

Pathways to global worker representation: Three case studies in the metalworking sector

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Abstract

Forms of labour representation have emerged over recent years that help constrain the global mobility of capital and the strategies of multinational companies (MNCs). This article focuses on one set of developments at company level: forms of voluntary regulation which we refer to as *global worker bodies*. It analyses the steps taken within three MNCs to establish their global worker bodies: a World Union Council, a Global Union Network and a World Works Council. We apply a regulatory space framework to explore how each MNC set up its global body and followed a distinct pathway that was determined by a unique configuration of factors at different levels. These involved the role of legislation, mandated negotiation, voluntarist negotiation and voluntarism in ‘domains’ at each level. Our research contributes to the literature on global regulatory space by providing a more nuanced understanding of the role of global worker bodies in this context.

Keywords

global worker bodies, labour representation, metalworking, multinational companies, regulatory space

Introduction

Intensifying global economic competition continues to have a major impact on workers, their trade unions and representative bodies, and national systems of industrial relations. The internationalization of companies, accompanied by their global restructuring

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strategies, affords them greater capacity to shift production from one country to another and threaten existing national regulation (Fichter, 2020). By moving, or threatening to move, production and operations across borders, multinational companies (MNCs) have also brought the competitive pressure of unorganized workers to bear on the international labour movement, weakening labour's bargaining power and encouraging a 'race to the bottom' in wages, working conditions and employer practices (Silver, 2003: 4).

The efficacy of private regulation in improving labour conditions within global supply chains is increasingly questioned. Amengual and Kuruvilla (2020) highlight the growing disparity between the expansion of global supply chains and the capacity of regulatory institutions to keep pace. Distelhorst et al. (2015) emphasize the critical role of national institutions in shaping labour practices despite the transnational character of production, and argue that enhancing domestic institutional environments is paramount for improving workplace conditions. Locke and Samel (2018) focus on the persistence of contentious labour issues even in countries with strong labour laws, suggesting a complex interplay of factors influencing worker welfare.

For labour, the central issue of globalization is the increasing disparity between the mobility of capital and labour (Mayer, 2019; Webster and O'Brien, 2020), because of which a global labour strategy remains a necessary response to match the reach of global capital (Burgmann, 2016). Such a view of the relationship between labour and capital is, of course, hardly new. Levinson (1972) argues that trade unions need to respond by developing international collective bargaining within MNCs. Indeed, despite the challenges that globalization creates for labour, it also establishes a basis for solidarity as labour movements form more meaningful linkages across borders (Brookes and McCallum, 2017; Burgmann, 2016). Accordingly, in parallel with capital globalization, new dynamics of cross-border labour regulation have emerged over recent decades, operating at different levels: global, sector and company.

At global level, political lobbying activities have intensified to establish a regulatory framework through agencies like the International Labour Organization (ILO) and the Organisation for Economic Co-operation and Development (OECD), as well as the International Trade Union Confederation (ITUC) and World Federation of Trade Unions (WFTU). At sector level, there are nine Global Union Federations (GUFs). Many unions, lacking the capacity to influence corporate policy at national level, are members of one or more GUFs, which represent specific sectors and engage in a wide range of global campaigning activities (Ford and Gillan, 2022). Schmalz et al. (2021) have suggested three GUF 'fields of action': global framework agreements, organizing and engagement in local struggles, and efforts to exercise influence on national-level labour laws and regulation.

At company level, there are a range of worker bodies that represent all sites of an MNC. Within the European Union (EU), negotiation by European Works Councils (EWCs) promotes a higher level of institutionalization of industrial relations. The EWC Directive (1994) has enabled the establishment of over 1250 EWCs (De Spiegelaere et al., 2022). Moreover, with EU enlargement, and the recasting of the Directive in 2009, the scope of EWCs has widened. Nonetheless, given the speed of corporate internationalization, EWCs can represent only an intermediate step, at European regional level, towards full labour globalization (Rüb, 2002). Hungler (2020: 9) argues that employee

participation ‘should not remain a privilege of European citizens, but must be treated as a universal right of all workers employed by Europe-based multinational corporations’.

Given the limited capacity for political regulation at global level, voluntary, self-regulated initiatives by actors within MNCs are also gaining importance (Fichter, 2020; Telljohann et al., 2009). One such initiative is the creation of global worker bodies at company level, which include extended EWCs, Global Union Networks (GUNs), World Union Councils (WUCs) and World Works Councils (WWCs). The variety of such bodies can be explained partly by the different strategic interests pursued by the key actors involved (Müller et al., 2006) and partly by the practical operation of the individual body, determined by opportunities and constraints resulting from company-specific conditions, including its global structure and strategy, industrial relations tradition and management attitudes.

Steiert (2009) emphasizes the importance of the range and quality of information provided by management. He summarizes various factors that can influence the effectiveness of these bodies, including the negotiating process, composition of the global worker body, duration and scope of the agreement, frequency of meetings, interlocutors on the company side, the extent of union involvement, monitoring procedures, terms of reference, joint activities of the global worker body, and establishment of corporate and union networking arrangements (Steiert, 2009: 6). Müller et al. (2005) note that some WWCs have evolved to play a consultative role. For example, the DaimlerChrysler WWC successfully blocked management’s plan to relocate production to Germany and Brazil following a strike in South Africa (Wick, 2005). The Volkswagen WWC, considered even more advanced (Müller et al., 2005), also has consultation rights. International Framework Agreements (IFAs) agreed at both Volkswagen and DaimlerChrysler WWCs signify management’s formal acknowledgement of their negotiation capacity (Müller et al., 2005).

A parallel development in global employee representation involves the emergence of trade union cross-border alliances (Lévesque and Murray, 2010a), also called Global Company Networks (Croucher and Cotton, 2009), Transnational Union Networks (Helfen and Fichter, 2013) or Global Union Networks (GUNs), as we refer to them in this article. Several studies have analysed the internal dynamics of GUNs and the integration of local unions within them (Bergene, 2007; Dufour-Poirier and Hennebert, 2015; Lévesque and Murray, 2010a, 2010b). For example, Lévesque and Murray (2010a) found that local union involvement in GUNs arises from the interplay of union capacities in different spaces: local, national and international. Drawing on three cases in Mexico and Canada, Lévesque and Murray (2010b) identified three patterns of local union engagement with GUNs: proactive solidarity, defensive isolationism and risk aversion, reflecting the nature and intensity of their cross-border relationships with workers, unions and union bodies.

Our article has its origins in the lead author’s doctoral study (Alexeeva, 2021a, 2021b) and forms part of an emerging area of research which seeks to trace the various ‘pathways’ through which transnational forms of labour regulation emerge and are sustained. Haipeter et al. (2024) have recently extended the discussion of ‘pathways’ with a specific focus on global framework agreements in three MNCs across different sectors. Our research, in contrast, focuses on one sector (metalworking) and examines a wider range

of mechanisms through which labour representation has been secured at global level within MNCs. The mechanisms we examine include management-driven initiatives, such as codes of conduct and business ethics statements, and negotiated labour–management agreements, such as European Framework Agreements (EFAs) and International Framework Agreements (IFAs).

It is these mechanisms which, in combination, create what we refer to as *global worker bodies* at company level. We utilize the ‘regulatory space’ analytical framework as the means to explore the interplay of organizational and institutional dynamics in each case and to explain how the formation of these bodies results from the interaction between various regulatory domains at different levels. The framework, in emphasizing both agency and structure, highlights how individual and collective actions shape – and are shaped by – these regulatory domains, or ‘spaces’. In our empirical analysis we illuminate the role of key actors in each case, and interpret them using the conceptual language of regulatory space. Global worker bodies, we argue, are all forms of *voluntary regulation*, which evolve in different ways depending on specific circumstances involving the actions of managements, workers and GUFs.

We distinguish between four types of global worker body at company level: extended European Works Councils, Global Union Networks, World Union Councils and World Works Councils. We analyse the steps taken within three major MNCs in the metalworking sector to set up their own global worker bodies: namely a *World Union Council* (WUC) at Swedish-Co, a bearing and seal manufacturing company; a *Global Union Network* (GUN) at German-Co, a mechanical engineering conglomerate; and a *World Works Council* (WWC) at French-Co, an automotive company, which grew out of an extended European Works Council. In doing so, we illustrate the conditions under which these three different pathways to global worker representation have been achieved, highlighting both the common and specific factors that shape the development of voluntarist negotiation at global level. Our research therefore helps to update some of the older literature in this area by offering valuable new empirical and theoretical insights into more recent developments.

We begin with a summary of each of these global worker bodies, explaining the forms that global worker representation at company level might take. Next, the methods section outlines how we sampled and examined these structures in three metalworking MNCs. This is followed by our findings, and then by a discussion section which explains how we applied a regulatory space framework to understand the distinct pathway that each of the companies has taken. We analyse the emergence of these pathways, illustrating the conditions that underpinned each stage of development, including factors at global, European, national and company levels, before drawing some conclusions.

Global worker bodies at company level

Extended European Works Councils

An extended European Works Council is an extension of the EWC to include non-European employee representatives. In companies with significant production sites outside Europe, employee representatives from these sites may be included in the EWC as

‘observers’. The process of extending the EWC may be based on an informal agreement with central management (for internal and plenary EWC meetings) or on an independent decision of the employee representatives (solely for internal meetings).

Global Union Networks

A GUN is a company-specific network of trade union employee representatives organized by the relevant Global Union Federation (Dufour-Poirier and Hennebert, 2015). GUNs are usually established by the signing of an IFA between the company management and the GUF. However, GUFs may also create GUNs unilaterally without any management involvement. As noted above, some commentators refer to them as Trade Union Cross-border Alliances, Global Company Networks or Transnational Union Networks. This article refers to them as Global Union Networks. They differ from other forms of cooperation, such as activist networks and labour–community coalitions, insofar as they comprise primarily full-time officers of unions with interests in the MNC around which the network is formed, and their aim is to protect the rights of workers within the MNC.

World Works Councils

A WWC is a body based on an agreement between employee representatives, management and sometimes the relevant GUF. The agreement determines the composition of the WWC and management’s obligations to cover its costs. WWCs are not union entities, though union officials are usually involved as ‘experts’ (Steiert, 2009). Global bodies not recognized by MNCs are not included in this category (neither are they in World Union Councils). The first WWC was established at the National Westminster Bank in April 1996 (Rüb, 2002), but disbanded after the bank was acquired by the Royal Bank of Scotland in 2000 (Waddington, 2011). The most well-researched example of a World Works Council is at Volkswagen, where the European and World Works Councils function in parallel (Da Costa and Rehfeldt, 2008; Greer and Hauptmeier, 2016; Whittall et al., 2017).

World Union Councils

A WUC shares some features with a GUN and a WWC. A WUC is based on an agreement between employee representatives, management and sometimes the relevant GUF. The main difference between a WUC and a WWC is that the former comprises mainly union members from local trade unions affiliated to a relevant GUF. Some unions not affiliated to the relevant GUF are allowed to send observers. In contrast to the GUN, the role of the GUF in the WUC is restricted, as it is allowed to send external experts only to the meetings and has no input into its organization, size or financing. In contrast to GUNs, WWCs and WUCs are institutionalized forums, rather than networks of local unions/committees, and primarily comprise employee representatives (Müller et al., 2005). The two main requirements for a WWC/WUC are: (a) it needs to include non-EU employee representatives as full members; and (b) it is established through a bilateral agreement between employees and management (and sometimes the relevant GUF).

The key differences between the different global worker body types are summarized in Table 1. Global worker bodies manifest in distinct forms, depending on the nature of the relationships and interplay between the actors involved. Recent estimates suggest there are 28 GUNs and 37 WUCs/WWCs currently operating (based on the lead author's independent research).

Methods

It would have been impossible to study all 65 global worker bodies that existed at the time of the research (28 GUNs and 37 WUCs/WWCs). Therefore, the decision was made to choose three companies representing different pathways to global employee voice: a Global Trade Union Network, a World Union Council and a World Works Council. To control for sectoral differences, all cases were chosen from one sector, metalworking, the one most likely to provide examples illustrating the success of pathways to global worker representation (Anner et al., 2006). Indeed, there were 15 WUCs/WWCs and 11 GUNs in the metalworking sector at the time of the research, but only 10 WUCs/WWCs and five GUNs in the services sector, and eight WUCs/WWCs and six GUNs in chemicals. The metalworking sector also has the largest concentration of EWCs, with 426 then functioning, in contrast to 254 in services and 204 in chemicals (European Trade Union Institute [ETUI], 2019). The challenge of selecting appropriate cases was partly overcome by carrying out preliminary interviews with experts at IndustriALL Global, the worldwide federation for industrial workers, and IndustriALL Europe, its regional body for Europe, who provided richer insights into the context of each case. These interviews also helped identify which companies would *not* be interested in providing access so they could be removed from the list of potentials, but the choice of metalworking meant there was a larger pool of potential cases in the first place.

Since sector is an important dimension that shapes the transnationalization of union actors (Anner et al., 2006; Dufour-Poirier and Hennebert, 2015), it might be argued that a limitation of this study is its lack of generalizability across other sectors and possibly to other companies in the metalworking industry. However, Yin (2018: 21) reminds us that in case study research the goal is 'to expand and generalize theories (analytical generalizations) and not to extrapolate probabilities (statistical generalizations)'. The important point, he argues, is that 'the generalization will be at a conceptual level higher than that of the specific case' (2018: 38). In relation to our own research, this means that we use our cases to *illustrate* and *refine* our regulatory space framework, not to represent a sample of representative companies. We use our cases to examine how applying such a framework – at a higher conceptual level than the cases themselves – improves our overall understanding of pathways to global worker representation.

The research is based on interviews and documentary analysis. In-depth semi-structured interviews were carried out between September 2017 and October 2019 with 29 participants: 20 company participants and nine 'experts'. Company interviews included discussions with 16 employee representatives, and two management-side and two trade union officials at national level, who provided a broad picture of the development of global worker bodies, the environment in which they operate, and insight into the three case studies. Expert interviews included those with Global Union Federations (five at

Table 1. Forms of worker representation at global level.

	Extended European Works Council (EWC)	Global Union Network (GUN)	World Works Council (WWC)	World Union Council (WUC)
Main actors	European employee representatives, non- EU representatives invited as 'observers'	Trade union representatives (EU and non-EU)	Employee representatives (EU and non-EU), management, and (sometimes) GUF	Employee representatives (EU and non-EU) from local unions affiliated to relevant GUF, management, and GUF
Role of management	Involved	May or may not be involved	Involved	Involved
Union involvement	May involve union officials as 'experts'	Central, often established by GUF	May involve union officials as 'experts'	Central, comprising mainly members from local unions
Formation	Extension of existing EWC, based on informal agreement with central management or independent decision of employee representatives	Usually established through an IFA between company management and GUF. But GUFs may also create GUNs unilaterally without management involvement	Based on agreement between employee representatives, management and sometimes the relevant GUF	Based on agreement between employee representatives, management and sometimes the relevant GUF
Level of institutionalization	Institutionalized forum	Networks of local unions/ committees	Institutionalized forum	Institutionalized forum

IndustriALL Global and one at Public Services International [PSI]), two at a European Trade Union Federation (IndustriALL Europe) and one at the ETUI. Some of these experts also acted as coordinators and facilitators in the global worker bodies themselves and so provided in-depth knowledge about their formation, functioning and effectiveness. More detailed information about participants cannot be given for reasons of confidentiality.

Most interviews were conducted by telephone or Skype and, where possible, were face-to-face, though three involved responses by email for reasons of convenience. Interviews were recorded, and the researcher also made field notes as a means to highlight the context of the interview, such as jokes or sarcasm, or as a reminder to look up material after the interview (for example, Global Trade Union Federation officials often referred to articles published on the GUF website). All interviews were conducted in English, apart from three because the participant did not speak the language. In one case, the lead researcher, a native speaker of Russian, undertook the telephone interview in that language. In the other two cases, the interview questions were translated into Mandarin and Spanish as required and sent to the participants via email (both interviews were written). To create a database, recordings of the interviews were transcribed and, where necessary, translated into English by competent translators, as the researchers' common language was English. In the instances where the standard of spoken English was relatively poor, the researcher asked follow-up questions and on two occasions sent a follow-up email to clarify certain answers.

Data were uploaded to NVivo source section as an aid to analysis. Following Thomas's (2006) general inductive approach for analysis of qualitative evaluation data, the analysis was conducted in two iterative stages: First Cycle Coding and Second Cycle Coding. During the First Cycle, informant-centric terms were employed to remain close to participants' own language and meanings. In the Second Cycle, the coded data were reorganized and refined using more researcher-centric terminology, incorporating theoretical concepts to raise the analysis to a higher level of abstraction and support theoretical insight (Gioia et al., 2012). The regulatory space framework was introduced at this stage to guide interpretation. NVivo software supported the coding process. Two types of codes were applied: static codes, derived from the literature review (e.g. managerial attitudes), and dynamic codes, generated inductively from the interview data (e.g. role of GUF). Nodes were created through close analysis of the text and subsequently grouped to reduce redundancy. Relevant categories were then established by clustering related codes. In the Second Cycle, coding was conducted manually after exporting the categories from NVivo into Word documents. By systematically examining relationships between categories and codes, several overarching themes were identified, such as company-level factors determining the formation of a global worker body.

The research also involved analysing a wide range of relevant documentation relating to the case studies, including: agreements establishing the various global worker bodies; IFAs; codes of conduct; IndustriALL Global checklists and memoranda; EWC agreements and related material (such as project maps and newsletters); union press releases; campaign documents; union organizational charts and other material provided by interviewees; and company annual and half-yearly reports.

Global regulatory space: Framework

The concept of ‘regulatory space’ is used to frame theoretically the GUNs, WUCs and WWCs operating in the global arena and to illuminate the dynamics through which key actors gain, retain and lose their positions within a regulatory arena (Black, 2002; Hancher and Moran, 1998). It specifically helps to explain how existing actors such as EWCs, GUFs, national trade unions and works councils may acquire or lose space, while new actors (GUNs, WUCs and WWCs) emerge to occupy and expand space (MacDonald and Richardson, 2004). The framework therefore serves to focus attention *both* on the actors involved in these processes *and* on the structures – the specific, permeable dimensions – within which they operate. Our use of the framework builds on the work of Inversì et al. (2017) and Inversì (2019), who in turn draw on the conceptualization developed by Berg et al. (2014).

Inversì et al. (2017) refer to four dimensions of regulation: law, mandated negotiation, voluntarism (voluntarist negotiation) and unilateralism; and three levels: workplace, national and international. We have adapted their framework by adding a fourth level to differentiate explicitly between European and global levels, and we also refer to the company, not the workplace, level (Table 2). Regulatory space analysis thus acknowledges that formal legal authority is not the only source of regulatory power. *Law* is only one relatively small part of regulatory space and is given a facilitative function. *Mandated negotiation* refers to the statutory processes of agreement-making between management and employees as required by law under different national institutional settings, such as statutory forms of information and consultation (Inversì, 2019). In contrast, under *voluntarist negotiation*, actors freely arrive at their own rule-making agreements.

We focus principally on the *voluntarist domain* at the global level, as this shapes the form of global worker bodies: Global Union Networks, World Union Councils and World Works Councils. These bodies are not enforced by legislation, but created through voluntary negotiation between employee representatives, union officials and company managements. Voluntary, self-regulated initiatives by actors within each MNC played a key role in the formation of distinct global worker bodies. Each global body followed a particular regulatory pathway. *Unilateralism* refers to the imposition of regulation by a single authority, without bargaining or consultation, through management control. In the global regulatory space framework, this dimension is dominated by employer-side actors (Berg et al., 2014). Indeed, Hancher and Moran (1998: 151) argue that ‘the corporate strategy of individual firms is a major determinant of the directions of the regulatory process’.

The global regulatory space framework, with its emphasis on actors and institutions across different levels, arises from a European perspective. This is because Europe has a unique landscape with various employee representation bodies operating at different levels (e.g. EWCs and national works councils in Germany). We acknowledge MacKenzie and Martinez Lucio’s argument (2005: 499) that any regulatory process ‘can only be understood by a mapping of the complex interrelation of spaces, spheres and actors of regulation’. This article develops the original framework, adapting our understanding particularly of the ‘global level’ to distinguish it more clearly from the European level.

Table 2. Global regulatory space framework (illustrative examples – not exhaustive).

Domain/level	Law	Mandated negotiation	Voluntarism/ voluntarist negotiation	Unilateralism
Global	ILO Conventions	None	Global worker bodies, International Framework Agreements, OECD guidelines, codes of conduct	Multinational companies, Global Union Federations
European	EU law, e.g. EWC directives, Information and Consultation Directive	EWCs	Collective bargaining at EU level, European Framework Agreements	European Commission, European Trade Union Confederation, other EU-level social partners
National	Constitution, Acts, case law	'Statutory' collective bargaining	Social partnership, collective bargaining	Regulation by employers or unions
Company	None	Laws on employee participation, board-level representation	Collective bargaining (workplace), non-union voice	Managerial prerogative, HRM, conflict

Adapted from Inversì et al., 2017: 298; Inversì, 2019: 176.

Company case studies

Swedish-Co

Swedish-Co is a bearing and seal manufacturing company employing workers in 32 countries. It has a long history of international meetings of trade union representatives which began in the mid-1970s. In 1975 the International Metalworkers' Federation (IMF) organized the World Swedish-Co Council with the aim of information exchange. Delegates from Sweden, France, Germany and Italy attended the first meeting, but the network soon grew to include non-European representatives. However, meetings were irregular and took place only every two or three years. There were language barriers and a lack of international contacts.

The company therefore decided to establish a Swedish-Co World Union Council in 1996, the same year in which it also signed its EWC agreement. However, there were no separate meetings of the Swedish-Co EWC until 2016 as the EWC merely formed part of the WUC set-up. In 2016 the decision was made to 'reactivate' the EWC. There is a single steering committee at Swedish-Co, which consists of five *ex officio* officers: the WUC Chairperson, the WUC Vice-Chairperson, a secretary and an advisor each from IF Metall and IndustriALL Global. The key feature of the Swedish-Co WUC is that only unions affiliated to IndustriALL Global may send delegates. However, some unions not affiliated to IndustriALL are permitted to send observers to the meetings, at the discretion of the WUC Chairperson.

The Swedish-Co WUC meets annually for four days. Since 2016, the first day is the EWC meeting, while on the second non-European employee representatives join and this global set-up participates in all activities together for this and the next two days. The second day comprises an internal meeting of workforce representatives, which includes presentations, country reports, exchange of information and questions. The third day is dedicated to a joint meeting with management, when Swedish-Co senior management presents the corporate strategy and updates employee representatives on current developments. There is a joint plant visit on the fourth day, usually followed by a final global meeting of all the representatives.

In 2003, Swedish-Co management, the European Metalworkers' Federation (EMF) and the IMF signed an IFA that recognized the principles outlined in the ILO's eight Core Labour Conventions. However, the IFA was never updated. In 2014 Swedish-Co updated its Code of Conduct and offered the WUC Chairperson the opportunity to sign the section relating to employees. This is not a typical IFA, which must normally be signed by a relevant GUF. This Code of Conduct is monitored by the WUC and breaches may be discussed at its annual meetings.

German-Co

German-Co is a mechanical engineering conglomerate employing workers in 190 countries across five principal divisions, with two operating as separate entities. A World Company Council existed in German-Co in the 1990s and consisted of 100 delegates. However, it met only once and stopped functioning after the first meeting. Global organizing initiatives resumed only after an IFA was signed in 2012 by the company's

management, Central Works Council, IG Metall and IndustriALL Global, which initiated the creation of a Global Union Network.

Based on geographical location, the German-Co IFA established five regional committees that form the German-Co GUN:

- Steering Committee of the unions from the US and Canada represented at German-Co;
- German-Co China Trade Union Chairperson Community;
- Employees' Federation of German-Co India;
- Coordination Committee of German-Co in South America;
- German-Co Labour Union South Korea.

The Central Works Council initiated the creation of regional committees in China, South Korea, the USA and Canada, while IndustriALL Global set up committees in India and South America. Meetings of national-level committees in specific countries or regions, known as 'meta-clusters', take place on an alternating basis between these countries and regions. The regional committees are not normally invited to attend the meta-cluster meetings in other regions and countries, with the one exception of all the GUN committees in 2018 in Munich. The meta-clusters consist of the national trade union officials with interests in the company. The decision to join the committee is voluntary (for example, not all unions from the US and Canada represented at German-Co take part in the steering committee of unions from those countries). The German-Co IFA does not specify the appointment of committee members.

The EWC at German-Co was set up in 1995 under Article 13 of the EWC Directive. The German-Co EWC Agreement (2015) is the most recent agreement at the time of writing, but its fundamental contents have not been changed since 1995.

French-Co

French-Co is an automotive company employing workers in 37 countries worldwide. Its World Works Council is the result of a gradual extension of the European Works Council, which was established in 1993. Major changes came in 2000, when observer status was granted to employee representatives from Argentina, Brazil, Romania, Slovenia and Turkey. By 2003 South Korea had been added, joined in 2007 by Russia and in 2011 by Morocco. The French-Co WWC was set up in 2015 when the Addendum to the French-Co Group Council was signed by management, IndustriALL Europe, IndustriALL Global and union representatives from major French-Co facilities in Europe.

The French-Co WWC incorporates the functions of three bodies: a WWC, an EWC and those of a group committee (*comité de groupe*, a national body of worker representation that French legislation provides for in companies with a group structure). The French-Co WWC comprises the representatives of general management and employee representatives. General management exchanges information about the company's position, strategic direction and future prospects.

The French-Co WWC monitors the IFA. The two most recent IFAs negotiated at French-Co date from 2013 and 2019. Company management, the EWC and IndustriALL

Global signed the French-Co IFA (2013), an agreement that renews and reinforces the previous French-Co IFA (2004). In 2019 management, the French-Co WWC and IndustriALL Global signed a revised French-Co IFA. It complements the existing agreement and incorporates the principles stipulated by the ILO in its Violence and Harassment Convention, 2019 (No. 190).

Formation of global worker bodies in the three case studies

Three distinct ways in which global worker bodies are formed can be identified. First, at Swedish-Co, a WUC was established through an agreement that transformed the GUN into a WUC. The IMF World Swedish-Co Council had been operating since 1975, even though it was not based on any formal agreement. Meetings were organized only once every two or three years, which hindered international solidarity and information exchange. As a result, the decision was made to create a formal body with more regular meetings, which was established in the Swedish-Co WUC Agreement (1996).

Second, at German-Co, the GUN was created following the signing of the IFA (2012). The IFA has shaped the voluntarist domain at global level by promoting dialogue between management and labour through the meta-clusters noted above. Negotiation of these meta-clusters was divided between the Central Works Council and IndustriALL Global, each focusing on different regions of the world. Meta-clusters were not achieved simultaneously as it took time to contact local trade unions and organize appropriate networks. This may be explained by the decentralized and divisional structure of the company, making contact between trade unions more difficult to establish, hence the creation of a flexible network of trade unions (a GUN).

Third, at French-Co, a WWC was established through the gradual extension of an EWC. EWCs occupy the mandated negotiation domain of the regulatory space framework. The gradual transition was evident in the French-Co case, where the extended EWC was transformed into a WWC in 2015. The tradition of social dialogue and holding of EWC meetings spilled over into the WWC set-up. In this case, the transformation entailed a three-stage process:

1. non-EU employee representatives from key locations were invited as observers;
2. these observers gradually established their role and were given titular status as full members; and
3. an agreement was signed, the French-Co Addendum (2015), which formalized creation of a World Works Council, which took over the role of the EWC.

The WWC, having taken over the role of the EWC, does not, however, meet on a regular basis, and the EWC no longer meets at all. By contrast, at Swedish-Co, the EWC was 'reactivated' in 2016. Another regulatory actor, the Swedish-Co EWC, is attempting to re-enter the space monopolized by the Swedish-Co WUC. However, even though the EWC Directive 94/45/EC gives more regulatory powers to the EWC (than the voluntary WUC), at Swedish-Co the EWC has not yet developed into a strong actor. Voluntarism at the global level could substitute mandated negotiation at the European level, which

can be observed in the case of French-Co and Swedish-Co, where the global worker bodies took over the role of the EWCs. This reflects Waddington's (2011: 22–24) notion of 'articulation' – the way in which different levels of unionism interlink together, with the capacity to articulate EWC-related activities conducted at different levels. However, managements may restrict articulation to hinder cooperation (Pulignano and Waddington, 2020).

Factors determining the creation of global worker bodies

Having outlined the background, formation and scope of these three types of global worker body, we now analyse the range of factors that have contributed to their specific pathways. 'Regulatory space' emphasizes that the 'actions and intention of regulatory actors are embedded in larger systems and institutional dynamics' (Morgan and Yeung, 2007: 80). In this section, we refine this observation by discussing the *similarities* across all three case studies, followed by discussion of *differences* between them – company global strategy, the role of mandated negotiation and the presence of an existing EWC – that have contributed to the specific type of global worker body in each case.

Role of management

The support of management in establishing and maintaining global worker bodies has been highlighted for many years (Gold and Hall, 1992; Rüb, 2002; Steiert, 2009). Management may see myriad benefits, including opportunities to foster communication, cascade information across different locations, and promote company values to create a sense of belonging. Furthermore, management that has positive attitudes towards these bodies is more likely to support their operation by providing resources and participating in meetings. Greer and Hauptmeier (2016: 45), in their research on Volkswagen, noted that management 'took the EWC and World Works Council meetings seriously' and participated directly to convince labour 'of the need to increase productivity and stay competitive'. Management may use global worker bodies to communicate company messages and address global initiatives, such as restructuring.

Access to information and the ability to utilize it is one of the key considerations when analysing actors' regulatory agency (Inversi, 2019). Management support enabled the creation of the WUC at Swedish-Co. The role of management was less apparent, yet still important, in the other two cases. In French-Co, an interviewee highlighted the culture of openness adopted by top management in communications with employee representatives. The interviewee specified that management invites employees to speak about their site locations and ask questions. In German-Co, an interviewee noted that delegates come to the global meeting to establish contacts with management in Germany, hoping to get their help in resolving local issues.

Swedish-Co funds participation for its employee representatives, covering logistics, communications (interpretation and translation) and travel. In contrast, while German-Co provides interpreters for GUN meetings, its EWC agreement specifies that the company covers organizational and steering committee running costs, with individual travel borne

by the company employing the German-Co EWC member. French-Co mirrors Swedish-Co's approach by covering all organizational expenses for its WWC meetings.

Company history of social dialogue

Another company-level determinant of the pathway is the history of social dialogue. At French-Co, for example, the tradition of European social dialogue facilitated the gradual transformation of the EWC into a global worker body, making the extension of the already existing set-up preferable to the creation of a separate global worker body. Moreover, the WWC resembles the EWC in its clear provisions set out in the French-Co Addendum (2015), which follows the wording of the previous EWC agreements.

At Swedish-Co, cross-border organizing activity dates back to the mid-1970s, and led to the creation of the IMF World Swedish-Co Council, the predecessor of the Swedish-Co WUC. Since social dialogue at Swedish-Co was originally at the global level, creation of the WUC was a logical step. In fact, the EWC at Swedish-Co was reactivated relatively recently, in 2016. In contrast to the French-Co WWC, the Swedish-Co WUC follows less formal procedures and the agreement formalizing its creation is less detailed.

At German-Co, the World Company Council (the predecessor of the current Global Union Network) met just once in the 1990s and then stopped functioning (Rüb, 2002). One potential explanation for its ineffectiveness was the large number of delegates (around 100) and their lack of experience and knowledge. This may explain the current GUN set-up at German-Co, where meta-cluster meetings take place on an alternating basis in different countries and regions. The regional committees are not normally invited to attend the meta-cluster meetings in other regions and countries. The German-Co GUN relies heavily on the German-Co IFA (2012), which initiated its creation.

National system of industrial relations

Company-level forces interplay with national-level variables. A national system of cooperative labour relations in the country of origin can encourage the creation of global worker bodies. In Sweden, the 1976 Co-determination at Work Act grants unions rights to organization, union recognition, and information and consultation, while the 1987 Act on Board Representation for Employees in Private Employment regulates the rights of workers to elect board members. Both Acts supported the development of industrial democracy in Sweden, and establishing the WUC at Sweden-Co helped to extend the cooperative style of industrial relations from the national to the global level.

Similar national factors are evident in Germany. At German-Co, the Central Works Council and a national trade union, IG-Metall, signed the IFA (2012) which guided the creation of the GUN and its regional committees. The Central Works Council and an efficient trade union helped the employee representatives build their own networks of contacts. At French-Co, French traditions of company-level employee representation provided a solid background for the establishment of a global worker body. The French model is characterized by a dual channel of employee representation at company level: company employees now elect social and economic committees (that replaced the existing network of employee delegates, works councils and health, safety and working

conditions committees, following President Macron's labour reforms of 2017), while trade union delegates are nominated by the representative unions.

In all three cases, our findings show that the extension of national traditions of cooperative industrial relations in the home country has influenced the creation and operation of global worker bodies. This is closely linked to strong national employee representation structures underpinned by legislation. They play an important role at both formation stage (supporting and leading the creation of the global worker body) as well as in day-to-day operations. National structures, such as a powerful Central Works Council that occupies the mandated negotiation domain of the home country's regulatory space, or national trade unions in its voluntarist domain, provide necessary resources, expertise and support for the global worker body.

However, contrasts in national systems of industrial relations also emerge. Both the German and Swedish systems, for example, provide for board-level employee representation, which is lacking in France (Gold and Waddington, 2019). This allowed the trade union chairperson of the Swedish-Co WUC – who was also a member of the company's supervisory board – greater influence over its operations than his union counterparts at French-Co or even German-Co. Key actors from the Central Works Council at German-Co, such as its chairperson and deputy chairperson, and the chairperson of its EWC steering committee, also held seats on the company's supervisory board. At German-Co, such influential national representation structures play an important role, while at French-Co, French delegates have traditionally dominated the EWC due to their numerical dominance and potentially more established relationship with management. Another contrast comes from different approaches to European-level employee representation in the three companies. At Swedish-Co and French-Co, symbolic EWCs have dissolved into global worker bodies. Swedish-Co was trying to reactivate its EWC, while at French-Co only the steering committee met on a regular basis. At German-Co, the GUN operated separately to the EWC, which held regular annual meetings.

Role of GUFs

At global level, the strategic objectives of a GUF include its position regarding the formation of GUNs, WUCs and WWCs, and the role it plays in their development and coordination. Müller et al. (2006) distinguish between autonomous, pragmatic and institutional approaches. The GUF can take an autonomous approach and run the global worker body separately from the company's management, with costs fully borne by the GUF. It can take a pragmatic approach and invite the company's management to meetings and convince it to cover costs. In such cases it aims at gradually institutionalizing the global worker body to become a company representation forum. The institutional approach, by contrast, involves a more limited role for the GUF and is based on a bilateral agreement with the company's management, which bears all the costs.

Our three case studies all reflect the institutional approach. Indeed, GUFs played an important role in the creation of the GUN, the WUC and the WWC in our examples, but their role was restricted by other actors. GUFs were important, but far from the only agents determining the creation of the global worker bodies. At Swedish-Co, for instance, the presence of the International Metalworkers' Federation helped to create the WUC.

However, it did so with the agreement of the company's management and the existing IMF World Swedish-Co Council. Swedish-Co retained its close ties with the GUF, and an advisor from IndustriALL Global remained a member of the Swedish-Co steering committee, together with an advisor from IF Metall. A defining characteristic of the Swedish-Co WUC is its exclusive delegate access, limited mainly to unions affiliated with IndustriALL Global Union. This underscores IndustriALL's significant role in shaping the composition of the WUC at Swedish-Co.

At German-Co, its Central Works Council, IG Metall and IndustriALL Global Union all signed the IFA with the company's management. IndustriALL Global helped to establish contact with the trade unions across different regions and created networks in India and South America. This may have contributed to the creation of a more flexible network (a GUN), where the GUF initially played a more active role in setting up committees in some regions. The GUF also initiated contacts and communications between the regional committees. This demonstrates that IndustriALL Global has resources to foster regional collaboration and representation of workers across different parts of the world. It highlights their proactive approach in establishing a platform for dialogue, complementing the efforts of the Central Works Council in other areas.

At French-Co, the IndustriALL coordinator was involved only in the preparatory meeting (without management) and meetings under the auspices of the IFA. IndustriALL Global is not allowed to participate in the plenary sessions with the company's management, which can take up to three days. The role of IndustriALL Global is hence more restricted as its coordinator does not participate in the WWC meetings, unlike the other two cases.

In summary, while the specific role of the GUF varies in our case studies, it is limited in general to that of advisor/coordinator in all three.

Framework agreements

A further factor facilitating the establishment of a global worker body is the existence of an agreement that sets out the main provisions of the body, its composition and the support to be provided by the company. The French-Co Addendum (2015) formalized the creation of the WWC. The German-Co IFA (2012) explicitly outlined the creation of the GUN. Indeed, previous research indicates that IFAs are designed to put union networks in a position where they can play an operational role in the monitoring of subsidiaries (Bourguignon et al., 2020). The Swedish-Co WUC Agreement (1996) formalized the creation of the WUC. The existence of an agreement sets out the regulatory space for the operation of a global worker body.

Delegate-driven networking and communications

Workers' capacity to access regulatory space and influence the formation of global worker bodies depends on their organisational role (as employee representatives and/or trade union officials) and the resources available to them (such as information, contacts with management, and communication channels) (Hancher and Moran, 1998: 161). If workers can mobilize collectively, they can facilitate the creation of a

global worker body or, in the case of Swedish-Co, replace an ineffective body with a new one.

At Swedish-Co, employee representatives participated in the IMF World Swedish-Co Council meetings, where they discussed global developments in the company and the information provided by management. This served as a communications channel among the workers as well as between management and employees. Through their organizational role as delegates and use of the resources available (such as information gathered at meetings, and contacts with management and other delegates), employee representatives were able to exercise their collective power to encourage management to create a global body with more regular meetings and a larger membership. Previous meetings at Swedish-Co helped employee representatives build networks, communicate with other delegates, and gain access to information about the company, its strategy and future plans. This was also the case at French-Co, where employee representatives were able to facilitate the transformation of the EWC into the WWC. At German-Co, trade union representatives actively participated in the creation of the GUN meta-clusters. Rüb (2002) argues that participant-driven networking and communication are key to the development of global worker bodies. In their absence, employee representatives are unlikely to take steps to further the development of the global worker body, despite recognizing the usefulness of the information provided.

Having analysed the similarities across the three cases, we now identify more specific determinants of the different pathways to global worker body formation, explaining why the companies chose specifically to establish a WUC, WWC or GUN. We argue that these choices are shaped by company global strategy, regulation of mandated negotiation, and the presence of an existing EWC.

Company global strategy

A company's product strategy (homogeneous or fragmented) and organizational structure (integrated or segregated) also play a part in determining the way global worker bodies are formed. A homogeneous product strategy is evident at French-Co, while at Swedish-Co and German-Co this is more fragmented. Both Swedish-Co and French-Co are organized in two divisions or sectors, and characterized by a relatively integrated structure, whilst German-Co has a segregated structure. Companies with a fragmented product strategy might face greater challenges when establishing a WUC or WWC as a forum for employee representation. Fragmented product structures might prevent fruitful dialogue and international union organization, as the nature of products, jobs and industries in which different divisions operate may vary significantly (Marginson, 1992).

One of the German-Co participants explained why companies might adopt different pathways to creating global worker bodies, contrasting Volkswagen that has a WWC with German-Co that operates a GUN. The key difference is that Volkswagen is an automobile company in which the nature of jobs in different locations across countries is similar. The factories tend to be large and unions may already have power to raise questions with management and identify common challenges workers are facing. In contrast, German-Co comprises many different divisions, such as energy, electronics and health-care, and the size of factories varies significantly. According to this interviewee, if

German-Co were to have a WWC, a fruitful discussion may be difficult to achieve due to differences in jobs, products and working patterns across its divisions. Organizational structures and business models may therefore play an important role in determining the way global worker bodies are formed. Indeed, another German-Co interviewee suggested that a segregated organizational structure, together with a more fragmented product structure, might have led to the creation of a more flexible network of trade unions – a GUN.

The other two cases reveal a more nuanced position. On the one hand, French-Co is an automobile company with a homogeneous product structure and a WWC but, on the other hand, Swedish-Co has a more fragmented product structure than French-Co (though not as fragmented as German-Co), but the company chose to establish a WUC, that is, a forum rather than a fluid network of trade unions.

A company's organizational structure also affects the way global worker bodies are formed. For instance, German-Co (at the time of the research) was involved in a restructuring programme aimed at achieving even more segregation. One of the German-Co interviewees highlighted that creating a World Works Council may not be suitable for German-Co due to its complex, segregated organizational structure and the ongoing restructuring initiatives then underway. This demonstrates the divergence of the company's trajectories and the company-specific development of employee representation bodies in its global regulatory space.

Regulation through mandated negotiation

At the European level, change in the regulatory regime from voluntary to mandated negotiation was an important factor that determined the creation of a global representation body. The EWC Directives promote social dialogue at European level and form an important component of EU regulatory space for employee voice. The imminent adoption of the EWC Directive 94/45/EC encouraged Swedish-Co to create the WUC in 1995 as its management acknowledged the need to pre-empt the legislation. The Swedish-Co EWC Agreement was signed in 1996, but the EWC on its own did not exist until 2016, and so was incorporated into the WUC set-up that same year, when voluntarism at global level substituted mandated negotiation at European level.

Presence of an established EWC

A long-established EWC, rooted in the company's industrial relations tradition, may encourage the emergence of a global worker body. At French-Co, the EWC was established in March 1993 and over time became integrated into the company's industrial relations system. Building on the company's tradition of social dialogue, EWC membership was gradually extended to include observers. This was viewed as a logical step, to involve employee representatives from significant manufacturing sites outside Europe. Once all participants had become accustomed to such practices, observers were given full member status and the EWC morphed into a WWC.

However, the German-Co case shows that the existence of a long-established and well-functioning EWC is not sufficient to determine its extension and transformation

into a WWC. The German-Co EWC was set up in 1995, only two years after French-Co's. German-Co took a different route and established a separate global worker body, a GUN. Furthermore, there are other MNCs with long-established EWCs that do not have any global worker bodies. A long-established EWC may therefore help in the creation of a global worker body, but only if other factors are present too (such as integrated product and organizational structures).

Discussion and conclusions

To summarize our core argument, the interplay of various factors at different levels underpins the formation of GUNs, WUCs and WWCs as complex global worker bodies. These three MNCs share some fundamental similarities, such as the transfer of aspects of their national industrial relations models to their global worker bodies. In all three cases, the Global Union Federation is IndustriALL Global, which employs an institutional approach to organizing these bodies. In addition, IFAs and the Swedish-Co Code of Conduct (2014) play a comparable role in fostering global labour relations by supporting the organizing campaigns and trade union cooperation of WWCs, WUCs and GUNs. However, despite these similarities, there are aspects specific to the development of each body, with the interplay between factors unique to each case.

At Swedish-Co, the history of social dialogue, support of the IMF and involvement of delegates in the global worker body all provided a solid basis for further dialogue between employees and management. Employee representatives could mobilize and network collectively at global level (through the existing IMF World Swedish-Co Council) to request management to create a WUC. Management in turn had a positive attitude towards such bodies and was aware that the company was required to comply with EWC Directive 94/45/EC. It decided to establish a global worker body – the WUC – instead of having two separate bodies at the company. This demonstrates how an existing informal body (the IMF World Swedish-Co Council) was formalized, and thus illustrates the 'renegotiation of regulatory space' (Clarke, 2000: 25–26). Only unions affiliated to IndustriALL Global may send delegates to the WUC, which demonstrates the importance of the GUF. The influence of the national system of industrial relations is also particularly apparent, as international meetings of trade union representatives had been taking place since the mid-1970s when two key pieces of legislation were passed to foster industrial democracy in Sweden. The establishment of the WUC in 1996 extended this collaborative model to a global scale, reflecting the company's deep roots in Swedish industrial relations.

At French-Co, the EWC gave employee representatives a platform from which to network and exchange information with management, which promoted cooperation between countries. Having a formal agreement that supported the extension further facilitated the gradual transition of the EWC into a global worker body at company level. However, it was the convergence of specific company characteristics that uniquely positioned French-Co for the creation of a WWC rather than another kind of global worker body. Indeed, a homogeneous product strategy coupled with an integrated organizational structure and the French tradition of company-level employee representation were key

factors in the creation of the WWC. The role of the GUF is restricted in the French-Co case, as its coordinator does not participate in the WWC meetings.

At German-Co, the existence of strong, legally enforceable national employee representation structures, such as a powerful Central Works Council and trade union (IG Metall), helped to stimulate the creation of a global worker body. The German-Co IFA (2012) fostered this process, as did positive management attitudes. However, it is the company's fragmented product strategy coupled with its segregated structure that favoured the creation of a fluid network of trade unions based in different countries and regions, rather than an institutionalized forum like the WWC at French-Co. While the Central Works Council initiated the creation of regional committees in China, South Korea, the USA and Canada, IndustriALL Global helped to establish contact with the trade unions across different regions and created networks in India and South America. This may have contributed to the creation of a GUN, where the GUF played a more prominent role in setting up committees in some regions.

Overall, the establishment of a global worker body is institutionally conditioned and depends upon circumstances at company, national, European and global levels. We can identify factors that are both common and specific to the development of each body, with the interplay between factors unique to each case. This interplay supports the view that regulatory space is both multi-level and multi-dimensional, with vertical and horizontal factors influencing the ability of such actors as a GUN, WUC or WWC to utilize resources to occupy it. MacKenzie and Martinez Lucio (2005) argue that factors affecting change at one level are better understood by assessing the complex interactions of actors across other levels, and that these levels and actors do not operate in isolation from one another. Instead, actors have linkages and their levels of operation may overlap. This is particularly important for this study, where different levels of regulatory space are interconnected.

Within this framework, we can analyse the role of key actors in each case and would again stress their agency as a core component and driver of regulatory change. Management initiative enabled the creation of the WUC at Swedish-Co, and was also important in the other two cases. GUFs played an important role in the creation of all three worker bodies we examined, although their role was restricted by other actors. And workers, when they mobilize and network collectively, can facilitate the creation of a global worker body or, in the case of Swedish-Co, replace an ineffective body with a new one. The agency of these actors interweaves with other salient factors, such as traditions of social dialogue, the development of company-level agreements and national institutional factors, to guide the creation of particular global worker bodies in each firm. Global worker bodies thus do not exist in a 'regulatory void' (Inversi et al., 2023: 1294), but rather in a space where actors operate in various dimensions of regulation: law, mandated negotiation, voluntary negotiation (voluntarism) and unilateralism at workplace, national and international levels. When global worker bodies are considered – together with the IFAs, GUFs, EWCs and other actors at national and company levels – as constituting such a complex interplay of forms of labour regulation, the pattern or outline of global regulatory space becomes more apparent.

In our study, articulation – the way in which different levels of union activity interlink (Waddington, 2011) – is apparent between the various levels and domains of regulatory

space. At company level the mandated negotiation domain is occupied by the Central Works Council at German-Co, which supports the operation of the global worker body. Similarly, board-level employee representation is another example of mandated negotiation: the Swedish-Co WUC Chairperson sits on the board of directors, while the key members of the German-Co Central Works Council sit on the German-Co supervisory board. At national level, IG Metall coordinates the operation of the German-Co GUN. At French-Co, the existence of mandated negotiation at European level in the form of a well-established EWC paved the way for the establishment of the WWC. At global level, voluntarist negotiation in the form of IFAs (German-Co and French-Co) and a Code of Conduct (Swedish-Co) played an important role. Indeed, at German-Co, the GUN was created following the signing of the IFA in 2012.

These close, mutually supportive relationships with other actors underpin the operation of the global worker bodies in our three cases. Similar conclusions were drawn by Rüb (2002) in the case of the Volkswagen WWC, where cooperation between German employee representatives and a German–Brazilian seminar facilitated the Competitiveness Agreement in Brazil. Rüb (2002) also explains that at Volkswagen there is a tiered system of representation, which consists of the Volkswagen WWC, the EWC and the EWC steering committee operating at global and European levels.

When examining the interplay of actors in each company, it is possible to see that a global regulatory framework starts to emerge. It takes the form of complementary bodies at different levels and domains, which often unintentionally strengthen regulatory frameworks (Pries and Seeliger, 2013). Therefore, to understand ‘global regulatory space’ it is necessary to look at the whole picture across different levels and domains, in order to uncover these complex relationships. Furthermore, our findings illustrate the permeability of the levels in the regulatory space framework. Different levels of regulation are not always distinct, and actors can operate in multiple domains at the same time. Voluntarism at the global level could replace mandated negotiation at the European level, as in the case of French-Co and Swedish-Co, where the global worker bodies took over the role of the EWCs. No separate EWC meetings were taking place in either company (though Swedish-Co was attempting to reactivate the EWC at the time of the research). As the German-Co case study demonstrated, an actor (such as the Central Works Council) may simultaneously operate in two domains: mandated negotiation (company level) and voluntarism domain (global level) as coordinator of the German-Co GUN. This means that the negotiating team was able to participate in both mandatory and voluntary forms of regulation. The same applies to the voluntarism domain at national level, where a national trade union may occupy a voluntarism domain at both national level and global level, as when the IG Metall coordinator facilitated the German-Co GUN.

Global worker bodies are one of the forms of labour representation that have emerged over recent years that help constrain the global mobility of capital and the competitive strategies of MNCs. We have analysed various themes that contribute to our understanding of these bodies, but whether they will develop into a significant movement remains uncertain and requires further research, particularly into their ability to adapt to the changing world of work in building solidarity across borders. Some commentators argue that GUFs can provide a counterweight to capital mobility and respond to the challenges of globalization (Burgmann, 2016; McCallum, 2013). Further research might consider what role GUFs should play in the creation of the

global worker bodies of the future. Trade unions are likely to continue to seek to engage in a variety of new campaigns and to be proactive across various fronts in promoting labour standards globally (Gold et al., 2020).

Our research highlights the structural imbalance between the global reach of capital and the largely local nature of labour in examining how global worker bodies emerge to complement national forms of employee representation. This article makes two key contributions to the limited research into these bodies. Firstly, it identifies distinct pathways through which global labour representation has emerged at company level, specifically through forms of voluntary regulation – global worker bodies – which are integral to the complex interactions of various actors shaping global employee voice. Framed as part of broader international union efforts to match the scope of global capital, they make MNCs more ‘transparent’ by facilitating communication and creating connections among trade union actors across different levels, transcending national frameworks within the regulatory landscape (Fichter and McCallum, 2015; Helfen and Fichter, 2013). Secondly, it demonstrates the value of regulatory space as a means to analyse systematically the key determinants of these pathways, focusing attention on the actors involved and the structures – the specific, permeable domains – within which they operate. The regulatory space framework also proves valuable in analysing how new actors gain influence. It reveals that new actors, exemplified by the German-Co Global Union Network, Swedish-Co World Union Council and French-Co World Works Council, complement the role of established actors who have traditionally represented employee interests within these companies.

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References

- Alexeeva A (2021a) The analysis of world works councils, world union councils and global trade union networks in a regulatory space framework. At: *19th ILERA World Congress*, Lund University, Sweden, 21–24 June 2021.

- Alexeeva A (2021b) *Pathways to global employee voice: Analysis of three company case studies in the metalworking sector*. Unpublished PhD, University of London.
- Amengual M and Kuruvilla S (2020) Editorial essay: Introduction to a special issue on improving private regulation of labor in global supply chains: theory and evidence. *ILR Review* 73(4): 809–816.
- Anner M, Greer I, Hauptmeier M, Lillie N and Winchester N (2006) The industrial determinants of transnational solidarity: Global interunion politics in three sectors. *European Journal of Industrial Relations* 12(1): 7–27.
- Berg P, Bosch G and Charest J (2014) Working-time configurations: A framework for analysing diversity across countries. *Industrial and Labour Relations Review* 67(3): 805–837.
- Bergene AC (2007) Trade unions walking the tightrope in defending workers' interest: Wielding a weapon too strong? *Labor Studies Journal* 32(2): 142–166.
- Black J (2002) Mapping the contours of contemporary financial services regulation. *Journal of Corporate Law Studies* 2(2): 253–287.
- Brookes M and McCallum J (2017) The new global labour studies: A critical review. *Global Labour Journal* 8(3): 200–217.
- Bourguignon R, Garaudel P and Porcher S (2020) Global framework agreements and trade unions as monitoring agents in transnational corporations. *Journal of Business Ethics* 165: 517–533.
- Burgmann V (2016) *Globalisation and Labour in the Twenty-first Century*. Routledge.
- Clarke M (2000) *Regulation: The Social Control of Business Between Law and Politics*. Macmillan.
- Croucher D and Cotton E (2009) *Global Unions, Global Business: Global Union Federations and International Business*. Middlesex University Press.
- Da Costa I and Rehfeldt U (2008) Transnational collective bargaining at company level: Historical developments. In: Papadakis K (ed.) *Cross-border Social Dialogue and Agreements: An Emerging Global Industrial Relations Framework?* International Institute for Labour Studies/International Labour Office, pp. 43–64.
- De Spiegelaere S, Jagodziński R and Waddington J (2022) *European works councils: Contested and still in the making*. European Trade Union Institute (ETUI).
- Distelhorst G, Locke RM, Pal T and Samel H (2015) Production goes global, compliance stays local. *Regulation & Governance* 9: 224–242.
- Dufour-Poirier M and Hennebert M-A (2015) The transnationalisation of trade union action within multinational corporations: A comparative perspective. *Economic and Industrial Democracy* 36(1): 73–98.
- ETUI (European Trade Union Institute) (2019) EWC database. Available at: <http://www.ewcdb.eu/stats-and-graphs>
- Fichter M (2020) International regulation: Standards and voluntary practices. In: Frege C and Kelly J (eds) *Comparative Employment Relations in the Global Economy*. Routledge, pp. 260–281.
- Fichter M and McCallum J (2015) Implementing global frameworks agreements: The limits of social partnership. *Global Networks* 15 (Suppl.): S65–S85
- Ford M and Gillan M (2022) Understanding global union repertoires of action. *Industrial Relations Journal* 53(6): 501–601.
- Gioia DA, Corley KG and Hamilton AL (2012) Seeking qualitative rigor in inductive research: Notes on the Gioia methodology. *Organizational Research Methods* 16(1): 15–31.
- Gold M and Hall M (1992) *Information and consultation in European multinationals: An evaluation of practice*. European Foundation.
- Gold M and Waddington J (2019) Introduction: Board-level employee representation in Europe: State of play. *European Journal of Industrial Relations* 25(3): 205–218.

- Gold M, Preuss L and Rees C (2020) Moving out of the comfort zone? Trade union revitalization and corporate social responsibility. *Journal of Industrial Relations* 62(1): 132–155.
- Greer I and Hauptmeier M (2016) Management whipsawing: The staging of labor competition under globalization. *ILR Review* 69(1): 29–52.
- Haipeter T, Rosenbohm S and Üyük C (2024) The missing link: The significance of institutional interdependencies and dynamics of action for transnational labor regulation in multinational companies. *British Journal of Industrial Relations* 62(3): 521–539.
- Hancher L and Moran M (1998) Organizing regulatory space. In: Baldwin R, Scott C and Hood C (eds) *A Reader on Regulation, Oxford Readings in Socio-Legal Studies*. Oxford, pp.148–172. [online edn, Oxford Academic, 22 Mar. 2012], <https://doi.org/10.1093/acprof:oso/9780198765295.003.0005>
- Helfen M and Fichter M (2013) Building transnational union networks across global production networks: Conceptualising a new arena of labour–management relations. *British Journal of Industrial Relations* 51(3): 553–576.
- Hungler S (2020) *The Dual Nature of Employee Involvement: An Economic and a Human Rights Issue*. L'Harmattan.
- Inversi C (2019) Employment regulation and working time through the lens of a regulatory space approach. In: Blackham A, Kullmann M and Zbyszewska A (eds) *Theorising Labour Law in a Changing World*. Hart, pp. 171–188.
- Inversi C, Buckley L-A and Dundon T (2017) An analytical framework for employment regulation: Investigating the regulatory space. *Employee Relations* 39(3): 291–307.
- Inversi C, Dundon T and Buckley L-A (2023) Work in the gig-economy: The role of the state and non-state actors ceding and seizing regulatory space. *Work, Employment and Society* 37(5): 1279–1298.
- Lévesque C and Murray G (2010a) Trade-union cross-border alliances within MNCs: Disentangling union dynamics at the local, national and international levels. *Industrial Relations Journal* 41(4): 312–332.
- Lévesque C and Murray G (2010b) Local union strategies in cross-border alliances: From defensive isolation to proactive solidarity. *Labor Studies Journal* 35(2): 222–245.
- Levinson C (1972) *International Trade Unionism*. Allen & Unwin.
- Locke RM and Samel H (2018) Beyond the workplace: ‘Upstream’ business practices and labor standards in the global electronics industry. *Studies in Comparative International Development* 53: 1–24.
- McCallum J (2013) *Global Unions, Local Power: The New Spirit of Transnational Labor Organizing*. Cornell University Press/ILR Press.
- MacDonald LD and Richardson AJ (2004) Identity, appropriateness and the construction of regulatory space: The formation of the public accountant’s council of Ontario. *Accounting, Organisations and Society* 29(5–6): 489–524.
- MacKenzie R and Martinez Lucio M (2005) The realities of regulatory change: Beyond the fetish of deregulation. *Sociology* 39(3): 499–517.
- Marginson P (1992) European integration and transnational management–union relations in the enterprise. *British Journal of Industrial Relations* 30(4): 529–545.
- Mayer B (2019) Financialization, technological change, and trade union decline. *Socio-Economic Review* 17(3): 477–502.
- Morgan B and Yeung K (2007) *An Introduction to Law and Regulation*. Cambridge University Press.
- Müller T, Platzer H-W and Rüb S (2005) Global company strategies: Global employee interest representation? In: Garibaldo F and Bardi A (eds) *Company Strategies and Organisational Evolution in the Automotive Sector: A Worldwide Perspective*. Peter Lang, pp. 57–82.

- Müller T, Platzer H-W and Rüb S (2006) *Global trade union responses to global companies: Global union networks, world works councils and international framework agreements – status quo and prospects*. European and Global Industrial Relations Group, Fachhochschule Fulda.
- Pries L and Seeliger M (2013) Work and employment relations in a globalised world: The emerging texture of transnational labour regulation. *Global Labour Journal* 4(1): 26–47.
- Pulignano V and Waddington J (2020) Management, European works councils and institutional malleability. *European Journal of Industrial Relations* 26(1): 5–21.
- Rüb S (2002) World Works Councils and other forms of global employee representation in transnational undertakings. A survey. *Arbeitspapier No. 55*.
- Schmalz S, Conrow T, Feller D and Rombaldi M (2021) Two forms of transnational organizing: Mapping the strategies of global union federations. *Tempo Social* 33: 143–162.
- Silver BJ (2003) *Forces of Labor: Workers' Movements and Globalisation since 1870*. Cambridge University Press.
- Steiert R (2009) *Multinationals and unions: World company councils and world works councils as strategies of union counter-force*. IndustriALL Union. Available at: http://www.industriallunion.org/sites/default/files/migration/imf/RelatedFiles/10030911201810005/2009_RS_WKA_WBR_Gewerkschaften_eng_endg3.pdf
- Telljohann V, Da Costa I, Müller T, Rehfeldt U and Zimmer R (2009) European and international framework agreements: New tools of transnational industrial relations. *Transfer* 15(3–4): 505–525.
- Thomas D (2006) A general inductive approach for analysing qualitative evaluation data. *American Journal of Evaluation* 27(2): 237–246.
- Waddington J (2011) *European Works Councils and Industrial Relations: A Transnational Industrial Relations Institution in the Making*. Routledge.
- Webster E and O'Brien R (2020) Ten years of the global labour journal: Reflecting on the rise of the new global labour studies. *Global Labour Journal* 11(1): 4–17.
- Whittall M, Lucio MM, Mustchin S, Telljohann V and Sánchez FR (2017) Workplace trade union engagement with European works councils and transnational agreements: The case of Volkswagen Europe. *European Journal of Industrial Relations* 23(4): 397–414.
- Wick I (2005) *Workers' tool or PR ploy? A guide to codes of international labour practice*. Friedrich-Ebert-Stiftung.
- Yin RK (2018) *Case Study Research and Applications: Design and Methods*. Sage.

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