



# Private and public co-operation in preventing and addressing corporate crime: the case of labour trafficking in the Finnish construction industry

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## Abstract

Numerous corporate and state processes have long underpinned harms related to human trafficking and exploitation. A consequence of these processes has been a growing interest in how public and private sector organisations co-operate to address key challenges, including accountability for alleged exploitation. The purpose of this article is to examine these public-private sector dynamics in the Finnish construction industry, with a particular emphasis on how stakeholders respond to challenges associated with human trafficking, corporate social responsibility (CSR), and the ‘grey economy’. The core argument developed is that despite a strong regulatory framework in Finnish construction, significant aspects of corporate compliance rely on companies’ voluntary efforts, whereby public sector authorities can have competing views of solutions to address trafficking and exploitation. This paper contributes to existing discussions within white-collar and corporate crime on the dynamics of CSR, and how these apply to the broader context of the grey economy.

**Keywords** Grey economy · Corporate social responsibility · Human trafficking · Multi-authority co-operation · Construction industry

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## Introduction

When addressing crimes such as human trafficking, in political-economic terms the Finnish regulatory landscape tends to be viewed favourably due to its association with the ‘Nordic Model’ of industrial relations (Bergholm & Bieler, 2013; Gjøberg, 2010). The Nordic Model broadly consists of factors including strong state regulation, effective trade unions (aka a unionised workforce), and collective oversight of industry (de la Porte, 2019). Importantly, the notion of ‘multi-authority co-operation’, referring to collaboration between public authorities such as the police, labour inspectorate, and tax authorities, is strongly emphasised as part of the Nordic Model, whereas the role of ‘corporate social responsibility’ (CSR) – involving private companies – is backgrounded. This distinction in importance between multi-authority co-operation and CSR in the Finnish construction industry is particularly visible due to the numerous strategies that have developed in recent years on the former, especially in relation to tackling the ‘grey economy’ (Grey Strategy, 2016, 2020), whereas the latter is only now starting to gain significant traction (e.g., Kivelä, 2019; Mikkilä et al., 2021). However, the tools available to public authorities are limited, and such authorities rely to some extent on private sector co-operation. This points to the shortcomings of multi-authority co-operation, and the need for a broader ‘multi-stakeholder co-operation’ involving public and private sector actors, as well as other civil society organisations in developing a multi-dimensional strategy to address pressing social challenges such as trafficking for labour exploitation.

The challenges of human trafficking and exploitation have a strong grounding in existing research, with some emphasis on structural factors that encourage trafficking and exploitation, including state policies, market competition, as well as businesses and their supply networks (Benstead et al., 2021; Crane et al., 2019). The construction industry is a prominent setting where such factors apply, due to its informal employment practices, short-term projects, extensive subcontracting, and sometimes a lack of regulation (Davies, 2022). However, there is little understanding of multi-stakeholder co-operation in the fast-changing nature of the construction industry, which is important to develop due to construction being a high-risk sector to exploitation (Crates, 2018). The contribution of this article is to help address this limited understanding by examining the case of human trafficking in the Finnish construction industry, as well as the various public-public and public-private partnerships that have developed.

In this paper, the challenges of how public and private stakeholders co-operate in the construction industry to mitigate against human trafficking and exploitation are explored. The paper’s key argument is that despite the Finnish construction industry being underpinned by a strong regulatory framework when addressing trafficking, the measures available to public authorities are limited by tensions associated with multi-authority co-operation, as well as somewhat depending on voluntary efforts of the private sector. In so doing, we draw out the key pillars of the Finnish approach to human trafficking and attention to the interplay between the concepts of the grey economy and CSR. We begin by conceptualising and grounding these overlapping policy issues in previous research: actions against human trafficking and labour exploitation, the promotion of corporate social responsibility, and measures

against the grey economy. Second, a critical overview of the Finnish construction industry and how it is regulated. Third, an outline of data collection methods used to inform this research, which consisted of a small-scale qualitative project. Fourth, key themes from interview data are discussed, including tensions associated with multi-stakeholder co-operation and the protections in place within Finland's construction industry. This paper contributes to existing understandings of how the public and private sectors co-operate in tackling human trafficking within industry by critically considering these tensions, and how they fit into the broader scope of intertwining concepts of the grey economy, white-collar and corporate crime, and CSR.

## Human trafficking, corporate social responsibility, and the grey economy

Human trafficking and other exploitation have been well discussed across numerous disciplines and types of industry (Benstead et al., 2021; Davies & Ollus, 2019; Gadd & Broad, 2018; LeBaron, 2020), including construction and its supply networks (Crane et al., 2019; Crates, 2018; Davies, 2022; Davies & Malik, *forthcoming*). In the Finnish context, forced labour is the most usual form of human trafficking (Ihmiskauppa, 2022). At the same time, research on labour exploitation has consistently demonstrated its embedded nature in various sectors of the Finnish economy (Lillie, 2012; Ollus, 2016; Pekkarinen et al., 2023; Viuhko, 2019). This work has included discussions on the efficacy of numerous interventions (Shamir, 2012), including criminal-legal sanctions, immigration/border controls, victim protection and human rights, as well as a drive to address root causes such as social inequality, thereby reducing the problem before it manifests. Crosscutting responsibilities of different stakeholders from public, private, and civil society sectors, labour trafficking and exploitation require multi-stakeholder co-operation, for instance as a part of a 'whole government approach' (Jahnsen & Rykkja, 2020; Malik et al., 2022). As part of this picture, there have been efforts to assess vulnerabilities within businesses and their supply networks that lead to severe exploitation, which are partly linked to transparency legislation in some countries (e.g., the UK Modern Slavery Act 2015) that emphasises 'corporate social responsibility' (CSR).

In criminological research, CSR has long been regarded with scepticism for being a business 'buzzword', rather than consisting of genuine efforts to address systemic tensions within or beyond business settings that can result in harm (Slapper & Tombs, 1999; Tombs & Whyte, 2015). In broader political-economy, CSR presents a model of business-society relations that backgrounds the role of governments and trade unions, which is difficult to reconcile with social democratic principles often associated with Finland and other Nordic countries. Based on the 'Nordic Model' of industrial relations (Bergholm & Bieler, 2013), markets are open and private enterprise is encouraged, while also safeguarding strong welfare programmes, workplace protections, and regulation of businesses. For these reasons, Finland has been compared favourably against other political-economic models such as 'neoliberalism' associated with countries such as the UK and US (Cavadino & Dignan, 2006), who tend to take more punitive stances on matters such as welfare systems and workers' rights, while being more 'hands-off' when regulating business activity. CSR's affinity to neoliberal thinking is seemingly incompatible with the Nordic model of governance

based on the traditions of corporatism, consensus, and close co-operation between state, capital, and labour (Gjølberg, 2010). At the same time, CSR has been implicit in the Finnish system, whereby Finnish companies are traditionally regarded as socially responsible due to positive stances towards economic crime prevention (Alvesalo & Tombs, 2002). Although these political-economic models are more nuanced than outlined here, they bring into question why practices such as human trafficking and exploitation still occur in countries like Finland, despite the strong regulatory framework associated with the Nordic model.

In Finland, human trafficking for labour exploitation is officially regarded as a form of economic crime, which is a synonym for concepts such as white-collar and corporate crime (Alvesalo, 2002). Controlling economic crime has been high on the political agenda since the 1980s, whereby ad-hoc co-operation initiatives between the police, tax authority, and the Board of Customs to control economic crime have evolved into strategies for tackling the grey economy and economic crime. Such cooperation was later institutionalised in strategies and action plans for tackling the grey economy and economic crime, published on a regular basis since 1996 – hereafter the Grey Strategy. The concept of the grey economy principally refers to unpaid statutory payments and taxes within the scope of legitimate business activities (Kankaanranta & Muttilainen, 2010), whereas the term economic crime signifies criminalised acts or omissions which are committed in the framework of, or using an enterprise or other corporations (Alvesalo, 2002).

Hence, the concepts of the grey economy and economic crime overlap, but not all grey economy activities are criminal, which highlights the importance of co-operation between criminal justice stakeholders and other regulatory agencies. Multi-authority co-operation is the central premise of tackling the shadow economy and economic crime (Grey Strategy, 2016). Authorities combine their information into a shared risk-based target selection process and supervision, and conduct audits using harmonised practices (Grey Strategy, 2020: 10; Roth & Luhtasaari, 2021; 43). These include co-operation during criminal and enforcement procedures, joint inspections, tax supervision, enforcement of occupational safety and health, and of contractors' liability, monitoring of permits by permit authorities, and monitoring of pension and other social insurance contributions. While this co-operation focuses on public-public partnerships, the 2016 Grey Strategy explicitly refers to transparency of business, the role of the private sector and the importance of smooth co-operation between public and private stakeholders to curb the shadow economy. The latest Grey Strategy (2020) does not explicitly refer to CSR, however the choices made by companies and private individuals are acknowledged as a part of a holistic approach. Still, in Grey Strategies the onus is placed on the state to ensure transparency and access to information, while the role of CSR is decentred. CSR is more strongly rooted in Finland's latest Action Plan against human trafficking, which seeks to combine multi-authority co-operation and CSR (Roth & Luhtasaari, 2021), making the discussion in this paper timely and important to understand the ways in which the challenges of human trafficking and exploitation are understood from regulatory perspectives.

## The construction industry and regulatory challenges

Construction industries across the world are renowned for their volatile market settings, flexible labour practices, and hazardous work conditions. Perhaps the most well-known case is the Qatar 2022 World Cup preparations, which has long been connected to the poor conditions of migrant workers (Ganji, 2016). The number of human trafficking cases and aggravated work discrimination investigated by Finnish authorities points to the criminogenic character of the construction industry (Eastern Uusimaa Police Department, 2022; National Bureau of Investigation, 2022; Rakenusliitto ry, 2023). More widely, workers and other stakeholders within construction industries have been vulnerable to a range of physical, psychological, and financial harms, whether this be concerns over posted workers across the European Union (Lillie, 2012), (false) self-employment in Ireland (Wickham & Bobek, 2016), or labour subcontracting in Thailand (Buckley et al., 2016: 35).

The challenges highlighted above relate closely to the dynamics of construction supply networks, which are frequently dominated by a small number of large multinational companies serving as main contractors, who typically use numerous smaller subcontractors to achieve smaller project objectives related to materials supply and work tasks requiring skilled or unskilled labour (Crates, 2018; Davies, 2022). Most construction projects are short term, irrespective of their size, which generates a series of systemic vulnerabilities for workers including casual work, poor labour conditions, and longer-term insecurities, since most companies will not directly employ full-time permanent workers. To varying degrees, the industry relies on migrant labour, which some companies use to reduce costs by employing a cheaper, outsourced workforce and mitigate further expenses such as training and paid absence (Crates, 2018). To thoroughly understand the dynamics that lead to vulnerabilities within industries such as construction, it is necessary to consider their internal legitimate processes and how they are subject (or not) to regulation, rather than viewing systemic problems as an external 'crime' problem that threatens otherwise unproblematic industries.

The Finnish construction industry contrasts with construction industries discussed elsewhere within and beyond Europe (Buckley et al., 2016; Ganji, 2016; Wickham & Bobek, 2016), due to its seemingly robust levels of regulation and oversight. As a labour intense sector, the construction industry is vulnerable to both human trafficking and labour exploitation, and shadow economy activities. Finland belongs to a small group of countries who approach economic crimes via traditional law enforcement as a part of regular police work (Alvesalo, 2002). Specialised police units and prosecutors focusing on economic crime and/or human trafficking may investigate severe cases of criminal activity in the construction industry. In turn, the Finnish Tax Authority is well situated to tackle shadow economy activities. To assure transparency and avoid undeclared economic activity, everyone who works on a construction site must be registered in a tax number register and wear a photo ID that displays their tax number. In addition, the Tax Authority hosts the Grey Economy Information Unit (GEIU), established in 2011 to enhance awareness and information exchange on matters of the grey economy.

A key piece of Finnish legislation designed to tackle the grey economy is the Contractor's Liability Act 2007 (hereafter CLA), which was updated in 2012 to

include additional measures for the construction industry. The purpose of the CLA is to address undeclared economic activity and promote fair competition between businesses. The construction industry tends to rely on large subcontracting chains, thereby making avoidance of tax and VAT payments, as well as pension payments and other conditions of collective bargaining agreements easier to pursue (Eurofound, 2013). Therefore, companies that use subcontractors are required to check that employers are meeting their obligations to workers, such as asking for evidence to confirm payment of taxes. The 2015 reform of the CLA introduced an information reporting requirement for construction work completed electronically or manually every month with the Tax Authority.

While this regulatory picture may seem to include many authorities, there is a strong emphasis on an integrated approach, given that “no authority alone has sufficient resources to rein in the phenomenon” (Roth & Luhtasaari, 2021: 43) of economic crime. Indeed, Jokinen and Ollus (2018: 34) cite increasing co-operation between public actors by sharing information and conducting joint inspections as a key action point, to ensure that exploited workers have better access to justice and that perpetrators have a greater chance of being sanctioned. Despite a dense regulatory matrix and legislation such as the CLA, vulnerabilities to exploitation remain, which brings into question the effectiveness of this together with other measures such as multi-authority co-operation, as well as other forms of regulation contained within Finnish construction. These discussion points have value beyond the construction industry and beyond Finland, since they relate strongly to the field of human trafficking research and strands of work associated with it, such as industrial relations and criminological perspectives on the role of businesses and supply networks. It is to these considerations that the focus of the paper now turns.

## Research methods

This article is based on a small-scale, exploratory qualitative project that took place in Finland – notably, in the cities of Helsinki and Turku, in 2020. The empirical data collection consisted of semi-structured interviews and focus group discussions, involving a total of 10 participants who were spread across the labour inspectorate, trade unions, police, tax authority, an employer group, and an NGO that supports victims of human trafficking. One of the authors from this paper (Jokinen) as part of HEUNI (The European Institute for Crime Prevention and Control) were key in identifying and securing access to participants from their previous research in the areas of human trafficking and exploitation. Therefore, the team adopted a purposive sampling approach, which can be a pragmatic means to access participants in smaller scale projects where specialist input is needed and not readily available elsewhere (Etikan et al., 2016: 2).

The criteria for selecting participants were based on two factors: first, that they held a position either in a public or private sector organisation that worked in a professional capacity within (or with) the Finnish construction industry; and second, that they were proficient in speaking English. Participants were asked questions on vulnerabilities to exploitation in the construction industry; what measures they and private

sector companies were taking to prevent or address exploitation, including perceived effectiveness of CSR measures; as well as how the organisation they worked for cooperated with other public and private sector organisations. As per the literature on semi-structured interviews (Roulston & Choi, 2018: 233) and focus groups (Lune & Berg, 2017: 94–95), these discussion points provided an overall focus but allowed enough flexibility for participants to highlight topics that they felt were important.

Most discussion was in English, since most participants were proficient in the English language, although there were certain expressions that needed Finnish interpretation. The research team was aware of potential language barriers for non-native English speakers, and the potential loss of meaning that may result from the extra effort required when listening and speaking – a point that is outlined in existing research (Welch & Piekkari, 2006). To this end, a member of HEUNI was present at each interview to help navigate such language barriers, and upon transcribing the interviews, these expressions were checked with HEUNI as part of the coding process. Following transcription, the research team conducted a thematic analysis of the interview data, firstly by coding relevant and/or prominent issues of interest, and then by organising these codes into broader topics of discussion. For example, the ‘Relevance of existing reporting obligations’ topic set out in the below discussion was developed from narrower themes, such as documentation provided by self-employed persons, efforts to tackle the grey economy, and voluntary efforts of construction companies.

As a caveat, the authors do not claim that the findings discussed below are statistically representative, either of the construction industry or of the human trafficking context in Finland. The relatively small sample size means that the discussion points are intended to be illustrative and suggestive rather than generalisable. In addition, the authors understand that the ‘voices’ of victims themselves are not represented in this work – although it does draw on views from a victim support organisation, thereby providing a form of secondary representation. However, this type of small-scale research is still valuable in developing broader questions and important understandings (Manning, 2017: 52), that can later be developed in larger-scale research, in this case potentially beyond the construction industry and Finnish context. Key discussion points on conceptualisations of CSR, the limitations of legislation, as well as trade union activity and multi-authority co-operation, are all prominent issues in relation to white-collar and corporate crime more broadly. It is these topics that form the basis of discussion.

### **Protections against exploitation in finnish construction**

While the global construction industry is considered vulnerable to human trafficking, Finnish construction is highly regulated and therefore arguably less vulnerable than other labour and cash-intensive sectors. Most participants suggested that construction contains inbuilt ‘protections’ against human trafficking and exploitation. First, the varying and implicit ways in which stakeholders alluded to notions of CSR. Second, the influence of the CLA on stakeholders. Third, the relatively strong presence of trade unions, and their ability to negotiate directly with the employer’s association and companies, or to blacklist companies if negotiations fail. Taken together, these

points feed into broader dynamics of how public and private organisations in the construction industry co-operate and use the enforcement tools that are available to them. Although there appears to be strong co-operation between stakeholders, there are still challenges with implementation. These include not only the usual problems with information sharing, but also the risk of ‘tunnel vision’ (Malik et al., 2022) whereby each organisation attends to its own aims and objectives while neglecting the bigger picture of trafficking.

### Conceptualisation of corporate social responsibility (CSR)

In Finland, given the high levels of social protection and strong state regulation, the idea of CSR might be considered superfluous in the domestic context (Gjølberg, 2010). Finnish policies against both human trafficking and the grey economy, while acknowledging the role of the private sector, place greater emphasis on multi-authority co-operation. Therefore, it is important to recognise how regulators at the operational level conceptualise the role of CSR and multi-stakeholder co-operation. Some participants were positive about construction companies committing to CSR:

“I think nowadays, it’s a bit easier to get co-operation because social responsibility, the idea of social responsibility is going forward with these companies. And it’s a new type of tool for us to have this co-operation in that relation.”

**Tax-Authority-01.**

Since CSR may differ from binary depictions of ‘regulators’ and ‘the regulated’, sharing information and working with organisations such as trade unions and tax authorities could be seen as an innovative tool of securing compliance. Here the challenge of CSR is how to define what constitutes compliance. As Tombs and Whyte (2015: 123) point out, compliance is ambiguous and determined through negotiation and bargaining between regulators and the regulated. Against this background, investigative priorities may influence definitions and enforcement of compliance standards.

While few participants acknowledged the importance of CSR, they related more strongly to the concept of the grey economy, pointing to challenges connected with addressing human trafficking and exploitation:

“... so far, the concentration has been very much on this grey economy. But maybe, I hope it’s changing towards labour exploitation now ... there would probably have to be a big scandal to make the companies see the profit of social responsibility from the labour exploitation side ... so far, they have very much looked into this economic side of it ... That’s all fine, but it’s only the economic side, and yeah, it can help to avoid economic crime. But then I think the labour exploitation side is maybe not so much thought of.” **Labour-Inspector-01.**

There are at least two important points worth drawing out here. The first is how stakeholders including companies primarily focus on the ‘economic’ side of the grey economy at the expense of labour exploitation, which the inspector here seems to classify as a separate aspect of the grey economy. However, this may be partly due



to language issues, where the Finnish translation of labour exploitation often literally refers to the exploitation of migrant workers, which is a separate discussion from the grey economy since the latter mainly connects to undeclared work. Such a linguistic fusion between labour exploitation and migrant workers could be unhelpful if it hinders a more comprehensive understanding of what exploitation is – i.e., that migrant workers are just one subgroup affected by it. This is significant because such a fusion could distort public perceptions and institutional countermeasures to exploitation. Indeed, in the past, control efforts were rather selective, as most investigated cases targeted small-scale business, where the exploiter and the exploited belonged to the same ethnic group (Ollus, 2016). Taken together, overlooking a wider range of exploitation could unwittingly mean that forms of structural exploitation are left unchallenged.

Second, the inspector claims that only a significant scandal in the construction industry would motivate companies to pay more attention to human trafficking and exploitation in their own organisations and supply networks. Such a scandal did develop later in Finland in 2020 that involved Skanska, which is one of the world's leading construction companies. Originally at least 13 subcontractors of Skanska were suspected of underpaying migrant workers during the renovation of the Olympic Stadium in Helsinki (YLE, 2019), whereby this scandal later grew (YLE, 2020). This has led to an extensive investigation into the prevalence of labour exploitation in the Finnish construction industry, and by extension a greater emphasis on construction companies in Finland developing commitments to address exploitation. Such developments bring into question other interventions and means of ensuring accountability, which in Finland can be strongly seen with the CLA from 2007 and other reporting obligations.

### Relevance of existing reporting obligations

Although there has been recent discussion on mechanisms to enhance companies' efforts to improve internal accountability and workplace standards (FinnWatch, 2022; Ministry of Economic Affairs and Employment, 2022), legislation on a Corporate Social Responsibility Act is still pending. In relation to economic crimes, existing legislation provides some due diligence checks, reporting and monitoring obligations. Participants frequently mentioned the use of tax numbers as a key preventative measure to issues such as underpayment of wages. Every construction worker should have a tax number before being permitted to enter construction sites, whereby they scan their card upon entering. The main contractor has the responsibility to ensure that everyone working on their site – regardless of any subcontracting arrangements – has this individual tax number activated to the public register which shows information such as salary payments. As one trade union representative discussed:

“... it's been good for the workers, even if there is a bit more control now that at the sites you have to have an ID badge, with this tax number before you can enter the site. For some people it might feel as if you're being followed, because it's registered how much you work etc. But still, we think that it's been good that we have this surveillance, we are monitoring it. We have explained this

to our members, that in the long run it's good for us. Of course, it's not 100% waterproof, you can try to use somebody else's card etc, you can do that."

**TradeUnion-Helsinki-02.**

Therefore, tax numbers represent one aspect of preventing exploitation by ensuring a degree of transparency for workers. However, as the trade union representative acknowledges, these numbers are not infallible, since they may be used in a fraudulent way, and an equivalent level of protection may not be in place for those working on smaller sites and projects that have no access control and oversight of labour conditions, including any informal work and means of payment. Connected to this, given ever-evolving innovative technologies, measures that are designed to protect workers from exploitation could well be (mis)used as forms of workplace control, such as monitoring performance management, thereby potentially leading to more subtle forms of exploitation at work. Still, the fact that there is surveillance of workers' tax numbers suggests that some aspects of financial crime are at least acknowledged by companies in the broader context of CSR.

A recently added mechanism to guard against exploitation is the income register, in which Finnish authorities can check earnings payment data in real time since 2019, and pensions and benefits payment data since 2021:

"... it's a huge step forward for us as well, still, to get this real time information about wages on specific persons. But since it was the first year doing this, last year there were some issues on getting the correct information on time to this register. But as the year went on, I think the quality got better and more comprehensive, so I hope that this is done at the moment on a good level, at least."

**Tax-Authority-01.**

Moreover, in relation to the CSR efforts of companies, participants referred to the importance of the CLA more than any other legislation. While they generally regarded the CLA as a positive starting point, there were some expressions of tension between what the CLA was intended to do in theory, and difficulties of implementation. In other words, the CLA's legal provisions seem to contain a gap, whereby factors such as company tax debts are visible, but workers' salary payments are not. This tension between theory and practice is represented in the below extract:

"... That law came into force in 2007. It was a new law, that kind of law didn't exist in any EU countries, we were the first one. In general, it's a good law, but you are not tackling the grey economy or these kinds of issues with that law. Because on paper, yes, you can say, and you can see that there are no tax debts, you can see there are no debts of social payments, and they have insured that workforce. But you cannot see if they are paying salaries ... you have a gap, that grey area, which you cannot see with that information which is demanded by us from the law. It's a good law, it puts leverage on subcontractors, but on the other hand, you are not preventing the grey economy with that law."

**Employer-Group-01.**

Hence, there are provisions to make companies' finances more transparent, especially in relation to factors such as insurance, as well as tax debts that could have negative knock-on effects to salary payments if unresolved. Despite the theoretical advantages of the CLA, as the employer group representative notes, there is a limit to what information can be disclosed, which in turn limits efforts to tackle the grey economy. In this respect, some companies were accused of not taking labour exploitation as seriously as they could, especially if they already exceed the minimum legislative requirements of the CLA:

“...I don't think the big, main contractors really see labour exploitation as a big issue. I think they are proud of the fact that they fulfil the Contractors Liability Act, and that they go further than the minimum requirements. Because the minimum requirement is to check your own contractor. But in the construction sector, they have got internal rules that they should go through the whole chain. So, I think they are probably of the opinion that since we have checked the whole chain, then we are fine, and we don't know about labour exploitation or anything like that.” **Labour-Inspector-01**.

These 'internal rules' may include ethical principles that form part of the Confederation of Finnish Construction Industries (CFCI, 2022), which is a joint organisation of contractors and other similar businesses. Despite some positivity with the CLA, if companies do not go beyond the minimum standards as per the general principles of CSR or, following internal rules companies merely settle for superficial checks of their supply chain, the fight against exploitation will remain illusionary. Thus, this same labour inspector suggested that there is still part of the CLA that relies on companies' voluntary efforts:

“I think it's more up to the company, because we can't force anybody, we can't tell the main contractor, look, you can't have a contract with this company. But we can try to influence them indirectly by sending the inspection reports and saying, look, this is what's happening in your subcontracting chain, do you want to do something about it? But it's really up to the companies, what they want to do.” **Labour-Inspector-01**.

Here, the inspector refers to their own audits of companies, in this case subcontractors, which in Finland are public documents. Typically, inspectors would conduct their reports of subcontractors and send these to the main contractors to highlight any areas of concern. However, the expression “it's really up to the companies” shows that there is a limit to the remit of labour inspectors in terms of how companies engage with other businesses. While the prerogative of labour inspectors is important to uncover exploitation, there are other tools available to public bodies to motivate companies to go beyond minimum standards and address concerns, including trade union 'blacklisting'.

## Role of trade union blacklisting

As signposted above, the CSR model of business-society relations does not assign any privileged role to trade unions, which are treated similarly with other civil society actors such as non-governmental organisations and local community groups. In contrast, under the Nordic Model, trade unions have a greater influence on corporate decision-making. Despite the challenges that trade unions face in contemporary settings (Jansen & Lehr, 2022), union membership in Finland is higher than many other countries, at just under 60% in 2019 (ILOSTAT, 2022). Aside from the involvement in bi-annual negotiations between the government and the employer organisations, and universally applicable collective agreements, the main tool that some unions have is the ability to blacklist companies that they feel are behaving unacceptably towards workers:

“... we have been working together with the employer organisation on these issues quite a lot. We have a very good co-operation in this area. For them, it’s unfair competition, because companies tend to be quite small in the construction sector. So, if foreign small companies can compete with these lower wages or not paying taxes etc, that would be unfair competition towards Finnish companies, who are trying to do the right thing. Then for us, it’s a question of social dumping and wage dumping.” **TradeUnion-Helsinki-02.**

The extract suggests that blacklisting is a relational tool between trade unions and employers’ organisations, which can be used as a last resort if negotiations with individual companies fail. While there is some co-operation between these organisations, this stems from different perspectives: for the employer group, their priority is to minimise the likelihood of unfair competition between companies becoming a significant concern; whereas trade unions are primarily concerned with workers’ salaries and conditions being undercut. Some outlined the blacklisting process in further detail:

“The employer’s union was negotiating with us, with our collective agreement, so we let them know that this company doesn’t play by the rules of our collective agreement in this and this ... and then the employer’s union said that you can kick them out from the construction site, and you don’t have to pay them anything. The site manager called us ... They want this block out because they want to keep the money and kick them out from the construction site ... so it’s a good tool because when they have this block-out they want to negotiate and pay, because otherwise they don’t get the money.” **TradeUnion-Turku-01.**

“... bigger picture, if you have those companies which are on the blacklist on your side, that’s bad publicity for sure. And if you have journalists who are coming to the site and asking, how can you have 20 people from here who are not paid, or paid two euros per hour, or they’re not able or not licensed to work in Finland, they don’t have those permits to work here. What is your answer to that?” **Employer-Group-01.**

Although these extracts outline the ways in which co-operation is possible between stakeholders, one problem is how to incentivise construction companies to join employer organisations in the first place. On the one hand, joining an employer's association is seen as 'respectable', and may increase the chances of accessing larger construction sites and projects. On the other hand, as the union suggests, smaller companies at lower tiers of supply networks may be more difficult to reach.

Stakeholders such as labour inspectors cannot officially use this blacklisting tool, but is still important on an informal level due to a 'naming and shaming' strategy:

"Labour inspection can't have any blacklists, it's illegal, but we also have this trade union magazine where the list is, and then when we went to construction sites and did inspections, so if it looks familiar to the company, we could look a little bit closer." **TradeUnion-Turku-02.**

Therefore, blacklisting can informally help labour inspectors to ask questions about named companies, especially since they are officially named through the trade unions. These points of discussion on agencies' perceptions of social responsibility, CLA legislation, as well as union blacklisting, all represent significant tools that different stakeholders can and do use. Despite these tools, which initially seem to provide comprehensive ways to oversee construction companies, there are challenges across public sector agencies in how they co-operate and collectively influence companies to address problems related to exploitation and trafficking.

### **Dynamics of multi-authority co-operation between public and private institutions**

The cross-sectional character of trafficking and exploitation requires concentrated efforts and information exchange between actors, which is also central to the Finnish Grey Strategy (2020: 5–6). The above discussion illustrates how public and private agencies operate, both as individual agencies and in collaboration with others at practical and policy levels:

"... we work together with the inspectorate, they have these specialised inspectors for foreigners [for monitoring the use of migrant labour]. So that's quite good, so that's a lot of help for us also. And also, we work together with the tax administration, police, so that's one thing, we can't do this alone, we have to be a network." **TradeUnion-Helsinki-01.**

"We can't do this alone" is difficult to disagree with in principle, but in practice it reflects a broader tension that co-operation must happen at operational levels among practitioners, since the legislative level may be slower to act and hence 'behind the curve' of latest industry developments. The acceleration inherent to developments in modern business practices decrease the ability of state regulation to react to pressing societal issues; in particular, the slow pace of the legislative process forces regulators to seek novel instruments that promise more flexible solutions (Rosa, 2013, 261; Werner, 2018, 94). Accordingly, as noted by the employer group, the strong co-

operation between public and private sector organisations can partially be attributed to circumstances and decision-making (or lack of) at the governmental level:

“... it’s always difficult with the politicians, because you don’t know what they’re deciding or what’s on their mind in three weeks’ time. That’s why we cannot rely on changing the laws, we have to be faster in doing this kind of way, like public-private partnerships.” **Employer-Group-01.**

The points alluded to here suggest that the potential lack of ‘synchronisation’ between government and the operational level underpins the need for and value of public-private partnerships. In Finland, the private sector refers not only to businesses and industry groups, but also an active civil society, and some organisations may have informal agreements with the construction industry to provide mutual support:

“... we’ve had some informal projects with some companies who have agreed to hire some of our clients who have been exploited and then maybe made complaints, like reported their employer, and they’ve had trouble finding new jobs ... we work with organisations that work with undocumented migrants, and if they come across somebody who has been exploited, then they refer them to us. And we work with labour inspection a lot. So, we refer people, or people’s cases, to labour inspection, and labour inspection refers people to us who contacted them, and who they think would need our services.” **Victim-Group-01.**

This NGO has strong connections with a range of stakeholders to supplement official state support. However, despite the willingness and ability of different organisations to work together, there are a range of challenges related to private sector co-operation. For example, challenges to multi-authority co-operation are contained within the scope of the employer group and the companies it represents:

“... in certain cases, it’s hard to get compliance with the company or the persons, there are some who don’t want to co-operate with us ... what’s challenging for us now is the smaller companies who aren’t members of the employers’ organisations ... the supervision there is not that comprehensive in relation to larger sites which are for new buildings. And smaller companies don’t necessarily have ... the expertise to know about the obligations, and that can relate to the shadow economy in those cases as well.” **Tax-Authority-01.**

There are at least two key challenges alluded to here: information exchange, and competition between small and medium-sized businesses, which includes the broader problem of interacting with small-sized and foreign companies. In terms of information exchange, this has been the most significant issue with multi-authority co-operation, both at the policy and research levels (Kuukasjärvi et al., 2021, 2022; Raunio et al., 2022). The fact that information exchange seems to occur primarily between public authorities while excluding the private sector, is significant and may go some way to explaining the lack of interaction with some private companies. To some extent, the challenge of smaller companies operating in construction was highlighted above

with the issue of tax numbers, since smaller companies who may operate on smaller sites may not have the same infrastructure or awareness of how to check someone's status via their tax number registration.

Information flows are familiar challenges also within public-public partnerships, due to both the existence of restrictive legal provisions and, conversely, a perceived lack of clear provisions (Malik et al., 2022). In addition, existing research indicates that co-operation is influenced by work cultures of coordinating actors (Skilbrei & Tveit, 2008; Cilliers & Geyvenstein, 2012; Giacomantonio, 2015). The theme of 'tunnel vision' (Malik et al., 2022) emerged from some discussions, since this challenge suggests that individual authorities tend to become pre-occupied with their own daily tasks while overlooking the 'bigger picture'. This challenge also refers to the importance of how engaged individual officers/bureaucrats are with their area of specialism – for example, engaging with fieldwork is important to understand the latest developments first-hand, rather than just conducting office work.

Some stakeholders may change roles across public authorities during their careers, which initially seems to contradict the notion of tunnel vision as a barrier. However, during the research a union representative claimed that some labour inspectors are less willing to leave their desks and 'get their hands dirty' in some fieldwork, which supports the idea of tunnel vision, but suggests that the personality of individual stakeholders can determine how they are willing to address exploitation and the grey economy. Therefore, a combination of politics, inter-relationships between public-public and public-private organisations, as well as individual personality, all have a part to play in explaining the hindrance of genuine multi-stakeholder co-operation within the construction industry.

## Concluding thoughts

The focus of this article has been on the dynamics of multi-stakeholder co-operation in the Finnish construction industry, framed through the example of human trafficking and exploitation. To develop a more rigorous understanding, we pull together overlapping yet disconnected strands of literature on trafficking and stakeholder co-operation. The small-scale qualitative research involving stakeholders associated with Finnish construction reveals some perceived advantages and tensions between public-public and public-private organisations, and importantly, how these discussions relate to CSR and broader efforts in Finland to tackle the grey economy. Stakeholder participants implicitly recognised CSR as part of efforts to tackle the grey economy – although this is often framed from an economic/financial perspective rather than a 'social' one. Participants cited the CLA as an important but fallible tool due to its obligation on businesses to check the employment conditions of subcontractors, despite aspects of enforcement remaining voluntary. A useful tool for some trade unions is their ability, usually in co-operation with the employer's association, to 'blacklist' companies who do not abide by collective agreements, thereby applying further pressure to address exploitation and the grey economy. While there is a strong degree of co-operation between public sector authorities in Finland and its construction industry, there are still challenges associated with information exchange, reach-

ing smaller and foreign-owned businesses in the private sector, and the possibility of ‘tunnel vision’ developing among individual authorities.

Based on the key findings summarised above, the purpose of the article has not been to develop an all-encompassing or generalisable explanation for either Finland, the construction industry, or the challenges of human trafficking and exploitation. To even consider such an approach would require a wider range of participants and research methods, as well as potentially some comparative research to assess the ‘Nordic model’ alluded to towards the start of this paper against other political-economic models such as ‘neoliberalism’. The key contribution of assessing public-public and public-private sector co-operation does, however, have broader implications for industries and human trafficking contexts beyond construction, and beyond Finland. For example, in countries such as the UK and its labour market there are numerous regulatory authorities, each with their own areas of responsibility, which can make sharing information and co-operating a more significant challenge. If key challenges of multi-stakeholder work can be understood, then these pitfalls could be avoided to the advantage of other authorities elsewhere. In a similar vein, the perceived effectiveness of CSR, while not always explicitly referred to by participants, seems to be limited in scope at best, especially given the reliance on some voluntary reporting mechanisms and other business views of labour exploitation as primarily an issue of ‘unfair competition’. This conclusion would seem to reinforce existing research that critiques self-regulation and notions of CSR, even in Nordic countries (Midttun et al., 2015; New, 2015).

It is worth noting that there have been some developments in public and business policy since the data informing this paper were collected in 2020, including a report from FinnWatch (2022) outlining how businesses have developed their due diligence processes and improved accountability mechanisms, such as different surveys of vulnerable workers and other ways of engaging with posted workers. In addition, the police now have a specialised trafficking unit, and the labour inspectorate has more specialised staff to monitor the use of migrant labour, suggesting further potential for dedicated resources. While it remains to be seen how the new government elected in Finland in 2023 will approach these challenges, the necessity for public sector authorities to continue developing communication and co-operation while navigating practical challenges is going to be a crucial issue when ramping up efforts to address human trafficking in the coming years.

**Author contribution** All authors contributed to the study conception and design. Material preparation, data collection and analysis were performed by Davies, Malik, and Jokinen. The first draft of the manuscript was written by Davies and Malik, and all authors commented on previous versions of the manuscript. All authors read and approved the final manuscript.

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**Data availability** The datasets generated and/or analysed during the current study are available from the corresponding author on reasonable request.



## Declarations

**Ethical approval** This project received ethical approval from The University of Turku in 2020, before any data collection took place.

**Informed consent** The research team took an overt approach to this project, discussing with participants the aims and objectives of the study. All research participants were provided with a participant information sheet and signed an informed consent form prior to any interviews being conducted.

**Statement regarding research involving human participants and/or animals** This research involved human participants who held professional positions and discussed their day-to-day work, as well as associated views, opinions, and recommendations, on a professional basis. The research project did not involve vulnerable participants.

**Competing interests** HEUNI (with whom Jokinen and Haapasaari are affiliated) provided a small amount of funding to support parts of the data collection efforts of Davies during the fieldwork period.

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