WHOSE INTERESTS? VOICE AND REPRESENTATION IN TRADE UNIONS: THE USE OF INTERSECTIONAL ANALYSIS

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ABSTRACT

A number of authors have recently argued that the field of industrial relations could benefit from a greater engagement with feminist-influenced concepts and methodologies (Greene and Kirton 2003; Holgate et al. 2006op.cit: 315; Wajcman 2000), with Holgate et al. (2006) proposing the greater use of intersectional analysis. By critiquing their earlier empirical studies of male and female trade union members (Hebson 2001; Holgate 2004; McBride 2001), the authors are able to provide insights into the contribution of intersectional analysis to industrial relations and identify two knotty issues which need to be untied before its use.

INTRODUCTION

Wajcman (2000: 184) notes how 'power-based gender relations has been defined as *outside* the scope of industrial relations', whilst noting the 'burgeoning literature on gender and work, unions and the state in the companion fields of history, political science, sociology and law' (185). Why this should be so, perhaps partly stems from the primacy of class-based analysis in industrial relations where orthodox Marxism and trade unionism presume that the most significant social actions will be defined by class relationships rooted in the process of production and, by and large, all other social identities are secondary in constituting collective actors (Buechler and Cylke 1997). Sociologist, Avtar Brah (1996: 10) notes how economic and cultural concepts are rarely addressed together in practical politics, remarking that to be concerned about cultural issues is to lay oneself open to the charge of being 'divisive' or 'diluting' the struggle for redistributive equality. This goes some way to explaining Wajcman's observation that gender analysis within industrial relations tends to be conflated with studies of women, or of 'women's issues', rather than an examination of the 'gendered character of work for men and women, as well as the major institutions involved' (Wajcman 2000: 195).

Finding a way through these complex issues is important and qualitative work can be a productive way of understanding the changing nature of class and its relationship with other forms of oppression in a way that highlights the complexity with which they are experienced. An earlier paper by the authors reviewed some classic industrial relations monographs (Holgate et al. 2006) and identified the tendency of industrial relations to homogenise workers whether it be through 'male norms' or referring to undifferentiated 'women', with little attention paid to the impact of ethnicity or class on their positionings, experiences and actions. That paper argued that intersectionality provides a means of conceptualising, analysing and articulating the manner in which women's lives are shaped by gender, class, ethnicity, disability, sexuality and age and challenged colleagues (ourselves included) to revisit work and reflect on the implications of this concept. Phoenix and Pattynama (2006: 118), however, argue that the term intersectionality is used 'in different ways, sometimes inconsistently and with ambiguity'. As proponents for the greater use of this concept in industrial relations literature, it is incumbent on us to unpack some of these ambiguities and explain its relevance.

Crenshaw (1989) is credited with the first use of the phrase intersectionality to indicate the consequences of the intersection of gender and race for black women. She (1993: 1245) identifies three forms of intersectionality: '*structural intersectionality*', which is used to capture how actual experiences and reforms may be qualitatively different for black women; '*political intersectionality*', which captures how remedial reforms can work in tandem to marginalise black women; and '*representational intersectionality*', which describes the cultural construction of black women. For Crenshaw, it is the 'patterns of racism and sexism which intersect' that is

important (1993: 1243). She argues that 'because of their intersectional identity as both women *and* of color within discourses that are shaped to respond to one *or*, women of color are marginalised within both' (Crenshaw 1993: 1244). Hailed as a 'spectacular success within contemporary feminist scholarship', Davis (2008: 67), notes how intersectionality has been used in a number of different ways – as theory or concept; crossroad or dynamic process, and as a means of understanding individual experiences or a property of social structures and cultural discourses. The issue of the *European Journal of Women's Studies* devoted to intersectionality (2006) and the emergence of intersectional analysis within the field of industrial relations (Bradley 2007; Bradley and Healy 2008; Briskin 2008), indicates that it is a good time to explore the complexity of the concept and better understand its application within industrial relations.

This paper has developed from an iterative, comparative analysis and an examination of the intersectionality literature situated in feminist and sociological studies and the authors' own studies of men and women in trade unions. Throughout, the authors have interrogated these literatures to examine how, and to what extent, these concepts increased the visibility of workers from diverse ethnic and class backgrounds in their studies. The authors' studies were conducted over the period 1993 to 2003 using in-depth case study analysis. The first indicates how the intersection of identity and interests of women members played out at an individual level and fed into the trade union agenda at a collective level (McBride 2001). The second provided insight into how working class and middle class women negotiated 'hybrid' identities that encompassed their subjective experiences of class and gender which often shaped the priorities within their unionism (Hebson 2001). The third study indicates how black minority ethnic workers were recruited and organised through the association of the union with social justice, dignity and respect at work and its place within the wider community (Holgate 2004). The complexity of identity, used as an organising tool in union recruitment, is used to explore the geographical, temporal and social aspects of identity formation and its impact on mobilisation.

An iterative debate and questioning of the above literatures between the authors identified the implications of not using an intersectional analysis and raised two interrelated issues to be considered by researchers embarking on this form of analysis: (1) the manner in which categories are used to understand complexity (McCall 2005) and (2) clarification on what is 'intersecting' and whether intersectionality is an additive or constitutive model (Yuval-Davis 2006). As will be seen below, the inter-relatedness of these issues indicates a degree of artificiality in these distinctions and therefore it may be useful to consider these two issues as knots of intersectionality that require consideration so that the implications of different responses can be unravelled and made explicit.

THE CONTRIBUTION OF INTERSECTIONALITY

Although McBride (2001) engages with issues of gender, race and class, she does not explicitly engage with the concept of intersectionality. In common with Holgate (2004), McBride used theoretical frameworks from Iris Marion Young (1990) to understand the political processes amongst different groups of trade union activists. Young (1990: 149) argues for a 'politics of difference' where a theoretical conception of justice should, in the first instance, begin with an understanding of the processes of domination and oppression. In doing so she establishes five criteria of oppression by which social groups experience the consequence of injustice: namely exploitation, marginalisation, powerlessness, cultural imperialism and violence. These 'five faces of oppression' attempt to encompass all oppressed individuals and groups, leaving space for inclusion for those who are not powerful or articulate enough to organise and lobby against their own injustice. While this was a useful theoretical framework for the studies in question, it did not get to the heart of structural or representational intersectionality and the social and cultural nuances affecting the lived experiences of different groups of workers.

Following Cockburn (1996), McBride used Young's conception of oppressed social groups to study women's participation and representation in Unison, primarily in relation to the social group of men, who traditionally took the larger role. A focus on Young's prescriptions and the use of Young's identification of women as an oppressed social group, however, leads McBride away from Young's concern not to reduce injustice to groups. What McBride did not consider was the need for a more nuanced starting framework for studying the group of primary concern

in her study, which was women trade unionists. A re-reading oFthis study reveals that despite being an in depth study of union women, we learn very little about what Unison's strategies for increasing women's participation and representation mean for black women, for lesbians or for women with disabilities We learn more about what it means for working class women, but on reflection, this was because the researcher wanted to interview the occupants of the different types of representative seats – in this case low paid women's seats. This emphasis on interviewing women representatives *per se* provided a methodological bias whereby, virtually all representatives in mainstream and women-only committees were white and as a result, only one interviewee was black (McBride 2001: 184). A self-criticism is that McBride failed to articulate the manner in which the social divisions institutionally developed within Unison (specifically self-organized groups for women, black members, disabled members and lesbian and gay members) were marginalising black women and leading to *political intersectionality*.

In her unpublished thesis, McBride (1997) did highlight the concerns of black women about their (in)visibility at women-only activist and educational events, but this was not published in subsequent work. Nor was the observation that white activists seemed unable to appreciate that the institutional strategies of proportionality (for women) and fair representation (for a number of social categories) were making black women feel they had to emphasise their identity as women over their identity as black members. Further, the observation of the manner in which white officers and lay activists reacted defensively to questions about why there were only white educators on a women-only course, and their concerns that this 'militant' element amongst the course should not disrupt the course was also not included. What did get published is the story of how a black male white-collar member was 'selected out' of a branch election because his election would have resulted in a disproportionate number of white-collar members on the committee. Thus, while McBride highlighted the marginalisation of black members at a particular intersection of gender, race and class, this emphasised the exclusion of black *men*, rather than black women – thereby reinforcing Crenshaw's original concern that 'when practices expound identity as woman or person of color as an either/or proposition, they relegate the identity of women of color to a location that resists telling' (1993: 1241). The above reflection takes us to the first knotty issue – how do we make sense of complexity?

KNOT ONE: MAKING SENSE OF COMPLEXITY

Although limited in the ways indicated above, McBride's analysis can be categorised as being an 'intercategorical complexity' approach to the study of multiple, intersecting and complex social relations (McCall 2005: 1773). This is because it makes use of *existing* analytical categories to document relationships of inequality among social group and understand the nature of the relationships among social groups and how they are changing. McBride used Young's prescriptions for overcoming domination by others as a means of analysing Unison's rule-book commitments to support the greater participation and representation of women. This framework provided a means for indicating how restricting the number of representative seats for men enabled women to be 'pushed' and 'pulled' into increased representation. It also helped explain how the social group of women could remain relatively powerless in liberal democratic organisations despite new forms of representation. Its usage, however, meant that the experiences of the more marginal members of the social category of women were, in the process, made invisible.

Despite the potential of an intercategorical method to homogenise generalisations, McCall advocates the use of such an approach to focus on the 'complexity of relationships among multiple social groups within and across analytical categories and not on complexities within single social groups, single categories, or both' (McCall 2005: 1786). From this perspective, it is acceptable to chart empirically the changing relationship among social groups using a categorical approach precisely *because* it allows systematic comparison of relationships of inequality among groups that are already constituted. McCall also uses her own research to indicate how using traditional analytical categories as a starting point to examine inequality (between men and women; between the college educated and non-college educated; among blacks, Asians, Latino/as, and whites; and among intersections of these groups) enabled her to conclude that 'no single dimensions of overall inequality can adequate describe the full structure of multiple, interesting, and conflicting dimensions of inequality' (2005: 1791). McCall does not

privilege her particular approach, but uses it to illustrate her argument that a wider range of methodologies is needed to fully engage with intersectionality and, that there is a need to acknowledge that different methodologies produce different kinds of substantive knowledge. Thus, it is important that research acknowledges the approach that is being taken and identifies the implications for the voices that are likely to be missing from the main narrative – something that is often lacking in industrial relations research.

The intercategorical approach is only one of the three approaches that McCall identifies as being broadly representative of current approaches to the study of intersectionality. The other approaches are called 'anticategorical' and 'intracategorical', where the first is based on a methodology that deconstructs analytical categories and the latter focuses on social groups at neglected points of intersection (2005: 1773). The studies of Hebson (2001) and Holgate (2004) can be categorised as belonging to the intracategorical approach as they give us explicit voices which are often missing from industrial relations: those of working class and middle class women in the former study, and those of black minority ethnic men in the latter.

Hebson's starting point is a gendered analysis that recognises women as a neglected group in trade unions, but is also, as part of a wider study of class and gender identities, comparing the working experiences and identities of working class and middle class women. The research set out to explore the intersections of class and gender identities in trade union women's accounts of their unionism. Eighteen of the women interviewed were trade union activists and their narratives reveal the complexity of their lived experiences. Thus, Hebson acknowledges that social categories (of gender and class) exist, but her focus is on the process by which her interviewees *experience* the implications of that intersection. Hebson shows us that intersectional stories can be painful, and give us an insight into why certain voices and representations are the result of difficult negotiations at the level of lived experience and identities. This was particularly the case for trade union women who were uneasy with a middle class identity and struggled to reconcile different aspects of their experience and their identities through their trade union voice. This is graphically illustrated through Hebson's discussion of Louise, a full time regional officer for Unison. Louise experiences conflict over her class identity, dis-identifying with middle-class women while admitting she *feels* very middle class. Whereas her background is working class (her father was a sheet metal worker and her mother was a shop assistant) she now finds it hard to place herself in terms of class. She went to university and economically and culturally she recognises she would be classified as middle class, but still does not feel this, distancing herself from middle-class women in her union by describing how they embody class with; 'blouses, nice skirts, make-up, lipstick'.

Holgate's (2004) approach was similar, but her concern was to listen to those voices that had been marginalised in past and recent debates about how unions developed organising initiatives. The research began with the basic premise that, as many black workers suffer multiple disadvantage, union organising strategies need to reflect the distinct social experiences of those particular workers. Inherent in the premise was an understanding of the multiple and intersecting levels of oppression that may affect the way individuals do (or do not) get involved in union organising. The majority of Holgate's interviewees were black minority ethnic men, gathered through a snowballing process, and an explicit intersectional analysis enabled Holgate to reveal important distinctions between newly arrived immigrants and those who had been in the UK for a much longer period. The issue of different cultural and social divisions in the factory where the organising campaign was taking place was raised by many interviewees and the study illustrates how perceived cultural variances between some workers, members, non-members and union officials were thought to affect different ethnic groups' perception of the propensity of others to join the union. An example is that of two black British workers (in a factory where 99 per cent of the workforce are recent migrants originating mainly from French-speaking African countries and Sri-Lanka) who indicate they are not opposed to joining the union, but do not see the point without a recognition agreement. They voice their opinion that the union is unlikely to achieve recognition because Asian workers would not join the union, as they did not understand what the union was about and that Asians 'just stick together with their own kind'. Similar views were expressed by an African male shop steward about Asian workers; 'There is one big problem…some of the Asians… they have experience of trade unions in their own country, but they are not realising the importance of having a union and union recognition'.

The importance in this study is that minority ethnic workers voices were not considered homogenous and intersectional analysis was used to investigate intra and intergroup differences. By interviewing across and within the different minority ethnic groups within the factory, the author was able to reveal different cultural, economic and social factors affecting the lived experience of these workers. This can be contrasted with a similar study by Scott (1994: 83-84) who adopted an unquestioning analysis of race relations in a biscuit factory.

By using an intracategorical approach to understanding complexity, Hebson and Holgate are able to provide the voices that are often missing from industrial relations. This is an important contribution but as McCall (2005) has explained, different methodologies produce different kinds of substantive knowledge. Thus, it is important that Hebson and Holgate also acknowledge and reflect on the implications of using an intracategorical approach. For example a re-reading of Holgate's work enables us to reflect on the limited comparison of male and female workers in her study and question the extent to which assumptions are made by her male interviewees about the complexity of the actual lived experience of women. The following comment from a union organiser, explaining why it is important to organise in the local community, enables Holgate (2004: 199) o reflect on the gendered issues at play in trade union organising:

> After I had finished my job each day we would go door to door and inside people's homes we would arrange meetings. We had a little difficult [persuading] the women, but we explained that we needed unity. Especially for the ladies, we would arrange the meeting in a lady's home, so that people would feel comfortable. (Zaheer, Pakistani male union organiser)

Whilst a researcher may assume what some of the gendered issues may be, such as additional domestic duties that require some women to be at home in the evenings to prepare food for the family, or the range of cultural norms inherent in the different Asian communities in west London, Holgate appreciates that there may be a multitude of other issues that could have been uncovered if more women had been interviewed in her research. Each of these factors (and others) had the potential to prevent or limit women workers getting more involved in their union, but the issues are more multi-layered than suggested here. For example, there is a long tradition of union militancy led by Asian women workers in west London where the research was conducted. Well-known industrial disputes such as Grunwick, SkyChef, Hillingdon Hospital and more recently, Gate Gourmet and Chemilines – all led by south Asian women - challenge the gendered analysis that seems evidence in the above account. The lack of women voices and a reliance on male respondents discussions of union organising left out the important factors behind this militancy or the differences between women workers in the companies mentioned above and those of women in the factory where the union organising campaign was taking place. This self-reflection reiterates McCall (2005) concern that we acknowledge how different methodologies produce different kinds of substantive knowledge. Thus, clarification is also necessary about what and which intersections should be studied.

KNOT TWO: WHAT'S INTERSECTING; IS IT AN ADDITIVE OR CONSTITUTIVE PROCESS?

A critical analysis of the authors' own discussion of intersectionality (Holgate et al. 2006), indicates how we moved perhaps imprecisely between using the terminology of intersectionality to relate to social processes; divisions; and identities. Thus, the second knotty issue is to clarify the focus of the intersections. Whilst Crenshaw's initial usage of the concept was to explore the ways in race and gender intersect to shape structural, political and representational aspects of violence against black women, she noted that the concept could be expanded by adding class, sexual orientation and age. These definitions would infer that intersectionality can refer to social processes, social divisions *and* identities. Yuval-Davis (2006: 197, 195), however, cautions the danger of focusing on the intersection of *identities*, noting that the individual and collective narratives of 'identities' are often required to perform 'analytical tasks beyond their abilities', and can reflect 'hegemonic discourses of identity politics which render invisible experiences of the more marginal members of that specific social category'.

At the risk of tying us all up in knots (!), it is possible to see that this is a double knot which needs unravelling. The first strand relates to clarifying the subject of intersections and a literature review indicates a number of responses: social processes, identities, social categories.

Although concerns have already been raised of the danger of focusing on the intersection of identities, McCall (2005) provides us with a rationale for using identity groups as categories for the purposes of intersectional identity. However, this does not address Yuval-Davis' (2006) point that a focus on identities increases the likelihood of intersectionality being viewed as an *additive model* – a second strand where we need to consider if intersectionality is an additive *or* constitutive process. Arguing against earlier work that conceptualised black women as suffering from the triple oppression of being black, a woman and a member of the working class, Yuval-Davis notes that; '…any attempt to essentialize 'Blackness' or 'womanhood' or 'working classness' as specific forms of concrete oppression in additive ways inevitably conflates narratives of identity politics with descriptions of positionality as well as constructing identities within the terms of specific political projects' (2006: 195).

Yuval-Davis identifies the prevalence of the additive model in public international discourse, citing The Centre for Women's Global Leadership (2001) discussion of 'multiply burdened groups' and the space given to Crenshaw's crossroads imagery where oppressions 'link together to make a double, a triple, multiple, a many layered blanket of oppression'. These texts also provide us with another possible answer to the knotty issue of the focus of intersectionality, and here we find the Centre for Women's Global Leadership (2001) indicating that it is about 'capturing the consequences of the interaction between two or more forms of subordination'. We find this stance also taken by authors such as Bradley (2007) when she notes that intersectionality corresponds to what she calls 'multiple positioning' and 'multiple disadvantage' citing Kanyoro's (2001) argument that it concerns the way 'multiple forms of subordination interlink and compound to result in a multiple burden' (Bradley 2007: 190). These views are taken forward into Bradley and Healy's (2008) book, *Ethnicity and Gender at Work*.

A concern with the experiential level and identities was a major preoccupation in our own earlier work on intersectionality. We argued 'the concept of intersectionality can be essential to interpreting the lived experience of the researched' (Holgate et al. 2006: 312) and interrogated key IR texts and the ways they had (or had not) explored 'the intersecting identities of workers' (op. cit: 315). In this sense we fall into the tradition identified by Yuval Davis of reducing the analysis of intersectionality to the level of identities. However we also put an emphasis on how intersecting identities were shifting and were redefined over time and space (op. cit: 311) in an attempt to avoid an additive conception of intersectionality that did not speak to the more complex lived experiences we were uncovering in the IR texts under discussion. However, our imprecise terminology meant we were unclear as to what was intersecting and shifting and thus we provided an unclear framework for IR researchers wishing to use an approach that utilised the debates around intersectionality.

UNTYING THE KNOTS: IMPLICATIONS AND POSSIBLE ANSWERS

Yuval-Davis (2006) provides a more workable definition and provides a convincing argument for using social divisions (such as class, race and ethnicity, *but not these exclusively*) as the focus of intersectional analysis and she provides a constitutive model for conducting this analysis at four different levels. She unpacks the concept of social divisions and provides a clarity that is absent from other approaches that focus more specifically on identities. For Yuval-Davis, the point of intersectional analysis is; 'to analyse the differential ways in which different social divisions are concretely enmeshed and constructed by each other and how they relate to political and subjective constructions of identities' (2006: 205).

The four different levels of analysis identified by Yuval-Davis relate to the different forms of social divisions: organisational; intersubjective; experiential; and representational. By unpacking the concept of social divisions to reveal different analytical levels intersectionality becomes more than the expression of multiple identities; it necessarily engages with power relations and in particular allows us to theorise differential access to economic, cultural and political resources that these different social divisions create. For Yuval-Davis (2006: 200) this involves the recognition that social divisions are not all reducible to the same ontological level but nevertheless each social division and how it intersects with others can be explored using the four different analytical levels discussed below.

First, social divisions can be expressed in specific institutions and organisations and Unison's establishment of self-organised groups could be an example of this. Second, Yuval-Davis argues that social divisions involve 'specific power and affective relationships between actual people, acting informally and/or in their roles as agents of specific social institutions and organisations'. Briskin's (2008) analysis of the political practices of cross-constituency trade union groups could be seen as an example of using organisational and intersubjective forms of intersectional analysis. The third level of analysis is the experiential, in which people experience subjectively 'their daily lives in terms of inclusion and exclusion, discrimination and disadvantage, specific aspirations and specific identities', which includes that they think about themselves and their attitudes towards others. The references noted above from the work of Hebson (2001) and Holgate (2004; 2005) provide a good example of an intersectional analysis at the experiential level. The final level of analysis put forward by Yuval-Davis is that social divisions exist at the level of representation in images, symbols, texts and ideologies.

This is an approach to intersectionality that has some exciting possibilities for the IR tradition. Yuval-Davis argues using such an approach allows us to go beyond reifying identities as we are able to recognise there is no correspondence between positionings and social groupings. She argues 'Studying the relationships between positions, identities and political values is so important' (2006: 203). In this approach identities are only part of the study; they are a construction and are not to be conflated with the class, gender, race or other social positions people are situated in. She disentangles political values from social positions arguing they can be separate and become the unifying factors and shape access to knowledge collectively rather than individually (2006: 199). This approach to intersectionality avoids conflating posititionings, identities and values and means there is no homegenized 'right way' to be a member of a social group (2006: 195). In the sense that intersectionality is always sensitive to power relations and how they are constituted via organisational, intersubjective, experiential and representational levels, we would argue it is possible to mainstream the concept in IR research.

Applying this model would have enabled Hebson (2001) to question whether the level of social divisions as expressed in specific institutions was important in understanding the voice and silences in the narrative of Dawn, a female Afro-Caribbean trade union activist. Dawn became active in union politics because of a union campaign around immigration and she tells of how black people look to the union to represent them on issues beyond the workplace. For Dawn, the ways racialised social divisions are expressed in state laws around immigration is a central way in which the social division of race is played out and is a focus of her politicisation. More could have been asked about how this played out at the intersubjective level. Hebson's (2001) focus on Dawn's experience and identity meant the relationships between herself and the union representatives and her employers were not a central part of the analysis. However including this dimension may have allowed for a better understanding of the ways the union representatives appealed to Dawn's race politics. Dawn links class and race throughout her narrative but we get little sense of how the unions were able to successfully appeal to Dawn's politicised racial identity in ways that were sensitive to class. At the experiential level, Dawn had experienced discrimination in her working life as a black woman. She had endured sexual harassment from male colleagues and had successfully taken out a claim for sexual harassment. However this experience had not politicised Dawn's gender identity and the reasons for this were not interrogated in enough depth because of the primacy given to the experiential level. Dawn distanced herself from women's committees in the unions because black members perceived these as 'racist and middle class'. Thus Hebson used an intersectional analysis that assumed Dawn's 'silencing' of a gendered identity/perspective was an expression of her race and class politics; by distancing herself from a feminist politics she was revealing the primacy of other aspects of her identity (in this case race and class). However as to why this was the case, the analysis gives us little in way of explanation. This could have been explained more fully by looking at how intersections played out at the different levels of social divisions. For example, why did Dawn think feminism in the union was middle class? The organisational, intersubjective and symbolic level are all important in understanding why black members were distrustful of the women's committees. How was this communicated through the ideologies and symbols/text by women active in the union? At the organisational level what policies were in place that suggested this was the case? What were concrete relationships like with representatives of the women's committees? Hebson needed this data to explore fully why

Dawn had negotiated the specific union voice and identity she had. Yet because the aim of the study was to legitimise feminist theory and research that recognises class differences among women, Hebson wanted to emphasise that there was no right way to be a black, working-class female member of a union and the primacy given to legitimizing Dawn's experience and identity meant the analysis lapsed into description.

We would argue that an intersectional analysis enables us to better understand the diversity of experience of trade union members. It enables us to identify those voices we have missed through our particular choice of methodology or to seek out those voices which may have been silenced by political intersectionality. There is no one best way to conduct intersectional analysis but McCall provides us with a useful framework for determining what our approaches might be. Indeed, IR is well placed to fully engage with a new research agenda for an intersectional analysis that advocates the use of a wider range of methods. Likewise, Hebson's self-reflection indicates how Yuval-Davis provides us with a useful multi-level, constitutive model of analysis for our consideration.

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