Employee Representation, Multinational Companies and Institutional Context: Union Recognition in Canada, Ireland, and the United Kingdom

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Abstract

The relationships between employee representation, union presence, and employer strategies within and across institutional regimes offer a complex and changing landscape in the context of globalization. Key questions concern the institutional latitude/permissiveness afforded to multinational companies vis-à-vis union representation and the extent to which MNCs are catalysts for change in different institutional contexts. This paper focuses on MNCs' approaches to union recognition and double-breasting in three liberal market economies: Canada, Ireland and the United Kingdom. We address the notion that although MNCs may seek to import home-country behaviors and practices into host environments, divergent institutional structures shape and mediate these efforts as they relate to union recognition and double-breasting; we also consider the influence of individual organizational characteristics.We use data gathered through coordinated surveys of employment practices within each country and employ quantitative methods to compare results both within and across the three countries. We find that country of origin and other organizational characteristics largely influence MNCs' union recognition and double-breasting likelihoods, but that this influence is, to varying degrees, mediated by the permissiveness of the host environment and other complicating factors.

Introduction

The relationship between multinational firms and different employee representation regimes justifiably generates much interest among scholars of employment and industrial relations (IR). Employee representation is deeply embedded in the institutional arrangements of national political economies, reflecting unique trajectories of institutional development founded in the particular compromises of social actors at key historical moments. Multinational firms are often seen as exogenous to such national path dependencies, arguably carriers of practices and understandings forged in other contexts and imbued with other influences. The confrontation between these two logics provides for fascinating contrasts, traditionally framed in terms of contesting 'home' and 'host' country influences on employee representation practice.

This paper explores the institutional latitude afforded multinational employers vis-à-vis employees' representation by unions. More specifically, we examine how MNCs deal with union recognition in three IR regimes: in Canada, Ireland and the United Kingdom (UK). This choice is of particular interest because these three countries are conventionally labelled as 'liberal' market economies in the influential varieties of capitalism literature (Hall and Soskice 2001; Hall and Gingerich 2009) thus creating the possibility to explore variation within a particular variety of capitalist coordination. The different models of union representation in North America and Anglophone Europe offer an intriguing example of "within-system" variation. By excluding any form of representation that has not secured majority employee support, the Wagner model in the Canada (and the U.S.) erects considerable barriers to union representation, whereas Ireland and the UK both tended historically to favour voluntary union recognition arrangements (though there has been some formalization of this process in both countries in recent years). From the perspective of any ‘home’ country influence, the similarity, rather than the differences between three countries, is also of relevance. In particular, MNCs based in ‘coordinated’ market economies may take advantage of ‘institutional distance’ to deploy practices in their subsidiaries in Anglophone countries that they could not necessarily do in their home country.

The three countries also vary in respect of economic dominance, that is the extent to which host economies are dependent on foreign direct investment (FDI), particularly U.S. FDI. MNCs based in economically powerful and successful nations, above all the U.S., can act as conduits for the diffusion of dominant management practices (Smith 2005) – associated with their domestic models – including preferences regarding union engagement or avoidance. Anti-unionism is, of course, deeply embedded in the U.S., whose institutional regime affords considerable latitude for such behaviour. A potential consequence of such dominance effects is ‘institution bending,’ whereby local institutions move from a situation of permissiveness to one of acquiescence under which local regimes are reframed to accommodate dominant practice (and remain attractive to multinational capital).

This paper’s key research question relates to the notion that, although MNCs may to some degree seek to carry their home-country behaviour into the host environment, divergent institutional structures in each country may well shape and mediate these efforts as they relate to union recognition and double-breasting (that is, a firm’s simultaneous operation of union and non-union facilities), even within seemingly similar institutional contexts. In particular, we argue that the level of permissiveness of the system acts as a key force in shaping the extent to which MNCs are successful in their goals regarding union recognition. We maintain that a key determinant of union recognition and double-breasting, in addition to other factors, is the country from which the MNC originates. Our contribution to the literature is unique in that we are able to empirically compare, using quantitative techniques, common survey data both within and across three liberal market economies (Canada, Ireland, and the United Kingdom), which share a number of similarities but also diverge in important ways in terms of their IR systems and dominance of (U.S.) multinational capital. In addition to these institutional and economic variables, we are able to take account of key organizational dimensions – relating to structure, policy and strategy, and value chains – of the MNCs under investigation. This cross-institutional comparison allows us to test our research questions in a novel way.

We will begin with an overview of the literature and theory in which this paper can contribute, then turn to a discussion of the contextual considerations of the three employee representation regimes under consideration, our hypotheses, the data we employ to test these hypotheses, our empirical results, and finally the conclusions we are able to draw from our analysis.

Institutional Variations and MNCs

There has been a great deal of scholarly research into the impact of so-called national business systems on the practices of MNCs. The “varieties of capitalism” (VOC) approach suggests that there are fundamental differences between the structures and institutions constituting liberal market economies and those enveloping coordinated market economies (Hall and Soskice 2001). In contrast to the espoused notion that the world’s political economy is converging towards a common neo-liberalism, VOC suggests that firms operate within and transmit the institutional structures in which they operate. MNCs offer a unique laboratory for understanding the interface between and within different types of national business systems. Much of this literature can be traced to the notion that the national business system of the country of origin of an MNC plays a significant role in shaping subsidiary behaviour. There is much debate about the merits and weaknesses of this theoretical approach (Crouch et al. 2009; Hancke 2009; Hall and Gingerich 2009). However, the evidence of the importance of the mediation by institutional structures on MNC practices is well established (Almond et al. 2005; Ferner 1997; Harzing 1999; Maurice et al.1986; Whitley 1992, 1999). The potential impact of different business system configurations and of variations within these configurations on union recognition offers an important line of analysis for understanding the interactions between MNCs and different regimes of employee representation. This can be conceived in terms of "home" or country-of-origin or region-of-origin effects, "host" country effects and various forms of institutional duality.

Home: Analyses focused on the influence of home or country-of-origin institutions on MNC subsidiary behaviour suggest that firms carry particular sets of attitudes and behaviours forged in their home environment into their global operations (Ferner 1997; Ferner and Quintanilla 1998; Harzing 1999, Harzing and Sorge 2003; Almond et al. 2005). In particular, research indicates that MNCs emanating from the United States aspire to implement business policies and practices in their subsidiary operations that are consistent with those found in the U.S. system, rather than necessarily amending their home-country behaviours to conform to the host context (cf. Jacoby 1991; Ferner 1997; Wheeler and McClendon 1998; Edwards and Ferner 2002). These results are especially relevant when looking at patterns of union recognition, where MNCs emanating from traditionally anti-union environments will continue to maintain a negative approach towards unions, regardless of the IR system in which their subsidiary operations are found (De Vos 1981; Ferner 1997, 1999; Almond et al. 2005; Gunnigle et al. 2005; Lavelle 2008).

Host: An alternative line of institutional analysis emphasizes the importance of host country influences. In effect, IR are deeply embedded in national institutional arrangements and varieties of economic coordination. According to this view, it is unlikely that foreign MNCs can simply transport their home country practices into a different local context. They must instead adapt to local context. Indeed, in the wake of so many studies focusing on the organizational characteristics of MNCs, many authors make a plea for taking better account of the impact of context (Child 2000, 2008; Geppert and Clark 2003). Certainly, there is much evidence as regards the importance of local institutional mediations (cf. Ferner et al. 2005). Schmidt (2003) found strong support for the maintenance of typical IR practices in the German subsidiaries of British and U.S. MNCs.

At the broad level, the findings tend to imply that, not only are not all host economies alike – including in the profile and weight of FDI (what we term' economic dominance' below), but also there are differences between IR systems in similar types of economy. As in any typology, a particular challenge with the "varieties of capitalism" framework is how to take account of more nuanced difference between institutions that are grouped within the same broad category. As we shall explore further below, despite some similarities in the liberal market country cases that we have chosen, the IR literature readily identifies important differences in the IR regimes and union recognition procedures. If we look at how different liberal market economies score on the Hall-Gingerich (2009) index of labour relations coordination, IR specialists would be hard pressed to find much similarity in the employee representation regimes between the apparently most proximate cases on the liberal market economy side of the scale, namely Canada and New Zealand and Ireland and Australia.[1] Similarly, Freeman et al. (2007) report considerable differences in union density and, even more so, collective bargaining coverage between the six main Anglophone economies, namely the above four plus the US and UK. In their study of German MNCs in Britain and Spain, Ferner et al. (2001) argue that host country environments act as a constraint, even providing bargaining power to subsidiary management in its dealing with corporate HQ. All of these results suggest that there is a strong argument for a more complex rendering of host country institutional effects, in particular one that goes beyond the simplified typological effects of VOC.

Dualities: A third institutional take focuses on evidence of hybridization or dual institutional effects. As the "home" and "host" literature has evolved, attempts to understand the diffusion of different kinds of MNC practices point to unique forms of adaptation and hybridization. Of course, the institutional duality inherent in the MNC is one of its compelling features (Kostova and Roth 2002).

The predominant approach to institutional duality places the MNC as a strategic actor seeking to take advantage of 'institutional distance.' Firms may thus choose to operate within host environments in order to escape particular structures found within their home countries; for instance, some German MNCs may choose to operate in environments wherein they are not subjected to co-determination and works councils (Bluhm 2001; Dorrenbacher 2002; Meardi et al. 2009a). This work highlights a key element of 'institutional distance,' which is that MNCs from similar institutional structures (i.e., those operating within the Anglo-American system) may more easily transfer their home practices into the host environment than those operating within other structures, such as continental or Nordic European IR systems (Meardi et al. 2009a). Further, the divergence of institutional structures within these host environments plays a considerable role in shaping the relative levels of success the MNC enjoys in incorporating its business practices into the host environment (Almond et al. 2005). The notion of institutional duality therefore underscores the potentially complex interplay between divergent institutional structures in host and home countries that in turn impacts on both levels of institutional permissiveness between host environments and on the extent of institutional difference between host and home environments.

Economic Dominance Effects

A second avenue for understanding the behavior of MNC subsidiaries is that of economic dominance. Dominance effects "concern the uneven nature of economic power, and the tendency for one society to take the lead in evolving work organization or business practices considered more efficient than those operating within other countries" (Smith 2005: 615). It follows that MNCs emanating from economically successful nations, for example the U.S., can most easily and credibly transfer and implement specific business policies and practices in their foreign subsidiaries (Smith and Meiskins 1995; Edwards and Ferner 2002; Gunnigle et al. 2005). This

[1] According to calculations by Hall and Gingerich (2009: 458), on a scale measuring the extent of coordination in labour relations, where the U.S. represents the archetypal coordinated market economy with a score of 0 and Austria the most developed coordinated market economy with a score of 1, the scores of the three liberal market economies considered in this paper are as follows: United Kingdom 0.04, Canada 0.09, Ireland 0.28. The other two liberal market economies - New Zealand and Australia – scored 0.09 and 0.29 respectively.

occurs because such "...dominant or hegemonic states are able to exert organizational, political and technological influences that invite dissemination and adoption around the global capitalist system" (Almond et al. 2005: 280). In essence, economic success in the home country and internationally gives that country's management practices a strong level of global legitimacy which consequently provides its foreign subsidiaries with extensive capacity to implement home country practices abroad.

Although the origins of this literature can be found in an effort to understand the adoption of Japanese managerial practices in both the subsidiaries of Japanese MNCs and other firms affected by isomorphic pressures and spill-over effects (cf. Smith and Meiskins 1995; Elger and Smith 2005), the dominant management practices are primarily associated in recent studies with those of U.S. MNCs. Pudelka and Harzing (2007: 540) identify the dominance effect as "standardization around American management practices commonly perceived as representing best practices." Although variegated, the dominance effects in HRM practices trend, though not unequivocally, towards an American model. This is very similar to Jacoby's (2007) finding that the societal effects in his study of Japanese and U.S. firms were so deeply intertwined with dominance effects that it was avowedly difficult to disentangle one from the other. In their study of strategy, finance and HRM, Carr and Pudelko (2006) found most convergence around HRM practices. Dominance effects, in terms of U.S.-extracted best practice, would therefore be strongly associated with union avoidance.

It is not simply, however, a question of power relations within the firm but rather of the nature of relationships between economies as channelled through MNC practices and their reception. The impact on the host institutional terrain is of particular interest for a comparative study of union recognition in three liberal-market economies. In principle, this institutional terrain might be judged to be quite similar. In fact, these three economies, just like most others, play a particular role in the international economic division of labor. From this perspective, the permeability of sets of host institutional arrangements to so-called dominant practices is not just a question of relative institutional permissiveness but of, in some cases at least, active institutional acquiescence. Geary and Roche (2001) point to the impact of international companies on countries with what they label as *weak* IR systems – a point that features extensively in Gunnigle et al.'s (2002) analysis of the evolution of the Irish IR regime to accommodate FDI from U.S. MNCs. The province of Nova Scotia in Canada actually modified its union recognition legislation to facilitate the union avoidance preferences of the French MNC Michelin. Royle's (2006) study of the entry and impact a dominant MNC in the fast food restaurant sector in Italy (McDonald's) shows how it undermined more generally unionization, wages and working conditions and exerted dominance effects in that particular sector, while societal institutions for employee representation in other sectors remain largely intact. In the global hierarchy of production relations, these are examples of both the proactive social engineering of host institutions and of their more gradual erosion in the face of product market and other organizational pressures. In her study of Polish IR and foreign capital, Jane Hardy (2006) aptly depicts this process as "institution bending."

We therefore might anticipate that dominance effects on host institutional terrains vary in relation to their insertion into the international political economy. Judged in terms of institution bending against union recognition, Ireland, which has so oriented its economy to U.S. FDI, is likely to exhibit a high degree of dominance. Given its integration into a US-Canada free trade zone and then into a North American free trade zone (including Mexico) and its significant reliance on the U.S. as its predominant trading partner, Canada is also more likely than the U.K. to exhibit dominance effects in this regard.

Organizational Structure, Policy and Strategy

While comparative IR research recognizes the importance of institutional variation as a mediating force in relation to the common economic pressures of globalization and technological change (Lansbury et al. 2003), the emphasis on the interplay of national business systems can come at the cost of integrating and understanding the interplay between other types of organizational and political factors, (Crouch 2005; Howell 2003 and 2005; Kelly et al. 2007; Weiss 2003; Pontusson 2005). Disentangling apparently institutional effects and those pertaining to economic dominance therefore also requires the integration of organizational and strategy variables. We identify these under the headings of structure and contingency, organizational policy, and global production network or value chain effects.

Structure and contingencies: The major countervailing argument to the relative importance of home, host and dual institutional effects springs from an organizational analysis of MNCs. As research on the internationalization of firms has progressed (cf. Westney and Zaheer 2009), the vision of MNCs converging towards a single model has run up against the persistence of different organizational structures. Drawing on the different structural typologies developed by Bartlett and Goshal (1989), Harzing and Sorge (2003), for example, contrast the impact of country of origin effects and what they label as "universal contingencies," such as sector and size, finding that control mechanisms within the MNC tend to reflect the country of origin but that MNC internationalization strategies are more likely grounded in the sector of its activities and the size of the organization. Meardi et al. (2009b), who examine the extent of relocation threats of manufacturing sites of MNC subsidiaries sites in Hungary, Poland and Slovenia, identify the influence of a range of structural and other contingent factors: the nature and intensity of inter-site competition, the degree of vertical integration and product standardization, the absence of low-cost production facilities outside of the EU and the extent to which a firm can choose location (as opposed to being bound to customer preferences).

While some of these factors can also be treated as control variables (in particular, size), there is much evidence that they are expressing forces at play in the organization that are likely to have a direct impact on patterns of union recognition. For example, important variations in union density and associated institutional arrangements point to the development of distinct sectoral logics (Marginson and Sisson 2004; Crouch et al. 2009). A higher degree of product diversity is generally associated with increased complexity (Tallman and Li 1996), and less centralization (Hill and Hoskisson 1987; Marginson et al. 1995) and, potentially, less detailed interest in IR practices (Edwards 2000). While the hypothetical relationships might yield varying results in the case of union recognition, it is difficult to ignore these structural and contingent factors, given prior research as regards their impact on MNC subsidiary behavior.

Organizational policy: Behaviour is not simply an algorithmic expression of societal duality and organizational contingency. As expressed by Westney and Zaheer (2009: 361), the MNC is "a political system as well as an organizational design, with conflicts of interest built into its configuration." Numerous studies therefore point to the importance of actor strategies and power. Geppert et al. (2003) highlight the scope for strategic choice in subsidiaries (see also Kristensen and Zeitlin 2005). Relative autonomy in local decision-making might be perceived as simply the expression of business system or societal effects, but it might actually be translating the effects of intra-organizational policy (Sako and Jackson 2006). Management discretion in MNC subsidiaries can be seen as an organizationally embedded and path dependent result of a continuing power struggle (or micro-politics) within the MNC.

There is evidence of this source of variability in respect of employer anti-unionism. Gall (2010: 26) notes that data analysis of employer anti-unionism against union recognition in the U.K. and Ireland "shows no clear pattern by workforce size, multi-site status, nationality of employer origin (primarily 'indigenous' vs. 'foreign'), economic sector, market share or profitability (or by bunch of variables)." In other words, the explanation lies elsewhere. In their analysis of the policies of U.S. MNCs in the U.K., Ferner et al. (2005: 722) point to the interaction of evolving institutional contexts and the interests and power resources of local actors and "that decisions on union relations at critical junctures can have an abiding path-dependent impact on subsequent approaches" whereby the relations of British managers with unions "could, in effect, provide a power resource for UK managers … used to counter the institutional pressures exerted by the centre" (p. 721). Ferner at al. (2001: 124), in their study of German MNCs in the UK and Spain, also emphasize how subsidiary managers can mobilize the constraints of the local environment and thereby "win the right to interpret and adapt global policies; in short, they may be able to negotiate more freedom of action with respect to the center." These results invite particular attention to the degree to which local autonomy (i.e., policy discretion -- the ability of subsidiary managers to interpret MNC policies) has come to be defined and practised in MNC subsidiaries. If we can observe such organizational effects, independent of societal or institutional effects, then we might anticipate that local managers may sometimes exert their discretion in favour of union recognition, particularly if they are able to mobilize such relations to maintain their policy discretion.

Global Production Networks and Global Value Chains: The emergence of global production networks or global value chains constitutes both a new feature of MNC operations and an alternative way of studying MNCs. Drawing on the work on a first wave of internationalizing industries, such as clothing (see Gerreffi and Korzeniewicz 1994), and its focus on commodity chains, global production networks or value chains represents an attempt to understand the linkages within and across firms and across borders and between regions, in the way that a sequence of production and/or services is organized (see Dicken et al. 2001; Lane 2008). The key notion, for our purposes, is that in the study of MNCs the actions of subsidiary operations must be understood in terms of their connectedness to other parts of the global production network. In subsidiary terms, this can be gauged in terms of mandates, the scope of activities, distinctive capabilities, and the extent to which a unit is supplied by or supplies other parts of the parent firm.

In fact, there has been very little research on the importance of this factor on MNC IR and union recognition. We can formulate possible alternative interpretations. A first interpretation would suggest that the greater integration characteristic of a production network entails increased cost and flexibility pressures. Such would be the effect of enhanced competition within global regions (for example, the higher cost economies of Canada and the U.S. relative to Mexico within the North American Free Trade region or the lower cost economies of the new accession states within the European Union), as well as between global regions, potentially providing a greater incentive to engage in different forms of union avoidance. An alternative interpretation would suggest that it would simply be more difficult to standardize HR practices in networked firms, in which case other factors such as host country influences are more likely to be preeminent.

Accounting for Complexity

The more sophisticated studies are certainly taking up the challenge of a multi-faceted view of MNC behaviour with regard to IR in their subsidiaries. Geppert et al. (2003) contrast low and high context approaches to studying the practices of MNCs. Low context tends to focus on universal contingencies and structural configurations whereas high context approaches emphasize the institutional embeddedness of MNC firms. Meardi et al.'s study of MNCs in Eastern and Central Europe finds "a high degree of variety which is not readily attributable to home-country effects, nor to the influence of host-country environments," even in the same economic sector (2009a: 505), though "the country of origin is not irrelevant and contingency is not absolute." (2009a: 506). Approaches to MNC behaviour therefore need to be tooled for understanding the complex mediations likely to be at work. Almond (forthcoming) points to the need to "integrate an understanding of the overall shape and structure of the productive systems of MNCs, with an analysis of socialised power relations – and consequent strategies – existing within the various different relations complexes…." While this paper cannot aspire to disentangle all of these explanatory strands of analysis, it can point to which appear to be working simultaneously.

In particular, our work serves to address these complexities in three ways. First, while taking account of MNCs from different home countries and regions, we compare three host countries. As noted, each of these host institutional regimes offers considerable similarities, not just that they can be classified together as LMEs under the VOC definition, but that each has a comparable union recognition regime. However, we argue that the contextual differences between each country contribute to influencing MNCs' abilities to incorporate their home country approaches to unions within the particular host environment. This provides for an analysis which delves more deeply into the nuanced divergences *within* LMEs, and allows for us to compare the effects of even relatively small structural differences between similar countries as mediating influences on MNC behaviour.

Second, since the literature increasingly highlights the broader complexities beyond just home, host and dual effects in relation to the varieties of capitalism literature, we are also able to consider the impact of a range of organizational and policy variables and of dominance effects in terms of integration into the international political economy. Our anticipation is not one of either/or but rather how they combine in each of the three cases and between the cases to predict patterns of union recognition and double-breasting on the part of MNC subsidiaries.

Third, we are able to employ quantitative methods to explore our research questions; in doing so, we use survey data that are identical (or at least functionally equivalent) across all three countries. This allows for an 'apples to apples' comparison across each country, wherein we are able to compare the quantitative results both within and between the three countries (using both (separate regressions that are more sensitive to institutional context and pooled regressions), thus offering a unique contribution to the literature within this area.

Union Recognition and Double-Breasting

In addition to our broader study of union recognition, we examine one specific facet of union engagement or avoidance, known as double-breasting (see Gunnigle et al. 2009 for a contemporary review). This term was first coined to describe the practice whereby certain U.S. construction firms operated "in both unionized and non-unionized segments of the industry" (Lipsky and Farber 1976: 401) and captured the notion that unionized construction firms, in order to reduce labor costs and to gain greater flexibility in work practices, would engage in a strategic choice to open and operate a non-union plant while concurrently maintaining their unionized operations. The application of this concept has since spread to other industries and countries (cf. Gunnigle et al. 2009; also see Edwards and Swaim 1986; Rose 1986). The North American literature has argued that double-breasting is a form of strategic choice by employers, entailing a 'deliberate sequentiality' whereby secondary non-union sites (often in areas with less stringent employment regulation) are added to the existing unionized sites. However, researchers from Europe's Anglophone countries consider that double-breasting may not follow this pattern of 'deliberate sequentiality' (Beaumont 1985, Beaumont & Townley 1985; Beaumont and Harris 1992) but rather view double-breasting as occurring where "a multi-establishment organization may simultaneously operate establishments on both a union and a non-union basis" (Beaumont and Harris 1992: 268). Key in this definition is the concept of 'simultaneity,' rather than 'sequentiality' and the absence of a normative element; that is, the authors make no prescriptive judgment regarding the logic behind companies' engaging in double-breasting. Adopting this broader definition, double-breasting may occur as part of a firm's strategic choice to directly compete with the established unionized plant (mirroring the U.S. definition) or, crucially, for a number of other reasons unrelated to strategic choice. For instance, double-breasting may occur in certain instances due to distinctions in the type of work undertaken in different plants/locations. In this paper, we define double-breasting using the Beaumont et al. concept of simultaneity.

Country-Specific Contexts

It is crucial to understand the nuanced differences between the three contexts under which our study occurs. These differences may help to explain the lack of conformity in MNC behaviour across each country, in that they have something of a mediating effect on MNCs' efforts to implement their home country approaches in their subsidiary operations abroad. We now discuss briefly the IR context and system operating in each country, namely Canada, Ireland, and the U.K.

Canada: Canadian IR are characterised by extensive legal regulation (Murray and Verge, 1999). Canada shares a common North American heritage in the Wagner model (U.S. legislation dating back to 1935). This entails a legal process to secure recognition of a union as a monopoly bargaining agent on the basis of majority representation of a designated group of workers. Jurisdiction over IR issues in Canada is divided between provinces, northern territories and the federal government. This decentralization leads to varying approaches to union recognition, notably as regards the way majority status is ascertained (card check, compulsory ballot or some combination thereof), the thresholds for initiating a recognition procedure, and whether there are provisions for the compulsory arbitration of first contacts. This decentralization also means that there is no procedure for the extension of recognition between jurisdictions: if a firm opens a new site in a neighbouring jurisdiction, there is no mechanism for linking the existing site and the new site. Even within jurisdictions, a new site would be subject to a separate recognition procedure, unless deemed to be the extension of an existing site.

The trend in union density over the last three decades is one of relative decline: from 35.7 percent in 1980 to 29.4 percent in 2008 (Statistics Canada and HRSDC, various years). Bargaining structures are typically decentralized - a single establishment involving a single employer and a single union being the most prevalent – although, exceptionally, employers and unions may agree to conduct bargaining at some higher level. More typical is pattern bargaining but, from the 1980s onwards, there have been strong pressures towards the decentralization of bargaining and the disarticulation of patterns as employers, despite union resistance, seek to tie the fortunes of particular sites to the markets that they serve rather than the overall evolution of their industry. There are no national- or provincial-level accords that seek to set broader settlement patterns.

Although the Canadian legal framework has traditionally been seen as more favourable to union recognition than that in the U.S. (Weiler 1983; Tarras 1997; Godard 2003), the public policy framework over the last two decades has also become less accommodating for union recognition and more amenable to employer strategies that seek to differentiate between unionized and non unionized sites. The greater use of card check procedures as opposed to elections to establish representativeness has been consistently found to facilitate access to union representation, notably by reducing the scope for employer opposition and the efficacy of unfair labor practices (Riddell 2004). While some jurisdictions, in particular Quebec, have continued to seek to facilitate access to union representation (affirmed and reaffirmed in recent decisions by the Supreme Court of Canada as a fundamental right), there has been a larger trend away from card check certifications in a number of jurisdictions and towards compulsory certification elections and, echoing U.S. experience, consequent negative effects on the degree of union success in the most populous jurisdiction (on Ontario, see Bentham 2002). The overall Canadian framework therefore offers considerable institutional latitude for employer discretion over the recognition of new units.

Ireland: Having reached a high of 62 percent in 1980, union density has since declined and now stands at 33 percent (Roche 2008). While the reasons are varied, one particular factor pertinent to this paper is changing employer postures towards unions. There is little doubt that employer resistance to union recognition has increased since the turn of eighties. Though certainly not confined to FDI sectors, there is extensive evidence that union avoidance is especially prevalent among MNCs, particularly those that established operations since the early 1980s (Gunnigle 1995; Gunnigle et al. 2002; Roche 2001). Furthermore, Ireland's extensive reliance on FDI has meant that the MNC sector exerts considerable influence on public policy.

Ireland has no mandatory legal process through which unions can secure recognition from employers. This is partially traced to provisions in the Irish Constitution but also reflects a public policy stance which seeks to avoid mandatory union recognition provision because of its perceived negative impact on Ireland's capacity to attract FDI (Gunnigle et al, 2005).

Traditionally, the absence of statutory provision with regard to union recognition was not a major concern as most medium and large employers recognised and concluded collective agreements with unions (Roche and Larragy 1989). However, declining union density, increased employer opposition to union recognition (particularly among U.S. MNCs) and growing employer rejection of Irish Labour Court recommendations on recognition led to an upsurge in union pressure for legislative provision. The union movement effectively concluded that industrial action and Labour Court recommendations were no longer viable methods of gaining recognition in the face of hardened employer postures. Persistent union pressure to obtain legislation to address union recognition led to creation of a 'high-level' group comprising representatives of the government, unions, employers and *IDA Ireland* (Ireland's main body for promoting inward FDI). This culminated in the passing of what became known as the 'right to bargain' legislation (2001/2004). Uniquely, this legislation does not provide for mandatory union recognition but rather allows unions to pursue cases against companies where no collective bargaining exists.

United Kingdom: Over the past quarter century, Britain's voluntarist IR system has been overlaid by a developing framework of individual employment rights and EU-originated innovations in collective representation concerning employee consultation. Moreover, legal changes under the 1979-97 Conservative governments tilted the balance of the legal immunities that enable trade unions to operate against them. As a consequence, their ability to organize, take industrial action and secure recognition from employers has been significantly constrained. The enactment of a statutory recognition procedure by the Labour government in 1999 impinged on the principle of voluntarism, but its impact has been modest when set against that of the earlier Conservative legislation. Whilst the number of new recognition agreements has increased markedly since, the numbers of agreements involved and workers covered are not large (Gall 2007). Moreover, fewer than 20 percent of these new recognition agreements have been concluded under the statutory procedure. The larger effect has been indirect, with voluntary recognition being encouraged in circumstances where employers believe that the statutory procedure might otherwise be invoked.

Union density and union recognition have both declined since 1980. From a peak of 55 percent of the workforce in 1979, the Labour Force Survey shows that union density dropped steeply to 30 percent by 1997. It has since trended further down, although by much less: by 2009, union density was 27 percent. Union recognition exhibits a similar trend. The proportion of private sector workplaces with 25 or more employees recognizing unions stood at 50 percent in 1980, declining to 24 percent by 1998 and 22percent by 2004 (Blanchflower and Bryson 2009). The marked shift in public policy since 1979 has also affected employer preferences on union recognition. The proportion of new private sector workplaces recognizing unions fell from around 50 percent for those established in the decade prior to 1980 to 16 percent in the decade prior to 2004 (Blanchflower and Bryson 2009).

In larger, multi-site companies this decline has been accompanied by a growth in the practice of double-breasting. Employing the broader 'simultaneity' definition (see above), a 1985 survey of large, multi-site companies found that around one-third of the 89 percent which recognized unions for manual workers did not do so at all sites (Marginson et al. 1988). A subsequent 1992 survey of similar companies found that approaching one-half of the 69 percent which recognised trade unions for the largest workforce group did so at some but not all of their sites. Moreover, of the 89 companies recognising unions which had opened new sites, more than a third had not recognized unions at them (Marginson et al. 1994). The policy of overseas-owned MNCs towards engaging with trade unions has also long commanded attention, with debates about the implications of U.S. MNCs' non-union preference going back forty years (TUC 1970). This preference continues to be evidenced in the comparatively high incidence of non-unionism amongst U.S. MNC operations in Britain reported in a number of surveys (reviewed by Ferner et al. 2005), although a measure of pragmatism is also apparent in the acceptance of union recognition in some manufacturing operations (Almond and Ferner 2006). The wider implication of variation in recognition practice amongst MNCs from a given country of origin is that overseas-owned MNCs are engaged in the practice of double-breasting. This is also the case for U.K.-owned MNCs, where Marginson et al. (1994) found that U.K.-owned firms that were multinational in scope were more likely to recognize unions at some sites but not at others, than were large companies whose operations were confined to the U.K.

Similarities and Differences between the Three National Contexts

All three countries have seen a decline in private sector union density in recent years. There are clear indications also that global pressures have influenced the IR systems in each country, and that MNC approaches and behaviours may be shaping, to various degrees, these systems. Beyond these common trajectories, the above review of the institutional context for union recognition in each country variously suggests similarities and differences according to legal provisions for union recognition, bargaining structure and public policy.

The importance of legal procedures in union certification in Canada stands apart from the other two countries. The U.K. now has a statutory union recognition procedure, yet the great majority of employer decisions to grant new recognition remain voluntary – although some effect on these voluntary decisions from the 'shadow' of the new recognition law cannot be ruled out. In Ireland, union recognition remains a voluntary decision. Canada's single-employer bargaining structures tend to be more decentralized than those in Ireland and the U.K. Multi-site recognition, and therefore bargaining, in Canada is constrained by the absence of links between jurisdictions. The definition of the bargaining unit in Canada is almost always deemed to be a single site. In Ireland and the U.K., multi-site bargaining arrangements in certain service sectors, such as banking and retail, and the privatized utilities are not uncommon; MNCs in such sectors opening new sites tend to wrap them into the existing multi-site bargaining arrangement, and thereby voluntarily extend union recognition.

Two dimensions of public policy reflect both host country variations and dominance effects. First, the presence of national partnership arrangements and/or public policy support for collective bargaining may have an indirect impact in encouraging union recognition at company level, and consistency of approach as unionised organisations open new sites. Canada and the U.K. do not have the national partnership arrangements, which have become an integral feature of Irish IR, at least until the onset of the current global financial crisis. Indeed, since 1980 the U.K. has abandoned longstanding public policy support for collective bargaining as the preferred means of regulating IR, established at the turn of the 20th century. Key jurisdictions in Canada have rendered the unionization process more onerous through compulsory certification votes (as opposed to card checks), thus discouraging union recognition.

Second, policies to attract inward investment can play a role in encouraging or discouraging union recognition. Ireland's long standing policy of attracting mobile FDI in manufacturing and internationally traded services appears to have operated under a tacit understanding (at least) of the capacity to establish operations in a union-free environment (despite national partnership arrangements). As with the first policy dimension, this sets Ireland apart from Canada and the U.K. Given the type of FDI targeted, any effect is also likely to be sectorally specific. Overall, Canada and the U.K. do not appear to differ greatly in the likely impact of public policies on union recognition.

Methodology

This paper draws upon data gathered through co-ordinated large-scale surveys of employment practice in MNCs operating in Canada, Ireland and the U.K.[2] These surveys attempt to redress two major methodological weaknesses in many studies of employment practice in MNCs. First, in terms of poor levels of representativeness (cf. Collinson and Rugman 2005; McDonnell et al. 2007; Edwards et al. 2007), Collinson and Rugman (2005) argue that much published work on MNCs reflects a sample bias towards the largest, most global, well-known and predominantly U.S. manufacturing firms (e.g., IBM or General Electric) leading to an unrepresentative depiction of employment practice in MNCs. Second, most studies focus on patterns of foreign-owned sites as opposed to the aggregate behaviour of particular MNCs within a particular country. Our aim has been to address these gaps by carrying out the most representative international investigation to date.[3]

This paper is based on a total of 770 responses from MNCs operating in Canada (n=208), Ireland (n=260) and the UK (n=302), though various filters have been employed that lower these N values for each individual regression. The same criteria were used to identify the survey population in each country and the same target respondent was identified and interviewed (i.e., the most senior HR practitioner capable of answering for all of their organisation's national operations in each country). The response rate in Ireland was 50 percent of the identified population of MNCs (McDonnell et al. 2007)[4] For the U.K., the sample is estimated to represent 18 percent of the eligible population (Edwards et al. 2007). In Canada, the sample represents 15 percent of the eligible population. In each country, robust checks for non-response bias were undertaken against known parameters in the population listing. For the U.K., service-sector MNCs were found to be slightly under-represented in the achieved sample as compared to manufacturing MNCs, and the findings have been weighted to adjust for this. The Canadian survey also represents the broad characteristics of the population with a slight

[2] This paper draws on data from a larger international research project known as INTREPID - *Investigation of Transnationals' Employment Practices: an International Database,* involving coordinated surveys of employment practice in MNCs in Argentina, Australia, Canada, Denmark, Mexico, Norway, Spain, and UK. This paper focuses on three of these countries. Greater detail on each national study is available in Bélanger, et al. 2006 (Canada); Lavelle et al. 2009 (Ireland) and Edwards, et al. 2007b (UK).

[3] Details on the size thresholds used and the various steps involved the compilation of accurate and comprehensive listing of the MNC population in each country and on instrument design are documented in the first paper in this series (Edwards and Marginson 2010). Additional details on the precise steps taken in each country to compile their respective MNC databases are available as follows: Canada (Bélanger, et al. 2006); Ireland (McDonnell et al. 2007); UK (Edwards, P. et al. 2007).

[4] The Irish sample was stratified, and the response rate is 63 percent when taking this into account.

underrepresentation of service-sector MNCs. For Ireland, the surveyed sample was found to be broadly representative of the population.

Models and Hypotheses

Given the literature and our aims for this paper, we have chosen two models to study. The first incorporates the broad notion of union recognition influences. The second model lies within this same topic, but focuses specifically on double-breasting. The dependent variables are (1) whether a surveyed firm recognized unions, and (2) whether the surveyed firm was operating entirely unionized facilities or a mixture of union and non-union sites (thus engaging in double-breasting). In the first model, firms were given a value of 1 if they recognized unions for the purposes of collective bargaining at any site, and a 0 if they did not recognize unions. In the second model, firms that engaged in double-breasting were given a 1, and firms that did not were given a 0. We chose to filter from the data set the home-owned MNCs, looking only at those from foreign countries; including home-owned firms would potentially cloud the results, particularly for country of origin.[5] Removing home-owned firms also allowed us to focus on the 'institutional distance' of the MNCs operating in each of the countries. For the double-breasting model, we also filtered out firms that were not unionized.

In attempting to determine the factors that contribute to union recognition and double-breasting within each of the three countries, we have established a set of independent variables which we can use to create our models for each country.[6] The following independent variables are used.

Country of origin: The substantial literature dealing with home country effects on the management of labor suggests that U.S. MNCs are less likely than others to engage with trade unions. We use three broad categories for country of origin: U.S., Continental European, and other Anglo-American (aside from U.S. firms).[7] Given the literature, we would expect that U.S.-based companies would be less likely to recognize unions, and more likely to engage in double-breasting, than those from either Continental Europe or other Anglo-American countries. We hypothesize that the extent to which these companies differ in their union recognition levels across each country likely varies based on institutional factors. Significant differences between the U.S. and other Anglo-American categories will point to the importance of dominance effects.

Sector: The role of sector is again heavily cited in the literature as contributory toward differences in HRM practices of MNCs. Since manufacturing is generally seen as the sector in which unions are most entrenched (Roche 1997; Wallace 2003), we compare the manufacturing and services sectors, with the expectation that MNCs operating in manufacturing would be more likely to recognize unions than those in the services sector. We also expect manufacturing firms

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[5] Note that filtering the data brought the N size down to 165, 213, and 258 firms for Canada, Ireland, and the U.K., respectively.

[6] It is important to establish that each of the variables included in the models is independent of all the other included variables. For instance, it is critical to know whether any associations between sector and country of origin would lead to clouding of the included data. To test the methodological suitability of our variables, we used a number of techniques, including condition indexes, tolerance/VIF tests and also a standard correlation matrix. None of the variables violated any collinearity diagnostics; therefore, all have been included in our analysis. A series of tables detailing each of the methodological suitability tests is available on request.

[7] Ideally, our study might have yielded an additional Asian category for country of origin. However, the n values were too small to include, so those firms and any other country or region of origin have been eliminated.

to more readily engage in double-breasting, given the already high union presence in the industry.

Employment size: In keeping with the literature, we expect subsidiary size to influence union status since the number of employees at a site is so strongly associated with unionization. Our focus here is on the subsidiary operations alone and not the MNC's worldwide operations. We distinguish between three sizes of subsidiary: smaller (100 to 499 employees), medium (500 to 999 employees) and large (over 1000 workers). In addition to having a higher union presence, we would expect that larger firms would be more likely to engage in double-breasting, considering that there may be greater incentive for a company to open a non-union site given the already high unionization levels. We can also anticipate that the size variable might be affected by the host country employee representation regime, (for instance, the high degree of territorial fragmentation in the legal jurisdictions in Canada).

Subsidiary product diversity: We compare the extent to which the production of goods or services by the MNC subsidiary is dominated by a single product (or service) that accounts for 90 percent or more of sales, a dominant product that accounts for 70 to 90 percent of sales, or a range of products where no product or service accounts for more than 70 percent of sales. Greater product diversity can suggest a higher degree of centralization. However, greater heterogeneity is also likely to be associated with an increased recourse to double-breasting.

Subsidiary management discretion on union recognition: The extent of discretion in policymaking and execution is one expression of a complex set of relations linking subsidiaries and higher levels of decision making within an MNC. If the degree of subsidiary discretion is merely one facet of country-of-origin effects, notably in the case of more limited discretion observed at U.S. MNCs, then we might expect its influence to dissipate in multivariate analysis. However if, as we suspect, discretion is expressing other forces at work, then higher discretion will be associated with a greater capacity to take account of host institutions or simply to do what works for that particular subsidiary. We contrast here subsidiaries that report full discretion, as opposed to some or no discretion, over the setting of policy related to union recognition.

Subsidiary integration into MNC value chain: We capture two dimensions of a subsidiary's integration into its parent company: the extent to which its inputs are supplied by other units within the parent company and the extent to which it exports to other units within the parent company. We anticipate that stronger levels of integration – particularly upstream – will exert cost pressures on the subsidiary, potentially at least associated with a negative impact on unionization and a positive impact on double-breasting strategies.

Propositions for Cross-Model Empirical Results

In addition to our hypotheses regarding the variables that we expect will influence union recognition and double-breasting within the three countries, our methodological approach allows us to make propositions related to the variation in the empirical output generated across the countries. These propositions are founded in the theory and literatures discussed above, and are derived from our reading of host country effects and institutional duality.

Proposition 1: The models for union recognition and double-breasting in Canada will be the least well-defined, have fewer significant variables, and have lower magnitudes of influence for significant variables.

Proposition 2: The models for union recognition and double-breasting in Ireland will be the most well-defined, have the most significant variables, and have the highest magnitudes of influence for significant variables.

Proposition 3: The U.K. models will sit between Ireland and Canada, but will edge closer to the Irish results than the Canadian outcomes.

These propositions can be traced back to earlier work on IR systems, some of which emphasized the notion that, in comparative studies, the magnitude and significance of variables are distinctly influenced by variances across systems (Whitfield et al. 1994). In our case, we would expect Canada to have fewer significant variables and a less well-defined model because the IR system is the most institutionally constraining of the three. A firm's internal factors (i.e., the MNC's country of origin, sector, size, etc.) are more likely to be overridden by the external constraints of the system in Canada than in Ireland or the U.K. in terms of union recognition practices.

Ireland, on the other hand, has the least institutionally constraining IR system of the three; MNCs are afforded considerable flexibility to implement their business strategies without substantial institutional obstacles. Therefore, we would expect that the models for union recognition and double-breasting amongst MNCs in Ireland would be the most well-defined and more of the independent variables would be significant, as there are fewer externalities that might overshadow the internal factors highlighted above.

Finally, the U.K. should fit somewhere between Canada and Ireland. It has more institutional constraints than Ireland, but the U.K. and Irish systems are still quiet similar, more so than the Canadian system. Thus, we would expect the models to be similar between the U.K. and Ireland, but not identical, with the U.K. falling behind Ireland in terms of model fit and variable magnitudes/significance.

Descriptive Information

Table 1 gives a description of the data for each of the included countries as well as a pooling of all three. The descriptive results indicate that firms operating in Ireland recognized unions more often than the other countries and engaged in double-breasting least often; there was very little difference in the union recognition and double-breasting figures between the U.K. and Canada, however. The levels of union recognition were largely even across all three countries, as demonstrated in the pooled results, whereas the overall numbers suggest a slightly higher amount of firms not engaging in double-breasting.

Looking at the MNC's country of origin, we found that firms based in the U.S. were particularly prevalent in Canada, comprising 70.7 percent of the sample. There was no real difference in the percentage of U.S. firms operating in the U.K. (52.8 percent) when compared with Ireland (49.0 percent). MNCs from Continental Europe were most prevalent in the U.K., and far less prevalent in Canada.

We found considerable difference in the sectoral categorization of the countries. In the U.K. and Canada, more of the surveyed firms operated in the manufacturing sector (58.5 percent and 63.0 percent, respectively) than in the services sector. In Ireland, there were equal numbers of services and manufacturing firms. There was considerable consistency across all three countries in terms of employment size; most of the firms had between 100 and 499 employees in the host country. Further, in all the countries there were more large sized firms (1000 plus workers) than those of medium size (500-999 employees).

In all three countries, we found substantial within-country product diversification. Conversely, discretion over union recognition varied across the countries; Canadian firms were more likely to lack full discretion, whereas most U.K. firms were given leeway over union operations. Irish firms were essentially split in terms of their discretion levels. Finally, there was some convergence in terms of our value chain integration variable; across all the countries, the majority of firms were both supplied by and suppliers to other units within the parent company.

Table 1: Frequencies for Dependent and Independent Variables in Each Country

Variable	**Percent Frequency**			
	Canada *N = 165*	Ireland *N = 213*	U.K. *N = 258*	Pooled Data *N = 636*
DEPENDENT				
Union Recognition = No	52.8	43.7	53.3	49.9
Union Recognition = Yes	47.2	56.3	46.7	50.1
Double-Breasting = No	54.5	65.8	57.5	59.9
Double-Breasting = Yes	45.5	34.2	42.5	40.1
INDEPENDENT				
Country of Origin				
U.S.	70.7	49.0	52.8	56.0
Continental Europe	18.7	30.6	39.9	31.2
Other Anglo-American	10.7	20.4	7.3	12.7
Sector				
Services	37.0	49.8	41.5	43.1
Manufacturing	63.0	50.2	58.5	56.9
Employment Size				
100-499	57.6	60.6	48.4	51.5
500-999	17.6	16.0	15.5	17.8
1000 plus	24.8	23.5	36.0	30.7
Within-Country Diversification				
Single Product	23.1	24.4	17.3	18.2
One Dominant Product	25.6	19.6	18.0	20.2
A Variety of Products	51.3	56.0	64.7	61.6
Discretion over Union Recog.				
Less Than Full Discretion	64.9	47.6	32.2	43.0
Full Discretion	35.1	52.4	67.8	57.0

Firm Supplies to Others				
No	41.8	32.7	36.0	40.4
Yes	58.2	67.3	64.0	59.6
Firm Supplied by Others				
No	30.6	37.1	24.1	33.1
Yes	69.4	62.9	75.9	66.9

Logistic Regressions

We used logistic regressions to empirically test the effects of the various independent variables on our dependent variables within each of the three countries of interest. Each independent variable was accorded a reference category; these included U.S. country of origin, services sector, 100-499 employment size, a variety of products produced, less than full discretion over union recognition, and no supply to/from other units within the parent company.

Canada: Table 2 provides the results for the Canadian regressions. We found that the models fit the data quite well, passing the Hosmer and Lemeshow test for goodness of fit, and the Nagelkerke R^2 values were .320 and .358 for each. In terms of the MNC's country of origin, we found no significant differences in union recognition or double-breasting for firms originating in Continental Europe or other Anglo-American countries when compared with the U.S. reference point. However, we did find a significant sectoral difference for union recognition, with manufacturing firms far more likely to have unions than services firms.

Employment size was significant as it related to double-breasting in Canada; large firms were more likely to double-breast ($p<.05$) than small firms. We found significance for our variables on both within-country diversification and discretion as influential on the union recognition model, but not for the double-breasting model. Firms producing a single product were more likely ($p<.05$) to recognize unions than firms offering a variety of products, and firms with full discretion were also more likely ($p<.05$) to have unions than those with less than full discretion. Finally, the supply variables were not significant in either model.

Table 2: Logistic Regression for Canada

	Union Recognition Model			**Double-Breasting Model**		
	N = 87 Nagelkerke R^2 = .320			*N = 58 Nagelkerke R^2 = .358*		
Variable	**B**	**Std. Error**	**Odds**	**B**	**Std. Error**	**Odds**
Country of Origin						
(U.S. = ref.)						
Continental Europe	-.122	.760	.885	-1.467	1.050	.231
Other Anglo-American	-.379	1.068	.685	.779	1.075	2.180
Sector						
(Services = ref.)						
Manufacturing	1.708***	.655	5.519	-1.304	.892	.272
Employment Size						
(100-499 = ref.)						
500-999	1.084	.871	2.958	1.187	.948	3.278
1000+	.916	.635	2.498	1.763**	.840	5.832

Within-Country Diversif.						
(Variety of Products = ref.)						
Single Product	1.867**	.768	6.472	-1.004	.837	.366
One Dominant Product	.269	.707	1.309	.002	.784	1.002
Discretion over Union Rec.						
(Less Than Full = ref.)						
Full Discretion	1.810**	.754	6.113	-.016	.775	.984
Firm Supplies to Others						
(No = ref.)						
Yes	-.771	.595	.462	.103	.718	1.108
Firm Supplied by Others						
(No = ref.)						
Yes	-.362	.663	.696	1.057	.744	2.877
Constant	-1.101	.915	.333	-.409	1.200	.664

Dependent Variable (Union Recognition model): did the company recognize unions (1 = yes; 0 = no)
Dependent Variable (Double-Breasting model): did the company engage in double-breasting (1 = yes; 0 = no)
Significance levels: *** =.01 level; ** = .05 level; * = .10 level
Hosmer and Lemeshow significance: .668 (Union Recognition Model), .653 (Double-Breasting Model)

Ireland: Our second country-specific regression studied MNCs operating within Ireland. The results for the regression are found in Table 3. As with the Canadian data, we found that our models appeared to fit well, as demonstrated by the empirical tests for goodness of fit. The cases included in the final analysis had the strongest Nagelkerke R^2 of all the countries, at .384 and .364 for each respective model. We also found more highly significant variables and generally more robust coefficients in Ireland for each of the models than in either the United Kingdom or Canada.

Country of origin was highly significant in the Irish regressions. We found that firms originating in Continental Europe were almost four times more likely to recognize unions than those from the U.S., and firms from other Anglo-American countries were almost six times more likely to recognize unions than the U.S. reference point ($p<.01$ for both). These firms were also substantially less likely to engage in double-breasting ($p<.01$ for Continental Europe; $p<.05$ for other Anglo-American) than firms originating in the U.S.

Similar to the Canadian results, we found a considerable sector influence for union recognition, with manufacturing firms again substantially more likely to recognize unions than services firms ($p<.01$). Unlike the Canadian case however, we found that sector influenced double-breasting in Ireland; manufacturing firms were less likely ($p<.01$) than services firms to double-breast. We also found an employment size effect in both models, with large firms more likely to have unions than small firms ($p<.05$) and also more likely to double-breast ($p<.10$). We found that there was no product diversification effect in Ireland; however, discretion was significant, with firms having full discretion more likely ($p<.05$) to recognize unions than firms with less than full discretion. Finally, the supply linkages were slightly significant, with firms supplying to others in the parent company more likely ($p<.05$) to engage in double-breasting.

Table 3: Logistic Regression for Ireland

	Union Recognition Model			Double-Breasting Model		
	N = 174	*Nagelkerke R^2 = .384*		*N = 100*	*Nagelkerke R^2 = .364*	
Variable	**B**	**Std. Error**	**Odds**	**B**	**Std. Error**	**Odds**
Country of Origin						
(U.S. = ref.)						
Continental Europe	1.325***	.475	3.763	-2.005***	.743	.135
Other Anglo-American	1.772***	.566	5.884	-1.710**	.783	.181
Sector						
(Services = ref.)						
Manufacturing	2.332***	.445	10.293	-2.065***	.736	.127
Employment Size						
(100-499 = ref.)						
500-999	-.200	.514	.819	.186	.833	1.204
1000+	1.115**	.465	3.049	1.179*	.614	3.250
Within-Country Diversif.						
(Variety of Products = ref.)						
Single Product	.064	.483	1.066	-.513	.684	.599
One Dominant Product	.105	.481	1.111	.609	.671	1.838
Discretion over Union Rec.						
(Less Than Full = ref.)						
Full Discretion	.801**	.396	2.228	-.241	.543	.786
Firm Supplies to Others						
(No = ref.)						
Yes	-.493	.472	.611	1.679**	.731	5.362
Firm Supplied by Others						
(No = ref.)						
Yes	.369	.428	1.446	-.668	.579	.513
Constant	-2.261***	.679	.104	.770	1.040	2.159

Dependent Variable (Union Recognition model): did the company recognize unions (1 = yes; 0 = no)
Dependent Variable (Double-Breasting model): did the company engage in double-breasting (1 = yes; 0 = no)
Significance levels: *** =.01 level; ** = .05 level; * = .10 level
Hosmer and Lemeshow significance: .495 (Union Recognition Model), .161 (Double-Breasting Model)

United Kingdom: MNCs operating within the U.K. were tested last. The results of these tests are found in Table 4. We found again that both our models fit well overall, passing the chi-square and Hosmer and Lemeshow tests for model fit. Further, the models had Nagelkerke R^2 values of .304 (union recognition) and .282 (double-breasting). In terms of the individual variable influences, we found the following. Country of origin was slightly significant in terms of both union recognition and double-breasting, with firms originating in Continental Europe almost twice as likely to recognize unions as the U.S. reference point ($p<.10$), and considerably less likely to double-breast ($p<.10$). There was no significant difference between firms from other Anglo-American countries and those originating in the U.S. for either model.

Mirroring the other results, we found a highly significant sector effect for union recognition; firms operating in the manufacturing sector were far more likely to have unions than those within the services sector (p<.01). There appeared to be significance for employment size in both models; large (p<.01) and medium (p<.10) sized firms were both more likely to recognize unions than small firms. Large firms were also more likely to engage in double-breasting than small firms (p<.01). Product diversification was also significant in each model; firms having a dominant product were more likely (p<.05) to have unions than firms with a variety of products, while single-product firms were less likely (p<.10) to double-breast than the variety of products reference point. Finally, although the supply variables were not significant, discretion again proved influential; firms that were granted full discretion over union recognition were more likely (p<.05) to have unions, again mirroring the results for the other countries.

Table 4: Logistic Regression for United Kingdom

	Union Recognition Model			**Double-Breasting Model**		
	N = 223 Nagelkerke R^2 = .304			*N = 104 Nagelkerke R^2 = .282*		
Variable	**B**	**Std. Error**	**Odds**	**B**	**Std. Error**	**Odds**
Country of Origin						
(U.S. = ref.)						
Continental Europe	.576*	.346	1.779	-.830*	.498	.436
Other Anglo-American	.481	.666	1.618	-.445	1.075	.641
Sector						
(Services = ref.)						
Manufacturing	1.811***	.376	6.116	-.195	.570	.823
Employment Size						
(100-499 = ref.)						
500-999	.793*	.467	2.211	-.210	.741	.811
1000+	1.441***	.365	4.225	1.501***	.535	4.486
Within-Country Diversif.						
(Variety of Products = ref.)						
Single Product	-.179	.448	.836	-1.494*	.889	.224
One Dominant Product	1.017**	.426	2.765	-.685	.566	.504
Discretion over Union Rec.						
(Less Than Full = ref.)						
Full Discretion	.703**	.351	2.019	-.068	.563	.934
Firm Supplies to Others						
(No = ref.)						
Yes	-.024	.371	.976	.687	.604	1.988
Firm Supplied by Others						
(No = ref.)						
Yes	.176	.433	1.193	-.377	.699	.686
Constant	-2.909***	.585	.055	-.347	.945	.707

Dependent Variable (Union Recognition model): did the company recognize unions (1 = yes; 0 = no)
Dependent Variable (Double-Breasting model): did the company engage in double-breasting (1 = yes; 0 = no)
Significance levels: *** =.01 level; ** = .05 level; * = .10 level

Hosmer and Lemeshow significance: .112 (Union Recognition Model), .222 (Double-Breasting Model)

Pooled Data: Our final regression involved pooling the data into a single set. This served two purposes: for one, it allowed us to garner a sense of the factors that most heavily influenced union recognition and double-breasting across all three of the countries, without necessarily controlling for all of the institutional variances, many of which may explain the country-specific differences in outcomes. For another, it afforded us an opportunity to control for the host country as it related to union recognition, which served as a way to verify that there were in fact differences across the countries of operation, which would support our decision to subdivide the data into specific countries of interest. A new variable called 'Host Country' was included in the pooled regression, wherein the U.K. was accorded the reference category.

Table 5 provides the full regression for the pooled data. As with the other regressions, we found that the data fit extremely well according to the quantitative tests for model fit. The included cases had respective Nagelkerke R^2 values of .304 and .255. We found a considerable country of origin effect in both models, with results that mirrored those found for Ireland; that is, both Continental European ($p<.05$) and other Anglo-American ($p<.01$) MNCs were far more likely to recognize unions than the U.S. reference point. Continental European firms were also less likely ($p<.01$) to double-breast in the pooled data set. We also found a large sector effect in each model, which mirrors the results found for of the country-specific regressions ($p<.01$ for the union recognition model; $p<.05$ for the double-breasting model).

Further, there was a size effect in the pooled data, with large firms far more likely to recognize unions than small firms ($p<.01$); the same result held true in terms of the double-breasting model. Product diversity was significant in both models, where firms having a dominant product were more likely ($p<.05$) to recognize unions, and single-product firms were less likely ($p<.05$) to double-breast. Discretion proved highly influential and positive ($p<.01$) on union recognition, again mirroring the single-country results. Supply to others within the parent firm was significant and positive ($p<.05$) in is relationship with double-breasting in the pooled data.

Finally, we did find a host country effect for the union recognition model. Firms operating within both Canada and Ireland were more likely to recognize unions than MNCs operating in the U.K. ($p<.01$ for both). This finding suggests support for our notion that there are indeed institutional/host country differences that influence the union recognition levels of MNCs. The high significance of this variable appears to validate our decision to look at the individual countries in parallel, rather than simply pooling the data without considering these institutional variations.

Table 5: Logistic Regression for Pooled Data

	Union Recognition Model			**Double-Breasting Model**		
	N = 484 Nagelkerke R^2 = .304			*N = 262 Nagelkerke R^2 = .255*		
Variable	**B**	**Std. Error**	**Odds**	**B**	**Std. Error**	**Odds**
Country of Origin						
(U.S. = ref.)						
Continental Europe	.640**	.251	1.896	-1.058***	.353	.347
Other Anglo-American	.979***	.365	2.661	-.608	.464	.545

Sector						
(Services = ref.)						
Manufacturing	1.855***	.243	6.393	-.838**	.354	.433
Employment Size						
(100-499 = ref.)						
500-999	.438	.305	1.550	.158	.426	1.171
1000+	1.203***	.255	3.332	1.308***	.332	3.699
Within-Country Diversif.						
(Variety of Products = ref.)						
Single Product	.290	.282	1.336	-.905**	.427	.404
One Dominant Product	.566**	.281	1.760	-.015	.349	.985
Discretion over Union Rec.						
(Less Than Full = ref.)						
Full Discretion	.898***	.236	2.454	.000	.322	.999
Firm Supplies to Others						
(No = ref.)						
Yes	-.272	.246	.762	.777**	.351	2.174
Firm Supplied by Others						
(No = ref.)						
Yes	.108	.258	1.114	-.005	.355	.995
Host Country						
(U.K. = ref.)						
Canada	1.218***	.315	3.380	.456	.408	1.577
Ireland	.829***	.249	2.291	-.071	.349	.931
Constant	-2.777***	.413	.062	-.342	.613	.710

Dependent Variable (Union Recognition model): did the company recognize unions (1 = yes; 0 = no)
Dependent Variable (Double-Breasting model): did the company engage in double-breasting (1 = yes; 0 = no)
Significance levels: *** =.01 level; ** = .05 level; * = .10 level
Hosmer and Lemeshow significance: .394 (Union Recognition Model), .347 (Double-Breasting Model)

Discussion and Implications

The results of the regressions raise a number of points worth discussion, both in terms of the hypotheses regarding the influence of the independent variables on union recognition and double-breasting, and the propositions related to the effects of institutional variations on the outcomes. An important finding is the confirmation of our initial contention that multiple strands of analysis are necessary to take account of the complex determinations of IR practice in the operations of the subsidiaries of multinational firms. Moreover, and we shall return to this below, these different sources of influence on MNC practices appear to interact with particular national IR regimes and their political economies in ways that suggest the need for more sophisticated integration of these combinations in the analysis of MNC employment practices.

Our first line of analysis, and the three-country comparison, considers the impact of institutional effects on union recognition and double-breasting practices. This explains our choice of more or less proximate regimes of union recognition within so-called liberal-market economies as a way of capturing institutional variety within that category. We suggested that we were likely to observe home, host and dual effects. In terms of home-country institutional effects, the influence of country of origin varies considerably across the three samples. In Canada, there is no effect for either model; in Ireland, there is a substantial effect in both models. In the U.K., there is a small effect in both models. Where there are statistically significant differences, the results uniformly show that firms from the U.S. are less likely to recognize unions. This finding is consistent with the literature, which suggests that U.S. firms are generally less likely to favour a union presence than, say, Continental European companies. In general, our hypotheses that country of origin should influence significantly both union recognition and double-breasting, and that U.S. firms would be less likely to recognize unions and more likely to double-breast, are largely supported by the pooled and individual regression outcomes, though notably are not supported in the Canadian results.

Our pooled data analysis offers important insights into host-country institutional effects. Both countries (Canada and Ireland) show significant effects relative to the reference category (the U.K.). These results suggest that there is clearly a host-country union recognition effect within our three liberal-market economies and this affirms the notion of varieties of institutional latitude anticipated at the outset of this paper.

Our analysis of institutional duality suggested that companies originating in different types of economies should use their institutional difference strategically in the implementation of IR policies. In particular, it was anticipated that MNCs originating from continental Europe might experiment with non-union or double-breasted models when operating within divergent institutional regimes from those in their home country. Our results do not support this contention. The home-country effects appear to be much stronger as, for example, in both Ireland and the U.K., where subsidiaries with parent companies originating in continental Europe are both more likely to recognize unions and less likely to engage in double-breasting.

A second strand of analysis focused on economic dominance effects. This implies that employment practices are not merely an expression of country of origin but also that of the relative hierarchy of economies within the international political economy. In particular, we anticipated that economic dominance would be manifested in two ways: first, in its most prevalent manifestation, the practices of U.S. MNCs would set the standard because of the role of the U.S. economy in the global economy; second, in a more novel way, that some countries are more likely to exhibit "dominated" effects, namely those most dependent on FDI for their prosperity. In this respect, we anticipated that the strongest dominance effects should be manifested in Ireland followed by Canada. The evidence for standardization around U.S.-style IR practices (union avoidance and double-breasting) is, in fact, greatest in Ireland but, contrary to our expectation on this count, least in Canada; the Canadian findings may be related to institutional externalities, which we will discuss below.

The third strand of our analysis was predicated on the notion that MNCs, as organizations, were not necessarily alike and that an understanding of institutional and dominance effects requires a more sophisticated analysis of organizational structure, policy and strategy. We therefore sought to ascertain the impact of variety of variables related to structure and contingencies, policy and degrees of integration into global production networks and value chains.

In terms of structure and contingencies, we limited our analysis to sector, size and product diversity. In all of the regressions, sector proved highly influential as manufacturing firms were substantially more likely to have unions than are services firms. While this result is not particularly surprising given that the manufacturing sector has been a traditional stronghold for unions and that the services sector appears far less amenable to a union presence, it does confirm that, irrespective of other influences, there is a distinct sectoral logic with regard to union recognition. However, the impact of sector on double-breasting practices runs counter to our anticipation. It is significant only in Ireland, where manufacturing firms are less likely to double-breast, whereas our reading of the literature would point us to the spread of double-breasting practices in manufacturing operations as a sector-specific strategy for cost control.

The results for employment size tend to confirm the hypotheses we had for each model. The category of MNC subsidiary operations with the largest size (as opposed to intermediary and smaller size) was significant in seven of eight regressions. Larger subsidiaries generally had both a higher union presence and an increased likelihood of engaging in double-breasting than the smallest firms. However, in many cases the middle category for employment size did not differ significantly from the smallest firms in terms of union recognition or double-breasting, and in Canada size was influential only as regards double-breasting.

In terms of product diversity, we find limited evidence that the concentration of activities on a single product (Canada) or a dominant product (the U.K. and the pooled data) would be likely to translate into increased union recognition. The effect in Canada, however, is particularly marked. In the U.K., firms with a dominant production were both more likely to recognize unions and to engage in double-breasting. Neither of these effects was observed in Ireland.

We suggested at the outset of this paper that organizational policy could be understood, *inter alia*, as an embedded and path dependent manifestation of micro-politics within an MNC; the subsidiary's understandings of its relative discretion on policy issues is potentially, therefore, an important strand in our explanation of MNC employment practices. Our results for discretion over union recognition consistently support this contention across the individual country and pooled data regressions. In each case, firms with full discretion were considerably more likely to recognize unions than firms without full discretion. In other words, irrespective of the other influences at play, subsidiary discretion on union recognition was associated with union recognition. However, subsidiary discretion on union recognition was not found to significantly influence the likelihood of it engaging in double-breasting.

A final dimension of our organizational analysis looked to the differential impact of subsidiary integration into the international operations of their parent MNC. We gauged this in terms of the extent to which a subsidiary was supplied by or supplied to operations of its MNC in other countries. In the absence of strong priors in the literature, we advanced alternative hypotheses: that more extensive integration and the cost and flexibility pressures associated with that integration would prompt more extensive union avoidance practices; or that such value chain influences would likely yield to host-country and other variables in the context of strongly networked MNCs. Whether or not a firm was more extensively supplied by the operations of an MNC in other countries did not appear to affect its IR practices, in terms of either union recognition or double-breasting. This was also the case for our results for the Canadian and UK regressions for more extensive supplying to MNC operations in other countries. However, our value chain hypothesis was significant in terms of increased likelihood to engage in double-breasting in both the Irish and pooled results when the subsidiary supplies the operations of the MNC in other countries. This mixed result gives support to our argument that cost and flexibility pressures can have an impact on IR practices. More importantly, and we will return to this below, it points to the need to understand the relationship between value-chain, economic dominance and host-country institutional effects as regards the complex forces at work in determining employment practices in MNC subsidiary operations.

Beyond the results for the influence of the variables within each regression, our parallel approach to the empirical analysis allowed us to compare the relative strength of the models and magnitude of the variables across the three institutional contexts. This allows us to test whether our propositions related to institutional variations and their effects on recognition practices across countries were accurate. Our propositions suggested that the overall model would be least well-defined in Canada, most well-defined in Ireland, and somewhere in between in the U.K. (though likely nearer to Ireland than Canada). According to the propositions, the significance of the variables would also follow this trend, as would the magnitude of the coefficients.

The results generally support our propositions. The Canadian regressions had the lowest number of significant variables in each model and the least robust variables across the board; crucially (as noted before), country of origin was not significant in either Canadian model. This may serve to highlight the overriding nature of externalities (that is, institutional constraints) on union recognition in Canada, which may have mitigated the country of origin effect found in the other regressions. The Irish regressions had the highest Nagelkerke R^2 values of the three countries for both models. Ireland also had the most robust variables and generally the largest coefficients for its significant variables; although the U.K. had the largest overall count of significant variables for the union recognition model, the significance levels were not as strong across the regression when compared with Ireland. These outcomes appear to support our notion that the permissiveness of the IR system influences the amount of success that MNCs have in bringing their home-country practices into the host environment. For instance, in the U.K., which has an arguably less permissive system than Ireland but still maintains similar IR structures, the MNC's country of origin remained significantly influential on union recognition, but the magnitude of influence was nowhere near as high as that found in the more permissive Irish context. Finally, as mentioned, the pooled regression results suggest support for the notion that host country differences do influence a firm's recognition of unions.

Overall, our results point to the continuing importance of institutional effects in understanding the employment practices of MNC subsidiaries. However, these effects are numerous, manifesting both home and host country influences. A unique aspect of our analysis flows from our ability to take account of varieties of institutional latitude in relation to ostensibly similar types of economies. Particularly striking is the apparent permissiveness of Irish IR institutions to practices associated with U.S. MNCs. In contrast, and contrary to our expectation, and this is perhaps also a manifestation of geographic proximity, as Canadian IR did not manifest a particular latitude to such practices. This might also reflect the highly decentralized character of Canadian IR and the ability of MNCs, originating in the U.S. or otherwise, to pursue the union recognition and double-breasting policies that they prefer within the greater constraints, but also the considerable possibilities, associated with the union recognition regimes in Canada. The Irish political economy and its strong dependence on U.S. FDI appear to make it more amenable to modifying its practices.

Our results also highlight the importance of MNC subsidiary organizational structure, policy and strategy. This not merely a question of taking account of what otherwise might be treated as control variables but rather of understanding how organizations are different and how policy discretion is built into organizations over time. These variables are important, irrespective of other influences. The value chain effects are particularly interesting in the Irish case, because they also appear to be linked to host country institutional permeability and related dominance effects. What then emerges is a complex and undoubtedly variegated picture where home and host country effects are at work in particular ways that favor union avoidance and double-breasting but that such effects are mediated by significant organizational factors working both in favour of union recognition (size, sector) and in favour of union avoidance (value chain integration).

These results are important for larger debates about MNC behaviour. In particular, they reinforce the contention that there are complex and multiple determinants at work and there is a need to move away from oversimplifications of types of economies in order to embrace the complex interface between multiple institutional effects, including varieties of host-country institutional latitude, a country's location in the global political economy and various organizational effects that, in turn, express both contingencies and particular path dependencies as firms develop over time and MNC subsidiaries manage to craft a particular role within their larger corporate structures.

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