restrictive legislation but also because the majority strike, as prescribed by the McAlevey model, was not possible in either (McAlevey 2016: 21-22). Within the range of realistically applicable tools and realistically achievable goals, gradualism matters and both these cases demonstrate this. In terms of achieving worker engagement, it is effective to start from a relatively low risk activity (filling out an anonymous survey), before upgrading to signing a public petition or supplying a face to a widely distributed photo campaign. Organisers and officials were aware of this need for gradualism in both cases and this also showed in their campaigning activity. Gradualism was also reflected in the timing of the involvement of different organisers, with new organisers first involved in low-risk activities and the more experienced ones taking the lead in high-risk events.

The cases also suggest that the transfer of participatory organising may work in both larger and smaller, newer and older, trade unions. A smaller organisation such as SZÁD may be dependent on external resources over a longer period, but none of our interviewees saw project-based operation as too restrictive per se. Some of them actually praised externally financed projects as helpful tools pushing unions to make conscious decisions about their medium-term goals and then stick to them. In KASZ, the organisation was ready to commit its own budget to hiring a full-time organiser, an important sign of policy embeddedness. In 2024, there were some changes in KASZ staff, the organising department expanding as a result of the GINOP funds provided

6. In a situation rooted in a conviction of the need for individuals to get active and stand up for themselves, it cannot by definition be known beforehand what techniques will be most convincing for a given individual.



by the EU. Nevertheless, at the time of writing it is still an open question as to what approach will be used by the new organisers and how many union branches will be supported in the future with tactics linked to participatory organising.

Regardless of these, it is safe to say that, in the span of a few years, participatory organising as a union policy has become much more prevalent and recognised in Hungary. There are many examples of workplace-level organising campaigns, demonstrating its effectiveness across different sectors and unions of various sizes and histories. Whereas five years ago the only union applying participatory organising in Hungary was Vasas, the metalworkers' union, there are now at least five who have started experimenting with this policy innovation and it has also taken its place in the work of MASZSZ, the largest Hungarian union confederation. Beyond that, organisers and unions have gained significant experience not only in actual workplace campaigns but also in managing and integrating organisers' work into existing union structures in the most effective way.

## **Note on method and data**

This chapter uses a broadly interpreted comparative case study method. When selecting the cases, trade unions were chosen in two economic sectors where the labour force has relatively similar structural features, but where the unions differed in their political and institutional environment. A variety of sources was consulted to gather data and back up the findings, ranging from documentary evidence to informal personal communications. The authors reviewed websites, the official and informal documents of trade unions and organising networks (from bylaws to flyers), and their activity reports, press releases and social media platforms, while also investigating media coverage of their campaigns. Between April and August 2024, six semi-structured interviews were conducted with union officials and organisers (the two roles in some cases overlap) from the selected unions and from one confederation and one federation – see Table 1. The average length of the interviews was around 90 minutes. The authors also participated in several events organised by the research subjects. One of the authors is currently working in union organising, facilitating deep personal insights into the subject. The writing up of the findings was inspired by more recent theories of union organising (McAlevey 2016). At the same time, this contribution should be conceived as chiefly empirical and inductive, achieved via the deployment of this particular case study design. The cases draw on a process-tracing approach, reconstructing the steps of an organising campaign, identifying the milestones and describing how the different steps followed each other.

Table 1 Conducted interviews

Identifier	Date	Function
INTVW1	18/4/2024	Trade union organiser
INTVW2	25/4/2024	Trade union organiser
INTVW3	13/5/2024	Trade union official and organiser
INTVW4	23/6/2024	Trade union organiser
INTVW5	6/8/2024	Trade union official and organiser
INTVW6	28/8/2024	Trade union official

Source: authors' elaboration.

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Cite this chapter: Szabó I.G. and Turai E. (2025) Hungary – What facilitates the policy transfer of participatory organising?, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Abbreviations

<b>BMSZKI</b>	Budapesti Módszertani Szociális Központ és Intézményei (Methodological Centre of Social Policy and its Institutions)
<b>COZZ</b>	Central European Organising Centre
<b>EU</b>	European Union
<b>KASZ</b>	Kereskedelmi Alkalmazottak Szakszervezete (Trade Union of Commerce Employees)
<b>MASZSZ</b>	Magyar Szakszervezeti Szövetség (National Confederation of Hungarian Trade Unions)
<b>NGOs</b>	Non-governmental organisations
<b>SZÁD</b>	Szociális Ágazatban Dolgozók Szakszervezete (Trade Union of Social Care Workers)
<b>SZEF</b>	Szakszervezetek Együttműködési Fóruma (Trade Unions' Cooperation Forum)
<b>SZGK</b>	Szolidáris Gazdaság Központ (Solidarity Economy Centre)
<b>TPI</b>	Transnational Partnership Initiative
<b>UNI</b>	Union Network International

## Chapter 9

# Slovenia – Achieving policy transfer in the organisation of young and precarious workers

Barbara Samaluk

This chapter focuses on policy transfer, innovation and learning within the Association of Free Trade Unions of Slovenia (ZSSS, Zveza svobodnih sindikatov Slovenije), the largest national trade union confederation in the country associating 22 unions mainly from the private but also the public sector. In the context of the external pressures which came with integration into European (Monetary) Union and the economic crisis of 2008, Slovenian trade unions were faced with increasing levels of interest fragmentation, changing membership structures, a gradual drop in membership and a growing number of nonunionised precarious workers and wider social groups (Samaluk 2017; Stanojević and Broder 2012). The economic crisis had a negative impact in particular on non-unionised young people transiting from education to work, migrant workers and other vulnerable groups (Samaluk 2017, 2021).

Despite the adverse conditions and de-unionisation, Slovenian trade unions at this time still possessed significant institutional power and mobilising capacity, while collective bargaining coverage remained relatively strong, standing at around 70% in 2010 and 68% in 2015 (Visser 2019). Unions were also able to utilise the social dialogue institutions to ease the effects of economic crisis and austerity (Stanojević and Klarič 2013) and to institute protective mechanisms for the growing workforce in non-standard employment. Nevertheless, they have been much more limited in addressing the wider precariousness experienced by (young) workers and those others most affected by the crisis in their transitions between various work and non-work statuses (Samaluk 2017). In general, the growth in precarious work represents one of the main challenges for trade unions in organising the next generation who often lack access to union structures (Keune and Pedaci 2020; Smith et al. 2019).

Apart from creating special youth committees for younger members, Slovenian unions did not actively engage with the precarious next generation. Such committees were found in the larger trade unions, but they mainly engaged with young people who were already employed. Furthermore, they addressed issues related to education-to-work transitions through traditional institutional channels rather than undertaking proactive fieldwork that also sought to organise precarious students and unemployed young people in transition (Samaluk and Greer 2021).

Following the 2008 economic crisis, Slovenia experienced exponential growth in youth unemployment and precariousness, combined with diminishing union power. Alongside damaging proposals for structural reforms to limit students' income, abolish student work and replace it with German-style 'mini-jobs', young people started mobilising, in cooperation with trade unions (Samaluk 2017). Along with the problems, however,

EU integration also brought new infrastructural and societal resources to unions in the form of cross-border union cooperation and EU-funded projects which increased social dialogue; forged (trans)national links, wider coalition building and partnerships; and brought ideas about the innovative servicing and organising of non-unionised (young) precarious workers and those transitioning between various work and non-work statuses (Samaluk and Kall 2023). These conditions brought about the emergence of Trade Union Youth Plus (MP, *Sindikát Mladi Plus*), a hybrid and independent organisation which is both trade union and youth campaigning organisation aiming to organise young and precarious workers and working on behalf of them within established trade union structures.

Based on union documents and semi-structured interviews with MP activists or others, this chapter explores the case of MP, its promotion of innovative organising methods and tactics and their policy transfer within ZSSS and its affiliated unions. Three main research questions are addressed:

- What innovative policies are being adopted and what makes them novel or transformative within the confederation or affiliated unions?
- How and by whom are these new policies being promoted and how does their transfer occur within the confederation or the affiliated unions?
- What are the effects of these policy transfers in terms of policy learning and enhancing the confederation's or affiliated unions' power resources, capabilities and their overall mission?

The findings demonstrate that MP provides an innovative bridge between young people, precarious workers and trade unions. The argument is made that it is transferring new know-how, methods and tactics on how to engage with the next generation of workers; utilising proactive fieldwork and communication tactics; and gaining external project funds to organise precarious workers, attract new members and better engage with existing ones or gain support for political actions and campaigning. As such, ZSSS and some affiliated unions' organisational and societal resources and capacity for dialogue with the next generation have received a significant boost.

## **1. The establishment of MP, its status and funding**

In view of the measures being taken in respect of youth employment in the wake of the economic crisis after 2008, campaigning students sought connections with trade unions (INTVW1). Their campaigns made unions aware of the need to organise increasingly precarious and non-represented young people on behalf of whom their considerable institutional power could be brought to bear (INTVW1). Youth activists recognised that, in order to address precariousness on a structural level, they needed to become part of the union movement: hence, they established MP in 2011 within ZSSS.

While this was a bottom-up initiative, it was also supported by a new generation trade unionist, who was already introducing new tactics within ZSSS to reach migrant workers, as well as by a ZSSS leadership that was, in the context of union decline and the emerging problems, open to innovative approaches to solving them.

Apart from providing access to the institutions of social dialogue, ZSSS offered MP free office space, accounting services and access to other (trans)national organisations and institutions, such as the European Trade Union Confederation and the European Trade Union Institute's young trade union leaders programme. This access immediately increased MP's organisational power, and all such routes were highly utilised in the following years. Simultaneously, MP addressed the lack of knowledge and strategies of ZSSS's affiliated unions to approach non-represented (young) precarious workers and wider social groups in transition:

We started from two facts: that trade unions are not adjusted to changes in the labour market, that they don't involve precarious workers [...] and our starting environment was student work, students, pupils and the unemployed [...] These are groups that could once become union members, but due to the bad public image of trade unions, they did not want to approach them. On the other hand, unions didn't have a clue about these groups and didn't represent them anywhere. (INTVW1)

MP thus opened up to non-represented young precarious workers and wider social groups who did not identify with, and had only barely been represented by, trade unions in Slovenia. Unlike the traditional youth committees, where membership is based upon chronological age and employment status, MP also encompassed students, the unemployed and precarious workers who are, due to persistent precarity, unable to achieve social adulthood despite being of an age that, in normative terms, is already quite advanced – they are labelled 'youth plus' workers:

Youth Plus on the one hand means more active youth [...] willing to change things and on the other it does not mean that young anymore [...] We were supposed to cover young people up to the age of 35, but this age is increasing enormously [...] We are thus approached by people who identify with that and don't perceive us as a stagnant trade union. (INTVW1)

Youth is thus regarded as a social category that has expanded due to widespread precariousness, demanding more active engagement on behalf of 'youth plus' precarious workers. Moreover, unlike traditional youth committees, MP has the status of an independent organisation.

Despite its organisational independence and autonomy, MP was not a full member and did not hold voting rights in the confederation in the first ten years, as it was initially regarded as an innovative experiment and as such internally formally placed under the wings of ZSSS affiliate Free Trade Union of Slovenia (SSS, Svobodni sindikat Slovenije). Nevertheless, ZSSS encouraged MP to participate in social dialogue institutions in relation to the issues relevant to young and precarious workers and wider social groups in work transitions. Moreover, MP is recognised as a youth organisation that has become rather powerful over the years; it participates in the governmental Youth Council, thereby extending trade union institutional power into youth politics and institutions. It is thus a unique organisation with triangular access to both social dialogue and youth institutions, enabling it to address the issues faced by precarious and unemployed 'youth plus' workers:

Our position is very good, because we are part of a confederation. We have access to ministries, institutions; through the confederation we can always participate in meetings and voice our concerns. Other youth organisations are part of the Youth Council [...] but they don't have this dialogue, this triangle. (INTVW3)

As a hybrid trade union and youth organisation, MP also has access to alternative sources of project funding, thus being able to utilise those resources available to both types of organisations. Access to various project funds has been crucial for MP as it was never the aim to become a representative, genuine trade union (INTVW1) but a structure facilitating 'a first step towards trade unionism' (INTVW3). Since MP has a very specific membership caught in precarious transitions, it charges only a symbolic membership fee (15 euros per year in 2024) (INTVW7). MP therefore does not finance itself through traditional membership fees, although the aim is to move towards higher monthly fees for those members who can afford it (INTVW7). By virtue of this, it has managed to keep a steady number of around 1,500 members despite a fluctuating membership (INTVW1). Nevertheless, the lack of traditional union funds demands alternative strategies to increase organisational resources. MP has thus successfully deployed its eligibility for small-scale youth projects tendered by municipalities and unconditional programmes for youth work offered by government's Office for Youth. The latter is especially valuable, as it allows MP to tailor its youth work according to its function as a trade union (INTVW3).

While national funding streams have enabled MP to set its agenda independently and to finance mainly educational and awareness raising activities (INTVW7), these were insufficient to elevate MP activists from their own precarity. Various (un)paid and time-consuming jobs drained activists and caused frustration and fluctuation, as explained by one activist in 2017:

There is administration within the union... there are expert issues... that would need to be paid... This is why we are all over the shop... One is currently in Brussels; I work on the radio... another one is self-employed... I am in crisis over that... I can only work like this for another year. (INTVW3)

In the early years there was major frustration among founding activists regarding their own precariousness and the confederation's unwillingness to employ MP activists and embed them into its own structures. Nevertheless, this has changed, while MP has also increasingly been successful in securing larger EU-funded social dialogue and European Social Fund or Youth Guarantee projects, which has allowed it to take on established and new activists as employees. Today, MP employs on average three to four activists funded through various temporary projects and regular Office for Youth programmes (INTVW7). In time, it has thus become a unique and more stable trade union project-based organisation, with a portfolio of integral and EU-funded projects related to youth politics or social dialogue which has also secured paid jobs for activists, a unique organisational identity, a mission and particular tasks within the confederation (Samaluk and Kall 2023).

## 2. Gaining influence outside ZSSS, and then inside ZSSS

MP became very influential in exposing rising youth unemployment and precariousness in the wake of the economic crisis after 2008. Its lobbying for an EU Youth Guarantee at national and EU level ultimately enabled Slovenia to receive EU funds to tackle youth unemployment and also allowed MP to be consulted regarding its implementation and involved in its evaluation (INTVW2). The primary focus in these early years was thus on active youth labour market policies, where they criticised subsidies for temporary placements that manufactured precarity and which also became utilised as quasi-internship schemes (Samaluk 2021). Here, MP worked along with self-organised students and unemployed graduates, some of whom joined it after seeing its organising efforts (Samaluk and Greer 2021). It continues to provide a critical assessment of the current implementation of the reinforced Youth Guarantee (INTVW7).

Newly available project funds, activists' proactive tactics and the adverse employment conditions faced by young people also brought MP access to pupils and students in educational institutions that, thus far, had been off limits for trade unions (INTVW2). MP now has an established network of secondary schools, with which it cooperates on a yearly basis, and it has also succeeded in 'getting trade unionism into the catalogue of elected subjects' (INTVW2). Following this entry to the formal curriculum and, later, through the introduction of compulsory classes on active citizenship that also cover the theme of youth employment, the demand for MP workshops increased enormously. These now involve around 1,000 pupils per year who are taught about 'precarious work, decent work, employment and social rights and trade unionism' (INTVW7). Through some higher education teachers, MP also has access to students in particular programmes and subjects. When they cover relevant themes, they also approach the Employment Office to refer the young unemployed to their workshops.

Apart from the workshops, MP uses other innovative and informal educational methods such as escape room-style sessions focused on labour market violations (INTVW1). MP's outwards-facing approach has enabled it to re-scale its activities in the area of apprenticeships and internships, youth unionism, advocacy and empowerment and to engage with young people in different Slovenian regions by implementing a travelling union school, having workshops in secondary and vocational schools in all Slovenian regions and by publishing podcasts, a magazine and educational material online and through mobile apps (INTVW4). Through these innovative outreach tactics MP has also increased the organisational power of unions by training new activists, developing regional councils (INTVW3) and increasing membership:

We get approximately five [new members] per workshop [...] mainly women, around 28, 29 years old, who all did precarious work, were on civil-law contracts or self-employed. (INTVW4)

Its outreach-oriented fieldwork has also allowed it to detect new problems related to the emerging platform economy, consequently stimulating attempts to organise the growing number of platform workers:

We wanted to organise them [...] and did fieldwork research on their working conditions, started talking to them and offering them our services [...] We also did a fieldwork campaign [...] Through this we built trust [...] but still nobody joined [...] But when Glovo and Wolt changed their payment system and lowered their rates [...] those three years paid off [...] and they came to us and asked us for help. (INTVW2)

Since 2023, MP has had a new member section of over 150 platform workers. Together with the confederation, MP is currently coordinating a transnational partnership project on 'establishing and strengthening social dialogue in digital platforms' designed to encourage the further organisation of platform workers, draft a proposal for a collective agreement and provide recommendations on the implementation of the Platform Work Directive in Slovenia (INTVW7).

Although MP is one of the smallest organisations within the Slovenian union movement, it is among the most prominent in terms of public exposure. Through its innovative communication tactics, including its use of social media channels (INTVW3) and other tactics perceived in union circles as 'unconventional', MP has substantially increased trade unions' capacity for dialogue. Consequently, it has been successful in changing the unpopular image of unions by showing that 'unionism can be different [...] that it is not about old men in the same positions for 30 years, but for young people wanting a better future and willing to fight for it' (INTVW2). Unlike traditional union work, based mainly on lobbying within social dialogue institutions, MP also effectively lobbies towards the institutions (INTVW5) and raises the political pressure (INTVW2) by using its web and social media communications channels innovatively.

Owing to this success, MP has, 13 years after its establishment, become recognised both outside and within the trade union movement. Nevertheless, policy transfer and learning about its tactics and practices among ZSSS's affiliated unions was not particularly straightforward. MP always had the support of the confederation's leadership, this being crucial for its establishment and survival, but affiliates were less convinced of its innovative tactics and practices in the early years, often questioning its focus on non-members and wider social groups and its consequent poor financial contributions in terms of collected membership fees. Yet, the agency of its motivated activists, combined with access to external project funds, enabled it gradually to develop expertise and to showcase its innovative approaches to the confederation and its affiliates.

Behind MP's success was a substantial amount of work behind the scenes with activists having to show persistence in internal conditions that were quite adverse at the outset:

When I now look back it seems easier [...] but in these ten years we were trying really hard and it took a very long time before we succeeded [...] It was neither easy to establish our position within the confederation, nor to succeed to put our themes on the agenda [...] Behind these results is hidden a lot of hard work. It is thus crucial that the leadership and affiliated unions are open. In reality often they are not [...] and you have to do a lot of rounds before they open up and it is questionable if you can afford that. If you don't have resources, funds, if one is not patient and motivated, one quits. Thankfully we haven't. (INTVW2)



While initially there was quite some suspicion, even resentment within ZSSS and its affiliates towards MP's tactics and practices, their successes gradually brought legitimacy. Internal recognition can thus be seen as a necessary precondition to facilitate policy transfer and learning. A significant development in internal recognition came in 2021 when MP became a full member of the confederation equal to all other affiliates. The importance of this lies in its demonstration that it had 'moved from being an experiment to becoming a strong and stable union that deserved to become a full member of the confederation... with formal voting rights' (INTVW7).

Internal as well as external recognition also brought policy transfers and learning that expanded the confederation's capacity for dialogue, alongside that of some affiliated unions, as well as its power resources. This will be explored in more detail in the sections that follow.

### **3. Transferring tactics and know-how on organising young and precarious workers**

The initial transfer of innovative tactics and practices focused on the methods of outreach and then organisation of the next generation. To facilitate and increase this policy transfer and learning across the confederation, MP activists, themselves in precarious positions, initially utilised temporary job training schemes for the unemployed to obtain placements within the confederation. In this way, they were able to conduct internal research among affiliates regarding their engagement with young workers and to prepare recommendations for them on how to engage the next generation (INTVW2). MP activists also put great effort into internal communication that would convince unions of their expertise, thus giving them legitimacy for their research into the practices of affiliates and for their recommendations (INTVW3).

As part of these efforts MP designed a handbook containing tactics on approaching, organising and involving the next generation in union work and then organised workshops for all affiliates:

The aim of these educational activities was to get affiliated unions to adopt their approaches towards youth, that they recognise youth, that they address themes relevant for youth, that they include youth, so they can become active members who take over certain tasks and responsibilities. We did this at the level of the confederation and according to the needs of specific affiliated unions. If an individual trade union invited us, we went directly to them [...] Evaluation showed that this was very beneficial for them. (INTVW2)

In showcasing their specialist knowledge, they opened doors to wider policy transfer and learning:

Initially this resulted in an invitation from some affiliated unions. It started with the workshops, when they saw that we know something they don't. (INTVW1)

MP's transfer of policy and know-how happened mainly among affiliates working in industries with growing precariousness and where the union leadership recognised the innovative approach of MP (INTVW2). The Trade Union of Metal and Electro Industry of Slovenia (SKEI, Sindikat kovinske in elektroindustrije Slovenije) was amongst the first to start cooperating closely with MP in order to utilise their tactics and know-how on engaging young people:

One of the first trade unions that opened to us was the Trade Union of Metal and Electro Industry of Slovenia [...] they invited us to their private workshops [...] Most often they wanted to hear how to get new young members. This was the starting point that opened all doors. (INTVW1)

Among the other unions in respect of whom there was policy transfer as a result of MP's activities are the Trade Union of Transportation and Telecommunication Workers (SDPZ, Sindikat delavcev prometa in zvez Slovenije); the Trade Union for Catering and Tourism Industry Employees of Slovenia (GIT, Sindikat delavcev gostinstva in turizma), the Trade Union of Public Utilities, Security and Real Estate Workers of Slovenia (SKVNS, Sindikat komunale, varovanja in poslovanja z nepremičninami Slovenije); the Slovenian Pre-school, Education and Research Workers Trade Union (VIR, Sindikat delavcev v vzgojni, izobraževalni in raziskovalni dejavnosti Slovenije); the Trade Union of Retired Persons of Slovenia (SUS, Sindikat upokojencev Slovenije); and the Trade Union of Retail Workers of Slovenia (SDTS, Sindikat delavcev trgovine Slovenije).

MP acted as transmitters of knowledge within the union confederation on how to reach out to the next generation of workers. MP also attempted to activate youth committees within affiliates that had become largely dormant or establish new ones but, apart from in SKEI, it was not successful in doing so (INTVW1). The reason for this is that many ZSSS affiliates with existing youth committees still failed to engage with non-employed young people in transition (INTVW1). Therefore, for most affiliates MP itself became seen as the link to the next generation and to precarious workers:

Through MP we expand our network, attract [young people] and raise awareness amongst precarious workers that they need to organise. (INTVW6)

MP thus effectively became not only a bridge between young people in transition, precarious workers and affiliated unions, it also connected trade unions to non-standard target groups including students, pupils, the unemployed, precarious and platform workers:

We are not a trade union that would have a member for the next 20 years. Youth is in transition and we always increased membership because we targeted certain groups. These could be interns [...] When there was high unemployment [...] we worked mostly on Youth Guarantee, now precarious workers, also platform workers in the last years. (INTVW2)

One of the major focuses in the early days was organising students and unemployed graduates in regulated welfare professions, where the government had cut the funding

for compulsory internships. Here, MP cooperated with VIR and some external sectoral unions and their youth committees in a campaign for paid government funded internships. The campaign brought some temporarily funded quasi-internship schemes, and in 2022 a return to government-funded internships in education (Samaluk 2023).

Due to the increasing precariousness in hospitality, MP has also cooperated with GIT, with the aim of organising the growing number of young precarious, and also migrant, workers in hospitality (INTVW2). Similar is its cooperation with SDTS, where many young student workers work alongside employed staff (INTVW2).

Policy transfers with regards to MP's outreach tactics has also occurred with regard to SDPZ in terms of organising precarious transport workers. This started with highly mobile truck drivers:

We cooperated with the Union of Transportation and Telecommunication Workers and introduced them to our fieldwork approaches [...] We also went out on the highways and talked to drivers there. (INTVW2)

SDPZ is also utilising MP's know-how on mobilising tactics to fight against emerging precariousness and a dual labour market for workers in postal services brought about by a new employer strategy (INTVW7). In 2021, when ZSSS started to place more emphasis on platform work, MP continued its cooperation with SDPZ, both to transfer know-how on innovative communications in the campaign against Uber in Slovenia (INTVW1) as well as to organise international conferences, events, webinars, a podcast on platform work and research on organising food delivery platform workers (Hladnik-Milharčič 2024; ZSSS 2022a; MP 2021). MP later also successfully unionised 150 platform workers and the result of this cooperation might see these workers transferred in the future to SDPZ (INTVW7). Since MP is not a representative trade union but a 'transition zone' for young and precarious workers on their way to unions, it does try to refer existing and emerging precarious members to affiliated sectoral unions:

We always said to affiliated unions that we intend to transfer these members over to them, once they get employed. With every notable exit, we gave them information that they could join affiliated unions. If we knew where they got employment, we recommended a specific affiliated union and notified it. Also, if already employed young people approached us to become members, we referred them to affiliated unions. (INTVW2)

Membership transfers are happening, especially in relation to some affiliated unions. Meanwhile, the planned digitalisation of membership at the level of the confederation will allow these to be more systematically followed up (INTVW1). However, transfers can still be difficult to materialise in practice. First, this is due to persistent and growing precariousness that hinders workers' transition into standard employment; and second due to the practice of some affiliates who are unwilling to service non-members who approach them with particular problems. While MP understands the internal politics regarding the servicing of members, it is critical of those unions that refuse such proactive workers; MP's success in opening up unionism to emerging problems and

attracting new members lies exactly in its openness towards all those who are willing to fight employer violations and improve their working conditions (INTVW7).

In cases where there are no affiliates within the confederation willing or suitable to take on such workers, MP does cooperate with other suitable trade unions outside the confederation.

#### **4. Transferring know-how on gaining alternative sources of funding**

MP is also occupied with effectively transferring know-how on gaining alternative sources of funding in the form of various projects, as explained by one former MP activist (who eventually became employed at the confederation):

I learned project work at MP [...] The confederation used to have projects before me, but I would call these political projects on social dialogue [...] this is not the same as applying for tenders at EU level where you need to actively look for partners, coordinate projects. (INTVW1)

This knowledge is being transferred to interested affiliates which are now able to access these external funds independently:

I helped the Trade Union of Metal and Electro Industry of Slovenia get this PIT number at EU level and involved them in three projects where they are partners [...] With them I have no work anymore; they now run these projects by themselves. (INTVW1)

The transfer of this knowledge made the confederation a more project-oriented organisation, resulting in an increase of external project funds that boosted the infrastructural resources of ZSSS and some of its affiliates, allowing them to address emerging issues better. In the period 2017-2022, the confederation secured 11 externally funded projects with (trans)national partnerships that covered issues such as social dialogue, posted workers, counselling for posted workers, establishing a network for fair working conditions for international transport workers, certification as a socially responsible employer, work-life balance, the gender pension gap, digitalisation and workers' participation in Slovenian enterprises (ZSSS 2022a: 41-44).

Projects are an important part of the confederation's strategy in the current programme period until 2027 (ZSSS 2022b). Recently ZSSS, in cooperation with MP, has managed to secure a transnational partnership project worth almost 500,000 euros on enhancing social dialogue in the area of platform work with partners in Poland, Austria, Italy and Belgium:

This is a total intertwinement of the confederation and MP, where MP brought the know-how... The confederation couldn't write this project by itself, also I alone couldn't [...]: I wrote it with a current and former MP activist. (INTVW1)

MP's knowledge of how to access external project funds thus brought the confederation and MP new organisational and societal resources to assess the situation in partnership countries, deepening their efforts to organise platform workers and institute protective mechanisms for them.

## **5. Transferring innovative campaigning and communication tactics**

Apart from its tactics towards engaging with young and precarious workers and securing external funding, policy transfer from MP also occurred in relation to its innovative campaigning and communication tactics, thereby increasing ZSSS and some of the affiliated unions discursive and organisational resources. Initially, ZSSS utilised this know-how to reach and organise precarious and mobile migrant workers also through social media (INTVW1). The confederation then temporarily hired an MP activist to run its campaign to change the definition of the minimum wage (INTVW3). In 2015, the activist involved explained her hopes and set out her attempts to revive the confederation's obsolete communications strategies and turn it into an effective discourse-oriented organisation:

What I tried to do at confederation level is to turn its webpage into an information portal; we took this upon ourselves also by including social media [...] The information side of our work is one of the most important. (INTVW1)

While ZSSS recognised quite early on MP's knowledge base and its capabilities as regards increasing the confederation's dialogical, communication and project capacities, it was not until 2017 that this know-how was permanently embedded into the union structure. Then, one of the founding activists of MP joined the new leadership team responsible for ZSSS's communications and project activities. There are currently two former MP activists employed in ZSSS's communication team (INTVW2) who are involved in modernising ZSSS's communications channels and organisational image. The scope of the activities has been sizable and has included: building a new website and a Facebook page; developing a mobile app; renewing its graphics; refreshing the newsletter *Workers' Unity*; introducing open days; publishing timely and relevant external communications; and taking steps toward the digitalisation of work processes and data management (INTVW1). It is also instituting a common information point that provides an overview of the information sought and given to (potential) members (ZSSS 2022a). All this has increased the number of followers and of views of the confederation's website and social media channels, and has improved its media image. Social media posts reach over 10,000 people per month and the website has 20,000 individual hits per month (ZSSS 2022a).

Gradually, MP's innovative communication policies also transferred to some affiliated unions who consequently renewed their websites and started using social media pages to attract new members, as well as activate and provide information to their existing ones:

Social media was the breaking point; it opened doors for us [...] The Trade Union of Metal and Electro Industry of Slovenia was amongst the first; for them we organised workshops on how to use Facebook, which they hadn't used previously and are now fully active there. They also renewed their website. The Union of Transportation and Telecommunication Workers renewed their website, when they discovered what they can do with it [...] They were completely mesmerised when I taught them about social media. They totally went for a Facebook page which they now have for members and it's fully active. Then the Trade Union of Public Utilities, Security and Real Estate Workers of Slovenia wanted a forum [...] The Trade Union of Retired Persons of Slovenia is now on Facebook! (INTVW1)

Moreover, MP's know-how on campaigning and its related organising power has now been transferred to some also initially unconvinced affiliates:

Here is a trade unionist [...] who used to look at us very sceptically, but when we and I, as PR, prepared a campaign to achieve equal pay for meals at work in utilities [...] and it was necessary to collect signatures for this initiative. And who gathered them? The MP [...] Therefore through certain activity, when they realise, they do not have this organising power but MP does, then you open doors. (INTVW1)

MP's organising power was further utilised in successful political actions by SKVNS, which now also employs one former MP activist (INTVW1).

MP's transfer of innovative and timely communications to the confederation has borne fruit in some unexpected ways. For instance, in the outbreak of the Covid-19 pandemic, the communications team reacted swiftly to collect and publish all relevant information for workers on the confederation's website. This was publicly available and the team addressed the inquiries of members and non-members alike during this chaotic time, which resulted in increased membership:

When Covid started we organised questions in one day [...] we had a new webpage in 12 hours [...] and we achieved something that is very difficult in this organisation, which is to make ourselves available for anyone for free regardless of membership [...] We then increased our membership by hundreds. We worked for free for about a month; we said, this is our solidarity contribution. (INTVW1)

Another example of opening up to non-members that can be effective in increasing membership are the confederation's open days, introduced by newly employed former MP activists in 2019 to showcase their work to the interested public (ZSSS 2022a). Open days are now organised on a yearly basis on International Workers' Day:

These days could have been a complete disaster, where no-one turned up or they were a complete media success [...] When we selected payslips, we had hordes of people queuing, because they wanted to know what is actually written in there [...] and this brought us new members, because it was open for all. (INTVW1)

These tactics offered non-represented workers new channels to learn about their rights and trade unions which, in turn, helped the confederation and its affiliates attract potential members.

Overall, MP advocates a more active trade unionism which can introduce union organisations to wider social groups and to economic, social, political and environmental issues relevant to the labour movement:

MP has an agenda [...] to change trade unionism [...] A return of unionism towards some kind of militancy [...] With our work we contribute to the confederation by putting this activism up front [...] We emphasise that unions shouldn't be closed structures, that they should not only represent typical workers [...] We broaden the themes, emphasising that environmental questions, questions of democracy, tax, health questions; all these are union questions. (INTVW2)

In this regard, MP activists also bring important new societal resources to the confederation as most of them were, prior to joining MP, involved in self-organised struggles or otherwise came from progressive student organisations or social movements addressing wider issues connected to emerging economic, social and environmental problems. For instance, one committed MP activist, also involved in the climate justice movement, was given the chance to lead on policy transfer concerning climate change and the green transition:

Exactly due to this overlap of membership, we managed to be the one who prepared the policy paper on climate change and just transition which was then accepted as the formal position of the confederation. This widened the scope of our work [...] Cooperation with civil society is very welcome for us and strengthens particular topics for which we don't necessarily have enough expert capacities by ourselves. (INTVW2)

MP thus utilises important new societal resources to effectively address emerging policy themes, which are then transferred also onto confederation. As part of these efforts MP also encouraged the confederation's leadership to attend the rally organised by Youth for Climate Justice (INTVW1).

## **6. Sustaining policy transfer through training new activists and revitalising the wider union movement**

MP has also itself become an entry point for the recruitment and training of new generation activists. Within the confederation's internal trade union academy, it was entrusted with the training of new activists and young trade union leaders (INTVW1). As such, MP is, according to one of its former activists, 'the best hatchery for new cadres' (INTVW2); and, to a union official with no MP connections, a pool from which the confederation and affiliated unions may recruit a new generation of activists and young leaders (INTVW6). According to current full-time officer within ZSSS, at least 10 to 15 former MP activists have been employed in the confederation or its affiliated unions at



some point in various positions (INTVW1), mainstreaming MP's knowledge in the areas of 'communications, fieldwork, expert or legal services' (INTVW2).

MP's role in revitalising the union movement has also become recognised beyond Slovenian borders. For instance, MP currently cooperates in a transnational Erasmus+ partnership project – Trade Unions: new impetus for youth participation (MP 2024) – coordinated by North Macedonian trade unions with partners from Bosnia and Herzegovina, Montenegro, Greece, Turkey and Serbia, where MP acts as an example of good practice (INTVW7). MP's approach to attracting and organising young people is thus now being transferred to unions in other European countries, and including larger western union confederations such as the German Trade Union Confederation (DGB, Deutsche Gewerkschaftsbund) and the Austrian Trade Union Confederation (ÖGB, Österreichischer Gewerkschaftsbund) (INTVW7). Moreover, MP's innovativeness has also been recognised at EU level: in 2019, the then MP leader was elected president of the Youth Committee of the European Trade Union Confederation; and in 2023 she became part of the ETUC's leadership team responsible for strengthening union youth structures and union renewal.

## **7. Conclusions**

This chapter has focused on the innovative union organisation of young and precarious workers in Slovenia via a case study of the hybrid trade union organisation Mladi plus. MP has been successfully operating for over 13 years within the largest Slovenian union confederation, ZSSS, first by providing a bridge between young people, precarious workers and trade unions; and second by transferring new tactics, know-how and power resources to the confederation and its affiliates so that they can more effectively organise the next generation, precarious workers and wider social groups.

The findings show that MP's unique, independent and project-based organisational form, which differs in important ways from traditional union youth committees, provides triangular access to both social dialogue and youth institutions as well as alternative sources of external project funding that can increase unions' institutional power resources. Moreover, its innovative organising tactics, awareness raising and communication strategies brought wider knowledge of emerging issues and enabled it to engage with young people in secondary schools and faculties, as well as precarious workers and wider social groups in transition. In this regard it has re-scaled union activities in the area of the (supra)national politics of youth employment, transitions and related active labour market policies and, lately also, of platform work which has also brought an increase in membership by young and precarious workers. Through its innovative communication tactics, MP has also substantially increased unions' capacity for dialogue to increase pressure and lobby institutions, and which has made unions more inviting to next generation and precarious workers.

MP's tactics and know-how have also been gradually transferred to trade unions operating in industries characterised by growing precariousness and, importantly, where the leadership is open to innovation. Such a transfer was, however, not

straightforward as MP initially met quite adverse internal conditions. This demanded a significant amount of persistence from motivated activists in order to obtain internal recognition of the value of their innovative approaches. With internal recognition, MP gradually became a transmitter of knowledge within ZSSS on how to engage with the next generation of workers, utilise proactive fieldwork and communication tactics to organise precarious workers, attract new members and better engage with existing ones, and gain support for political actions and campaigning, thereby boosting unions' organisational and discursive resources. The most important policy transfer has been to teach affiliates on engaging, organising and unionising these new groups of workers by using outreach-based fieldwork that goes beyond standard workplaces and the labour market, as well as through the innovative use of social media and other communications channels and the novel utilisation of additional sources of external funds to achieve these goals and address other emerging issues.

These policy transfers have become embedded in ZSSS and its affiliates through the re-activation of passive internal structures, the establishment and mainstreaming of new communication channels and the utilisation of new proactive tactics and external funds to organise young and precarious workers. Within the confederation, MP effectively became a structurally embedded bridge utilised either for particular campaigns or to organise and subsequently refer those workers to sectoral affiliates. Furthermore, MP has also acted as confederation's entry point for recruiting and training new activists and young union leaders. Coming from progressive student organisations or social movements, such new leaders bring with them new societal resources that open unions to the need to embrace economic, social, political and environmental issues which are relevant to the labour movement, thus also bringing renewal.

Overall, MP's transfer of tactics, know-how and its cadres has increased unions' organisational and discursive resources and their capacity for dialogue. Moreover, through transnational cooperation, MP's innovative approach is also being transferred to unions in other EU countries. The most important points to note from the case study in terms of policy transfer both internally and externally, and which might, in turn, make it valuable to as-yet unconvinced ZSSS affiliates and the wider international union movement, are MP's hybrid status and function within the confederation; recognition internally of its contribution; and its visible successes.

## **Note on method and data**

The chapter leans on critical policy transfer and the union power resource literature (Evans 2009; Hyman 2007; Lévesque and Murray 2010) to explore MP's innovative practices and policy transfer to the confederation and its affiliated unions. The analysis was based on in-depth interviews with seven MP activists and confederal and affiliated union officials (see Table 1). Several secondary data sources were used, including yearly reports and programme guidelines and other material available on the web and social media sites of MP and ZSSS. Initial fieldwork was carried out in Slovenia in 2015, followed by six new or follow-up interviews up to 2024, these being conducted in Slovenian and then transcribed and thematically analysed through the process of

coding and categorisation into relevant themes (Charmaz 2006). The data was then translated into English. All the quotes have been anonymised, as has information on respondents’ relationship with the confederation or its affiliated unions and the year of the interview.

Table 1   **Conducted interviews**

Identifier	Year	Function
INTVW1	2015, 2024	(Former) MP activist
INTVW2	2015, 2024	(Former) MP activist
INTVW3	2015, 2017	MP activist
INTVW4	2017	MP activist
INTVW5	2015	Confederation officer
INTVW6	2019	Secretary of affiliated union
INTVW7	2024	MP activist

Source: author’s elaboration.

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Cite this chapter: Samaluk B. (2025) Slovenia – Achieving policy transfer in the organisation of young and precarious workers, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Abbreviations

<b>GIT</b>	Sindikat delavcev gostinstva in turizma (Trade Union for Catering and Tourism Industry Employees of Slovenia)
<b>SDPZ</b>	Sindikat delavcev prometa in zvez Slovenije (Trade Union of Transportation and Telecommunication Workers)
<b>SDTS</b>	Sindikat delavcev trgovine Slovenije (Trade Union of Retail Workers of Slovenia)
<b>SKVNS</b>	Sindikat komunale, varovanja in poslovanja z nepremičninami Slovenije (Trade Union of Public Utilities, Security and Real Estate Workers of Slovenia)
<b>MP</b>	Sindikat Mladi plus (Trade Union Youth Plus)
<b>SUS</b>	Sindikat upokojencev Slovenije (Trade Union of Retired Persons of Slovenia)
<b>VIR</b>	Sindikat delavcev v vzgojni, izobraževalni in raziskovalni dejavnosti Slovenije (Slovenian Pre-school, Education and Research Workers Trade Union)
<b>ZSSS</b>	Zveza svobodnih sindikatov Slovenije (Association of Free Trade Unions of Slovenia)



## **Part IV**

### **Conclusions and reflections**





## Chapter 10

# Union rebels with applause. Comparing policy transfer processes for union revitalisation in Europe

Kurt Vandaele

This concluding chapter examines how the processes of policy transfer unfolded in the union organisations featured in the qualitative case studies presented in this volume.<sup>1</sup> Based on an interpretative, comparative analysis guided by the established framework of Dolowitz and Marsh (1996, 2000), along with subsequent critical developments on the framework (Benson and Jordan 2011; Dussauge-Laguna 2012; James and Lodge 2003; Marsh and Sharman 2009), the chapter aims to integrate the findings and to assess the extent to which these transfer processes have contributed to union revitalisation. In addition, insights on how innovations are diffused, paired with others drawn from the strategic capacity of trade unions and their organisational learning processes, further inform the mapping exercise and analytical approach (see also Chapter 1).<sup>2</sup> Policy transfer is understood here as the process through which ideas, knowledge and practices are borrowed and adapted from one context to another, across time or place, to address specific challenges or problems. The analysis is structured around five central questions that unpack this, distinguishing between the process and its outcomes aimed at union revitalisation:

- Why are trade unions engaging in policy transfer?
- What kind of ideas, knowledge or practices are being transferred?<sup>3</sup>
- From where do the ideas, knowledge or practices for policy transfer originate?
- Which actors are involved in the policy transfer process?
- What factors constrain or facilitate successful policy transfer?

From the cross-case analysis, four key arguments emerge, each contributing to a broader understanding of how trade unions innovate and adapt in changing environments.

First, while trade unions create space for experimentation by framing environmental pressures through narrative resources, their embeddedness in diverse networks serves as the primary conduit for transferring innovations. Notably, this network embeddedness includes internal solidarity, or the relationships among the rank-and-file within unions themselves (Lévesque and Murray 2010). Union activists emerge here as major sources of innovation, underscoring the importance of union democracy in

- 
1. Note at the outset that the case studies – eleven in all – do not necessarily map directly to the chapters, some of which contain more than one.
  2. Organisational learning is essentially a reification as learning occurs only through individuals within organisations rather than by the organisations themselves.
  3. One aspect that is far less discussed here is the extent of policy transfer – namely, whether the policy is merely copied or emulated from one context to another, or whether it has undergone changes (to varying degrees). This distinction requires a research design and methodology capable of detecting the nuances in utilisation between the policies of the borrower and the lender.

fostering revitalisation efforts. They are labelled here, perhaps somewhat romantically, as ‘union rebels’ (see also Child et al. 1974). They typically constitute a ‘militant minority’ within unions but their efforts have historically been a driving force for revitalisation experiments (Uetrict and Eidlin 2019). These case studies reveal a crucial limitation, however – union rebels cannot succeed on the strength of their initiative alone: their experiments and innovations must be met with applause – that is, with organisational support – which manifests itself in three essential conditions.

This leads to the second argument: successful policy transfer depends on the alignment of three internal conditions within trade unions (see also Fletcher and Hurd 2001). These are: (1) supportive leadership with a long-term vision; (2) adequate infrastructural resources; and (3) the organisational capacity to test, adapt, scale and embed innovation through organisational learning. In the absence of this threefold organisational support, union rebels’ initiatives for innovation and policy transfer tend to crash or, at best, falter rather than flourish. These internal dynamics interact with external conditions, influencing both the processes and outcomes of policy transfer.

Third, policy transfer processes often seem to follow a three-stage developmental trajectory: emergence, diffusion and institutionalisation. Revitalisation experiments are scaled out and up within a select number of union structures before being formalised and integrated into established frameworks.

Fourth, policy transfer both reflects and reshapes unions’ capabilities in mobilising power resources, which constitute their strategic capacity and propel their ongoing development (Ganz 2000; Lévesque and Murray 2010). In other words, the innovations shared through this process can strengthen that capacity and sometimes lead to a cycle where early successes create new resources and support for more innovation. This circularity extends beyond individual unions: adopters of innovative practices can, in turn, become transmitters, spreading policies, methods and tactics across organisational and national contexts.

Together, these arguments shed light on how internal organisational dynamics – in particular, the role of union rebels – interact with external networks to inform unions’ capacity for adaptation and revitalisation. By exploring the conditions under which policy transfer supports union revitalisation, this chapter offers both considerations and perspectives for trade union organisations seeking to strengthen their strategic capacity and influence.

## **1. Environmental pressure: motivations and reasons for policy transfer**

Trade unions face increasing disruptions and tensions in the regulation of work and employment today (Fairbrother 2015; Laroche and Murray 2024; Murray et al. 2013, 2020). These pressures are, however, creating room for union revitalisation experiments. A key resource of union power in responding to these pressures and seizing opportunities for revitalisation is the strategic use of their narrative resources.

As Laroche and Murray (2024: 220) observe, unions employ narratives to ‘construct an overarching narrative, one centred on core values and often rooted in a union’s original foundations’. Through narrative development, unions aim to build a shared understanding of changing external conditions. This framing process serves several purposes: it enables members to interpret complex shifts in the union environment through diagnostic framing; it opens the space for experimentation aimed at union revitalisation; and it provides cognitive guidance for future action via prognostic framing (Coderre-LaPalme 2024; Frege and Kelly 2003).

Crucially, rooted in a union’s ideology, organisational history and institutional context, union identity informs how these external pressures are interpreted and which strategic choices are considered legitimate or viable (Coderre-LaPalme 2024; Hodder and Edwards 2015; Hyman 2001). Union identity influences how unions perceive threats and opportunities, frame challenges and evaluate innovations for revitalisation. However, while the role of union identity is acknowledged, the case studies in this volume primarily focus on the innovations and policy transfers themselves. These are largely motivated by pressures on workers’ associational power and unions’ own organisational basis. Although the challenges share broad similarities across national contexts, they are moulded by local and sectoral dynamics as well as country-specific industrial relations regimes. The diffusion of innovations, both within and across unions, is similarly mediated by nationally specific opportunity structures and conditioned by the strategic actions of employers and the state. These motivations can be analytically grouped into three main, though often interconnected, categories.

First, the *fear* of declining union membership is a recurring theme in all the case studies. Like other pressures, this concern must be contextualised and its significance situated within specific organisational and institutional arrangements. For instance, competitive dynamics between trade unions influence approaches to organising across different countries. In Belgium, union competition during social elections directly influences organising strategies. In Italy, rivalry between the Federation of Commerce, Hotels, Catering and Services Workers (FILCAMS CGIL, Federazione Italiana Lavoratori Commercio, Alberghi, Mense e Servizi) and grassroots unions reflects the pluralist nature of national unionism. Similar tensions shape the dynamics at Amazon Poland, where Workers’ Initiative (OZZIP, Ogólnopolski Związek Zawodowy Inicjatywa Pracownicza) competes with other unions.

Beyond inter-union competition, both low and high density union environments face membership decline challenges. However, context is crucial: relative change can be more telling than absolute numbers. For instance, density at Denmark’s Billund Airport fell from around 90% pre-pandemic to 50–55% post-pandemic, a dramatic proportional decline despite starting from a strong position. Similarly, union membership at Copenhagen’s Hotel and Restaurant School almost halved, urging 3F (the General Workers Union), involved in both these cases, to prioritise organising young workers in the hospitality industry. Despite these concerning trends, it is important to note that those Danish unionisation rates remain high by international standards. This contextual factor influences how unions interpret and respond to membership challenges.

Indeed, many of the trade unions in the case studies operate in notoriously hard-to-unionise sectors. Here, they face particular difficulties in organising young and precarious workers, often with a migrant background, who are typically employed in fissured workplaces (Weil 2014). Several cases highlight how high turnover among workers creates significant barriers to organising, something which is especially evident in Hungary's retail and social care sectors, as well as in the transport sector in Belgium. Furthermore, the precarious nature of employment creates additional organising challenges across multiple contexts. In France, concerns arise regarding 'isolated' workers in small companies. In Italy, seasonal and temporary workers in tourism and hospitality often face illegal employment practices. Similarly, the workforce at Amazon in Poland confronts precarious conditions that complicate unionisation efforts (see also Zanoni and Miszczyński 2023). Meanwhile, young people in their transition from education to work, and other precarious workers, encounter comparable issues in Slovenia that hinder their union membership.

Second, company strategies are also of influence: union avoidance and union busting are widespread, especially in Central and East European (CEE) countries. An e-commerce giant like Amazon is exemplary in this regard as being notorious for thwarting unions like OZZIP. This Polish case study shows, however, how OZZIP, a grassroots union, reassessed its strategic approach after a failed strike attempt. Furthermore, some cases demonstrate how union representation in small and medium-sized enterprises is often absent, such as in France's private services sector and Italy's tourism industry. In contrast, other contexts offer more favourable conditions: for example, longstanding union access has enabled successful mobilisation in hospitality in Denmark. These differences demonstrate the importance of institutional settings in structuring how unions respond to external pressures.

Third, labour market dynamics, regulatory shifts and broader socioeconomic changes are contextual factors also tied to the drivers of policy transfer. For instance, labour shortages following the Covid-19 pandemic have opened space for innovations in several contexts. In Denmark's hospitality sector and Italy's tourism industry, tighter labour markets have strengthened unions' bargaining leverage, making employers more responsive to their demands. Conversely, in Hungary, the pandemic exacerbated workplace stress and health risks in retail and social care; such workplace safety concerns created new challenges but also established a more favourable context for unions' organising efforts. In Slovenia, young people were disproportionately affected by unemployment and precarity after the government implemented austerity measures to counter the post-2008 debt crisis.

Last but not least, regulatory changes have altered the terrain for some trade unions in the case studies. The Belgian Union of Transport Workers (BTB/UBT, Belgische Transportbond/Union Belge du Transport) has faced deteriorating employment conditions in road transport, partly due to EU liberalisation policies dating back to the 1990s. EU enlargement has further intensified competition in the sector, which is often perceived as unfair by workers and their representatives. In Czechia, legal and administrative hurdles have made it harder to establish company-level unions, pressing the Metalworkers' Union (OS KOVO, Odborové sdružení KOVO) to reassess

its organisational structures. Additionally, political factors have also informed union responses. In Hungary, the deliberate political assault on the industrial relations regime has undermined the industrial power resources available to the trade unions (see also Meszmann and Szabó 2023), a hostile environment which has forced them to explore alternative power resources and strategies. Finally, demographic and technological changes present further challenges. In France, demographic change has contributed directly to membership decline, as a substantial number of the members of the General Confederation of Labour (CGT, Confédération Générale du Travail) leave the union upon retirement without equivalent replacement. Meanwhile, technological disruption is playing a central role in the case of Amazon Poland, fundamentally reshaping employment relations and forcing OZZIP to develop new strategic approaches.

All these challenges have founded the base for intentional and voluntary policy transfers aimed at developing effective responses.

## **2. Content: what kind of ideas, knowledge or practices are being transferred?**

Before reviewing the specific content of the policy transfers, it is necessary to establish three key analytical considerations.

First, it is essential to distinguish conceptually between union strategies and the specific policies, methods and tactics employed by unions. Union strategies relate to the organisation's overarching purpose 'in relation to the evolving arrangements in the political economy of capitalism' (Fairbrother 2015: 573), while policies and tactics refer to more narrowly defined courses of action to achieve those strategic aims. Research on union revitalisation underscores the importance of this distinction (Simms and Holgate 2010). Rather than incorporating 'best practice' as a quick fix to immediate challenges, effective revitalisation efforts must be anchored in broader, long-term strategic thinking (Gumbrell-McCormick and Hyman 2010; Turner 2005). These strategic choices are not only shaped by external pressures but also by identity, which influences how challenges are understood and what strategies are viable. Without this clarity of purpose, union strategies and their implementation risk becoming disconnected and ineffective. In this sense, successful union revitalisation should be understood as 'an integrated process involving a dialectic whereby union members reassess their organisation, their capacities, and their purpose as collective actors' (Fairbrother 2015: 572).

Second, innovations in policies, methods and tactics are rarely adopted in a one-to-one manner. Instead, they are more often combined with, and layered upon, existing traditional ones, reflecting path-dependent organisational preferences consistent with union identity (Coderre-LaPalme 2024; see also Mrozowicki and Maciejewska 2017). However, organisational learning may ignite processes that gradually shift this pattern (Hyman 2007).

Third, it is evident from the case studies that several policy transfers have generated secondary effects. In other words, initial transfers have spurred further innovations aimed at union revitalisation, creating cascading patterns of change.

The previous section demonstrated that the perturbations in most of the case studies primarily relate to the organisational and membership dimensions of union revitalisation (Behrens et al. 2004; also Chapter 1). Yet, it is also evident that some policy transfers extend into the economic and political dimensions. Several cases demonstrate accompanying changes in bargaining processes: the Danish and Hungarian studies showcase procedural innovations through ‘open bargaining’ techniques increasing transparency in the negotiation process and aiming to enhance member participation throughout the process (see also McAlevey 2020); in the Italian case study, FILCAMS CGIL successfully revived collective bargaining in the tourism and hospitality sector.

A more detailed distinction can be made, however, between three intersecting strategies to which the transferred ideas, knowledge and practices are connected: (1) re-engineering organisational forms; (2) modifying repertoires of collective action; and (3) launching organising initiatives.

The first union strategy, the re-engineering of organisational forms, includes three case studies linked to a bottom-up rethinking of internal union structures. A first example is the ‘grouping of members’ model in Czechia, developed within OS KOVO’s regional centres. Since 2013, this model has supplemented traditional basic organisations at establishment or company level, long the backbone of Czech unionism. The grouping of members offers two advantages over basic organisations. First, it ensures greater continuity in union membership as workers move between jobs and companies. Second, it provides anonymity in union affiliation, creating an alternative to the check-off system deeply embedded across many CEE countries.<sup>4</sup> France provides the other two examples: union activists within CGT have initiated separate organisational innovations to organise a fragmented and precarious workforce: ‘site unions’ have been operational since 2008; ‘inter-company unions’ were established in 2020. These organisational forms serve distinct purposes: site unions unite all unionised workers within a specific geographical location, such as a shopping centre; inter-company unions, meanwhile, recruit and represent ‘isolated’ workers in firms tucked away from union representation. Both forms thus combine geographical and inter-occupational organising criteria and offer an alternative to the traditional company union model within CGT.

Second, repertoires of collective action have also evolved as the three following case studies demonstrate. Since 2008, BTB/UBT has employed ‘roadshows’ as an outreach strategy. These mobile events enable full-time officers (FTOs), lead organisers and union activists to engage with workers, identify concerns and offer legal or other support. As an alternative to a traditional style of unionism based within a workplace, the roadshows are especially suited to the mobile nature of transport sector work.

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4. Notably, abolishing the check-off system is seen as a potential burden, making member recruitment and retention more challenging in other contexts, such as Hungary. Furthermore, check-off systems are present as well in western Europe, for instance in Italy.



Similarly, Italy's FILCAMS CGIL has expanded its repertoire with the 'Tourism Upside Down' ('Turismo Sottosopra') campaign, involving the deployment of branded union campervans at tourist hotspots to raise awareness about the challenges facing seasonal and temporary workers in the tourism and hospitality sector. This recurrent summer campaign combines mobile service provision with organising, designed to increase union visibility and engage public stakeholders in the improvement of employment conditions in the sector. While the Belgian and Italian initiatives resemble the methods and tactics of a US-style organising approach, the next example from Amazon Poland shows how the strategic litigation approach of OZZIP stemmed from a strike attempt which failed to meet the stiff tests of the Polish legislation. OZZIP has also developed campaigns around occupational safety standards to reduce physical workloads, which have been expanded nationally, beyond the Amazon site, and transnationally.

Lastly, the subsequent case studies are more explicitly aligned with the US-style organising approach. As outlined in Chapter 1, this arguably represents the most prominent instance of policy transfer between trade unions. From a broad, distant perspective, the adoption of US-style organising approaches by European unions could be viewed as a form of policy convergence (Ibsen and Tapia 2017). Closer examination, however, reveals more nuanced applications: policy transfers are not just about copying methods, tactics or practices but are instead about context-specific adaptations (see, for instance, Aguiar 2023).

In Denmark, shop stewards and local branches of 3F have been instrumental in introducing two policy transfers, partly influenced by negative and positive experiences with the organising approach. The case at Billund Airport has less in common with a more aggressive approach towards member recruitment. The inclusion of a 'member-only benefit' in the form of a pay supplement to union members in company-level collective agreements was framed as an instrument for less adversarial relationships with management, such as benefits functioning as additional compensation to offset union fees and encourage retention. In contrast, the second case is more in line with the organising approach as it entails a shift from a transactional to a participatory union-member relationship (see Holgate et al. 2018). 3F developed 'methods and tactics for engaging young people in collective bargaining', aiming to make the process in the hospitality sector both more inclusive and more transparent.

Three other cases relate to the US-style organising approach come from trade unions in CEE countries. In Hungary, the approach is referred to as 'participatory organising' to distinguish it from earlier member recruitment practices based on solely instrumental relationships. Participatory organising has been quite recently transferred to two unions: the newly established Trade Union of Social Care Workers (SZÁD, Szociális Ágazatban Dolgozók Szakszervezete), for whom member recruitment is essential to survival; and the more established Trade Union of Commerce Employees (KASZ, Kereskedelmi Alkalmazottak Szakszervezete), which is seeking to expand its membership base in a low-density sector. Finally, Trade Union Youth Plus (MP, Szindikat Mladi plus) aims to connect young and precarious workers with the affiliated unions of Slovenia's largest union confederation, the Association of Free Trade Unions of Slovenia (ZSSS, Zveza svobodnih sindikatov Slovenije). Initially founded as an independent organisation in

2011 by young activists with experience in social movements, MP serves as a platform for the diffusion of ideas, knowledge and practices around union revitalisation labelled ‘proactive fieldwork’. While MP could in itself also be conceived as a re-engineering of union structures, its place was originally different from ZSSS-affiliated unions with the aim of bringing innovation incrementally to those unions showing an interest in doing things differently. MP was, however, formally integrated into the confederal structures of ZSSS in 2021.

To conclude, aligning with earlier research on union revitalisation (Bernaciak and Kahancová 2017; Murray et al. 2020), the case studies confirm that policy transfers are not confined to particular sectors, union types or institutional contexts. Their sectoral scope spans diverse industries including commerce and retail in France, Hungary and Poland; health and social work in Hungary; hospitality and tourism in Denmark and Italy; the metal industry in Czechia; transport in Belgium and Denmark; and across a wide range of sectors, metals and transport among them, in Slovenia. The organisational diversity is equally striking. The transfers involve not only grassroots unions like OZZIP but also mainstream unions that researchers are perhaps less likely to recognise as revitalisation pioneers.<sup>5</sup> Furthermore, resource capacity also varies significantly among the unions engaged in policy transfer. The cases include unions of all sizes, from small to large. Some participating unions operate with limited infrastructural resources while others possess substantial financial and organisational capacities. Finally, policy transfers manifest in unions operating within fundamentally different industrial relations regimes, each offering distinct configurations of institutional power resources. This suggests that policy transfer can occur across a wide range of systemic contexts despite the institutional differences.

### **3. From where: the significance of network embeddedness**

All of the case studies demonstrate that the circulation of new ideas, knowledge and practices is strongly contingent on the network embeddedness of the union organisation (see also Rogers 2003; Wejnert 2002).<sup>6</sup> Leveraging internal interconnectedness, or relationships with other organisations as a union resource, requires capabilities such as framing, to identify common interests and influence shared understandings, and intermediation, to build cooperation between multiple actors and enable collective action (Kall et al. 2019).

When analysing policy transfer, two important distinctions in these networks should be considered. First, a distinction should be made between horizontal and vertical networks (Lévesque and Murray 2010), implying that policy transfers occur either among similar organisational levels or between different levels within the union hierarchy, respectively. Second, it should be distinguished whether such networks function on a national or

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5. Yet, there may be valid reasons for this: assuming that left-leaning actors are generally more receptive to new ideas, the tendency of mainstream unions to be relatively less radical than grassroots unions may account for their comparatively lower openness to innovation.

6. This union power resource largely corresponds to coalitional power as defined within the power resource approach.



transnational scale, and consequently under which influence(s) the policy transfer is realised.

To uncover the network patterns emerging from the cases, each union organisation discussed in the studies is mapped according to these two dimensions of network embeddedness. Table 1 summarises the outcome of this exercise and reveals cross-cutting patterns that shape policy transfer dynamics.

Table 1 **Mapping policy transfers in union organisations along network dimensions**

		Direction	
		Horizontal	Vertical
<b>Scale</b>	<b>National</b>	3F; BTB/UBT; CGT; FILCAMS CGIL; KASZ; MP; OS KOVO; OZZIP; SÁDS	(CGIL); (FH); FILCAMS CGIL; (MASZSZ); (ZSSS)
	<b>Transnational</b>	KASZ; MP	KASZ; SÁDS

Source: author's elaboration.

Before presenting the analysis in more detail, four observations are warranted.

First, national-level networks may include the union organisation itself, reflecting internal networks of solidarity among union activists and members, and collective creative thinking within the union organisation (see Ganz 2000; Lévesque and Murray 2010). Second, inspiration for policy transfers may be multifaceted. This implies that union organisations could be placed in more than one cell in Table 1 regarding their network embeddedness. Accordingly, an organisation that is put between brackets indicates that embeddedness is present in the policy transfer but is considered less dominant. Third, the intensity of network embeddedness cannot necessarily be generalised to the entire union organisation, as the mapping exercise focuses exclusively on the policy transfer and does not account for other union strategies (in other dimensions of union revitalisation).<sup>7</sup> Finally, there is limited quantitative network data available in these qualitative case studies regarding the basic network indicators as put forward by social network analysis (see Martí et al. 2022). The findings presented in this section are therefore descriptive and explorative: at this stage, it is not possible to verify empirically whether ideas, knowledge and practices flow more extensively through union organisations characterised by higher connectivity as opposed to those with fewer links.

Based on the case studies and the binary mapping of network relationships in Table 1, five observations emerge regarding the significance of network embeddedness in the policy transfer process: (1) the dominance of national horizontal links; (2) the relatively limited role of union confederations; (3) the significance of transnational networks for trade unions in CEE countries; (4) the functions of external domestic actors close to unions, blurring the distinction between internal and external learning; and (5) the bidirectional nature of some policy transfers. Each is discussed in detail below.

7. This remark accounts in particular for CGT and, to a lesser extent, 3F and OS KOVO.

First, as is visible in Table 1, national horizontal links are pivotal in all policy transfers. While transfers are commonly associated with ‘learning from abroad’, the clustering of union organisations in the top left quadrant demonstrates that transfers have at least some domestic roots in the cases examined. Such transfers suggest the involvement of union activists or local and regional structures – labelled above as ‘union rebels’ – in union revitalisation experiments. While those bottom-up dynamics cannot exclude that inspiration at the level of the individual comes from personal networks with a transnational dimension, the horizontal channels for policy transfer suggest the significance of mechanisms that support internal democracy within unions (Hyman 2007; Lévesque and Murray 2010). Democratic experimentation seems evident in particular in the BTB/UBT roadshows where the policy transfer is ‘home brewed’ as it was activists from the union itself who initially launched them.<sup>8</sup> The Danish case study on the inclusion of member-only benefits in company-level collective agreements points to strong horizontal embeddedness within 3F and the leeway given to its shop stewards.

The presence of many union organisations in multiple categories suggests that national connections are rarely the sole source of inspiration, however. So, while 3F shop stewards did initiate open and transparent collective bargaining in the hotels and restaurant sector, it is the US-style organising approach that lingered throughout the policy transfer (see also Arnholtz et al. 2016). The importance of horizontal transnational links in understanding policy transfer applies as well to FILCAMS CGIL. Here, the ‘street unionism’ exemplified by Tourism Upside Down equally shows the inspiration of the organising approach, although national vertical and horizontal connections were of more direct influence upon the campaign. Whereas the union leadership was initially inspired by outreach activities in agricultural labour contexts, both the leadership and local and regional union structures are now jointly involved in processes of organisational learning based on feedback loops. Notably, such an entente between leadership and activists is largely lacking in CGT: the latter are, rather, union rebels without much applause as it is almost solely individual activists who are pursuing alternative organisational forms and navigating the structures.

The significance of national horizontal policy transfer is not confined to trade unions in western Europe – all the union organisations in CEE countries illustrate this point. In Czechia, a regional centre in OS KOVO pioneered the grouping of members in 2011 as an alternative organisational form, drawing inspiration from Germany’s IG Metall which operates in the same economic sector. In Hungary, relying on international experience and connections, individual young union activists in both KASZ and SÁDS have adopted the organising approach. The domestic Solidarity Economy Centre (SZGK, Szolidáris Gazdaság Központ) in Budapest, while external to these unions, has adopted a facilitating role in spreading the approach. In Poland, policy transfer within OZZIP originated within the Amazon local itself. This aligns with research indicating that members of politicised grassroots unions are predominantly active rather than passive (Connolly et al. 2014; Però 2020). In Slovenia, MP provided the impetus for policy transfer based on organising methods and tactics.

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8. It should be noted, however, that the union also benefits from strong transnational links, both horizontal and vertical, in other areas of interest.

Second, as examples of national vertical embeddedness, union confederations are underrepresented or less visible, at least in the policy transfers considered here. This may partly stem from the case selection, but there are nevertheless some important exceptions. The most prominent confederal role seems to be reserved for ZSSS, which supported MP in its endeavour to promote new organising methods and tactics across interested affiliates. Two other confederations, CGT and OS KOVO, have put the subject of policy transfer in their internal statutes although, in practice, this has not been fully advanced in either. Furthermore, the influence of the US-style organising approach within FILCAMS CGIL does partly result from the engagement of the confederal level with the approach. Finally, as examples of scaling up processes, the Danish Trade Union Confederation (FH, Fagbevægelsens Hovedorganisation) has given a recognition award to the local campaign in the hospitality sector, while the National Confederation of Hungarian Trade Unions (MASZSZ, Magyar Szakszervezeti Szövetség) has recently taken on a role in diffusing participatory organising by offering training programmes.

Third, a number of policy transfers highlight the importance of transnational networks for trade unions in CEE countries.<sup>9</sup> The pattern of these unions learning from abroad is not unique to the case studies covered here; previous research on the organising approach (Kall 2024) and other union revitalisation experiments (Bernaciak and Kahancová 2017) has emphasised similar dynamics. One of the Hungarian case studies explains this pattern as the result of ‘institutional inertia and the absence of financial resources’ (Chapter 9). This points to a key analytical distinction between unions’ infrastructural resources and other resources of relevance. Infrastructural resources may attract external support given the challenging financial situation of many CEE unions.

Transnational networks could function horizontally or vertically, or both, as demonstrated by KASZ, MP and SÁDS. Horizontally, the embeddedness of KASZ in networks abroad has been instrumental for the policy transfer of participatory organising with a specific catalyst being attendance at an international conference organised by IG Metall, Germany’s most important union with vast resources, illustrating the significance of interpersonal channels.<sup>10</sup> This event sparked new ideas on the organising approach. In addition, KASZ secured financial resources through a commerce union in Denmark, further enabling implementation. The Slovenian case study suggests that inspiration on methods and tactics with the organising approach has been taken from abroad via the experiences of MP activists through their involvement in European union organisations.

Equally, transnational vertical relationships also play a role. The findings from Hungary illustrate this dimension clearly. Both KASZ and SÁDS closely cooperate with the transnational Central Europe Organising Centre (COZZ, Centrum Organizowania Związków Zawodowych), the main organising centre set up in Poland by UNI Europa (De Spiegelaere and Egan 2024), and which secured the funding for KASZ organisers.

9. Transnational linkages appear to have played a less significant role in the policy transfers of the union organisations examined here in western Europe; again, this might be partly explained by case selection.

10. The Czech case on the grouping of members suggests that OS KOVO has also taken inspiration from its horizontal links with IG Metall; yet, perhaps tellingly, further tangible transnational embeddedness is absent in this policy transfer.

This vertical relationship provides essential support and expertise for implementing new organising approaches. The case of OZZIP demonstrates nevertheless that policy transfers can also emerge internally within CEE countries, without direct external involvement. Yet, OZZIP maintains ties with transnational activist networks, reflecting the pattern of such politicised grassroots unions operating beyond national boundaries and engaging with forms of leftist internationalism (Connolly et al. 2014; Però 2020). This transnational orientation may indirectly influence innovation, even when the immediate source is internal.

These examples of transnational influence among some trade unions in CEE countries complement the earlier observation regarding the significance of national horizontal networks. The evidence suggests that policy transfers in those unions are not purely transnational; rather, innovative ideas, knowledge and practices often emerge from a blend of domestic, local and transnational linkages. This points to a form of network hybridity characterising some policy transfers in CEE countries as best exemplified in the Hungarian cases.

Fourth, external, union-related actors contribute to the policy transfer process in several CEE countries. While the transnational organisation COZZ played a key role in transferring the participatory organising approach to the two Hungarian trade unions, the domestic organisation SZGK has been similarly instrumental in diffusing and sustaining it. In the Slovenian context, MP seems to function as the equivalent of SZGK (and COZZ). Although it receives support at confederal level, MP operates as a semi-autonomous space and remains largely external in how it introduces organising methods and tactics to ZSSS affiliates. What unites these intermediary organisations – SZGK and MP – is their position outside formal union hierarchies while nonetheless maintaining close relationships with them. They, together with COZZ, offer specialist expertise and culturally attuned guidance. Their proximity to unions allows them to introduce innovations with enough independence to shield these from immediate internal pressures. Put differently, as hybrid intermediaries, they blur the line between internal and external learning and help advance unions in their revitalisation efforts.

Fifth, bidirectional policy transfers indicate the complexity of network relationships, extending beyond the simple mapping presented in Table 1. These findings suggest that successful policy transfers rarely operate at a single geographical scale: the flow of innovations operates in multiple directions. Ideas, knowledge and practices developed at transnational level are interpreted and adapted within national contexts. Simultaneously, innovations from national settings diffuse into transnational arenas, creating circular patterns of influence. Adopters then become transmitters and inspire others. OZZIP is a particular example of this, having become involved in transnational networks of activists in Amazon, both with similar grassroots unions and with the Amazon Global Alliance steered by UNI Global. Similarly, MP has gained international recognition, with union organisations in neighbouring countries expressing interest in its approaches. Finally, apart from the historical, long-established transnational cooperation of BTB/UBT with like-minded unions across Europe and its vertical links with European and global union federations in transport, its own track record, as almost

the only trade union still winning members in Belgium, might have provoked further interest in the union's repertoire of collective action.

#### **4. Mechanisms: who is involved in the policy transfer process?**

This section examines the actors involved in the dynamics of policy transfer within the union organisations featured in the case studies.

The cases reveal distinct yet interconnected stages of the transfer process, indicating a temporal dimension in the diffusion of union innovations. Three iterative stages are considered inductively. The first involves the emergence and initial testing of (bottom-up) revitalisation experiments at the lower tiers of the union organisation. The second concerns the diffusion of those innovations across the union's organisational structure, either horizontally to other local units (scaling out) or vertically to central structures (scaling up). The third stage relates to the structural embedding and long-term sustainability of the transfer; namely, its formal integration into union routines, for example through training and education programmes. While the articulation of actions across time and organisational levels is likely to play a role throughout, it seems especially important during the diffusion stage, where coordinating and aligning the innovation across units and hierarchies facilitates effective policy transfer and integration (Lévesque and Murray 2010). In the previous stage (emergence), articulation may be less central due to the localised, experimental nature of the innovation, whereas in the final stage (embedding), it is likely to support consolidation and institutionalisation within existing structures.

In the first stage of policy transfer, emergent or deliberative revitalisation initiatives typically originate at the lower tiers of the union hierarchy, serving as testing grounds before wider adoption and diffusion (Murray et al. 2020). However, this does not necessarily mean that these tiers are the primary initiators of policy transfer. Rather, the mechanisms at work during this stage are more likely to be driven by union actors responding to disruptions in the regulation of work and employment. In addition, the interplay between a union's network embeddedness and union governance and its internal democracy may well influence which union actors become involved in the initial phase of the transfer processes. In more participatory trade unions, activists and local workplace representatives may have greater scope to act as agents of innovation, or 'policy entrepreneurs'. Conversely, in more centralised or hierarchical unions, which provide less leeway to local or regional union structures, innovations may be more directed (or sanctioned) by union staff, like senior FTOs.

The case studies indicate that bottom-up, individual-level agency drove almost all the policy transfers. Initially, union rebels like (young) union activists or workplace representatives, and their personal networks, acted as innovative policy entrepreneurs (also Bernaciak and Kahancová 2017; Murray et al. 2013). Irrespective of the type of network embeddedness of the union involved, these union rebels were often the initial key nodes for transmitting and adapting innovations.

Change from below is in particular evident in smaller unions such as SZÁD or grassroots organisations like OZZIP, where union revitalisation is internally driven as a minimal hierarchy facilitates activist involvement in union decision-making. However, activist agency is not limited to such trade unions. Workplace activists and FTOs in local branches of mainstream unions are also spearheading revitalisation efforts in Belgium, Denmark and France. Similarly, company or branch-level actors and semi-autonomous regional offices are key drivers in OS KOVO and KASZ. In Slovenia, MP was initiated by young activists with roots in progressive, often student-led, movements. The main exception proves to be FILCAMS CGIL, where the union leadership played the primary role in initiating and directing innovative change and, in collaboration with union representatives and regional and local union structures, expanded Tourism Upside Down to other regions; the three-stage policy transfer model might be of relatively less relevance in this context.

The second stage of policy transfer is associated with broader diffusion. In four of the cases, this stage of scaling out and scaling up is largely absent or incomplete, thereby impeding the transfer process. In Czechia, the grouping of members remains reliant on OS KOVO's regional structures, even after the practice formally became part of the union's statutes, due to the lack of clear central steering from the confederal level. In Denmark, the higher echelons in 3F consider member-only benefits in local collective agreements as controversial, resulting in rejection at the union congress. Nevertheless, the idea persists, transmission taking place on a company-by-company basis at local bargaining levels via shop steward networks. In France, both new, alternative organisational forms lack broad support within the confederation. Union leaders provide passive endorsement, praising them in internal communications, yet their further transfer seems to come up against a continuing belief in existing, dominant structures with which they therefore collide.

These cases illustrate how inertial pressures, arising from internal opposition, a lack of strategic coordination or organisational routines, can delegitimise policy transfer at any stage. When the functional effectiveness of an innovation remains uncertain or unproven, this too may undermine its legitimacy and hinder its broader transfer and acceptance within the trade union in question.

The remaining seven cases demonstrate scaling processes that require further coordination. In Denmark, the broader adoption of the union campaign in hospitality needs the further support of other elements in the union, including senior FTOs. In Poland, OZZIP's diffusion of knowledge on physical workload standards remains activist-driven yet supported by training and seminars. The technical complexity of the associated litigation strategy necessitates involvement from health and safety experts as well. In Slovenia, MP activists continue to drive the transfer of organising methods and tactics, with the personnel involved nevertheless being integrated, via temporary job training schemes for the unemployed, in those affiliates receptive to policy transfer.

This second stage sometimes also entails the activation of novel organisational mechanisms. On the one hand, these might signify freedom of action within the policy transfer process but, on the other, they might well end up by reshaping power



relations within unions. In Belgium, as part of a newly specialised union function, lead organisers, working alongside union activists, have helped institutionalise roadshows within the union's repertoire. They achieved this through compiling data, learning from experiences, and disseminating these to other subsectors in transport and logistics. In Hungary, both SZÁD and KASZ are hiring organisers, while COZZ and SZGK, organisations which are (semi-)external to the unions, provide financing and professional expertise and play a role in mentoring, motivating and training people in these roles. Both unions are expanding participatory organising beyond their initial contexts, yet their targets diverge: SZÁD is extending its organising approach to new sectors, whereas KASZ is scaling up its approach from a single-company campaign to multiple online initiatives.

The third stage of policy transfer concerns the formal, organisational consolidation of innovations within the trade union, specifically their replication across structures and their embeddedness in its day-to-day routines and norms. This stage reveals whether the transfer process can be deemed successful in generating durable organisational change for union revitalisation. It also points to the importance of 'systems of information sharing and education' (Ibsen 2024: 64) within unions for disseminating and internalising new ideas, knowledge and practices.

Several cases illustrate the use of such systems, referencing events, promotional tours and conferences; union newsletters, member magazines, symbolic awards and congress reports; as well as activities such as workshops and specialised courses. It is self-evident that several of these communications channels may also play a key role at the earliest stages of the policy transfer process by raising awareness of an innovation.

In Belgium, for example, the BTB/UBT road and transport section's redesigned union magazine served as a platform to announce the roadshows and report on other union campaigns and education activities. In Denmark, FH gave an award to the local campaign at the Hotel and Restaurant School for its success in organising hospitality workers, thereby boosting its visibility. In Hungary, COZZ and SZGK have played a key role in professionalising participatory organising, serving as hubs for mutual learning through the organisation of national and international networking events. It is also telling that KASZ has revitalised its dormant educational centre, which now offers training modules on the organising approach. In Poland, the main difference between the second and third stages appears to be an emergent bureaucratisation in OZZIP, with the arrival of paid staff in support of activist-led campaigning. Finally, in Slovenia, MP has consolidated its practices on proactive fieldwork through a handbook used in workshops and in the training of future union activists and youth leaders, which guarantees its future impact. Moreover, some MP activists have shifted to leadership positions in ZSSS affiliates, while clear efforts have been made to embed the policy transfer within union structures.<sup>11</sup>

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11. It can only be speculated here whether structural anchoring has led to cultural shifts in the union organisation.



## 5. Constraining and facilitating factors in policy transfer processes

This section explores the possible basic mechanisms underlying the varying degrees of success in policy transfer processes – that is, those which refer to the conditions considered necessary or sufficient to explain their success (Saka-Helmhout 2014). In this context, a successful transfer process is understood as the extent to which ideas, knowledge and practices are adopted and transmitted through the union organisation, rather than the effects or outcomes of the transfer on union revitalisation itself.

Several cross-cutting conditions associated with the success or failure of policy transfers can be identified in the case studies. However, the degree to which these conditions are necessary or sufficient is not fully assessed here, as such analysis would entail a different research design.<sup>12</sup> This overview is therefore not exhaustive in nature. Rather than offering a conclusive causal account, it lists and discusses the set of broad conditions which require further refinement in follow-up research. These conditions are presented in no particular order but tend to recur across most cases suggesting that they help explain (partly) failed or successful policy transfers.

What characterises successful policy transfers? In identifying the facilitating factors of effective transfers, a distinction can be made between innovation attributes and internal and external factors, with the latter being less controllable by trade unions as being typically contextual and, at times, reflecting coincidental circumstances. Innovation attributes concern here in particular trialability, adaptability and compatibility (as an external factor) (Rogers 2003 Wejnert 2002). Turning next to the internal facilitators of successful transfers, three general conditions can be inductively derived from the case studies. These are: union leadership; infrastructural resources; and organisational learning, which serves as a key capability enabling unions to consolidate union revitalisation experiments within their structures.<sup>13</sup> These may be regarded as potentially necessary conditions, implying that policy transfer processes can only be meaningfully undertaken when all three are present and, thus, working in combination. In this way, they should be seen as causal configurations, suggesting complex interactions rather than sole, independent conditions in isolation (Fletcher and Hurd 2001).

### 5.1 Innovation attributes

The approach that trade unions take towards innovative methods, tactics and practices seems important for understanding how innovations are subsequently adopted and diffused. For instance, some case studies suggest that the trialability of innovations (Rogers 2003; Wejnert 2002) matters; that is, the ability to test and adapt innovations

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**12.** A fuzzy-set qualitative comparative analysis might be an example of another possible research design to identify causal mechanisms.

**13.** These three conditions broadly correspond to the political, technical/economic and cultural/ideological dimensions outlined by Fletcher and Hurd (2001) in their framework for understanding organisational transformation in trade unions. Regarding the latter dimension, the emphasis here is put rather on the cultural than the ideological.

on a small scale before broader implementation. Beginning modestly, exercising patience and maintaining organisational agility, all elements of a gradual, iterative strategy, have proven effective in a number of cases. In Hungary, setting ‘ambitious but realistic goals’ (Chapter 8) facilitated effective policy transfer. Participatory organising was progressively scaled up to federal level within KASZ by being incorporated into education programmes. When early-stage innovations demonstrate tangible results, they gain legitimacy which can help persuade higher levels of the union hierarchy to support or replicate them. This process of constructing legitimacy and consensus-building is evident not only in KASZ but also in Slovenia, where MP initially operated independently but gradually gained recognition among ZSSS affiliates following its successes; after a decade, it was granted formal voting rights and fully integrated into the confederation. Compared to more hierarchical organisations, these longer timeframes for adapting innovations are arguably more typical of unions, given their democratic structures and deliberative processes.

The adaptability of innovative methods, tactics and practices seems to be another attribute of successful policy transfer. 3F’s campaign in Denmark’s hospitality sector evolved from relying solely on union-run social media to incorporating in-person methods, such as using postcards, to identify students’ interests and needs. A similar approach was taken by BTB/UBT in Belgium, which tailored its roadshow formats to different subsectors within road transport and logistics to facilitate their broader uptake. Furthermore, while the ‘organising model’ has sometimes been criticised as a mere ‘toolbox’ (Holgate and Simms 2010), the examples from Denmark, Hungary, Italy and Slovenia reflect its inherent adaptability. These examples reveal a consistent pattern: trade unions that treat innovations as adaptive templates rather than fixed blueprints tend to achieve broader diffusion. Such adaptations, however, may be less feasible when the policy transfer involves organisational restructuring, as seen in the cases of OS KOVO and CGT, which might also be considered more complex innovations which potentially limit their transferability (Rogers 2003).

## 5.2 Union leadership and deliberative vitality

The recurring association across the case studies between union leadership stance and the degree of success of policy transfers suggests a consistent pattern. Supportive leadership appears to operate as a necessary condition, independent of organisational and institutional variation. It is associated with successful transfer processes, whereas unsupportive leadership consistently emerges as a significant barrier in all the case studies in which transfers are deemed unsuccessful. For example, the contrast between the two 3F cases illustrates how leadership stance determines transfer success even within the same organisational context. While supportive leadership enabled successful youth engagement initiatives, the controversy about member-only benefits resulted in stalled implementation. This pattern holds across institutional contexts: leadership has offered only passive endorsement, while internal debate seems to be minimal, in the cases of OS KOVO and CGT alike. Moreover, perhaps rather surprisingly, the formal recognition of alternative organisational structures in the statutes of both unions does not equate to the presence of a highly supportive leadership. This calls into question

the long-term viability of the policy transfers in those unions, which are currently being driven largely from the bottom up, while, for instance, the grouping of members policy within OS KOVO is compounded by a lack of intra-union coordination.

It remains speculative whether the French and Czech cases reflect deeply rooted bureaucratic cultures resistant to change and a reluctance to reallocate resources – factors that could otherwise enable more effective policy transfer. Notably, indicating that internal resistance is not limited to top leadership (see also, for instance, Simms et al. 2012), opposition has also been observed among union staff, such as middle-ranking officers within 3F. Similarly, some senior FTOs in the road and transport section of BTB/UBT initially expressed scepticism toward the roadshow initiative. In this case, however, the transfer was endorsed by the sectional leadership and new lead organiser roles were introduced to oversee its implementation.<sup>14</sup> Comparable dynamics have been observed in both Slovenia and Hungary, where some affiliates of ZSSS and KASZ reportedly showed early reluctance toward policy transfer. It is important not to portray FTOs simply as obstructive figures resistant to change, however; while some may adhere to established routines, others, according to research outside this volume, express disillusionment with bureaucratic union structures, citing a perceived betrayal of core values as a reason for leaving union roles (Frangi et al. 2024).

While unsupportive union leadership is associated with failed policy transfers, the adoption of a strategic leadership framework tends to facilitate more effective transfer processes. Such a style of leadership can overcome internal divisions and foster collective coherence by establishing strategic goals anchored within a long-term vision. Supporting this, recent research on union revitalisation initiatives affirms that successful scaling out and scaling up is ‘more likely when a union could link its efforts to a longer-term vision and set of values to inform its ability to seize opportunities to advance that vision and those goals’ (Laroche and Murray 2024: 232).

Adopting a novel vision and setting new goals is sometimes accompanied by a generational shift in union leadership (see also Bernaciak and Kahancová 2017). This is evident in the case of BTB/UBT, where leadership renewal coincided with the diffusion of the roadshow initiative. Similarly, the leadership of SZÁD is comparatively younger and demonstrated an openness to participatory organising, while a new generation of trade unionists in ZSSS formed a coalition with MP. However, replacing the leadership is not always a prerequisite for union revitalisation experimentation. The leadership of the other Hungarian union, KASZ, showed trust in a new generation of activists and demonstrated a willingness to support experimentation. This accounts as well for ZSSS despite some sceptical affiliated unions.

Trade unions rely on internal mechanisms and structures that both reflect their democratic foundations and sustain their deliberative vitality. These are especially significant in the context of policy transfer as they facilitate forms of ‘democratic experimentation’ (Murray 2017). Their importance is evident for two main reasons.

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14. Nonetheless, the intra-union diffusion of the methods and tactics associated with roadshows has remained partial as they have been deemed ill-suited to the maritime sector of BTB/UBT.

First, as demonstrated in most of the case studies, with the notable exception of the Italian, many union revitalisation experiments are initially driven from below – by the union rebels – indicating the need for a degree of autonomy and self-activity among the rank-and-file to cultivate innovative methods, tactics and practices. Second, union leadership must provide overarching coordination and mobilise material support to ensure both the legitimacy and the success of the policy transfer. This requires the capacity to articulate and mediate between diverse internal structures, potentially necessitating a rebalancing of dominant coalitions and the overcoming of entrenched interests. The interconnection of these bottom-up and top-down dynamics is central to union revitalisation (Ganz 2000; see also Gumbrell-McCormick and Hyman 2013) and, by extension, to the effective transfer of policies which are aimed at this goal.

The Belgian case emerges to stand out as an example of enhanced deliberative vitality. At BTB/UBT, a rethinking of the union–member relationship in the road transport and logistics sector during the early 2000s led to the introduction of incentives for member participation aimed at reinforcing internal democracy. In Denmark, both the policy transfer processes within 3F emerged similarly from democratic experimentation. Internal debate within CGT about modernising its organisational structures paved the way for experimentation with novel organisational forms. In Italy, while Tourism Upside Down is characterised as a top-down campaign in nature, this is counterbalanced by the granting of autonomy and resources to regional and local structures as decentralised spaces. In Poland, policy transfer within OZZIP is especially being driven from the bottom up, with informal leadership emerging from within the activist base. The extent to which deliberative vitality underpins policy transfer in other trade unions in CEE countries cannot be fully determined from the available case studies except for the Czech case, where a genuine internal debate about the grouping of members model has been largely absent. Finally, given the influence of or resemblance to the US-style organising approach, it might be assumed that a model of ‘managed activism’ (Heery and Kelly 1994) tends to characterise the policy transfers related to participatory organising in Hungary and, perhaps, to proactive fieldwork in Slovenia as well.

### 5.3 Infrastructural resources

Supportive leadership involves freeing up infrastructural resources such as funding and staff, which may originate from internal allocations or external support. The case studies illustrate this in various ways. Institutional resources, such as facility time granted to union representatives, also enable union work and facilitate policy transfer in countries like Belgium, Denmark, France and Hungary. BTB/UBT created new union roles within its road transport and logistics section; lead organisers there are tasked with steering and coordinating organising activities such as roadshows – initiatives which, although not inherently expensive, still demand dedicated human resources and strategic oversight. Meanwhile, the national structures of FILCAMS CGIL provide regional and local branches with vans, campaign materials, branded merchandise and communications support – resources identified as critical to sustaining Tourism Upside Down.

Infrastructural resources may also come from outside trade unions, in particular in sustaining ongoing policy transfer. Previous research highlights how unions in CEE countries often rely on external sponsorship in their revitalisation efforts, moving them into project-based organisations (Bernaciak and Kahancová 2017; Samaluk and Kall 2023). Several case studies in this volume confirm this dependence on European project funding and similar external sources made available by union organisations in western Europe. In fact, grant-writing expertise has become an integral part of the policy transfer process, exemplified by MP, where access to project-based resources evolved into a policy that could be transferred. This enabled ZSSS affiliates to address emerging issues through European or international funding initiatives and transnational union cooperation. The Hungarian cases on participatory organising reflect this same pattern, underlining the importance of both horizontal and vertical networks for securing material resources.

However, such initiatives may face continuity risks: one of the original proponents in Hungary has since left. This points to a key vulnerability: union revitalisation initiatives that rely on ‘projectisation’ may falter if their sustainability depends on a small group of committed unionists who eventually leave – perhaps due to the union organisation’s lack of long-term perspective. A second challenge is that projectisation typically involves time-limited financial support which can halt the diffusion of innovations once the funding ends. Nevertheless, in cases such as those of SZÁD and MP, short-term funding was perceived not as a limitation but as a useful operational tool, encouraging unions to define medium-term goals and maintain focus in their revitalisation efforts. A third concern is the often limited organisational integration of isolated, time-bound innovations. While external capacity-building projects can promote novel ideas, knowledge and policies, it remains an open empirical question whether these are ultimately embedded in broader union strategies.

## 5.4 Spirals of success and organisational learning

Organisational learning appears to be a process through which diffusion can take place. Innovations for union revitalisation that prove effective not only tend to be scaled out and up within unions but often spark further innovations within the originating organisation. One innovation may lead to another through experiential processes and spillover effects, triggering positive feedback loops, or what might be described as ‘spirals of success’. These processes generate new methods, tactics and practices, potentially unlocking additional resources and influence. For instance, the BTB/UBT roadshows drew attention to issues in freight transport in Belgium, leading to follow-up actions such as the publication of ‘black books’ and the launch of comprehensive campaigns that reinforced the union’s political advocacy. Similar dynamics were seen in the evolving Tourism Upside Down campaign and in MP’s proactive fieldwork, which expanded from organising young precarious workers to include platform workers.

Sustained policy transfer requires organisational reflexivity and long-term learning if cultural change is to be fostered. This may include the ‘unlearning’ of entrenched practices and conventional approaches (Hyman 2007). These capabilities are closely

linked to the third stage of policy transfer, discussed in the previous section, which involves establishing the mechanisms and procedures which underpin organisational learning: from enhancing internal communications and interaction, and integrating innovations into training and education curricula, to creating new union structures. Injecting deliberative vitality into these mechanisms and procedures helps ensure they reflect the needs and interests of current and future members, in particular those more distanced from the union's leadership core (Laroche and Murray 2024). In Belgium, for example, BTB/UBT has sought to reduce top-down decision-making through more inclusive union meetings designed to foster collective reflection and learning.

In addition, the case studies show how some innovations originating in a particular trade union have diffused across other economic sectors or confederations, both nationally and internationally. Sectoral similarities and cultural or geographic proximity often facilitate this diffusion. In Belgium, the roadshow model spread from freight transport to the port sector within BTB/UBT. In Denmark, the success of open bargaining and youth involvement sparked inter-union diffusion. Likewise, strategies for engaging hard-to-reach workers in tourism in Italy via service provisioning were transferred to other sectors. In Hungary, participatory organising was scaled to the federal level within KASZ and, in Slovenia, tactics initially developed for traditional industries were later applied to platform work. Notably, unions that initially acted as innovation 'lenders' sometimes later become 'borrowers'. For instance, MP's achievements have garnered recognition from union organisations abroad, solidifying its horizontal and vertical ties. Similarly, OZZIP has played a central role in cross-border campaigns targeting Amazon's exploitative labour practices and anti-union strategies.

## 5.5 Compatibility and other external factors

Policy transfers and their (successful) outcomes in terms of union revitalisation should obviously be understood in their particular context. Although economic and political challenges might be similar across sectoral or national settings, the devil is often in the regulatory-institutional detail in terms of explaining why some transfers pay off and some do not (see also Laroche and Murray 2024). To identify the external factors that impede or facilitate policy transfers, three context-specific features emerge as having notable relevance across the case studies: employer attitudes and resistance; labour market conditions; and structural, institutional differences in industrial relations regimes.<sup>15</sup>

Employer resistance and the (perceived) incompatibility of innovations with existing institutional frameworks (see Rogers 2003) represent primary external obstacles. Employers often constitute a significant barrier, especially when transfers relate to the economic dimensions of union revitalisation. This is evident in both the Czech

<sup>15</sup>. Political opportunity structures might be added here, although this seems less the case for the policy transfers under consideration, which might be explained by them not being focused on the political dimension of union revitalisation. Nevertheless, for instance, a left-wing regional alliance was instrumental in France in supporting the establishment of site unions in Lyon.



and Danish case studies, where such initiatives were perceived as threatening the foundational principles of their respective industrial relations regimes. In Czechia, legal challenges initiated by employers, coupled with protracted judicial procedures, substantially delayed the implementation of the grouping of members initiative within OS KOVO. In Denmark, employer associations oppose the introduction of member-only benefits, viewing them as a challenge to managerial prerogatives in wage bargaining and as incompatible with the *erga omnes* principle underpinning collective agreements.

By contrast, favourable labour market conditions, in particular increased marketplace bargaining leverage among workers, seem to serve as enabling factors for successful policy transfer in several cases. In Belgium, for example, BTB/UBT benefits from operating within the road transport and logistics sector, where almost continual employment growth has helped maintain momentum behind the union's deployment of roadshows. Similarly, trade unions in Denmark's hospitality sector and Italy's tourism industry have leveraged labour shortages by framing them as shared concerns with employers. In Hungary, organising efforts have been more effective in smaller towns, where tight labour markets have increased employer receptiveness. There, it is also noted that not only has soaring inflation made traditional union wage demands more salient but that public opinion is becoming more favourable towards unions. This may help them in their effort towards participatory organising; the broader societal context should thus not be overlooked.

Finally, structural and institutional variations across sectors and countries play a role in shaping the viability of some policy transfers. For instance, the case of the first site union in Lyon illustrates how legal frameworks can obstruct implementation through regulatory complexity. More generally, western European trade unions, such as BTB/UBT, 3F and CGT, tend to benefit from established workplace access, which facilitates the adoption of innovative strategies. In contrast, unions in many CEE countries often lack such access or have had to face such arrangements coming under attack, as in Hungary, which might limit their capacity to implement innovations.

Taken together, the innovation attributes and internal and external factors combine in dynamic ways to form policy transfer both within and across trade unions. This interplay is especially evident in the cases of transfer observed in Czechia, Denmark and France. In these instances, the attempted transfers were significantly related to union identities which are, in turn, affected by the institutional environments in which the unions operate.

## **6. Policy transfers and outcomes of union revitalisation**

Having outlined the key factors that enable or obstruct policy transfer, this section turns to outcomes. The case studies in this volume focus primarily on the processes through which innovative methods, tactics or practices are replicated and utilised across organisational units, rather than on their immediate impact on union revitalisation. Still, it is assumed that successful policy transfers support revitalisation and that this may, in turn, generate positive outcomes for workers across economic,



political or social domains. The eleven cases are therefore examined in terms of their success in transferring policies and the contribution that this transfer makes to union revitalisation. This analysis is based on the assessments developed in the case studies, with the organisational uptake of innovations serving as a key criterion for an effective transfer.<sup>16</sup>

To avoid a rather deterministic view and allowing for alternative outcomes, Table 2 presents a basic two-by-two model outlining four possible combinations of policy transfer and revitalisation outcomes. It is a stylised model as outcomes are reduced to a binary classification; it thus oversimplifies the reality as policy transfers and revitalisation outcomes might involve partial success. Nevertheless, these four scenarios are all theoretically possible.

Table 2 **Policy transfer and outcomes of union revitalisation**

		Union revitalisation	
		Failure	Success
Policy transfer	Failure	Stalled	Accidental
	Success	Misapplied	Innovative

Source: author's elaboration.

First, failed policy transfers, whatever their underlying cause, typically result in stalled revitalisation efforts. This pattern appears to be illustrated by the French initiative on the development of site unions, an innovative organisational adaptation within the CGT's structure but which has yet to result in substantive policy transfer. It can perhaps rather be considered a partial failure to date. Similarly, the policy transfer involving the introduction of a clause on member-only benefits in local collective bargaining agreements has not yet achieved widespread uptake within Danish's 3F. Its expansion to industry level has been largely obstructed, although horizontal diffusion, across companies and sectors, has occurred to some extent.

Second, transfers that are unsuccessful may still lead to unanticipated revitalisation via organisational learning that eventually yields revitalisation benefits. No cases in this volume clearly reflect this outcome, however.

Third, some policies may be accurately implemented but fail to generate revitalisation due, for instance, to contextual incompatibility (Rogers 2003). Two cases seem to fit here. Although the grouping of members initiative in OS KOVO has existed for over a decade, its policy transfer is considered relatively limited. While all ten regional union offices currently apply the model, its diffusion has been uneven and slow.<sup>17</sup> The initiative has, furthermore, suffered from goal displacement: contrary to expectations, instead of a temporary organisational form morphing into traditional basic organisations, it has

16. Success here is largely as 'measured' by union actors, although researchers might add additional criteria (inspired by the policy transfer concept).

17. It has also not been adopted by other Czech unions, largely due to the limited presence of regional structures within those organisations. Nevertheless, only a few instances of inter-union policy transfer are documented in the other case studies presented in this volume.

turned out that the grouping of members has followed its own logic as an alternative to these. Likewise, the French inter-company unions aimed at reaching ‘isolated’ workers have seen some uptake, but their overall impact remains modest due to a lack of coordinated rollout.

Finally, successful transfers that align with institutional context and union needs can lead to meaningful internal and external revitalisation, enhancing various forms of union power. All of the remaining seven cases fall into this category as they can be regarded as genuine successes, albeit to varying degrees.<sup>18</sup> While trade union capacity propels policy transfers, these, in turn, influence the union’s internal resources as they are primarily aimed at strengthening the union’s organisational power and workers’ associational power.

When it comes to union revitalisation, many unions across the case studies report membership growth, often alongside increases in organisational capacity. This is most clearly documented in BTB/UBT, 3F and OZZIP. Results for the Tourism Upside Down campaign in Italy are ‘difficult to quantify’ (Chapter 5), while the participatory organising approach in the Hungarian unions reports tentative gains, though data remain fragmented.

In terms of infrastructural development, trade unions in Czechia, Hungary, Poland and Slovenia stand out. In Czechia, member consolidation has contributed to a modest professionalisation of collective bargaining, though broader infrastructural advances remain limited. In Hungary, SZÁD has taken a step towards professionalisation by employing a part-time FTO as of 2024 and has also established new local branches in Budapest and smaller towns; meanwhile, KASZ has expanded its organising footprint across more companies. In Poland, OZZIP has institutionalised its activities by setting up a union office and hiring FTOs, particularly to support members in navigating legislation in a strategic way. In Slovenia, MP has effectively reached underrepresented groups such as young and precarious workers, while also establishing regional councils and training new grassroots activists. Its efforts include modernised campaign techniques and improved internal and public communications.

The impact of policy transfer on unions’ collective identity and internal democracy – their deliberative vitality – is less immediately measurable but no less significant. Several policy transfers examined here, in particular those centred on outreach, participatory organising and open bargaining, are designed to improve the identification and representation of the evolving interests of current and potential members, and thus help strengthen deliberative vitality. In several cases, the influx of younger activists has brought renewed energy and increased union engagement. However, OZZIP, the grassroots union long characterised by flat, participatory structures, has experienced some bureaucratisation, leading to friction within the organisation. Even so, it has

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**18.** To recall, examples of successful policy transfers include: the roadshows in Belgium; the methods and tactics for engaging young people in collective bargaining in Denmark; participatory organising in both Hungarian unions; outreach methods and tactics in Italy; knowledge dissemination regarding workplace safety standards related to physical workloads in Poland; and proactive fieldwork in Slovenia.

institutionalised important innovations, such as electronic voting for collective dispute resolution, a practice that has since spread to other OZZIP branches outside Amazon.

Furthermore, the relationship between trade unions and their broader networks is clearly reciprocal. While transnational and national links often serve as sources of inspiration or support for policy transfer, the transfers themselves also deepen these connections. In Belgium, BTB/UBT maintains robust horizontal alliances with social-democratic political actors and strong vertical embeddedness via its roles in European and global union federations. In Hungary, SZÁD has reinforced ties with other trade unions and progressive civil society groups, while KASZ has mobilised its activist base to push for more transparent collective bargaining. FILCAMS CGIL in Italy has strategically involved student organisations in Tourism Upside Down, recognising their employment within the tourism sector. In Poland, OZZIP exemplifies deep transnational embeddedness. While its emergence was closely tied to international solidarity, the union is a founding member of the Amazon Workers International platform, established in 2015 in conjunction with Germany's united services union (ver.di, Vereinte Dienstleistungsgewerkschaft). OZZIP also participates in global initiatives like UNI Global Union's 'Make Amazon Pay' campaign. These international engagements have rebounded: they have bolstered domestic legitimacy and enabled new horizontal collaborations, including pragmatic coordination with Solidarność and the smaller unions active in Amazon Poland. MP has strengthened horizontal links with Slovenia's secondary educational and vocational system and progressive organisations domestically, as well as both horizontal and vertical ties transnationally.

Several unions have strengthened their narrative resources, improved public visibility and reshaped the way they are perceived. BTB/UBT, FILCAMS CGIL, OZZIP and MP have all successfully launched public awareness campaigns that have attracted media attention, expanded their reach through social media and helped reframe the public image of trade unions as responsive and socially relevant actors which, in turn, has strengthened their positions in the political field.

Finally, while strengthening unions' strategic capacity is important, internal union revitalisation should not be viewed as an end in itself. Fundamentally, union revitalisation involves expanding union influence in the economic, political and societal spheres which comprise unions' external dimension. Apart from the increase in workers' associational power and stronger external network embeddedness, several case studies provide evidence that the innovations have also contributed to raising workers' awareness of their rights, as observed in Belgium, Italy and Poland, and to the negotiation of improved collective agreements, as seen in Belgium, Czechia, Denmark and Hungary. Moreover, bargaining agendas have expanded beyond traditional 'bread and butter' issues, thereby engaging employers in the union agenda to influence the political field in the cases of Belgium, Denmark and Italy.

## 7. Conclusions

Union revitalisation concerns, to a large extent, how innovations circulate within and across trade unions. The concept of policy transfer offers a heuristic framework for examining the diffusion of innovations and the processes of adaptation and organisational learning. The empirical evidence presented in this volume reveals a strong association between effective policy transfer and positive outcomes for union revitalisation. Innovations that fail to take root tend to stagnate, remaining isolated and unable to diffuse across organisational units. In contrast, when policy transfers are effective, innovations are replicated and extended beyond their original context; they often exhibit self-reinforcing tendencies that facilitate further policy transfer and broader diffusion within union structures.

Drawing on comparative insights from this multi-case research, the findings offer both inspiration and caution for European trade unions. The inspiration begins at a fundamental level: with the content of the policy transfers, often referred to in union circles as examples of 'best practice'. The case studies demonstrate that innovation is not in short supply, regardless of union type, economic sector or institutional context. Some trade unions have adapted their organisational structures to improve their representation of workers in fragmented workplaces. Others have renewed their collective action repertoire to reach previously unorganised groups. Still others have embraced novel organising tactics and methods. All the policy transfers examined here relate fundamentally to the associational power of workers and the organisational basis of unions. However, several challenges remain largely unaddressed in the case studies – challenges that could serve to broaden the horizon of union agendas. These include, for example, the climate crisis, digital transformation and the rise of the radical political right. In the future, more thematically focused research could investigate how unions are responding to these emerging issues through policy transfer.

Additional inspiration stems from the role of network embeddedness as a critical resource for enabling policy transfer. Two findings are particularly noteworthy. First, both local and transnational activist networks participate in innovation and experimentation for union revitalisation, and frequently from the outset. These could also be considered union rebels. Even where initiatives are top-down, the engagement of such networks is essential for effective transfer. It is therefore advisable to strengthen ties not only among union activists but also with current members, as well as relations with potential members (Nissen and Jarley 2005), in order to encourage their mobilisation and to foster the exchange of innovative ideas and practices. This involves enhancing both the quantitative dimension, by expanding and densifying networks, and the qualitative dimension, by invigorating deliberative processes within unions. Second, intermediary organisations can function as innovation laboratories and facilitators of policy transfer. These entities typically operate outside the constraints of union bureaucracy despite their close affiliations with trade unions. However, their effectiveness is likely to depend on the extent to which unions acknowledge and embrace their intermediary role. Taken together, these findings suggest that unions should invest in both expanding their networks and deepening collaborative relationships.

At the same time, they also warrant caution. While it is acknowledged within trade unions that there are no ‘quick fixes’ for revitalisation, the case studies demonstrate certain enabling conditions that underpin effective policy transfers. Beyond demonstration effects and the incremental scaling of policy transfer processes, effective transfer depends on a union’s strategic capacity to back its union rebels: a combination of supportive leadership and an active deliberative culture; sufficient infrastructural resources; and a solid organisational learning capacity (Lévesque and Murray 2010). These conditions are hardly new. Though articulated differently, they were identified over two decades ago in the context of the diffusion of the organising approach in union locals in the United States (Fletcher and Hurd 2001).

The central question, then, is to what extent trade unions in Europe are both willing and able to cultivate those resources and leverage them for effective policy transfers of innovative methods, tactics or practices. Ultimately, the success of revitalisation efforts may depend equally on identifying specific innovations as on building the strategic capacity to adapt, implement and sustain them effectively.

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Cite this chapter: Vandaele K. (2025) Union rebels with applause. Comparing policy transfer processes for union revitalisation in Europe, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Abbreviations

<b>BTB/UBT</b>	Belgische Transportbond/Union Belge du Transport (Belgian Union of Transport Workers)
<b>CEE</b>	Central and east European
<b>CGT</b>	Confédération Générale du Travail (General Confederation of Labour)
<b>COZZ</b>	Centrum Organizowania Związków Zawodowych (Central European Organising Centre)
<b>FH</b>	Fagbevægelsens Hovedorganisation (Danish Trade Union Confederation)
<b>FILCAMS CGIL</b>	Federazione Italiana Lavoratori Commercio, Alberghi, Mense e Servizi (Italian Federation of Commerce, Hotels, Catering and Services Workers)
<b>FTO</b>	Full-time officer
<b>KASZ</b>	Kereskedelmi Alkalmazottak Szakszervezete (Trade Union of Commerce Employees)
<b>MASZSZ</b>	Magyar Szakszervezeti Szövetség (National Confederation of Hungarian Trade Unions)
<b>MP</b>	Sindikát Mladi plus (Trade Union Youth Plus)
<b>OS KOVO</b>	Odborové sdružení KOVO (Metalworkers' Union)
<b>OZZIP</b>	Ogólnopolski Związek Zawodowy Inicjatywa Pracownicza (Workers' Initiative)
<b>SZÁD</b>	Szociális Ágazatban Dolgozók Szakszervezete (Trade Union of Social Care Workers)
<b>SZGK</b>	Szolidáris Gazdaság Központ (Solidarity Economy Centre)
<b>ZSSS</b>	Zveza svobodnih sindikatov Slovenije (Association of Free Trade Unions of Slovenia)

## **Afterword: the importance of risk in the rebuilding of union legitimacy**

Melanie Simms

In the UK, the Trades Union Congress (the peak-level union confederation) was famously portrayed in political cartoons as a weary and cumbersome carthorse. This image of the trade union movement being tired and difficult to move is not uncommon in many countries, but the image is unreasonable. The studies in this book resoundingly challenge the stereotype, showing how unions have been highly responsive to new and ongoing challenges. What this book demonstrates highly effectively is that unions are extremely capable of strategic reflection and change. This is an important message because unions are ‘intermediary organisations’ (Müller-Jentsch 1985), meaning that they inevitably have to respond to a context shaped by capital and state regulation which can limit their capacity to make strategic choices. These cases show how they are still able to respond with a strong assumption of agency and that they can exercise considerable innovation.

Policy transfer is clearly an important mechanism by which these innovations start and grow. Within and beyond trade unions, policy transfer always comes with challenges. No two settings are ever exactly the same; every context is unique. So the trick for policy innovators is to work out what is similar, what is different and how this might shape outcomes. From there, leaders can decide whether any proposed course of action is likely to be effective at addressing whatever problem they have identified. This point about difference is more important than many decision-makers appreciate at first glance. It is often tempting to imagine that ideas and practices can simply be transferred between contexts, and these cases show how difficult that is in practice. Nonetheless, those who work with union leaders often encourage them to explore what is happening elsewhere and think of those initiatives as a menu of options. None will be entirely perfect, but if they have accurately diagnosed the problem they are trying to address, they can reflect on what would or would not be feasible within their own setting and set course appropriately. This book effectively sets out several menus of potential changes and innovations from which others can learn.

Of course, innovation inevitably brings risk, and this book celebrates the risk takers even if they may not have fully appreciated the risks they were taking at the time. Risk is often a dangerous concept in the world of trade unions. Many factors about what trade unions ‘are’ and what they ‘do’ incline towards conservative strategies. Most unions are funded through members paying subscriptions and their primary job is to represent the interests of those members. It can therefore be difficult to make a case to do something new. The cases in this book clearly remind union leaders that, without taking a calculated risk, decline and irrelevance is inevitable. No-one else is going to

come to the rescue. Like all organisations, unions have to work to be lively, dynamic and relevant to the lives of their members and to workers more broadly.

The case for taking risks is clearly laid out in these pages. Unions are in decline almost everywhere and it is becoming increasingly difficult to identify that they are properly representative voices when it comes to a growing number of workers. Rebuilding legitimacy is central to any understanding of the risks that the unions studied in this book have taken. How can a collective claim representative legitimacy if it is far removed from the people it claims to represent? It can, for a while at least, draw on forms of expert knowledge to legitimise its claims, but sooner or later it will start to matter that there are not very many members from the category on whose behalf the union is seeking to speak. In many ways, what the cases in this book share is a focus on rebuilding legitimacy in different areas of union activity.

By using the lens of unions' power resources, the cases highlight how legitimacy and power are interwoven. Power resources are needed to promote and pursue the interests of workers, but can only be effectively deployed when there is legitimacy in the exercise of power. Legitimacy matters a very great deal to democracy and unions remain our most vital mechanisms through which to pursue economic and industrial democracy. Unions are the primary voice of workers to counterbalance capital interests. The power of capital has increased – both in relation to labour and relatively over time (Lapavitsas 2011) – although different countries retain different levels of institutional regulation to mitigate its worst excesses. Evidence of unions acting to reshape and rebuild their role as legitimate representatives of workers' interests therefore takes on an importance in the democratic project beyond any evidence relating to a single campaign or initiative.

Academics can support these activities through exactly the kinds of studies that appear in this book. Union leaders can sometimes be fearful of opening their decisions to scrutiny and analysis. This book shows the benefits of opening up. Leaders need examples in order to understand the range of possibilities. Understanding what lessons can be taken (good and bad) from the experience of others helps them to secure buy-in to their own experimentation. Having more voices in this space can only lead to greater awareness in foreseeing the potential opportunities and pitfalls.

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Cite this chapter: Simms M. (2025) Afterword: the importance of risk in the rebuilding of union legitimacy, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.

## Afterword: the challenge of reflexive learning for union experimentation

Mélanie Laroche and Gregor Murray

We share the premise with the editors and colleagues in the chapters of this book that unions provide a vital mechanism for protection and advancement at work, voice and dialogue about work and avenues to achieve better work. The evidence is compelling: unions help to make work better and build better societies. They play a fundamental role in the defence of worker dignity, in the development of greater equality of opportunity and in the promotion of democracy. At a point when union membership is shrinking, many union structures and practices seem to be out of sync with current economic and social transformations, and union legitimacy is questioned, it is hardly coincidental that inequality is on the rise and democracy under challenge. In this context, the importance of understanding the pathways to and potential for union renewal is that much greater.

Our own book, *Experimenting for Union Renewal*, uses the lens of experimentation, notably the study of processes of democratic experimentalism, to promote cross-national understanding of what it is that unions are doing in this area. Union experimentation starts from the disruption of existing union practices and considers how trade unionists deal with the resulting uncertainty to navigate and shape change. It also examines how they experiment with and learn from innovation in their practices and structures, as well as the lessons they draw from this experimentation, and their capacity to engage in collective reflection about its implications (Laroche and Murray 2024a: 17).

In advancing this framework and documenting a wide range of cases of such experimentation conducted by various researchers in the *CRIMT Partnership for Institutional Experimentation* project (including Kurt Vandaele from the ETUI), we extended an invitation for others to draw on both real-life experimentation and academic research to understand union renewal.

We are therefore delighted to see how effectively the editors, and other colleagues, have responded to this invitation in bringing together a compendium of successful and unsuccessful cases of union experimentation across a variety of industrial relations regimes in western, central and eastern Europe. *When Trade Unions Learn to Innovate* enriches the palette of cases of experimentation, highlights unions' ability to take action to assert their legitimacy in a changing world of work and, as befits the ETUI's scientific mandate, deepens our comprehension of such democratic experimentalism in a variety of European contexts.

It also enlarges the conceptual toolbox available by focusing on the implications of experimentation for further innovation and renewal. In other words, while the spillover effect of experimentation has already been acknowledged, this book examines the

extent to which such experiments scale out and up – and, importantly, how this scaling occurs. *When Trade Unions Learn to Innovate* tackles the question of the diffusion of innovations and the processes of adaptation and organisational learning by connecting existing studies on union renewal, power resources and strategic capacity with the larger literature on policy transfer; that is ‘the processes through which ideas, knowledge and practices are borrowed from one context to another, across time or place, to address specific challenges or problems’ (Vandaele 2025: 187).

The key takeaways, finely explored in this volume’s Chapter 10 but also through the range of case studies, are important for our understanding of union experimentation. First, the embeddedness of union activists (who Vandaele labels ‘rebels’) in diverse networks can be a major source of innovation, provided that the activists driving change can also draw on organisational support. Second, successful policy transfer requires three interconnected conditions: supportive leadership with a long-term vision; adequate infrastructural resources; and an organisational capacity to test, adapt, scale and embed innovations through organisational learning. Third, policy transfer, when successful, entails the initial emergence of innovations, then their diffusion through scaling out and up within union structures and, finally, their institutionalisation or formalisation within established frameworks and practice. Fourth, the transfer of innovations crucially entails unions’ power resources and their strategic capacity to mobilise these. When successfully combined, innovation through experimentation can contribute to a self-reinforcing cycle where such innovation leads to strengthened union capacity which, in turn, contributes to yet further experimentation and even the transmission of innovation across organisational and national contexts. Throughout, organisational learning looms large, itself an important component of the conceptual tools available for understanding the processes of experimentation.

We ourselves (Laroche and Murray 2024b) have highlighted the key lessons from our range of case studies concerning: the array of strategic capabilities that appear essential to experimentation processes – capabilities essential to the diffusion of innovations also explored in the pages herein; the enlargement, diversification and interrogation of union strategic repertoires – a key aspect of the experimentations observed here; and, finally, the conditions of success for experimentation, notably through mediating, aggregating and learning – again, a key finding emphasised within this volume (Vandaele and Fabris 2025).

Learning is so important in these chapters that it figures as both a component of strategic capacity and, in terms of organisational learning, as an essential aspect of the capacity to scale innovations upwards and outwards through policy transfer. In a study of two union locals contending with globalisation, a key obstacle to experimentation is the stickiness of what one of these writers, with his colleagues, has labelled ‘referential unionisms’. This refers to ‘the production and internalization of sets of practices and norms that inform union behaviour’ – that is, how ‘trade unionists develop principles and practices that translate both their comprehension of how unions function and the social structures in which that unionism is embedded’ (Murray et al. 2010: 313). Drawing on Pierre Bourdieu’s notion of habitus (1990), it reflects how individuals internalise their social world and, consciously or unconsciously, respond to the events

they face. The authors conclude that the key to unlocking a kind of stasis is to return to the component dimensions of union practice and consider their ability to act upon themselves (2010: 330). In our own book (Laroche and Murray 2025), we also acknowledge the fundamental importance of reflexivity in experimentation, as a means to create a learning space for renewal strategies.

This is a key insight as there are different types of learning. Zoll (2003) helpfully distinguishes between first, second and third-order learning (Laroche and Murray 2024b: 233-234). First-order learning recognises new challenges, with disruptions prompting uncertainty and possible experimentation. Second-order learning is observed in experimentation with and innovation in internal structures and processes to deal with new problems and to deliberate and strategise around collective responses. Third-order learning, altogether less frequent according to Zoll (2003), and as is evident in the cases we have documented (Laroche and Murray 2024a), entails critical scrutiny and a redefinition of unions' existing learning strategies and structures, and more fundamentally of their understanding of what it is to be a trade union.

Hyman (2007) has suggested that 'to survive and thrive, unions must reinvent themselves as organisations'. However, in exploring the concept of 'referential unionisms', the importance becomes evident of the often-intractable embeddedness of existing shared understandings of union practice and of what it is to be a trade union (Murray et al. 2010). That is why it is such a challenge to institutionalise organisational experimentation (Murray et al. 2020). It is exceedingly difficult for union organisations to reinvent themselves, which again highlights the importance of the combinations of the conditions for policy transfer and the scaling of innovations observed in the experimentation featured in *When Trade Unions Learn to Innovate*.

Trade unionists, like many officials in organisations of all sorts, like to talk about experimentation, innovation and renewal. However, the thousands of business schools and institutes across the globe dedicated to researching best practice, innovation and experimentation in organisations and firms, as well as to training successive generations of managers, highlights a pronounced disparity of means. For societies committed to understanding not only the future of work but experimentation and innovation by organisations representing workers, we are hard-pressed to point to an equivalency for trade union and worker experimentation. There are but a handful of institutes, schools and universities with concentrations of specialists dedicated to such an end. The ETUI is one notable and compelling exception. Yet the ability to engage in effective social (and democratic) dialogue around key societal challenges such as demographic, technological and climate transformations depends on the capacity of workers and their union organisations to engage in change and to learn from that change.

A key premise for such studies, as is evident in *When Trade Unions Learn to Innovate*, is that there is scope for resilience and agency, as opposed to mere subjugation to structural determinants. While not wishing to deny the force of the latter, organisations and institutions do change – hence the importance of understanding these change processes which, as is argued by this epistemic community, is the result of the engagement and reflection of activists, the strategic capacity of their organisations and networks, and

their ability to learn from these processes and, indeed, to act upon themselves. These insights stem from trade unionists and scholars seeking to understand the processes of democratic experimentalism in and beyond unions. Given the multiple crises with which they must currently contend, the stakes could not be higher. There is no room for complacency, nor for business as usual, but much scope for critical learning and reflection – to which this book makes an important contribution and to which end further inputs are required and will be welcomed.

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Cite this chapter: Laroche M. and Murray G. (2025) Afterword: the challenge of reflexive learning for union experimentation, in Vandaele K. and Fabris B.L. (eds.) *When trade unions learn to innovate. Case study evidence from across Europe*, ETUI.



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## **Acknowledgements**

In preparing this book, we remain, as always, grateful to Calvin Allen for his meticulous copy editing and invaluable editorial support, and to Angélique Vanhoutte for expertly managing the project.

We would also like to extend our thanks to Bart Vanhercke, Research Director of the European Trade Union Institute, as well as to the internal reviewers, for their prompt and considered feedback on the draft.

We are honoured that Melanie Simms, of the Adam Smith Business School at the University of Glasgow, together with Mélanie Laroche and Gregor Murray of the École de relations industrielles at the Université de Montréal, kindly agreed to contribute excellent afterwords at very short notice – for which we are sincerely most grateful.

Kurt Vandaele and Bianca Luna Fabris

Brussels, 7 July 2025



## **When trade unions learn to innovate** **Case study evidence from across Europe**

Edited by Kurt Vandaele and Bianca Luna Fabris

Trade unions across Europe now mainly represent a shrinking workforce in the public sector and traditional manufacturing, while struggling to organise low-paid private service workers. Even in countries with strong institutional support, unions risk stagnation if they fail to adapt.

Countering this bleak outlook, research on union revitalisation underscores the agency of unions and their resilience as collective actors. Indeed, several trade unions are experimenting with innovative methods, tactics or practices. Often, such inspiration emerges from grassroots initiatives or comes from abroad.

This volume adopts a case study approach, examining eleven instances of innovation in nine union organisations across eight European countries: Belgium, Czechia, Denmark, France, Hungary, Italy, Poland and Slovenia.

The case studies illuminate the conditions under which innovations take root and then develop scale, and the barriers that cause others to stall. Particular attention is given to activist networks, internal alignment, a supportive leadership that enables resource reallocation, and organisational learning.

Ultimately, union revitalisation requires more than fresh ideas, new knowledge or improved policy. It also demands a sustained investment in unions' internal capacity to collaborate, adapt and learn.

D/2025/10.574/23  
ISBN 978-2-87452-773-9



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