



No. 41

Emergent Entrepreneurs
in Transnational
Advocacy Networks:
Professional Mobilization
in the Fight for Global
Tax Justice

Copenhagen Business
School

Leonard Seabrooke ^a
Duncan Wigan ^b



Please cite this working paper as:

Seabrooke, Leonard, and Wigan, Duncan (2013) 'Emergent Entrepreneurs in Transnational Advocacy Networks: Professional Mobilization in the Fight for Global Tax Justice', GR:EEN Working Paper No. 41, Centre for the Study of Globalisation and Regionalisation, University of Warwick. www.greenfp7.eu/papers/workingpapers

^a PIPES project, Department of Business and Politics, Copenhagen Business School, Porcelænsøen 24, Frederiksberg, Denmark, Tel: +45 3815 2449, ls.dbp@cbs.dk

^b GR:EEN project, Department of Business and Politics, Copenhagen Business School, Porcelænsøen 24, Frederiksberg, Denmark, Tel: +45 3815 3541, dw.dbp@cbs.dk

ABSTRACT

To advocate new transnational policy ideas, issue entrepreneurs must be able to switch identities to bolster their influence in different professional and policy networks. This paper provides a framework for understanding how issue entrepreneurs operate in transnational advocacy networks through ‘identity switching’ and professional mobilization. We describe how issue entrepreneurs switch identities between different professional ‘network domains’, and how identity switching is critical for accessing and activating advocacy strategies on technically complex issues. We demonstrate the power of the above concepts by examining the emergence of issue entrepreneurs working on global tax justice, particularly those organizing via a key group addressing global tax policy reform, the Tax Justice Network. We discuss how this group uses identity switching as an explicit strategy for professional mobilization in pushing forward the global tax justice agenda. Our evidence suggests that strategies supported by identity switching are vital for the emergence of technically complex justice issues. We also argue that studies of transnational advocacy networks require greater focus on modes of organizing rather than forms of organization in understanding issue emergence.

INTRODUCTION

In the immediate wake of the financial crisis G20 leaders issued a statement ‘to take action against non-cooperative jurisdictions, including tax havens’, declaring themselves ‘ready to deploy sanctions to protect our public finances and financial systems’. These leaders went so far as to argue that ‘the era of banking secrecy is over’ (G20 2009: 4). The issue of cross border tax evasion and avoidance hit the top of the international policy agenda and new initiatives emerged, with the US, the EU and at the OECD launching new proposals for regulatory reform. High profile corporate and elite tax scandals also spurred the EU and US to act. The US unilaterally attempted to eliminate tax evasion within its own borders with the Foreign Account Tax Compliance Act (US 2010; Palan and Wigan 2014). The OECD reinforced and reinvigorated earlier initiatives to tackle ‘tax havens’ with improved compliance processes and tools (Eccleston 2012; Sharman 2006). The EU launched a series of initiatives aimed at generating both a new political consensus on tax evasion and avoidance and a regulatory architecture to pursue it. Even countries that have

been traditionally associated with a benign attitude towards tax havens seem to have changed tack. In 2013 UK leadership of the G8 pushed the global tax reform agenda forward, with Prime Minister Cameron putting tax compliance at the heart of the meeting, alongside trade and transparency issues. At the same time the G20 commissioned a report from the OECD on 'Base Erosion and Profit Shifting' (BEPS) to articulate the challenge of taming tax avoidance by firms and to fix 'fiscal leaks' in advanced and developing economies. The importance of new accounting methods to assess fiscal leaks, such as Country-by-Country Reporting, was noted by these powers. The UN also pushed forward with policy solutions to address fiscal base erosion from transfer pricing, and the International Monetary Fund made significant noises about the need for global tax policy reform. In short, the agenda for global tax reform has recently gone through a significant and profound shift that is changing transnational regulatory interaction and content. At the forefront of campaigns to implement new policies were civil society actors and non-governmental organizations (NGOs) pushing international tax justice as an issue through transnational advocacy networks (TANs).¹

NGOs have long been interested in global tax issues but often floundered in articulating what should be done. 'Tax havens' were identified as a policy concern by NGOs in the late-1970s, with Oxfam briefly addressing the issue by pulling together a team to investigate havens' effect on development before declaring the issue too complex and difficult to navigate.² This remained the status quo throughout the 1980s and 1990s with no coherent movement on the 'problem of offshore' until the 2000s when activists organizing through the Tax Justice Network articulated a series of policy positions. Now large NGOs such as Oxfam, ActionAid, and Christian Aid dedicate time and resources to advocacy on tax justice issues, as have a number of smaller more specialized NGOs, most notably the Association for the Taxation of Financial Transactions and Aid to

¹ This research relies on over 30 confidential interviews and two Case Study Integrity Meetings with activists, lawyers, regulators, and practitioners on tax issues in Europe, the United Kingdom, and United States. TA = Tax Activist.

² Interview with TA, UK, March 2013.

Citizens (ATTAC), and advocates based in a number of development and 'new economic thinking' think tanks.

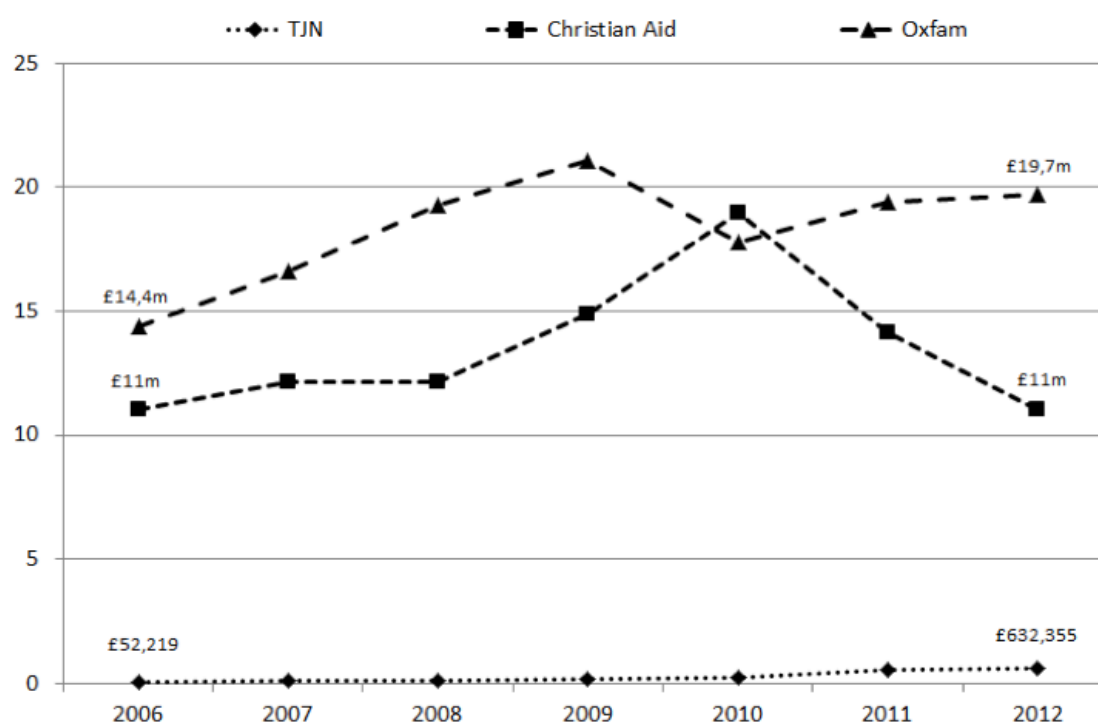
A number of NGOs have recently launched campaigns on the issue of tax justice, highlighting how tax havens 'cheat the system' in developed and developing countries alike. By the time of the 2009 G20 meeting a host of NGOs with a focus on development issues had launched campaigns on the issue.³ Amidst this NGO 'scramble' to take the mantle on tax justice issues (Cooley and Ron 2002), the UK-based Tax Justice Network (TJN) emerged as the specialists who were widely recognised as knowing best on tax issues. Established in 2003, TJN is a key actor on global tax justice issues and strongly influential in defining campaign issues, targets, accounting metrics, and policy content for the wider NGO community. As stated in an interview with a U.S. based NGO, 'pull any thread on where ideas come from on tax justice issues and it will lead you back to TJN'.⁴

Figure 1, below, compares TJN's total funding with the campaigning and advocacy budgets from two of their main competitors on tax justice campaigning, namely Oxfam and Christian Aid. We rush to add that the budgets of the latter are not only directed at tax justice issues, but the glaring distance in resources between TJN and the others suggests that Oxfam and Christian Aid can certainly out-spend TJN if they so wished and clearly have a larger administrative capacity.

³ Citizens for Tax Justice, Somo Netherlands, Transparency International, Amnesty, Greenpeace, Revenue Watch, Alliance Sud, Extractive Industries Transparency Initiative, Global Witness, Ethical Consumer, World Development Movement, The Rules, Catholic Agency for Overseas Development; European Network on Debt and Development, Save the Children, Robin Hood Tax, Stop Climate Chaos, Greenpeace, UKuncut, New Rules for Global Finance, Publish What You Pay, Occupy, People and Planet, the Cooperative Movement, IBIS Denmark; Christian Aid, and Scottish Catholic International Aid Fund

⁴ Interview with TA, US, November 2013.

Figure 1: Comparing Advocacy Resources, 2006-2012 (£ millions)



Source: Annual Reports from the respective organizations.

As we clarify below, TJN's ability to create and direct a transnational advocacy network and influence policy debates on tax avoidance and tax evasion cannot be explained by standard NGO tactics. If that were the case then we would expect larger and more established organizations to take the lead when political opportunities were created to push forward on the issue. Tax justice is also not the kind of issue that contains the particular brute moral or emotional content typically targeted by NGOs (Keck and Sikkink 1998). In short, while we have a lot of information on how NGOs control issues and how they act as gatekeepers (Carpenter 2010), we have less information on how activists mobilize on issues with high technical complexity. Explaining the rise of global tax justice activism in transnational advocacy networks provides a puzzle given the high level of issue complexity (Carpenter 2007).

This paper investigates how professional mobilization to campaign on issues with high technical complexity. We explain how this occurs as a consequence of strategies from issue entrepreneurs who engage in what

we call 'identity switching' as a form of professional mobilization (Seabrooke 2014a). Identity switching permits strategies for professional mobilization and transnational activism that have not previously been articulated. These strategies draw upon a capacity to *access* professional and policy arenas from a footing in a particular domain and then to *activate* a plan of action intended for a different audience. This is identity switching between different 'network domains' (White 2008), between different networks of individuals and organizations that belong to a particular identity, such as the 'corporate world', 'scientific community', etc.

To provide a hypothetical example, an activist may be invited to a workshop at an international organization because she is recognized as an expert in the corporate world on a particular issue. This activist will appear to conform to the habits associated with that world to reinforce her attachment to the network domain. She may then use her access to this arena to publicly agitate for reforms that 95% of her fellow attendees would reject, but provides good scientific reasons for the proposed changes in an attempt to create salience on the issue. This hypothetical example is often played out in reality, in meetings, workshops, and in the media as activists campaign on highly technical issues. We locate these 'access' and 'activation' points as key strategies that follow from identity switching and professional mobilization on technical complex issues like global tax policy. While there has been a lot of research on how highly technical issues, such as accountancy standards, are fiercely guarded by experts and private interests (Mattli and Büthe 2003), we intend to show how professional mobilization is possible on technical issues through identity switching.

Theorizing identity switching in professional mobilization provides an important contribution to the established literatures on norm and issue entrepreneurs, NGOs, TANS, and associated arguments on 'tipping points' in 'norm cycles', as well as how organizations muster of 'political salience' (Finnemore and Sikkink 1998, Wong 2012). Investigating identity switching requires us to specify strategies which permit different network domains to

be traversed to gain momentum on an issue, permitting professional mobilization that can enlist new followers from different settings to join a common professional and political institutional project (Suddaby and Viale 2011). We suggest that identity switching and the identification of network domains also places an important spotlight on how transnational organizing occurs rather than assuming that organizing is a property of particular organizations (Henriksen and Seabrooke 2013). As we clarify below, organizing on tax justice issues does not conform to standard accounts of how NGOs behave as organizations.

This paper is organized into four sections. First, we build on work on issue entrepreneurs in NGOs and network position in transnational advocacy networks. The second section provides a theoretical exposition of identity switching between network domains and how this informs professional mobilization. In the third section we discuss the emergence of professional mobilization on tax justice advocacy from 1978 to 2013, drawing on repeated semi-structured interviews with key actors and participant observation of tax justice campaigning from 2004 to 2013. In the fourth section we describe the four key strategies used by activists during identity switching and how they correspond to professional mobilization to assist activism on this technically complex issue. These include strategies of ‘bezerking’, ‘cornering’, ‘narrating’, and ‘templating,’ – all terms derived from interviews with tax activists. We conclude by suggesting that identity switching and professional mobilization become part of the analytical toolkit for the study of issue emergence in transnational advocacy networks.

ISSUE ENTREPRENEURS AND ORGANIZATIONAL STRATEGIES IN TANS

There is now a large body of work on how issues emerge within TANS and when NGOs are more likely to select particular issues to emerge over others. The key themes in this literature are issue entrepreneurs, the creation of issue salience, and organizations are positioned on an issue within organizational networks.

In general the chain of events for issues to gain traction is that those concerned can move from the identification of a grievance to the making of claims on how to address it, the adoption of the issue by NGO 'gatekeepers', and then authorities enacting their decision-making powers on the issue (Bob 2005). Work on the dynamics of policy influence in TANs also draws our attention to the role of issue entrepreneurs in 'information politics' (Keck and Sikkink 1998; Ron, Ramos, and Rodgers 2005). Here, the issue entrepreneur is depicted as strategically selecting and vetting issues on the basis of his or her passion for the cause and the receptiveness of the policy environment for the issue (Carpenter 2007). As such issue characteristics are very important, with campaigns on issues of bodily harm and unequal access to rights traditionally successful because of their emotive and moral content. This research suggests that it is difficult for issues to emerge unless they are transcultural and involve bodily harm to vulnerable individuals or legal inequalities in opportunities (Keck and Sikkink 1998: 23-27).

Building on earlier work by Keck and Sikkink (1998), Carpenter (2011) demonstrates that the moral and emotive content of an issue is determinative in processes of issue adoption and rejection by NGOs, with some issues too complex to handle. This helps us to understand why for instance the issue of 'children born of war', from wartime rape, fails to garner the attention it deserves because it is too complex to campaign on (Carpenter 2010). She argues that issue non-emergence is also important and that issue definition and adoption should be studied to understand why some issues are vetted from organizations. Wong (2012) has recently added to such analyses of NGOs, putting forward a compelling argument that 'political salience' is key for issue emergence and that NGOs are active in selecting issues that can gather political momentum. For Wong organizations seek to be centrally placed within their network on an issue to create a 'scale-free' network where buy-in from new members and other organizations comes at a low cost in terms of finances and energy. To ease buy-in issues have to be salient and easy to understand. In general these approaches do not deal with technically complex issues but broader issues common to NGOs and TANs, such as human

rights.

Much of the literature on NGOs and TANs deals with tactics employed by issue entrepreneurs and organizations. In explaining how an issue gains political salience, Keck and Sikkink (1998) show how issue TANs will move between states and organisations to circumvent issue blockage via a 'boomerang effect'. When one state blocks new norms or policy actions, TANs will use an alternative state or international organisation to pressure that state into compliance with the new norm or policy. Here the passionate issue entrepreneur engages in information politics to get the message across, calling upon her passion for the cause as a resource. Related work points out how the passion of issue entrepreneurs is often dampened by the professionalization and bureaucratization of NGOs in TANs, especially when organizational objectives dominate (Hopgood 2006).

Organizations also have particular strategies for controlling issue content and how issue definition leads to on-the-ground change, including between 'sending' and 'receiving' activists within TANs. Hertel (2006) discusses how transnational activists have two mechanisms to control the normative content of campaigns. The first is 'blocking', where 'receiving-end activists' deliberately express norms in a different way from those supplying the normative information. For example, local Bangladeshi activists blocked a US-based campaign on child labour, because of the harm it may create for the children and local economy, and insisted on a reinterpretation of economic rights. The second mechanism is 'backdoor moves' where receiving activists add secondary policy proposals to accepted normative content provided by the sending activists. An example Hertel provides is local Mexican activists accepting a US-led campaigning on anti-discrimination and adding a parallel campaign on reproductive rights.

Building on earlier work from Sell and Prakash (2004) on NGOs strategies with businesses, Bloodgood (2011) recently points out that NGOs often act like corporate and political interest groups in their strategies, especially in targeting political authorities with particular information during periods of

uncertainty. Bloodgood's study suggests that there are analogous to American interest groups and that the style of presentation is an important element of organizational strategy (see also Stroup 2012). From this perspective NGOs with 'a polished image, well-known experts, and large budgets, are more likely to gain access to decision-makers' (Bloodgood 2011: 114). As suggested in Figure 1 above, TJN does not fall into this category, even if some of its core members are now widely recognized as experts.

The state of the art on NGOs and TANs clearly has a view that issue entrepreneurs require passion but that information politics requires careful organizational vetting of issues and that successful organizations are those who have significant resources and are professionalized and bureaucratized. We suggest that activism on global tax reform exhibits some of these characteristics. This is the case when it comes to the larger NGOs campaigning on tax issues. However, issue entrepreneurship on tax justice issues does not follow the template outlined above, nor do the particular forms of entrepreneurship and organizing.

10

We do suggest that professional experience more than professionalization is an important part of campaigning on global tax justice as an issue. This is because professional experience and skills are vital to understanding the complex technical issues surrounding tax policy, but cannot remain within a professional community if the issue is to gain public support. On tax justice issues the NGO or TAN involved requires cross cutting expertise in law, accounting, tax, economics, and political economy. Without such technical expertise an NGO campaign will be limited to campaigning around particular public scandals rather than agenda setting and policy innovation. The issue of tax justice involves a complex network of tax treaties, idiosyncratic national tax and legal systems, iterative innovation in financial engineering, competing national and international accounting standards, and political economic forces and strategies. As such, professional expertise and experience are important but are infrequently located within larger bureaucratic NGOs. Furthermore, professional communities engaged in tax avoidance have no particular interest in breaking ranks to provide a radical reform agenda (Seabrooke and

Tsingou 2014). To professionally mobilize on global tax reforms the issue has to be put forward by entrepreneurs with unique capacities to organize rather than belong to a particular organization.

IDENTITY SWITCHING AND NETWORK DOMAINS

We argue that 'identity switching' between 'network domains' is a vital aspect for professional mobilization on technically complex issues. Of course these concepts require some explanation. First, the concept of 'network domains' is that people relate to each other within networks associated with particular forms of activity and identity (the domain). These are typically ties within networks of kinship, politics, and economic interaction (Padgett and McLean 2006). They may also be networks within that we more frequently distinguish as professional 'worlds', such as the 'business world', 'world of science', 'policymaking', 'activism', and so on.

People frequently move between network domains in their daily life, so an individual who is a mother in the early morning, an accountant at work, a tennis player in the evening has moved across kinship, corporate, and social sports network domains. Harrison White (2008) argues that personality comes from moving between these network domains and comes from a basic search for control over one's life. As people move between network domains they are also switching particular identities associated with the specific network domains. This is identity switching. As White states, 'individual lives emerge through an ongoing process of combining understandings of situations with sets of practices arrayed across lives embedded in social networks' (White, 2008: 114; White 1995). As individuals switch identities between different network domains they develop a 'style' that they reproduce as they observe others and learn how best to manoeuvre (White 2008: 134).⁵ From styles

⁵ For White the concept of style is analogous to Pierre Bourdieu's 'habitus' as a matrix of 'perceptions, appreciations, and actions' without a predetermined interpretative tone (Bourdieu, 1977: 83). However, for White the ongoing recombinant aspect of styles differs from Bourdieu's stress on assessing different forms of capital and their manipulation. While habitus is often understood as a person's 'signature', White argues that for a view of person

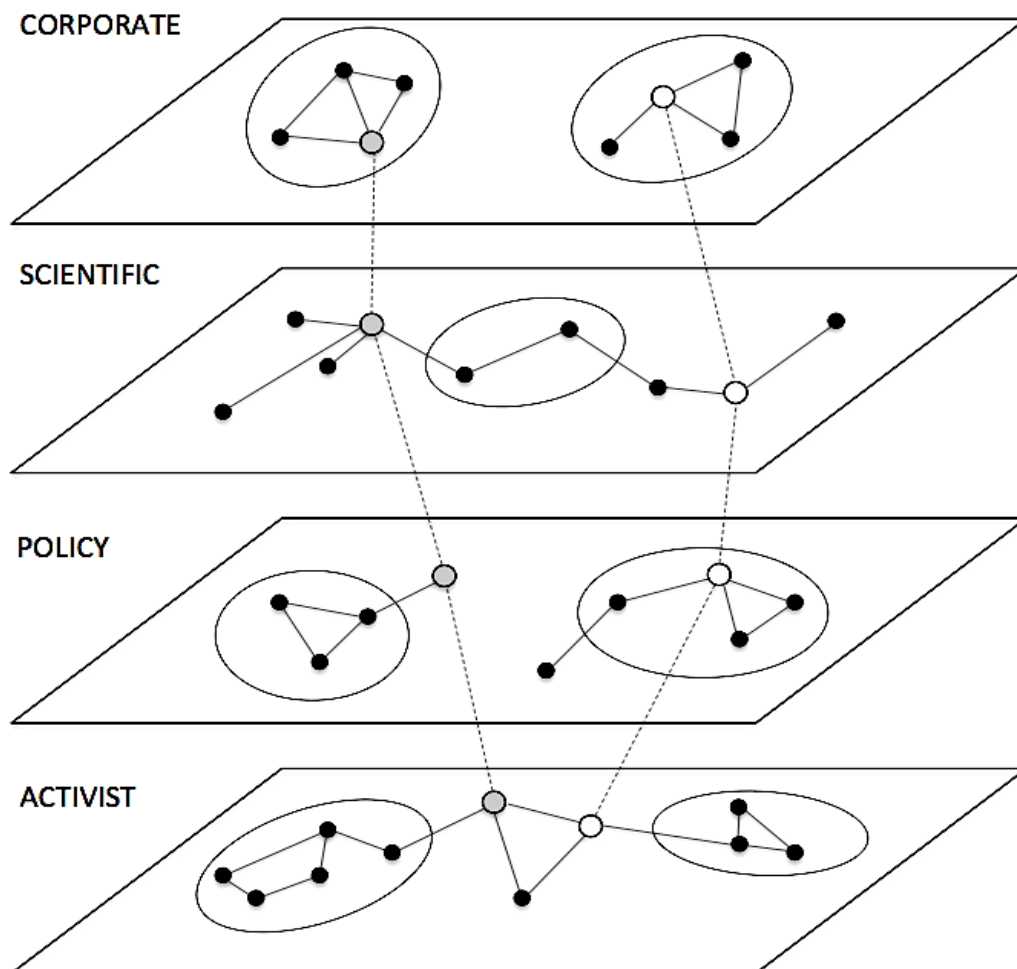
emerge storylines of how the world works that resonate in a particular network domain but have links to aspects of others. Storylines allow those engaging in identity switching to 'get action' by providing a clear plot on what should happen next (Godart and White 2010: 579). For those operating across professional network domains sufficient social capital in one domain can provide a resource to venture into others. Those who are particularly ambitious can develop a style that can be characterised as an 'intrepid broker' (Burt 2010).

This approach to investigating how people engage in identity switching across network domains has important insight for work on 'entrepreneurs' in International Relations. The research on NGOs and TANs typically identifies entrepreneurs as those who are willing to push ahead on reforms, using passion and resources to engage in information politics. Entrepreneurs are typically identified by what they are selling. Terms such as 'issue entrepreneurs' (Carpenter 1997), 'norm entrepreneurs' (Finnemore and Sikkink 1998), and 'policy entrepreneurs' (Sell and Prakash 2004) are common. The role of entrepreneurs in building sustainable networks is well recognized (Goddard 2009), but we suggest that a focus on identity switching and network domains provides some insight into how entrepreneurs emerge and how they act to push forward issues. It can also draw attention to how as entrepreneurs move between different professional network domains they can engage in 'epistemic arbitrage' to exploit differences in knowledge that can be put to strategic use (Seabrooke 2014b).

Figure 2, below, provides an illustration of identity switching across network domains that is appropriate for discusses the emergence of issue entrepreneurs on global tax justice. In the figure one can see four network domains where different professional worlds exist, including the worlds of business, science, policy, and activism. Within these network domains are black discs, individuals, who are networked. Some of them are networked

within organizations, represented by the oblongs, but it is also clear that belonging to an organization is not essential to being networked. We highlight two individuals in this story, the white and grey discs. These individuals are networked in different ways in the different network domains, with movement between the network domains depicted by the vertical dotted lines. Obviously this is a static picture and the moment of switching identities is not visible. However, the point is to illustrate how individuals can move between network domains and engage the people and organizations that populate them.

Figure 2: Identity Switching across Network Domains



Importantly, switching identities can be used as a means to build alliances and coalitions and articulate a view of how an issue should be treated (Fligstein

and McAdam 2011: 12). Professional mobilization may occur only within one of these network domains, and certainly work on the sociology of professions outlines how professional associations protect their jurisdictions from encroachment (Abbott 1988). However, to mobilize on issues and create salience on issues that are technically complex it is important to have entrepreneurs who can move across network domains to build professional mobilization and a coherent and underlying argument on the need for policy reform (cf. White 2008: 123). This is precisely what we see with the emergence of issue entrepreneurs mobilizing for global tax justice.

THE EMERGENCE OF TAX JUSTICE NETWORK

Advocacy work on tax havens and tax issues began in the late 1970s. In the US Citizens for Tax Justice established a campaign on federal, state and local taxes in 1979, and in the United Kingdom NGO Oxfam launched an exploratory project on the impact on developing countries of tax evasion and avoidance routed through tax havens. The timing is not incidental. While the problem of the taxation of cross border activities had been the subject of intergovernmental discussions as early as the 1920s, at the League of Nations (Picciotto 1992), it was not until the rise in international capital mobility in the 1970s and 1980s that the problem became acute and ubiquitous. The steady growth of the Euromarkets from their inception in the mid-1950s had broken through barriers established to protect the architecture of 'embedded liberalism' (Burn 1999). The US Federal Reserve Regulation Q, which between 1933 and 1986 imposed an interest rate ceiling on a range of deposits at US banks, had instigated a flood of dollars flowing into less regulated jurisdictions such as London, where no interest ceiling applied and the Euromarkets offered an effective way to circumvent US capital controls (Seabrooke 2001). With these restrictions transgressed the 'Euromarkets' spread to the British dependencies and Singapore alongside British policy advice that encouraged newly independent colonies to attract mobile capital and revenue by becoming tax havens (Sagar et al. 2013).

By the late 1970s nearly all regions of the world included a number of tax havens (Palan 2003; Hudson 1998; Sharman 2006; Palan et al. 2010). Notably, however a working group established by Oxfam and London's School of African and Oriental Studies, which included one of TJN's founders, met between 1978 and 1979 made little headway. Oxfam considered the tax haven and capital flight issue 'too political' in 1979 and the issue was left dormant.⁶

Only in the 1990s did efforts to combat tax havens rise on the policy agenda. The Financial Action task Force (FATF), formed in 1989 at the behest of the G7, issued a report in 1990 making 40 recommendations to combat money laundering. While the issues of tax evasion and money laundering are often linked in practice, and in many FATF member jurisdictions tax evasion is a predicate crime for money laundering linking these issues was hampered by legal impediments and official reluctance. For instance, tax evasion in Switzerland is not a crime and cannot therefore be the basis of money laundering. Further, anti-money laundering officials 'seemed reluctant to damage their simple compelling story of good versus evil and descend into the much more complicated questions of who should pay how much to fund public goods' (Sharman 2011: 32).

The issue of tax evasion was first given prominence by the OECD in a 1998 report 'Harmful Tax Competition: An Emerging Global Issue', which signalled the beginning of a new period of multilateral efforts to combat tax avoidance and evasion through the promotion of 'blacklist' of harmful jurisdictions (Sharman 2006). The harmful tax competition initiative was superseded by the promotion of Tax Information Exchange Agreements (TIEA) in 2002. These provided a legal basis for tax authorities, given explicit grounds for suspicion, to request information on a named taxpayer in another jurisdiction. Both the spread of Double Tax Agreements (DTA), which are designed to prevent income being taxed twice in different jurisdictions, and TIEAs have been subject to considerable criticism from NGOs such as TJN and academic

⁶ Interview, TA, UK, December 2012.

commentators (McIntyre 2009). The Financial Stability Forum (FSF, now the enlarged Financial Stability Board) identified 37 jurisdictions as tax havens in a 2000 report, but has since focused primarily on issues of financial stability rather than money laundering, tax avoidance and evasion.

The global financial crisis has accelerated policy development with the G20 announcement in 2009 spurring a series of new initiatives. The OECD has reinvigorated its process with the introduction of peer reviews among the 121 members of the Global Forum on Transparency and Exchange of Information for Tax Purposes to evaluate a country's implementation of the OECD information exchange standard.⁷ The peer review process brings in external regulators who evaluate legal and logistical provisions for tax avoidance, evasion and opacity. Since 2008 over 800 TIEAs and DTAs have been signed (OECD 2013). It should be noted however, that this rush to compliance may reflect form more than substance (Johannesen and Zucman 2014).

The US enacted the Foreign Account Tax Compliance Act as part of the Hiring Incentives to Restore Employment Act (2010). This in effect coerces foreign financial intermediaries to automatically report to the Internal Revenue Service on accounts held by US individuals and accounts held by legal entities in which US citizens hold a substantial interest. The EU in turn has reinvigorated its policy armoury with a 2009 update of the Mutual Assistance Directive (COM2009/28) and the 2011 Directive (2011/16) on Administrative Cooperation in the Field of Taxation.

FATCA has been 'multilateralized' through the 2012 signing of the Model Intergovernmental Agreement for Cooperation to Facilitate the Implementation of FATCA by Italy, France, Germany, the UK and Spain in combination with the 2008 proposal to update the EU Savings Tax Directive (2003/48/EC)

⁷ This is a radical shift. OECD information exchange has previously been based on the principle of information exchange on request, the application of which is costly and deemed largely ineffective. Automatic exchange, in contrast, provides for the on-going and comprehensive annual exchange of tax information between jurisdictions on by accounts held by individuals or entities.

signals a shift in policy direction and intensity.⁸ The OECD BEPS report and subsequent BEPS Action Plan (OECD 2013b; 2013c) has codified a commitment to upgrade core fiscal concepts such as that of permanent establishment and beneficial ownership disclosure. At the same time, echoing the G8 Lough Erne leaders statement, the BEPS Action Plan called for a comprehensive multinational system of automatic information exchange. These policies represent an apparent sea change in the governance of tax avoidance and evasion as an ostensibly inchoate host of initiatives coalesce to restrict the regulatory space in which avoidance and evasion flourish. TJN and its core members have been central in this potentially radical policy shift.

As early as 1999 the issue entrepreneurs who would become the Tax Justice Network were advising Oxfam on the report, 'Tax Havens: Releasing the Hidden Billions for Poverty Eradication' (Oxfam 2000). This was the first time a major NGO focused on the issue of tax havens. Following the 2002 founders meeting in Italy the Tax Justice Network was launched at the British Houses of Parliament in March 2003. TJN was formed as a single issue organization merging the interests of the Association for Accountancy and Business Affairs, and the German arm of the Association for the Taxation of Financial Transactions and Aid to Citizen (ATTAC) led by Sven Giegold, now Member of the European parliament and a key policy conduit for TJN. Crucially, TJN occupied a virtual void amidst the policy spaces inhabited by civil society organizations and NGOs. For example, at a December 2003 UN Ad Hoc Expert Meeting in Geneva the only civil society attendees were two members of TJN and the International Chamber of Commerce represented by the tax director of Swiss banking giant UBS.⁹

TJN pursues five overarching objectives: to raise the level of awareness about the world of offshore finance; to promote links between interested parties around the world; to stimulate and organize research and debate; to encourage and support national and international campaign activity; and to

⁸ EU Savings Tax Directive (2003/48/EC).

⁹ Interview, TA, UK, March 2013.

act as a vehicle for the promotion of tax justice issues at multilateral organizations such as the UN, OECD, European Union, World Bank and IMF. In pursuing these objectives TJN draws on the expertise of its core members. While a passion for tax justice unites the members of the network, these individuals are distinguished by the depth and specificities of their professional experience and skills.

The individuals we identify as core to TJN in combination traverse the fields of law, accountancy, economics, business and tax. The Director of TJN is an economist who worked for two years as a trust and company administrator for Walbrook Trustees in St. Helier, and served for ten years as Economic Adviser to the States of Jersey in the British Channel Islands. A prominent member of TJN is a chartered accountant and political economist. Before starting collaboration with TJN in 2003, he pursued a commercial career in which he trained with what is now KPMG, became senior partner of a London based firm of chartered accountants, and was a chairman, CEO or finance director for a range of companies.

18

Another important member of TJN is a chartered accountant and Professor of Accounting who has published more than 60 peer-reviewed articles in that discipline. Before embarking on an academic career he was an accountant at a major petroleum multinational in London. A key intellectual influence on TJN was a Commonwealth Fellow at the University of Chicago School of Law and has been a Professor of Law in the UK since 1992. A prominent U.S.-based member of TJN is a Managing Director of a private equity venture and consultancy. He previously served as a consultant and Chief Economist at McKinsey & Co and was Business Development Manager in Jack Welch's office at General Electric. This member was elected to the New York Bar in 1978 and is an investigative economist and author of 5 monographs.

The skills of these core members encompass the competencies necessary to analyse, and provide means of redress for, problems within the international tax environment. Accounting, law, economics, political economy and business constitute the principal disciplines encompassed by the tax justice issue.

Several interviewees confirm, in contrast to the more emotive issues commonly associated with issue selection and mobilization within TANs, tax requires interventions based on a diverse technical and interdisciplinary expertise. Notably, such disciplinary and career-based expertise is a scarce resource in the broader NGO community concerned with issues of tax justice, rendering TJN the key knowledge source within that community.

Until 2007 TJN's Director was its only employee – on a part-time basis. In line with the core objective to encourage and stimulate research and debate the first annual workshop was hosted at the University of Essex in June 2003. That the Network set out with a research event is indicative of its knowledge based role on the issue. In the same year a member drafted a new accounting standard, 'country-by-country-reporting' which would subsequently be partially incorporated in EU and U.S. hard law and define one pole in the on-going debate over global tax reform. The G8 June 2013 Lough Erne Leaders statement made a remarkable commitment to country-by-country-reporting as a means to ameliorate fiscal leaks.

19

TJN has often drawn resources from large NGOs as a form of professional mobilization. TJN's first substantive research output, 'Tax Us if you Can' and newsletter, 'Tax Justice Focus' were in 2005 funded by Christian Aid and the Catholic Agency For Overseas Development (CAFOD). As such, TJN can be conceived as providing expert consultancy services to the wider interested community. 2005 also marked the year of the launch of TJN-USA and the publication of the controversial report 'The Price of Offshore'. This specified that High Net Worth Individuals (HNWIs) held \$11.5 trillion of assets offshore, representing \$255 billion in lost fiscal revenues. In 2006 TJN secured additional core funding from Oxfam and funding from the Network for Social Change for the purpose of organizing a research workshop in Nairobi, Kenya, in 2007.

In line with the long-term goal of expanding high-level advocacy work, TJN provided briefings for developing country diplomatic teams attending the 2006 session of the UN Tax Committee in Geneva. Core members attended

conferences organised by the UN Finance for Development office and the UN Tax Committee, and co-organized a side-event on taxation at the ECOSOC Substantive Session. During 2007 a research grant was secured by the Ford Foundation to map the facilities provided by offshore jurisdictions and monitor compliance with international regulatory initiatives. By this stage TJN members represented the organization at conferences and events in Belgium, France, India, Kenya, Korea, the Netherlands, Norway, South Africa, Switzerland, the United Kingdom, and the United States. TJN came to consider itself a mature organization.¹⁰ Its lead role in the coalition of civil society organizations participating in the United Nations' Follow-up International Conference on Financing for Development to Review the Implementation of the Monterrey Consensus, held at Doha, and the securing of funding from the UK Department for International Development were symptoms of successfully integrating development issues with the technically complex issue of tax justice. 2008 also witnessed the consolidation and expansion of TJNs communication strategy, with previous successes in impacting the international print media augmented by internet, film, radio and television strategies.

As the policy space for the TJN's issue promotion opened up in the wake of the global financial crisis, it finalized its database of offshore jurisdictions and published a Financial Secrecy Index (FSI). This provided an alternative to lists of tax havens provided by the OECD and International Monetary Fund and shifted attention from tax havens as extreme manifestations of a perverse national competitive strategy, and as such peripheral phenomena, to the problem of tax injustice in the core of the OECD. The first FSI received media coverage in over 70 countries and jurisdictions. In 2009 TJN initiated a project on transfer pricing project to complement extant work on country-by-country reporting and to forge a path towards discussions about unitary taxation. The risk assessment in TJNs annual report notes that due to network expansion TJN was increasingly vulnerable to reputational attacks the threat of which required constant mitigation.

¹⁰ Interview, TA, UK, December 2012.

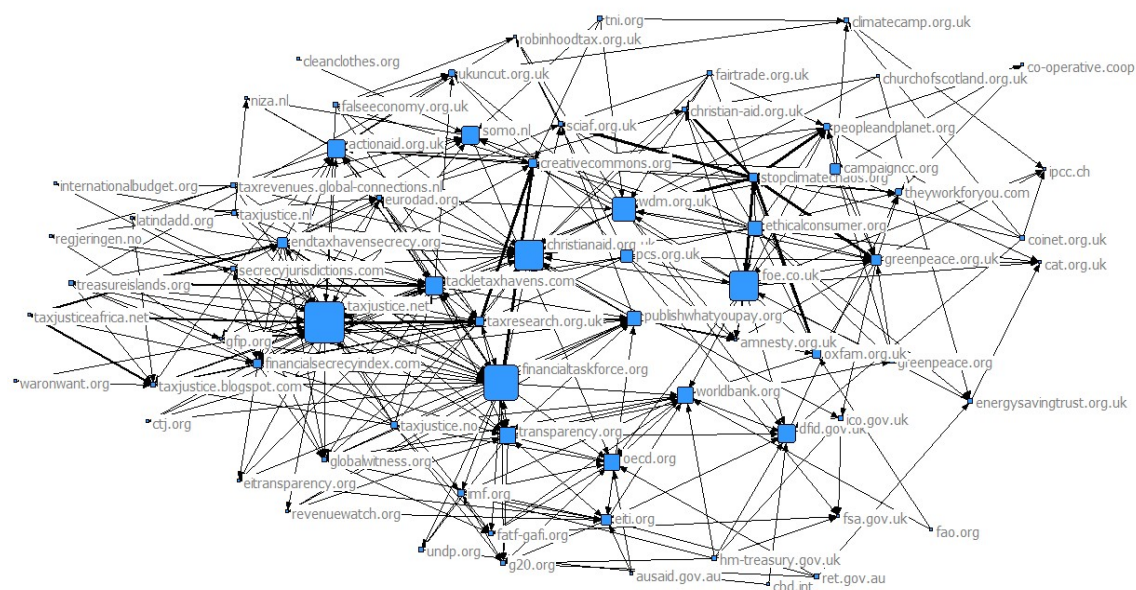
By 2010 TJN had four full-time employees. In 2011 TJN co-organized and participated in the work of the Coordinating Committee of the International Task Force on Financial Integrity and Economic Development and participated in work on the OECD's informal Task Force on Tax and Development. A prominent member of TJN's blog was named the number one economics blog in the UK. As policy and public interest in the tax justice issue continued its growth in 2011, Tax Justice Network Australia was launched, with strong efforts received from those willing to form a TJN branch in Central and Latin America. Similar branches were opened in India and Canada in 2012.

In 2012 TJN published the second version of 'The Price of Offshore', estimating global private wealth held offshore as standing between \$21 to \$33 trillion, or 18% to 25% of all global financial assets, a figure referred to by the US Permanent Subcommittee on Investigations and placed on the front page of *The Economist* (US PSI 2014). By March 2013, the Global Alliance for Tax Justice was formed. As of June 2013, the Alliance boasted 81 member organizations from various world regions. The Alliance is a symptom of both the success of TJN in promoting tax justice as a campaign issue within a broader TAN and the identity of TJN as a high-level advocacy organization.

Figure 3, below, provides an 'issue crawler' depiction of the organizations involved with tax justice issues. Issue Crawler is a network mapping software that captures outlinks from specified sites and 'crawls' along them to establish issue linkage from website presence. It permits a visualization of existing links between organizations based on the issue, such as tax justice. This technique locates links between websites and is established method for locating agenda setting in transnational networks (Tomaskovic,-Devey, Carpenter, and Brownlie, 2010; Carpenter et al. 2014). Figure 3 shows the betweenness centrality within nodes (the organizations) in the network, with the size of the nodes a reflection of the number of times it acts as the shortest bridge between two other nodes. TJN is clearly located to the left of the diagram, and the Financial Action Task Force and Christian Aid are also prominent. What is

interesting about this network depiction is that the nodes dotted around taxjustice.net on the left hand side of the diagram are tied in various ways to TJN. This includes TJN branches but also different websites that speak to different audiences. For example treasureislands.org is a website for a popular 2012 book on tax havens written by a journalist affiliated with TJN (Shaxson 2012). financialsecrecyindex.com refers to the Financial Secrecy Index produced by TJN and affiliates, which provides a unique methodology to measure the extent of financial secrecy and tax avoidance. This benchmark is aimed at the policymaking community, deliberately seeking to move attention away from the idea of ‘tax havens’ as tropical destinations getting away with daylight robbery and placing emphasis on corporate and elite tax avoidance within the core of the OECD member states.

Figure 3: Issue Crawler on Global Tax Justice



Source: Authors’ search on Issue Crawler network, with websites checked for actual policy content on tax justice issues and nonconforming organizations removed. The search ‘TJN’ was completed on 29.12.2012 and available from <https://www.issuecrawler.net/>. The diagram has been visualized in UCINET.

We asked TJN members on the strategy to appeal to different audiences with different websites. The answer was this web presence made TJN appear bigger than it is, a ‘peacocking’ strategy to have a large public presence despite the small staff and budget of the organization compared to other

NGOs.¹¹ As we elaborate below, TJN's entrepreneurs have has a number of strategies to campaign on global tax reform to different audiences.

IDENTITY SWITCHING STRATEGIES ON TAX JUSTICE

TJN's growth and success came from its capacity to build shared narratives, provide research-led alternatives to mainstream measures and indexes, assert clear policy positions, and engage corporate interlocutors in public debate. Members of TJN have been able to speak to and influence audiences in the, respectively, activist, scientific, policy, and corporate 'worlds'. We contend that the issue entrepreneurs who are able to engage in identity switching between network domains have a greater capacity for professional mobilization on complex technical issues. This mobilization occurs through a range of strategies that are assisted by identity switching, and which build coherent storylines from which issues, such as global tax justice, can be pushed forward. Following extensive interviews with key members of TJN and other activists and NGO staff, participant observation in meetings and workshops on tax justice, and Case Study Integrity Meetings¹² with tax activists, we located four key strategies.

23

The four key strategies are:

- ❖ *Berserking* – entering an environment and aggressively challenging key policy ideas.
- ❖ *Narrating* – providing a consistent storyline that challenges existing norms and gives life to actionable alternatives.
- ❖ *Cornering* – controlling a debate by representing diverse sources of

¹¹ Our thanks to Stefano Pagliari for coining the term 'peacocking'.

¹² The Case Study Integrity meetings follow a simple format. Stakeholders and practitioners are invited to attend a presentation of interim research findings and to comment on where they are inaccurate or not. These meetings typically involve people from different organizations and of different rank. For this study two Case Study Integrity meetings were held.

authority and maintaining distinct identities rather than the face of one organization.

- ❖ *Templating* – providing clear recommendations and treatments for complex issues to directly inform policy design and implementation.

These strategies for professional mobilization rely on identity switching between the activist, scientific, policy, and corporate network domains. They also rely on tactics that we call ‘access’ and ‘activation’ points. Access points are point of entry for issue entrepreneurs into particular arenas, often based on recognized expertise and past or present professional networks. Activation points are moments where actions are made for a particular audience in an attempt to create momentum on the issue.

Table 1: Access and Activation Points

	Activist	Scientific	Policy	Corporate
Berserking	❖		⊙	⊙
Narrating	❖	⊙	❖	
Cornering	⊙	⊙	❖	⊙
Templating	❖	⊙	❖	⊙

Access Point = ⊙ Activation Point = ❖

Table 1, above, outlines how these tactics are deployed according to access and activation points, as conveyed to us during interviews about the case history. The members of TJN will draw on expertise and authority in one network domain to get action in another. In Table 1 the circles are access points and the diamonds are activation points. To walk through the examples in Table 1, in the Berserking line past experience and professionals networks in the policy and corporate network domains permit access to events and

forums where TJN members can loudly complain about the lack of attention given to tax justice issues. The Narrating line shows an access point in the scientific networks, where key members of TJN receive esteem for their knowledge of accounting, law, and economics, permitting them to articulate a clear narrative and storyline as the people who know best on how reforms on tax justice should proceed to the activist and policy domains.

In the Cornering line in Table 1 we can see three access points in the activist, scientific, and corporate domains and an activation point in the policy domain. Here TJN members represent themselves as different professionals from different backgrounds to corner the issue in the media and provide a coherent position on what reforms are required that is aimed at a policy audience. Or, in contrast, Templating, where the access point is from the scientific and corporate network domains where particular skills, expertise, and credibility in forensic accounting lead to the creation of policy templates that are disseminated to the activist and policy network domains in an attempt to build greater support.

25

It is necessary to provide specific examples of these access and activation point tactics, to which we now turn.

Berserking

The term 'berserk', derived from Old Norse, denotes members of warrior gangs who served as bodyguards in the courts and were deployed as shock troops in battle. To quote Weber, the berserk 'bit into his shield and all about himself, like a mad dog, before rushing off in bloodthirsty frenzy (Weber 1978: 1112). In this context, it describes accessing a corporate or policy domain on the basis of professional identity and expertise and then switching identity to the impassioned activist. The Director of TJN reports the deployment of this tactic in 2004 at Chatham House during a forum on Corporate Social Responsibility. Invited to the forum because of his professional history at the end of the meeting he loudly demanded that addressing tax avoidance should be included as a core principle for Corporate Social Responsibility. His

intention was to redirect the debate, at the cost of transforming a 'love in to a hate in' and embarrassing a range of issue entrepreneurs for failing to address the key socioeconomic issue to do with multinational firms.¹³ A similar occurrence happened following an invitation to attend an OECD meeting, as a former Chief Economic Advisor to Jersey. More recently, a key member of TJN deployed this tactic at the UK's 2013 Public Accounts Committee hearing which investigated the tax avoidance strategies of Google, Starbucks and Amazon. Here he gained access to the hearing on the basis of links to the policy domain forged from professional prestige and expertise and, seated in the observers gallery, fed the Committee Chair via text message questions to pose to the firms' representatives as the hearing proceeded.¹⁴

Narrating

Persuasive and durable narratives rest on strong scientific credibility. A key example here is the Financial Secrecy Index (FSI). This places a jurisdiction on a spectrum according to how far they transgress 15 Key Financial Secrecy Indicators. The FSI is promoted as an alternative and competitor to OECD benchmarks, which is considered inadequate for the purposes of enhancing tax justice. For instance Jersey is 7th on the 2013 ranking but was one of the first jurisdictions to be placed on the OECD's 'white list' due to its fostering of tax information exchange agreements. The ranking is adjusted by a weighting based on a jurisdiction's share in the global market for financial services provided to non-residents. The 2013 FSI ranked 82 jurisdictions and identified the US as the 6th most secretive jurisdiction, closely followed by Germany at 8th and Japan at 10th (Tax Justice Network 2013). This methodology for calculation and the term 'secrecy jurisdictions' provides a narrative about how 'offshore' is not in the Caribbean but really within the core of the OECD. Narrative building around 'secrecy' via the FSI also renders TJNs agenda compatible with one placing emphasis on the importance of full information in perfecting markets.

¹³ Interview with TA, UK, December 2012

¹⁴ Interview with TA, UK, January 2013.

Promoting quantitative estimates of the impact of tax abuse has been crucial to activation in both the policy and activist domains. Algirdas Semeta, the European Commissioner for Taxation and Customs since 2009, has consistently referred to an estimate of €1 trillion the EU tax gap in his drive to spur tax reform, call ‘a scandalous loss of much-needed revenue, ... a threat for fair taxation’.¹⁵ The same €1 trillion figure was used Commission President Jose-Manuel Barroso. The figure, originally produced by TJN (Murphy 2012), become the referent in the European debate on ‘tax havens’ and tax abuse. The methodology used to produce the estimates has attracted a great deal of professional competition, leading to debate over whether is exaggerates or underestimates the problem.

Another U.S.-based member of TJN has provided a similar narrative through reports on ‘The Price of Offshore’ quickly became a global media story in the wake of its release. Although inherently disputable, the estimate of \$21-32 trillion was reprinted by a range of international broadsheets and was *The Guardian’s* second highest business story in 2012.¹⁶ It is important that any estimate of private wealth held offshore is inherently disputable. Boston Consulting Group provide an alternative, and starkly smaller, measure of private wealth held offshore at \$8.5 trillion (2013: 11). Where international macroeconomic data on capital flows and components of the balance of payments are themselves incomplete and uncertain, claims to scientific expertise are challenged by interests favouring tax optimization.

Cornering

A loose organisational structure can be a core asset to issue entrepreneurs. As stated above, we should keep a keen eye on forms of organizing as much as we look at NGOs as organizations. The core members of TJN maintain

¹⁵ ‘Clamping Down on Tax Evasion and Avoidance: Commission Presents the Way Forward,’ European Commission, Dec. 6, 2012, *available at* http://europa.eu/rapid/press_release_IP-12-1325_en.htm.

¹⁶ From confidential data provided to the authors from a private media monitoring agency.

separate primary allegiances or principal professional identities, which permits them to appear as independent experts in public discourse. The maintenance of these independent identities facilitates the cornering of specific debates. For instance, during the UK Public Accounts Committee hearings noted above, BBC Radio 4 news ran a five minute slot covering the proceedings. Three experts were invited to contribute to the debate. The Director of TJN was invited, as was another member who appeared as a chartered accountant and director of an independent tax research company. Yet another core member of the group was interviewed as a Professor of Accounting.

These issue entrepreneurs coordinated their responses prior to the interviews, choosing their particular storyline and the intensity of the pitch to contrast against public assumptions about their professional background. The chartered accountant was the most vehement and aggressive on the need for comprehensive reforms, while the Director of TJN articulated a more moderate opinion within the same storyline.¹⁷ As such, while TJN's core members acted in concert, the coverage could be considered balanced in terms of canvassing views from different expert stakeholders.

This tactic has been deployed consistently across various platforms. The series of films and documentaries that have emerged from the crisis - *The Tax Free Tour*, *We're Not Broke*, *Tax Me If You Can* and *The UK Gold* - have been dominated by TJN members who have appeared in the fashion described above. Crucially, the combination of these distinct contributions constitutes a coherent storyline on what should be done to further the movement for global tax justice.

Templating

A key tactic used by the issue entrepreneurs associated with TJN is the creation of treatments for complex technical issues about global tax reform.

¹⁷ Case Study Integrity Meeting, City University of London, October 2013.

This tactic relies on access points in the scientific and corporate domains, especially professional networks and experience that assist in understanding technical complex. Activation points then follow in the policy and activist network domains where templates are released to guide policy thinking, design, and implementation.

A prominent example here is the development of 'Country-By-Country Reporting' (CBCR), which was designed by a core member of TJN, and now part of an active policy discussion by the OECD, IMF, EC, and others. Multinational and transnational firms produce accounts on a worldwide basis, but are not obliged to provide separate accounts for each jurisdiction where they have a presence. This means profits, losses, costs, liabilities and assets can be distributed so as to minimise a tax exposure. CBCR promises to resolve this by demanding financial reports for each jurisdiction where a firm has economic activity.

The first governance initiative to introduce a reporting framework mandating country-level disclosures by MNCs was the Extractive Industries Transparency Initiative (EITI). This was launched in 2002 by UK Prime Minister Tony Blair after intensive campaigning by Publish What You Pay (PWYP), which is a transnational advocacy group of 650 members, including large NGOs such as Oxfam America, Human Rights Watch, Global Witness and the George Soros funded programme Revenue Watch. The network initially understood its mandate as identifying the underlying sources of corruption in developing countries. PWYP became interested in understanding the stark incongruities between payments to governments and levels of investment and extraction. The TAN, however, did not have the expertise to move forward on the issue as primarily a corporate transfer pricing concern.

TJN produced a template for CBCR in 2003 (Murphy 2003). PWYP picked up the concept of CBCR in 2005 after Global Witness (2005), one of the lead organisations in the network published, published a report on extractive industries that explicitly called for a new international financial reporting standard. A core member of TJN stepped up to the plate. By 2005, PWYP

were campaigning for CBCR to be introduced in International Financial Reporting Standard 6 for the extractive sectors, and subsequently pushed for its inclusion in International Financial Reporting Standard 8.

While setting up a sub-group on the topic, the private standard-setting body the International Accounting Standards Board (IASB) took a largely obstructive stance with regard to the demands of PWYP.¹⁸ The IASB issued a statement that its consistency had provided consistent feedback that CBCR was not in its interest to develop (IASB 2013: 22). However, by providing a template TJN was able to ally its self with PWYP and make the argument that CBCR could provide important contextual data. The CBCR template then sparked interest from the European Commission and in 2010 a Directive was put forward to apply the financial reporting standard either to all companies or to extractives. TJN played a critical consulting role in providing the template for applying CBCR to the extractives industry, with a key member of TJN noting that 'NGOs just don't get accounting'.¹⁹

Once the CBCR template was active in European policy it was noted by the Big Four accountancy firms and the larger professional service firms. PricewaterhouseCoopers (2013), for example, issued a report on CBCR in late 2013 discussing how a more minimal form of CBCR had become a new standard in the EITI framework, in Dodd-Frank legislation in the US, in the EU Accounting Directive, and in the Capital Requirements Directive (CRD) IVV, which is critical to the Basel III international regulatory regime for banking within Europe. PricewaterhouseCoopers' report explicitly acknowledges TJN as they founded of CBCR and uses TJN designation of what constitutes CBCR as the basis for comparison between regulatory regimes. As such, TJN's role in providing policy templates to the activist and policy network domains has also had a significant impact on how the biggest private players in tax, finance, and accounting are treating global tax justice issues.

¹⁸ Interview with TA, UK, December 2012; Interview with TA, UK, January 2013.

¹⁹ Interview with TA, UK, January 2013.

CONCLUSION

Technical complex transnational issues have to be articulated by professionals who are able to switch identities between different network domains. Switching identities provides issue entrepreneurs with a capacity to build alliances and coalitions from difference audiences. It also provides them with unique access and activation points; moments where they are able to access certain arenas and communication to then activate strategic messages to a particular audience. This happens across the worlds of policy, science, business, and activism. We have detailed how these strategies – such as bezerking, cornering, narrating, and templating – which draw on identity switching across network domains.

We have also noted that a focus on identity switching across network domains allows us to examine the characteristics of entrepreneurs. We contend that this provides an important insight for those working on issue entrepreneurs, norm entrepreneurs, policy entrepreneurs, and the like. The literature on NGOs and TANs stresses the importance of gatekeepers in organizations as critical in issue emergence (Carpenter 2011; Wong 2012). Here we have told a complementary story on how issue entrepreneurs have adopted a particular form of organizing to push ahead on an issue. This behaviour is not only strategic in campaigning on an issue but also involves a search for a particular style of engagement, and form of self-recognition that actions can be applied to a range of institutional contexts rather than belonging to an organization (Mohr and White 2008: 508).

Our case also demonstrates the importance of organizing in NGOs. While issue salience is crucial for NGOs to campaign effectively (Wong 2012), the organizational structure of many NGOs prevents the kinds of tactics described above. For example, the bezerking and cornering tactics used by the issue entrepreneurs described above would likely be blocked by senior managers in NGOs, who would fear falling out of favour with their funders and policy interlocutors. As Carpenter (2011) has discussed, those senior in NGOs

carefully vet what issues can be campaigned upon. Highly technical issues, such as the mechanisms of tax avoidance and evasion, provide them with a quandary since they are forced to rely on external experts or to develop expertise in-house. Given that large NGOs are highly bureaucratized and professionalized their staff are less nimble in being able to adopt complex technical issue at a quick pace.

Consider financial reform. Here the key European NGO, FinanceWatch, was deliberately established by members of the European Parliament to compensate for the absence of technical expertise from NGOs. Technical issues, such as the financial transaction tax, also heighten coordination problems among NGOs, who sought to establish their position in relation to each other while also seeking both technical and moral supremacy. Within the NGO world the lack of momentum on financial transaction taxes during the most recent financial crisis, when the issue had political salience in Europe, is attributed to intra and inter-group fighting on who should carry the torch.²⁰ On issues that are a mix of technical complexity and moral advocacy, issue entrepreneurs who can operate in different social realms are critically important for coherence and positioning.

Our analysis also has implications for understanding how issue entrepreneurs operate within their professional and organizational networks. As we detail above, TJN has a short but amazingly successful history in advocating global tax justice. This group is best characterised by how their form of organizing advocacy (identity switching) rather than as a typical NGO. They have made significant inroads in producing a new financial reporting standard, CBCR, in addressing tax avoidance and evasion through the provision of new metrics, by fostering political salience to address corporate transfer pricing, and placing unitary taxation on the global policy agenda for power states and international organizations.

All of this success does not come without costs. The unique form of

²⁰ Interviews with TAs and TL, UK, July 2013.

organizing exhibited by TJN has a time horizon. The access and activation point strategies are difficult to sustain when the social capital required for access is being depleted. The bezerking strategy here is the most obvious example; it can only be executed so many times before one is disinvited. The timing of TJN's activism has been important in building momentum and political salience on global tax justice. Timing is also important for how issue entrepreneurs behave if a key tactic is to move between network domains.

A further danger to TJN, and groups that seek to emulate them, is that their skills and expertise are difficult to replicate. The flipside of identity switching is that the network relies on particular individuals that have experience in different domains, such as corporate skills and experience combined with particular scientific expertise. These are difficult to find. It also creates a form of organizing that means the expansion of the network occurs with two tiers of activists, the specialists who can move across network domains and have unique skills, and the ranks who have enlisted because they are passionate about the issue. This two-tier system may be necessary for transnational advocacy on complex technical issues but introduces some fragility into the broader network should the core disappear or resign.

33

Another problem is that issues such as tax justice have to be successfully linked to broader issues, such as corporate fraud, human rights, and others to have sustained momentum and political salience. This then requires agreement between issue entrepreneurs of different types, mixing tax specialists with others who may be uninformed on tax issues. Specialists have to be careful in brokering these relationships in case they fall outside their comfort zone in public.

The opposite danger here is NGOs will flood an issue once it has political salience. For example, a key member of TJN recalled an incident in which staff from one of the larger NGOs, that had picked up tax justice as an issue, was present at an important policy discussion and incorrectly recounted his methodology for estimating tax avoidance. This led to embarrassment for the particular staff member but also a weakened policy stance from the NGO

group as a whole when they were considered by policymakers to be improperly informed about the details of the issue.²¹ The literature on NGOs points to how competition among staff, many of who are on short-term contracts, leads to a 'scramble' that inflates claims to good policy outcomes and leads to poor policy design and coordination (Cooley and Ron 2002). On issues with high technical complexity the danger is not only a scramble to claim knowledge on the issue but a loss of credibility with policymakers from governments and international organizations, not to mention professional associations.

Future research can identify how issue entrepreneurs differ from each other through the identification of their career histories and how they act across different social networks (Seabrooke and Nilsson 2014; Henriksen 2014). Such research would be useful in differentiating types of issue entrepreneurs and also types of organizing among NGOs and other types of organizations. Finally, identity switching and network domains are important concept in examining not only how issue entrepreneurs 'get action' in exercising information politics but also why they are able to do so. This can tell us a lot about the emergence of issue entrepreneurs and also insights into the micro-level sources of issue emergence.

ACKNOWLEDGEMENT

This research was funded by the 'Professions in International Political Economies' project from the European Research Council (#263741-PIPES), and the 'Global Re-ordering: Evolution through European Networks' projected funded by the European Commission Framework Seven Programme (#266809-GR:EEN).

²¹ Interview with TA, UK, March 2013.

REFERENCES

- Abbott, Andrew (1988) *The System of Professions: An Essay on the Expert Division of Labor*, Chicago: University of Chicago Press.
- Bloodgood, Elizabeth A. (2011) 'The Interest Group Analogy: International Non-governmental Advocacy Organizations in International Politics', *Review of International Studies* 37(1): 1-28.
- Bob, Clifford (2005) *The Marketing of Rebellion: Insurgents, Media, and International Activism*, Cambridge: Cambridge University Press.
- Boston Consulting Group (2013) 'Global Wealth 2013: Maintaining Momentum in a Complex World', Boston: Boston Consulting Group.
- Bourdieu, Pierre (1977) *Outline of a Theory of Practice*. Translated by Richard Nice. New York: Cambridge University Press.
- Burgerman, Susan (2001) *Moral Victories: How Activists Provoke Multilateral Action*, Ithaca, N.Y.: Cornell University Press.
- Burn, Gary (1999) 'The City, the State, and the Euromarkets', *Review of International Political Economy* 6(2): 225-261.
- Burt, Ronald S. (2010) *Neighbor Networks: Competitive Advantage. Local and Personal*, Oxford: Oxford University Press.
- Carpenter, R. Charli (2010) *Forgetting Children Born of War: Setting the Human Rights Agenda in Bosnia and Beyond*, New York, N.Y.: Columbia University Press.
- Carpenter, R. Charli, (2007) 'Setting the Advocacy Agenda: Theorizing Issue Emergence and Nonemergence in Transnational Advocacy Networks', *International Studies Quarterly* 51(1): 99–120.
- Carpenter, R. Charli. (2011) 'Vetting the Advocacy Agenda: Networks, Centrality and the Paradox of Weapons Norms', *International Organization* 65(1): 69-102.
- Carpenter, Charli, Sirin Duygulu, Alexander H. Montgomery and Anna Rapp (2014) 'Explaining the Advocacy Agenda: Insights from the Human Security Network', *International Organization* 68(2): 449-470.
- Cooley, Alexander and James Ron (2002) 'The NGO Scramble: Organizational Insecurity and the Political Economy of Transnational Action', *International Security* 27 (1): 5-39.
- Eccleston, Richard (2012) *The Dynamics of global Economic Governance: The Financial Crisis, the OECD and the Politics of International Tax Cooperation*, Cheltenham: Edward Elgar.
- Finnemore, Martha, and Kathryn Sikkink (1998) 'International Norm Dynamics

- and Political Change' *International Organization* 52(4): 887–918.
- Fligstein, Neil and Doug McAdam (2011) 'Toward a General Theory of Strategic Action Fields', *Sociological Theory* 29(1): 1-26.
- G20 (2009) 'Global Plan for Recovery and Reform', Statement Issued by the G20 Leaders, 2 April, London [online]. Available from: <http://www.cfr.org/financial-crises/g20-global-plan-recovery-reformapril-2009/p19017> [Accessed 10 December 2013].
- Global Witness (2005) 'Extracting Transparency: The Need for an International Financial Reporting Standard for the Extractive Industries', Global Witness Ltd.
- Godart, Frédéric C. and Harrison C. White (2010) 'Switching under Uncertainty: The Coming and Becoming of Meanings', *Poetics* 38: 567-586.
- Goddard, Stacie (2009) 'Brokering Change: Networks and Entrepreneurs in International Politics', *International Theory* 1(2): 249–81.
- Grabher, Gernot (2006) 'Trading routes, bypasses, and risky intersections: mapping the travels of "networks" between economic sociology and economic geography', *Progress in Human Geography* 30(2): 163–189.
- Henriksen, Lasse Folke (2014) 'Organic Expertise from Diverse Experiences', DBP Working Paper 88, Department of Business and Politics, Copenhagen Business School.
- Henriksen, Lasse Folke and Leonard Seabrooke (2013) 'Issue Professionals in Transnational Networks', DBP Working Paper 84, Department of Business and Politics, Copenhagen Business School.
- Henry, James (2012) 'The Price of Offshore Revisited: New Estimates for Missing Global Private Wealth', London: Tax Justice Network. Available from: http://www.taxjustice.net/cms/upload/pdf/Price_of_Offshore_Revisited_120722.pdf. [Accessed December 10 2013]
- Hertel, Shareen (2007) *Unexpected Power: Conflict and Change among Transnational Activists*. Ithaca: Cornell University Press.
- Hopgood, Stephen (2006). *Keepers of the Flame: Understanding Amnesty International*. Ithaca, N.Y.: Cornell University Press.
- Hudson, Alan C. (1998) 'Reshaping the Regulatory Landscape: Border Skirmishes around the Bahamas and Cayman Offshore Financial Centres', *Review of International Political Economy* 5(3): 534-564.
- International Accounting Standards Board (2013) 'Discussion Forum - Financial Reporting Disclosure: Feedback Statement', May, London: International Accounting Standards Board.

- Johannesen, Niels and Gabriel Zucman (2014) 'The End of Bank Secrecy? An Evaluation of the G20 Tax Haven Crackdown', *American Economic Journal: Economic Policy* 6(1): 65–91.
- Keck, Margaret E. and Kathryn Sikkink (1998) *Activists Beyond Borders*. Ithaca: Cornell University Press.
- Kim, Hun Joon and J.C: Sharman, J.C. (2014) 'Accounts and Accountability: Corruption, Human Rights, and Individual Accountability Norms', *International Organization*, FirstView DOI: 10.1017/S0020818313000428
- Mattli, Walter and Tim Büthe (2003) 'Setting International Standards: Technological Rationality or Primacy of Power', *World Politics* 56(1): 1-42.
- McIntyre, Michael J. (2009) 'How to End the Charade of Information Exchange', *Tax Notes International* 56(4): 255-268.
- Mohr, John W. and Harrison C. White (2008) 'How to Model an Institution', *Theory and Society* 37: 485-512.
- Murphy, Richard (2003) 'A Proposed Accounting Standard: Reporting Turnover and Tax by Location', Richard Murphy and the Association for Accountancy and Business Affairs Limited (AABA).
- Murphy, Richard (2012) 'The European Tax Gap', Report Prepared for the Group of the Progressive Alliance of Socialists & Democrats in the European Parliament, Tax Research LLP.
- OECD (2013a) 'Progress Report to the G20 Leaders: Global Forum Update on Effectiveness and On-going Monitoring', September 2013, Paris: OECD.
- OECD (2013b) 'Addressing Base Erosion and Profit Shifting', OECD: Paris. Available from: <http://dx.doi.org/10.1787/9789264192744-en>
- OECD (2013c) Action Plan on Base Erosion and Profit Shifting', Paris: OECD.
- Oxfam (2000) 'Tax Havens: Releasing the Hidden Billions for Poverty Eradication', London: OXFAM. Available from: http://www.taxjustice.net/cms/upload/pdf/oxfam_paper_-_final_version_06_00.pdf [Accessed December 10 2013]
- Padgett, John F., and McLean, Paul D. (2006) 'Organizational Invention and Elite Transformation: The Birth of Partnership Systems in Renaissance Florence', *American Journal of Sociology* 111(5): 1463-1568
- Palan, Ronen (2003) *The Offshore World: Virtual Spaces and the Commercialization of Sovereignty*, Ithaca, Cornell University Press.
- Palan, Ronen and Duncan Wigan (2014) 'Herding Cats and Taming Tax Havens: The US Strategy of "Not In My Backyard"', *Global Policy* 5,

forthcoming, DOI: 10.1111/1758-5899.12135

Palan, Ronen and Duncan Wigan, (2014) 'Herding Cats and Taming Tax Havens: The US Strategy of 'Not In My Backyard' *Global Policy*, doi: 10.1111/1758-5899.12135.

Palan, Ronen, Richard Murphy, and Christian Chavagneux (2010) *Tax Havens: How Globalization Really Works*, Ithaca, NY: Cornell University Press.

Picciotto, S. (1992) *International Business Taxation: A Study in the Internationalisation of Business Regulation*. Cambridge: Cambridge University Press.

PricewaterhouseCoopers (2013) 'Tax transparency and Country-By-Country Reporting: An Ever Changing Landscape: An Update', London: PwC. Available from www.pwc.com/tax [Accessed December 10 2013].

Ron, James, Howard Ramos, and Kathleen Rodgers (2005) 'Transnational Information Politics: NGO Human Rights Reporting 1986–2000', *International Studies Quarterly* 49(3): 557-87.

Sagar, Paul, Nick Shaxson and John Christensen (2013) 'British Government Attitudes to British Tax Havens: An Examination of Whitehall Responses to the Growth of Tax Havens in British Dependent Territories from 1967-75' in Jeremy Leaman and Attiya Waris (eds) *Tax Justice and the Political Economy of Global Capitalism, 1945 to the Present*, New York: Berghahn Books.

Seabrooke, Leonard (2001) *U.S. Power in International Finance: The Victory of Dividends*, Basingstoke: Palgrave Macmillan.

Seabrooke, Leonard (2014a) 'Identity Switching from Transnational Professionals', *International Political Sociology* 8(3): 334-336.

Seabrooke, Leonard (2014b) 'Epistemic Arbitrage: Transnational Professional Knowledge in Action', *Journal of Professions and Organization* 1(1): 49-64.

Seabrooke, Leonard and Emelie Rebecca Nilsson (2014) 'Professional Skills in International Financial Surveillance: Assessing Change in IMF Policy Teams', *Governance* 27, forthcoming, DOI: 10.1111/gove.12106.

Seabrooke, Leonard and Duncan Wigan (2013) 'Emergent Entrepreneurs in Transnational Advocacy Networks: Professional Mobilization in the Fight for Global Tax Justice', GR:EEN Working Paper No. 41, Centre for the Study of Globalisation and Regionalisation, University of Warwick

Seabrooke, Leonard and Duncan Wigan (2014) 'Global Wealth Chains in the International Political Economy', *Review of International Political Economy* 21(1): 257–263.

- Seabrooke, Leonard and Eleni Tsingou (2014) 'Distinctions, Affiliations, and Professional Knowledge in Financial Reform Expert Groups', *Journal of European Public Policy* 21(3): 389-407.
- Sell, Susan and Aseem Prakash (2004) 'Using Ideas Strategically: The Contest Between Business and NGO Networks in Intellectual Property Rights', *International Studies Quarterly* 48(1): 143-175.
- Sharman, J.C. (2006) *Havens in a Storm: The Struggle for Global Tax Regulation*, Ithaca: Cornell University Press.
- Sharman, J.C. (2011) *The Money Laundry: Regulating Criminal Finance in the Global Economy*, Ithaca: Cornell University Press.
- Shaxson, Nicholas (2012) *Treasure Islands: Uncovering the Damage of Offshore Banking and Tax Havens*, Basingstoke: Palgrave
- Stroup, Sarah S. (2012) *Borders Among Activists: International NGOs in the United States, Britain, and France*, Ithaca, NY: Cornell University Press.
- Suddaby, Roy and Thierry Viale (2011) 'Professionals and Field-Level Change: Institutional Work and the Professional Project', *Current Sociology* 59(4): 423-442.
- Tarrow, Sidney (2005) *The New Transnational Activism*, New York: Cambridge University Press.
- Tax Justice Network (2013) 'The Financial Secrecy Index 2013', London: Tax Justice Network. Available from <http://www.financialsecrecyindex.com>. [Accessed December 10 2013]
- Tomaskovic-Devey, Anna, Charli Carpenter, and Kyle Brownlie (2010) 'Agenda-Setting in Transnational Networks: Findings from Consultations with Human Security Practitioners', University of Massachusetts, National Science Foundation grant #SES-0452742.
- U.S. Permanent Subcommittee on Investigations (2014) 'Offshore Tax Evasion: The Effort to Collect Unpaid Taxes on Billions in Hidden Offshore Accounts', Hearings, United States Permanent Subcommittee on Investigations: United States Senate, February 26, (available at: <http://www.hsgac.senate.gov/subcommittees/investigations/hearings/offshore-tax-evasion-the-effort-to-collect-unpaid-taxes-on-billions-in-hidden-offshore-accounts> [Accessed October 10 2013]
- Weber, Max (1978) *Economy and Society: An Outline of Interpretive Sociology*, Vol. II, edited by Günther Roth and Claus Wittich, Berkeley, University of California Press.
- White, Harrison C. (1995) 'Network switchings and Bayesian Forks: Reconstructing the Social and Behavioral Sciences', *Social Research* 62: 1035-1063.

- White, Harrison C. (2008) *Identity and Control: How Social Formations Emerge*, Second Edition. Princeton, NJ: Princeton University Press.
- Wigan, Duncan (2008) 'A Global Political Economy of Derivatives: Risk, Property and the Artifice of Indifference', Doctoral Dissertation, University of Sussex.
- Wong, Wendy A. (2012) *Internal Affairs: How the Structure of NGOs Transforms Human Rights*. Ithaca, NY: Cornell University Press.