

**IMPLEMENTING PUBLIC POLICY IN A MULTI-NATIONAL COMPANY: SPANNING OCCUPATIONAL
BOUNDARIES**

**Thesis submitted in accordance with the requirements of the University of Liverpool for the
degree of Doctor of Business Administration**

by

Leon Wolmarans

Date: 10 September 2020

DECLARATION OF OWN WORK

Statement 1

I hereby declare that this work has not been accepted in substance for any degree and is not currently being submitted in candidature for any degree.

Signed:  (Leon Wolmarans)

Date: 10 September 2020.

ABSTRACT

In this action research project, I inquire into the challenge and describe what happened when a multinational company (MNC) implemented South Africa's Broad-Based Black Economic (B-BBEE) ownership policy, a policy that aims to indigenize economic ownership to redress apartheid injustices. Public policy implementation research generally reports on the effectiveness of different implementation models in public service (McTigue, Monios, and Rye, 2017; Holland *et al.*, 2016; Hupe and Hill, 2016; Kohoutek, 2013), but tends not to explore the implementation of local policies. It also does not explore the more micro aspects of managing across boundaries in MNCs. Globalization introduces management complexity into organizations who operate across national and occupational boundaries. The process to implement the public policy of a subsidiary in a MNC presented an opportunity to study how this novel requirement introduced tensions between occupational communities involved in the implementation and how skills and tools enabled boundary spanning to transfer knowledge and gain legitimacy, thereby easing tensions that threatened to delay the implementation.

In this study, I explore how to manage those tensions that arose from different understandings and expectations of the occupational communities involved in the local public policy implementation in the MNC. Particularly, I explore difficulties to engage different stakeholder communities to participate, how to facilitate exchange of information and ease tensions between communities, and how to accommodate different communities' expectations and goals. My action research project is a real-time longitudinal field study that used cultural historical activity theory (CHAT) as action research modality. I produced data using narrative, temporal and visual strategies from process research. Process research assisted in organizing raw data and provided context and history, from a critical realist philosophy of knowledge creation. In the data analysis, I deployed CHAT to model the human activity systems, to explore what caused tensions between elements in the activity systems of the project, and to understand what I could do to ease those tensions. MNC research is lacking in longitudinal studies extensive enough to explore the complexity of having an impact when using useful methods such as CHAT in complex managerial action-based situations.

The findings reveal how I transferred knowledge across community and occupational boundaries and gained project legitimacy by using boundary spanner skills, understanding of MNC bureaucracy and routines, social capital formation, boundary objects, own domain knowledge and knowledge of occupational community practices. Knowledge transfer and project legitimacy were needed to manage tensions arising from actions to engage occupational communities, share complex policy requirements, negotiate competing issues of policy and time, and develop new MNC policy. This study contributes to knowledge by marrying CHAT as action research modality with process research. It applies Carlile's (2004; 2002) recommendations to transfer knowledge at organizational boundaries across syntactic, semantic, and pragmatic boundaries by using boundary spanning and its skills and tools, as it enabled knowledge transfer of complex public policy requirements to occupational communities in my MNC. Furthermore, boundary spanning established project legitimacy with these communities. Additionally, my own occupational domain knowledge emerged as a key skill that facilitated this local public policy implementation in my MNC. Finally, I contribute a bottom-up policy implementation model, moderated by my experience in my action research project, to identify literature on MNC challenges that may be less relevant today.

ACKNOWLEDGEMENTS

To Allan Macpherson, without whose constant encouragement and feedback my action research project and the learning I experienced would not have been possible. I appreciate the gentle guidance into knowledge creation.

To Jill Shepherd, whose constructive feedback provided perspective.

To Esmé and my children, Len and Milla, whose support confirmed:

The capacity to learn is a gift;

The ability to learn is a skill;

The willingness to learn is a choice.

(From Prelude to Dune II: House Harkonnen, by Brian Herbert and Kevin J. Anderson, 2000, p. 453)

TABLE OF CONTENTS

IMPLEMENTING PUBLIC POLICY IN A MULTI-NATIONAL COMPANY: SPANNING OCCUPATIONAL BOUNDARIES.....	1
DECLARATION OF OWN WORK	2
ABSTRACT	3
ACKNOWLEDGEMENTS.....	4
LIST OF FIGURES	8
LIST OF TABLES.....	9
GLOSSARY	10
ABBREVIATIONS	13
1 INTRODUCTION	14
1.1 History of the B-BBEE policy	14
1.2 B-BBEE policy consequences	15
1.3 Problem statement	16
1.4 Management literature reviewed.....	16
1.5 Research method	18
1.6 Thesis structure.....	18
2 LITERATURE REVIEW	19
2.1 MNC history and challenges	19
2.2 Policy implementation research	25
2.3 Bureaucracy for effective policy implementation in MNCs.....	28
2.4 Conclusion	32
3 METHODOLOGY.....	34
3.1 Philosophical assumptions	34
3.2 Research strategy.....	36
3.2.1 Action research	36
3.2.1.1 Action research modalities	37
3.2.1.2 Critiques of action research	38
3.2.2 Choosing an action research modality	38
3.2.3 Cultural-historical activity theory (CHAT)	40
3.3 Research setting.....	43
3.4 Research approach.....	44
3.5 Data collection	45
3.6 Data organization.....	45
3.7 Data referencing	47

3.8	Data analysis	47
3.8.1	Approach to data analysis.....	47
3.8.2	CHAT elements in my project.....	49
3.9	Ethical considerations	50
3.10	Conclusion	51
4	PERIOD/ACTION RESEARCH CYCLE 1 – MOBILIZING.....	52
4.1	Introduction	52
4.2	Tension 1 – Engaging the disengaged	52
4.3	Tension 2 – Informing the uninformed	56
4.4	Tension 3 – Managing competing issues of policy and time	59
4.5	Discussion	61
4.6	Moving forward	63
5	PERIOD/ACTION RESEARCH CYCLE 2 – IMPLEMENTING.....	64
5.1	Introduction	64
5.2	Tension 4 – Beating the clock	65
5.3	Tension 5 – Navigating new territory.....	68
5.4	Tension 6 – Simplifying complexity.....	70
5.5	Tension 7 – Getting legitimacy	73
5.6	Tension 8 – Managing conflict	74
5.7	Discussion	75
5.7.1	Bounded rationality.....	76
5.7.2	Information or knowledge artefacts	77
5.7.3	Boundary spanning individuals	78
5.7.4	Social capital	78
5.8	Moving forward	79
6	PERIOD/ACTION RESEARCH CYCLE 3 – ANCHORING	81
6.1	Introduction	81
6.2	Tension 9 – Herding cats	81
6.3	Tension 10 – Moving targets.....	86
6.4	Discussion.....	89
7	CONCLUSION.....	95
7.1	Introduction	95
7.2	Discussion and findings.....	95
7.3	Contribution to knowledge	99
7.4	Limitations of my study.....	100
7.5	Future research	100

7.6 Final remarks.....	101
REFERENCES.....	102
APPENDIX 1: Journal and diary summary and project timeline.....	110
APPENDIX 2: Digital data references.....	113
APPENDIX 3: Journal entry data references.....	116

LIST OF FIGURES

FIGURE 1: BOTTOM-UP POLICY IMPLEMENTATION MODEL FOR B-BBEE POLICY IMPLEMENTATION IN MY MNC	33
FIGURE 2: BASIC MODEL OF ACTIVITY (COGHLAN AND BRYDON-MILLER, 2014)	40
FIGURE 3: ENGESTRÖM’S MODEL OF ACTIVITY (ER, 2014)	41
FIGURE 4: STRUCTURE OF A HUMAN ACTIVITY SYSTEM ADAPTED FROM ENGESTRÖM (2001).....	42
FIGURE 5: STRUCTURE OF A HUMAN ACTIVITY SYSTEM ADAPTED FROM ENGESTRÖM (2000) SHOWING CONTRADICTIONS BETWEEN ELEMENTS IN THE ACTIVITY SYSTEM AS WAVY LINES	42
FIGURE 6: SYSTEM VIEW OF MY ACTION RESEARCH PROJECT ENVIRONMENT.....	43
FIGURE 7: APPLYING CHAT TO MY PROJECT’S ACTIVITY SYSTEMS	48
FIGURE 8: USING CHAT TO LEARN AND PLAN NEXT ACTIONS.....	49
FIGURE 9: TENSIONS IDENTIFIED IN MY PROJECT’S ACTIVITY SYSTEMS	51
FIGURE 10: PERIOD/ACTION RESEARCH CYCLE 1 AND TENSIONS IDENTIFIED	52
FIGURE 11: TENSION 1 - ENGAGING THE DISENGAGED.....	53
FIGURE 12: TENSION 2 - INFORMING THE UNINFORMED	57
FIGURE 13: TENSION 3 - MANAGING COMPETING ISSUES OF POLICY AND TIME.....	59
FIGURE 14: PERIOD/ACTION RESEARCH CYCLE 2 AND TENSIONS IDENTIFIED	64
FIGURE 15: TENSION 4 - BEATING THE CLOCK	65
FIGURE 16: DEVELOPMENT OF A KEY ARTEFACT THROUGH SUCCESSIVE ACTION RESEARCH CYCLES (ADAPTED FROM COGHLAN AND BRANNICK, 2014).....	67
FIGURE 17: TENSION 5 - NAVIGATING NEW TERRITORY	69
FIGURE 18: REDACTED VERSION OF CHECKLIST (AN)	69
FIGURE 19: REDACTED VERSION OF ASSESSMENT MATRIX (AO)	70
FIGURE 20: TENSION 6 - SIMPLIFYING COMPLEXITY.....	71
FIGURE 21: INFORMATION ARTEFACT TO SIMPLIFY COMPLEX INFORMATION (AN, P. 4).....	72
FIGURE 22: VISUAL DISPLAY OF COMPLEX INFORMATION (AP).....	72
FIGURE 23: TENSION 7 - GETTING LEGITIMACY.....	73
FIGURE 24: TENSION 8 - MANAGING CONFLICT.....	74
FIGURE 25: PERIOD/ACTION RESEARCH CYCLE 3 AND TENSIONS IDENTIFIED	81
FIGURE 26: TENSION 9 - HERDING CATS	82
FIGURE 27: B-BBEE POLICY AS INTEGRATED APPROACH.....	84
FIGURE 28: QUARTERLY B-BBEE SCORECARD.....	85
FIGURE 29: B-BBEE BUDGET	85
FIGURE 30: TENSION 10: MOVING TARGETS	87
FIGURE 31: POLICY IMPACT ON BUSINESS IN HOST COUNTRY	93
FIGURE 32: SKILLS AND TOOLS FOR KNOWLEDGE TRANSFORMATION TO EASE TENSIONS IN MY PROJECT	96
FIGURE 33: AMENDED BOTTOM-UP POLICY IMPLEMENTATION MODEL FOR B-BBEE POLICY IMPLEMENTATION IN MY MNC.....	99
FIGURE 34: BOUNDARY SPANNER SKILLS AND TOOLS USED IN MY PROJECT.....	100

LIST OF TABLES

TABLE 1: MY JOURNAL AS DATA SOURCE.....	45
TABLE 2: MY DATABASE STRUCTURE AND DATA FOLDERS.....	47
TABLE 3: ACTIVITY SYSTEMS IDENTIFIED FOR CHAT ANALYSIS	48

GLOSSARY

Activity theory

Activity theory was developed by Vygotsky, Leont'ev and Luria to explain human consciousness and behaviour by examining the relationship between an individual's mental processes and their interactions in social settings (Er, 2014; Yamagata-Lynch, 2010).

Activity systems

Activity systems direct collective human actions to attain goals through "... networks of sociocultural elements, with complex mediational structures ..." (Trust, 2017, p. 100).

Boundary-crossing / boundary spanning

In business studies, boundary-crossing or boundary spanning refer to those activities that link, cross or span imaginary lines that define different occupations who provide specialist services in and to organizations (Carlile, 2004; Espinosa, Cummings and Pearce, 2003; Brown and Duguid, 2001; Aldrich and Herker, 1976). Generally, in this study boundary crossing or boundary spanning activities refer to the transfer of knowledge amongst teams and occupations involved in implementing a public policy of a host country in a multinational company.

Boundary objects

Boundary objects is an "... analytic concept of those scientific objects which both inhabit several intersecting social worlds ... and satisfy the informational requirements of each of them" (Star and Griesemer, 1989, p. 393). Star and Griesemer (1989, p. 393) suggest boundary objects are concrete or abstract, adaptable to local needs but with enough strength to retain its identity, and they act as a means of translation between different social worlds.

Bounded rationality and agency problems

Bounded rationality is rooted in the problem that humans cannot be rational in their interpretation of the world because they have limited information, are unable to visualise the outcome of future actions, and don't understand how human behaviours influence actions (Simon, 1955; 1947, cited in Cristofaro, 2017, p. 27). Consequently, since our reality is formed by our experiences, interpretations and perceptions, we observe our world through biased lenses and react because of our social programming. Consequently, we don't see the "full picture" in our social worlds and are therefore constrained by what seems real and rational to us. Bounded rationality therefore causes opportunistic behaviour due to self-interest. Combined with information asymmetry, bounded rationality causes problems in agency relationships (Jensen and Meckling, 1976).

Broad-Based Black Economic Empowerment (B-BBEE)

A policy of the South African government aimed at reversing the role of apartheid's race-based policies which excluded "non-white" people from participating in the economy of the country prior to 1994. Implementation of the policy by commercial enterprises in the country is voluntary, but those who provide services directly to government, state-owned entities or enterprises subject to government regulation must be policy compliant to benefit from contracts and licenses. In turn, those who provide products and services to these enterprises benefit if they comply. The policy addresses five business areas: ownership, management control, skills development, procurement including enterprise and supplier development, and socio-economic development. Points are awarded for reaching set targets.

An overall B-BBEE score is computed annually in line with either a generic or industry specific B-BBEE code. Accomplishment of targets are verified by independent agencies annually, whereupon a B-BBEE certificate is issued to the participating enterprise.

Bureaucracy

Bureaucracy is the structures and rules in organizations that ease social interactions to facilitate the coordination of actions (Schofield, 2004).

Critical realism

Critical realism is the philosophical position to knowledge creation that lies somewhere between strong versions of positivism and constructionism, where the realist perspective recognises that social conditions influence our lives whether we observe it or not, and the relativist perspective acknowledges that our actions create social life which impact us (Easterby-Smith, Thorpe, and Jackson, 2012, p. 29). Bhaskar structured critical realism's ontology as consisting of three layers of reality: the empirical, the actual, and the real or causal domain (Houston, 2014; Easterby-Smith, Thorpe, and Jackson, 2012, p. 29).

Cultural-historical activity theory (CHAT)

CHAT allows researchers to perform contextual analysis of human learning and development in combined activity by examining conflicts that arise from the relationship between people, mediating tools and goals as influenced by history, society and culture in activity systems (Trust, 2017; Darwin, 2011).

Institutional distance

The distance caused in organizations by difference from culture, administration, economy and geography (Ghemawat, 2001).

Institutional duality

In multinational companies, institutional duality comes from legitimacy demands by internal stakeholders on units and organizational communities that work together in diverse local environments to deliver corporate strategies, against different and even conflicting demands from external stakeholders such as national authorities, customers and competitors (Durand and Jacqueminet, 2015, p. 919; Kostova and Zaheer, 1999).

Knowledge transfer across syntactic, semantic, and pragmatic communication boundaries

Carlile (2004, p. 556) in describing the properties of progressively complex knowledge at boundaries: difference, dependence and novelty, applied Shannon and Weaver's three levels of progressive communication complexity: syntactic, semantic and pragmatic (1949, cited in Carlile, 2004, p. 557), to demonstrate how knowledge transfer at organizational boundaries occur. In this, difference in knowledge accumulated or the type of knowledge accumulated involve a *transfer* of knowledge across a syntactic or information-processing barrier. When there is dependence between parties who must work together, a semantic or interpretive barrier must be overcome for knowledge *translation*. Finally, when novelty is a property of knowledge, a pragmatic or political barrier must be crossed thereby *transforming* knowledge.

Liability of foreignness

Liability of foreignness describe the problem multinational companies face to attain legitimacy in the host country environment in which their subsidiaries operate (Roth and Kostova, 2003; Kostova and Zaheer, 1999).

Multinational company (MNC)

MNCs operate in at least two countries where the home country firm, or parent/principal, has significant managerial control over its subsidiaries and affiliates in host, or local, countries (Davison, 2015).

Multiple embeddedness

Multiple embeddedness refers to the effects of globalization on the “... complex interdependencies within and between multiple host locations as well as on their internal hierarchies” in multinational companies (Meyer, Mudambi and Narula, 2011, p. 237).

Ostensive and performative routine aspects

Routines have ostensive and performative aspects. Ostensive aspects address the abstract idea or structure of the routine, and performative aspects relate to the actions or activities of specific people at specific times and in specific places to bring routines to life (Feldman and Pentland, 2003, p. 95). Alternatively, ostensive aspects represent “routine in principle” and performative aspects “routine in practice” (Feldman and Pentland, 2003, p. 101). In summary, ostensive aspects address outcomes and performative aspects concern the actual activities to perform a routine (Hayes, Lee and Dourish, 2011, p. 164).

Routines and tools (artefacts)

Tools (or artefacts) are man-made objects that shape routines and are used to perform the tasks that routines require. Examples of artefacts include rules, standard operating procedures, arrangements of machines, tools, materials, computer systems, and representational forms such as language, text, and graphical representations, amongst others (D’Adderio, 2011, p. 199 - 208). Artefacts represent either ostensive or performative aspects of routines and influence these aspects. Although routines and artefacts are related and co-evolve, artefacts are distinct from routines (Pentland and Feldman, 2008, p. 242).

Social capital

Commonly, social capital refers to the assets used to maintain social relationship networks (Nahapiet and Goshal, 1998, p. 243; Burt, 1992). Nahapiet and Goshal (1998, p. 243) identified three dimensions: structural, relational and cognitive. The structural encompasses establishing links in social networks, the relational concerns how behaviours such as “trust and trustworthiness, norms and sanctions, obligations and expectations and identity and identification” (Nahapiet and Goshal, 1998, p. 243) attach people to social networks, and the cognitive deals with the resources used in social networks such as shared codes and language, and shared stories.

ABBREVIATIONS

Abbreviation	Description
B-BBEE	Broad-Based Black Economic Empowerment
CFO	Chief Financial Officer
CHAT	Cultural historical activity theory
COPs	Communities of Practice
GEAR	Growth, Employment and Redistribution
ICT	Information and Communication Technology
MNC	Multinational company
MNCs	Multinational companies (plural of MNC)
NDP	National Development Plan
NOPs	Networks of Practice

1 INTRODUCTION

I work for a multinational company (MNC) in the global Information and Communication Technology (ICT) sector. Through operations in its regions, it installs, manages and maintains ICT equipment and networks. I work from my MNC's South African office as a change and improvement manager, serving the business in the Middle East and Africa. My early training was in accounting and auditing, but after I completed an MBA my interest moved to management consulting. In my working career of more than 30 years, I worked in professional services, finance, manufacturing and ICT industries in South Africa and abroad where I mostly managed improvement and change management projects and departments staffed with specialist consultants.

At the end of 2015, I was asked to manage the implementation of new requirements of South Africa's Broad-Based Black Economic Empowerment (B-BBEE) policy in my MNC, where the real work started in 2016. Since I had no knowledge of public policy implementation in a MNC, this was the ideal subject for my action research project. However, my focus soon changed as I found that I had to manage many tensions amongst different stakeholders and occupational communities inside and outside my MNC, who had to cooperate and help me implement the public policy in my MNC. As I narrate later, these tensions arose because the requirements of the policy not only conflicted with established MNC policy, but its novelty and complexity created a fluid environment because ambiguous rules needed changes by the regulator whilst target dates for implementation remained fixed. This situation increased uncertainty and MNC executives who were removed from the local context had to make decisions in the absence of perfect information, provided by employees whom they did not know, with added pressure from looming deadlines and demands from customers for my MNC to become policy compliant. Furthermore, in this time I had to contend with regular changes in my work environment and with changes in participants and occupational communities in my project because of a global restructuring of my MNC's operations.

1.1 History of the B-BBEE policy

To understand the South African context of why the policy was developed and what it wants to achieve, the country's recent history must be considered. In South Africa prior to 1994, apartheid policies prevented economic participation by its black citizens. The Broad-Based Black Economic Empowerment (B-BBEE) Act 53 of 2003 (Government Gazette, 2004) was created to address this problem. The objectives of the act are to reverse the role of apartheid's race-based policies that prevented access to productive resources and skills for most of its people, to improve the country's economic potential by increasing the earnings potential of the previously excluded majority, and to establish a stable and prosperous economy for all its citizens (Government Gazette, 2004, p.2). The B-BBEE act supports the South African Government's National Development Plan, the NDP (South Africa, 2012), and its predecessor, the Growth, Employment and Redistribution (GEAR) strategy (South Africa, no date), both of which aim to establish an improved socio-economic environment in the country.

The B-BBEE act is regulated by Codes of Good Practice, amended in 2013 (Government Gazette, 2013). The Codes of Good Practice, commonly referred to as "the codes", "B-BBEE codes", or "generic codes" are guidelines for the implementation of government's policy. The generic codes are adapted to align with government's priorities for different industry sectors in South Africa and are called "sector codes". Companies can elect to be governed either by the "generic" code, or by their industry "sector codes". The act and its codes want to facilitate the transfer of ownership, management and control of

South Africa's economic and financial resources to its previously disadvantaged citizens (Luiz and Gaspari, 2007). Companies and multi-national companies (MNCs) in South Africa face demands from government and customers to comply with the requirements of the B-BBEE act. Although participation is voluntary, high B-BBEE ratings benefit local business because it eases access to operating licenses and allows them to contract with state-owned enterprises. Therefore, most MNCs participate in the South African government's B-BBEE programme through their local subsidiaries who implement the local public policy.

1.2 B-BBEE policy consequences

To participate in the South African B-BBEE programme, companies must adhere to the rules prescribed in either the generic codes or their industry sector's B-BBEE codes. The B-BBEE policy, regulated by the codes, requires enterprises to address five business areas: ownership, management control, skills development, procurement including enterprise and supplier development, and socio-economic development. Each area is a subsidiary policy of the B-BBEE policy with points awarded for reaching set targets, with an overall B-BBEE score computed annually. Ratings of B-BBEE level compliance are determined based on the number of points companies accumulate. Currently, ratings vary from non-compliant to levels eight (lowest) and one (highest). B-BBEE scores are independently verified by accredited B-BBEE verification agencies every year who issue B-BBEE certificates to local companies stating their B-BBEE compliance level.

The generic B-BBEE codes were amended in 2013 (Government Gazette, 2013) to align policy with party-political priorities and changes were made to the B-BBEE ICT sector codes (B-BBEE ICT Sector Council, 2016) that govern my MNCs compliance. The amended ICT sector codes, generally referred to as the "new" codes, have more demanding targets than the previous "old" codes. In fact, the codes and targets were so substantially revised that it required a new implementation of the B-BBEE policy. Consequently, I ended up having to manage the implementation of a new and complex local public policy and its related subsidiary policies in my MNC.

The B-BBEE ownership policy my project had to implement presented complex challenges as its requirements contradicted my MNCs policy to control local operations in host countries. The condition for businesses to offer a significant percentage of its local subsidiary's shares to black South Africans was therefore at odds with existing MNC policy, but non-compliance made it impossible to achieve the requisite B-BBEE rating customers demanded. Furthermore, a high B-BBEE ownership score was needed to compensate for low scores in other B-BBEE policy areas that would take years to address. Therefore, after evaluating all ownership options available under the B-BBEE generic code, my action research project advised that my MNC offer black women a 30.01% share interest in its local subsidiary to reach a maximum B-BBEE score for ownership. However, our recommendation was uncertain because the ICT sector codes were only amended and issued three years after the generic codes were revised, which introduced a risk if the ICT sector codes' requirements for ownership differed from the generic codes. A further challenge for my MNC was that the local subsidiary's customers wanted it to comply with the new B-BBEE policy by 31 December 2016 but we only had clarity when the amended ICT sector code was released on 7 November 2016 (B-BBEE ICT Sector Council, 2016), a month before the deadline to implement the new B-BBEE ownership policy. Therefore, in addition to having to deal with complex requirements, decision-makers in my MNC had to make choices without clear policy.

In summary, the consequences of implementing the South African B-BBEE ownership policy provided a unique challenge to my MNC because it not only conflicted with existing MNC policy, but its globally

integrated organizational structures did not support local adaptations to implement and maintain a host country's public policy.

1.3 Problem statement

My action research project's B-BBEE ownership policy implementation required that I had to mobilize people and resources inside and outside my MNC. As mentioned earlier, I had to do this at a time when my MNC reorganized its operations, when changes happened frequently and created a fluid work environment, with new communities and new project participants constantly emerging as organizational structures changed. Furthermore, the local regulatory environment was uncertain because policy rules were poorly defined. Also, because the policy's requirements were novel, most of my project's communities and participants did not understand what they had to do, or why. Therefore, as I acted and initiated project activities, I caused tensions in the activity systems of my project because communities and participants in my action research project had different levels of understanding and different expectations. I soon realised that I had to address and reduce these tensions if my project was to meet its milestones and deadlines. Consequently, as my project evolved, I needed answers on how to relieve many tensions that emerged in my project's action research cycles.

In summary, my central research question is:

“How can I manage tensions that arise from different understanding and expectations of communities and participants as I work with them in my MNC to implement and anchor a local public policy?”

As my action research project evolved over time, specific questions emerged, including:

1. How do I engage different stakeholder communities to participate in the implementation of the local public policy in my MNC?
2. How do I facilitate the exchange of information and manage tensions between communities involved in my project?
3. How do I anchor the local public policy to meet different internal and external communities' expectations and goals?

1.4 Management literature reviewed

Three main topics, the history and challenges of MNCs, knowledge about policy implementation in organizations, and how bureaucracy with its established routines and tools are valuable to organizations who implement public policies, formed the basis for my literature review.

General MNC challenges include how to structure the organization (Foss and Weber, 2016; Kaplan, 2008; Isenberg, 1986), their so-called “cross-border condition” that emerge as they work across boundaries (Kostova, Nell and Hoenen, 2016; Hoenen and Kostova, 2015), institutional duality from internal and external demands (Durand and Jacqueminet, 2015; Tempel *et al.*, 2006) and their multiple embeddedness because of the many and different demands from societies within which they operate (Meyer, Mudambi and Narula, 2011; Kostova, Roth and Dacin, 2008). Of interest here is MNCs' liability of foreignness because they are viewed as outsiders in the host countries where they operate (Roth and Kostova, 2003; Kostova and Zaheer, 1999). Another significant challenge arise from agency problems (Kostova, Nell and Hoenen, 2016; Hoenen and Kostova, 2015; Jensen and Meckling, 1976) caused by bounded rationality of different actors and institutional logics that can lead to subsidiary-level agency relations in MNCs (Foss and Weber, 2016; Wiseman, Cuevas-Rodriguez and Gomez-Mejia,

2012; Lubatkin *et al.*, 2007; Aguilera and Jackson, 2003; Granovetter, 1985). Agency problems affect levels of trust in MNCs and make it difficult for internal communities to gain legitimacy in the organization (Kostova and Zaheer, 1999).

Other MNC challenges include difficulties to integrate global operations because of institutional distance related to culture, administration, economy and geography (Ghemawat, 2001), how to transfer knowledge amongst diverse communities (Tallman and Chacar, 2011; Carlile, 2004; 2002; Bechky, 2003b; Brown and Duguid, 2001; Gupta and Govindarajan, 2000), and how weak formal institutions and rules cause uncertainty in MNCs (Nell and Hoenen, 2016; Peng *et al.*, 2009; Kostova and Zaheer, 1999; Khanna and Palepu, 1997). To ease tensions in MNCs, literature about social capital (Kostova and Roth, 2003; Nahapiet and Ghoshal, 1998; Putnam, 1993; Burt, 1992) when managing across borders in organizations (Espinosa, Cummings and Pearce, 2003; Kostova and Roth, 2003; Brown and Duguid, 2001; Aldrich and Herker, 1977) was particularly helpful as I managed tensions in my action research project.

My literature review of policy implementation revealed that few studies in MNCs exist, but policy implementation in public service is well researched (Mischen and Jackson, 2008; Schofield, 2004). Traditionally, implementation research in MNCs are largely from North America (Schofield, 2004) and use quantitative methods that fail to study dynamic and complex implementations (deLeon, 1999). Policy implementation research in public service typically involve assessments of the effectiveness of different implementation models (McTigue, Monios, and Rye, 2017; Holland *et al.*, 2016; Hupe and Hill, 2016; Kohoutek, 2013), and in organizations deal with how to manage complexity from social interactions during policy implementation (Siciliano, Moolenaar, Daly and Liou, 2017; Bridwell-Mitchel and Sherer, 2016; Lundin, 2007). Schofield (2004) observed that managers don't necessarily know how to implement policy and should therefore learn how to do so.

Literature on bureaucracy and routines highlight how bureaucracy benefit organizations by easing social interactions to coordinate actions (Schofield, 2004). Routines enable knowledge transfer in organizations because it allows boundary-crossing between organizational communities where their artefacts become boundary objects that are comprehensible to different users and translate requirements when people cooperate (Uittenbroek, 2016; D'Adderio, 2011; Phelps and Reddy, 2009; 2008; Kellogg, Orlikowski and Yates, 2006; Howard-Grenville, 2005; Carlile, 2004; Schofield, 2004; Bechky, 2003a; 2003b; Feldman and Pentland, 2003; Feldman and Rafaeli, 2002; Engeström, Engeström and Kärkkäinen, 1995; Star and Griesemer, 1989).

In summary, MNC challenges that were most relevant to my action research were agency problems that affected levels of legitimacy and trust in my project, some effects of institutional distance that made it difficult to integrate implementation actions and activities into my MNCs operations, and challenges to transfer complex policy knowledge to occupational communities and stakeholders. As my narrative will reveal, in dealing with these challenges, I was prompted to conduct further literature reviews as I sought more information of how to act as a translator between my project's communities and participants. In this, my essential role as a boundary spanner who used boundary crossing objects and artefacts to create shared concepts and compromise solutions (Engeström, Engeström and Kärkkäinen, 1995) in my action research project emerged and was important to enable trust, legitimacy and knowledge transfer in my project.

1.5 Research method

My research method uses cultural historical activity theory (CHAT) as an action research modality, where data was generated by using narrative, temporal and visual strategies of process research. Process research assisted me to organize my data and provided context and history, and importantly, supports my critical realist philosophy of knowledge creation. In my data analysis, I used CHAT's model of human activity systems as my examination instrument. This enabled me to observe what caused tensions between elements in the activity systems of my project as we acted to realize outcomes in consecutive action research cycles over time, and I could isolate the actions I initiated which relieved those tensions.

1.6 Thesis structure

My thesis is structured as follows. In Chapter 2, I report the results of literature I had reviewed. Chapter 3 outlines my research philosophy and justifies my research method. Chapters 4, 5 and 6 tell the story of my project's lifecycle as it progressed through action research cycles and periods of mobilizing, implementing and anchoring of the local public policy in my MNC. In these chapters, I analyse tensions that emerged from different understanding and expectations of communities and participants, where changes in my MNC and the regulatory environment introduced change and brought new challenges that required fresh planning and actions to deliver specific project outcomes in each period. Consequently, each action research cycle in the three periods of my project introduced specific research questions that I investigated. Finally, in Chapter 7 I present what I had learnt from managing the tensions in my action research project, as I found answers to my research questions. In this final chapter, in addition to introducing new management knowledge, I also reflect on the limitations of my study and I suggest new areas for future study.

2 LITERATURE REVIEW

Having worked in MNCs for most of my career, I have first-hand experience of how the global distribution of their operations bring challenges as MNCs manage their business across borders in different countries, each with unique social dynamics. Therefore, in planning my literature review, I decided that I first needed to learn about how MNCs as an organization form developed and what challenges they have. Armed with knowledge from this broad background search, I would next review literature on public policy implementation to identify implementation models that I could apply as I managed my project. Thereafter, I would narrow the field of my review and focus on specific management solutions that could be useful to my project. In essence, my idea was to use a funnel-type approach starting with a broad review of MNC history and challenges followed by a specific focus on policy implementation literature, since that is the object of my action research project, in the end concentrating on a few management solutions that could assist me in my research. Therefore, what follows is structured accordingly, starting with a review of MNC history and challenges, findings from policy implementation research and my conclusion of how effective bureaucracy is essential for policy implementation in MNCs. In concluding my literature review, I present a model of how key ideas and concepts I identified interact and affect public policy implementation in MNCs, to guide me in my research.

2.1 MNC history and challenges

MNCs are complex enterprises, and their development is grounded in corporate strategies wanting to unlock economic benefits of scale (Harzing, 2000), growth strategies to expand into new markets, responses to threats from foreign competitors, and the world economy's globalisation (Davison, 2015). Additionally, improvements in technology and changes in the institutional frameworks that govern global commerce contributed to MNCs emergence in international business (Meyer, Mudambi and Narula, 2011; Maerki, 2008; Palmisano, 2006). Starting in 1914, Maerki (2008) and Palmisano (2006) identify three phases of MNC evolution: the global enterprise model where products were manufactured in the home country and exported across national boundaries; models where home country operations were replicated in subsidiaries in host countries; and the globally integrated enterprise made possible by the information technology revolution of the 1970's combined with a decline of economic nationalism (Maerki, 2008). In this third phase, barriers created by national borders and poor communications technology disappeared and MNCs could concentrate research, design, manufacture, and value delivery functions in a few locales to serve global operations (Maerki, 2008). The MNC in this study is a typical example of a globally integrated enterprise.

MNCs are situated in society and are therefore subject to tensions that present unique challenges (Maerki, 2008; Palmisano, 2006). Reviewing MNC characteristics provides insight into these challenges. The defining characteristic of MNCs are that they operate in at least two countries where the home country firm, or parent/principal, has significant managerial control over its subsidiaries and affiliates in host, or local, countries (Davison, 2015). Similarly, Kostova, Nell and Hoenen (2016, p.2) recognize the "cross-border condition" as the key characteristic that distinguishes MNCs. Other organization-specific characteristics include that MNCs are "... diverse, nonmonolithic and fragmented" (Kostova, Roth and Dacin, 2008, p.997), they have unique boundaries and organizational forms, take decisions with consequences that cross borders, are socio-politically embedded at many levels, and they confront unique intra-organizational issues when managing host subsidiaries (Roth and Kostova, 2003). Particularly, the cross-border condition makes it difficult for the parent company to effectively coordinate and control the actions of host subsidiaries (Hoenen and Kostova, 2015).

Therefore, it is not surprising that MNCs direct a lot of resources into establishing systems that enable effective coordination and control across organizational boundaries.

Not only are there internal boundaries in the organization that arise from its internal operations, but most MNCs have boundaries that separate it from its external environment. As already mentioned, MNCs are socio-politically embedded and work in complex environments with pressures from external events, its internal and intra-organizational environment, and differences between individual employees (Roth and Kostova, 2003). The many institutional environments of MNCs are the result of diverse organizational settings with varying levels of dependence and interdependence, globally geographic distribution of operations, and many external institutional influences, all working on it simultaneously (Kostova and Zaheer, 1999, p. 67). Consequently, MNCs are multiply embedded (Meyer, Mudambi and Narula, 2011).

Multiple embeddedness of MNCs require that managers must manage differences and distance related to culture, administration, economy, and geography (Ghemawat, 2001). From an internal organizational perspective, multiple embeddedness in MNCs require managers to coordinate and control a variety of activities in different subsidiaries across diverse organizational levels, all subject to influences from dissimilar local settings (Meyer, Mudambi and Narula, 2011, p. 236). At an intra-organizational level, complexity stems from efforts to coordinate and control different strategies using assorted governance structures and control mechanisms in different practices and processes (Roth and Kostova, 2003, p. 890). Diversity in the external organizational environment comes from host country dynamics directed by local political motivations, economic pressures, legal requirements, social and cultural practices (Roth and Kostova, 20003, p. 889). Variety at the employee-level originates in diversity of backgrounds, motivated by cultural values, beliefs and expectations of performance associated with organizational roles (Roth and Kostova, 20003, p. 891). Consequently, increasing levels of diversity increase complexity in MNCs, and the environmental influences it is subject to fragment and diversify the organization. Therefore, managers in MNCs must carefully manage complex cultural, legal and political issues.

Furthermore, MNC managers' decisions convey unspoken messages to its environment that are interpreted differently by its many audiences. For instance, MNC organizational form shapes shared interpretations of the many inputs by various actors in the organization (Foss and Weber, 2016; Kaplan, 2008; Isenberg, 1986). Here, Foss and Weber (2016) find that hierarchical forms of MNCs introduce levels of conflict that come from bounded rationality problems resulting from cognitive frames and biases, and inadequate processing ability of individuals in the organization, amplified by the structure within which they work. Therefore, managers in MNCs must consider how internal and external stakeholders form perceptions from their observations of MNC operations. Where perceptions are critical of the MNC, managers may find it difficult to coordinate and control its operations, particularly if such operations happen in far-away hosted subsidiaries of the MNC. In such operations, elements of distance (Ghemawat, 2001), discussed in the preceding paragraph, materialise and therefore, management complexity multiplies and may introduce significant barriers to efficient MNC operations. In the quest for effective coordination and control of MNC operations, sensitive management of stakeholder perceptions through careful negotiation between the many and diverse internal and external communities is then needed in MNCs.

Generally, MNCs with geographically dispersed, diverse and fragmented operations need high levels of trust between organizational actors who work together in coordinated activities. Trust is found when intentions of others are perceived as good, honest, and without the intention to harm, or alternatively, when actions are perceived as safe and reliable (Cambridge Dictionary, 2019). Added to the need for high trust-levels between actors in the MNC, there is a need for the organization and its

operations to be accepted as trustworthy by organizational actors and their societies. Trust and legitimacy issues in MNCs originate in challenges of institutional duality (Kostova and Zaheer, 1999) and multiple embeddedness (Meyer, Mudambi and Narula, 2011). Institutional duality arises from regulating demands by internal stakeholders on units and organizational communities that work together in diverse local environments to deliver corporate strategies, against different and even conflicting demands from external stakeholders such as national authorities, customers and competitors (Durand and Jacqueminet, 2015, p. 919). Multiple embeddedness in MNCs, discussed earlier, has its origin in individual-level logics influenced by the diversity of backgrounds of employees, each formed by own values, beliefs and expectations (Roth and Kostova, 2003). Trust and legitimacy issues in MNCs are therefore considered next.

Trust issues in MNCs can be examined through the lens of agency theory. Complexity and diversity in MNCs force the parent company to establish agency relationships when owners and managers delegate responsibility for activities to its agents in host subsidiaries, and agency theory provides insights into the relationships between MNC parent and host subsidiary companies (Hoenen and Kostova, 2015). Furthermore, agency in MNCs partially create its institutional environment when actors work through processes of sensemaking, manipulation, and negotiation (Kostova, Roth and Dacin, 2008, p. 1001). Classical agency theory proposes that agency relationships form when a principal engages an agent to perform a service and delegates some decision-making authority to the agent (Jensen and Meckling, 1976, p. 308). If there is decentralisation and delegation of decision-making in the relationship, tensions between the principal (or parent) company and agent (or subsidiary) company can emerge (Kostova, Nell and Hoenen, 2016). Tension arises from efforts to control opportunistic agent behaviour when agents seek economic gain rooted in rational economic self-interest, and because of information asymmetry between principal and agent (Jensen and Meckling, 1976). This situation shapes actors' perceptions and expectations and confines their rationality. Misaligned expectations increase tension between principal and agent (Jensen and Meckling, 1995, cited in Kostova, Nell and Hoenen, 2016, p. 2). Evidently, understanding and carefully managing the effects of agency and its effect on trust relationships in the MNC require managers to be sensitive in how they manage stakeholder perceptions to limit damaging conflict in its operations.

Beyond individual actor-level agency influences, it is worth considering how institutional logics and shared frames and cognitions assist to set up subsidiary-level agency relationships in MNCs (Kostova, Nell and Hoenen, 2016). Specifically, organizational and social relationships are causes of subsidiary agency, subsidiary self-interest, and subsidiary bounded rationality in MNCs (Kostova, Nell and Hoenen, 2016). In situations where MNCs must implement the public policy of a local subsidiary, subsidiary-level agency problems in MNCs can emerge, particularly if the policy requirements are perceived to be unnecessarily demanding by the parent company or contrary to the MNCs policies. Therefore, managers in MNCs must consider that agency problems in MNCs are not limited to individual working relationships only but can also extend to collective levels of subsidiaries and communities within the MNC. Consequently, MNC managers must be sensitive in how they manage agency situations, and how this affects trust in relationships at all levels in the organization.

In managing trust relationships, using lessons from classical agency theory only is not enough because classical agency theory with simplistic assumptions of rational actors driven by self-interest fails to explain agency-related behaviours in MNCs (Aguilera and Jackson, 2003). Specifically, it fails because it ignores the many actor identities, the many interdependencies between stakeholders, and complexity in the organization's institutional environment (Aguilera and Jackson, 2003). Wiseman, Cuevas-Rodriguez and Gomez-Mejia (2012) suggest that the broad social context in which the principal-agent relationship is embedded in the MNC must be considered. This is because institutions

are socially constructed, complex and subject to national and political influences (Aguilera and Jackson, 2003, p. 450). Simply, classical agency theory fails to consider social embeddedness in diverse and complex organizations (Hoenen and Kostova, 2015, p. 106; Aguilera and Jackson, 2003, p. 449). Consequently, Granovetter (1985) suggests that agency theory should consider how actor and organizational embeddedness direct behaviours in MNCs. Furthermore, bounded rationality of actors and their tendency for opportunistic behaviour is grounded in social processes that arise from socialisation experiences in the workplace, where experiences are influenced by the embeddedness of organizations in national institutional contexts (Lubatkin *et al.*, 2007). These observations imply that agents, be it individuals or organizations, may be influenced more by opportunistic behaviours due to their bounded rationality from being socially embedded, rather than them simply wanting to gain economically. These observations again underscore the difficulty of managers in MNCs to manage different stakeholder perceptions, particularly if an agency relationship is complicated by differences in bounded rationality of individuals and communities in the organization. In MNCs where agency relationships are essential to execute corporate strategies, managers must therefore appreciate how demands and expectations of agents, agency, and the society in which it operates work together to create subsidiary-level agency problems, and how trust in agency relationships must be wisely nurtured to limit bounded rationality problems at all levels in its operations.

Institutional duality in MNCs and multiple embeddedness introduce demands for organizational legitimacy from many stakeholders. Generally, legitimacy is attained when actions and activities are seen to be legal and in a business context, when actions and activities are perceived to adhere to laws and are executed in accordance with organizational rules (Cambridge Dictionary, 2019). Unique to MNCs, a “liability of foreignness” attaches because the parent is a foreign entrant to the host country market (Roth and Kostova, 2003; Kostova and Zaheer, 1999), and being unknown in the host environment with unfamiliar motives complicates organizations’ efforts to attain legitimacy. Therefore, MNCs must understand their institutional environment’s legitimacy requirements and must carefully manage organizational characteristics and actions (Kostova and Zaheer, 1999; Hybels, 1995). Furthermore, demands for legitimacy in MNCs include internal legitimacy expectations (Kostova and Zaheer, 1999, p. 68). Internal legitimacy is accomplished when host country subsidiaries meet parent company expectations of having integrated parent and home country institutional practices, whilst external legitimacy comes from the host subsidiary being recognised by host country institutions for integrating institutional practices of the local environment (Tempel *et al.*, 2006, p. 1544). In addition, demands for external and internal legitimacy are co-dependent because failure by host subsidiaries to meet legitimacy standards reduce perceptions of MNC legitimacy, and failure to attain MNC legitimacy in turn limits perceptions of host subsidiaries’ legitimacy. These legitimacy spillovers can be positive when it supports legitimacy, or negative when it damages legitimacy (Kostova and Zaheer, 1999, p. 75). Consequently, managers must manage expectations of MNC legitimacy sensibly across all stakeholder domains, ideally to cultivate positive perceptions that the MNC and its subsidiary comply with all legal requirements in its operations.

Adding to the challenge of legitimisation, MNCs face demands not only from formal institutions, but also informal institutions that originate in host country cultures, social norms and regulatory pressures. In addition, there are informal institutions with their own demands for socially acceptable behaviours of subsidiaries in host countries (Liou and Rao-Nicholson, 2017). These cognitive and normative demands from informal institutions are more difficult to interpret than those of the regulatory domain where expectations are explicit in laws, regulations and rules (Kostova and Zaheer, 1999). Furthermore, informal institutions formulate national institutional logics that imprint the socialisation of individuals and their behaviours (Lubatkin *et al.*, 2007, p. 52). Because of the many formal and informal institutional demands for legitimacy placed on MNCs, it becomes difficult to meet

isomorphic legitimacy requirements (Kostova and Zaheer, 1999, p. 70). Therefore, managers in MNCs must not only ensure legal requirements as set out in laws and regulations are met, but the informal or unspoken demands from stakeholders and institutions, other than government, must similarly be adhered to. In doing so, skilful negotiation to manage the many stakeholder demands for legitimacy by MNC managers is necessary in complex implementations of policy.

Not only do MNC informal institutional environments present challenges to MNCs legitimacy efforts, but the quality of formal institutions in host countries adds to this problem. This comes about because subsidiary self-interest and bounded rationality are affected by the quality of how institutions present regulatory, cognitive and normative compliance requirements (Kostova and Zaheer, 1999). Hence, uncertainty because of weak institutions who cannot formulate and communicate requirements effectively can lead to agency problems in MNCs (Nell and Hoenen, 2016; Peng *et al.*, 2009). Here, agency problems arise because high levels of self-interest emerge due to institutional voids from underdevelopment and immature institutions (Khanna and Palepu, 1997). Institutional environments therefore affect understanding and interpretation and limits organizational actors' rationality. Consequently, for MNCs with subsidiaries in emerging or developing markets, poor quality of formal institutions and resultant agency problems and weakened trust relationships could be problematic and must be managed. This can be achieved by closely engaging policy makers or by employing skilled advisors to provide a clear understanding of policy aims and requirements.

As mentioned in the earlier discussion of MNCs' multiple embeddedness, distance introduce barriers (Ghemawat, 2001). In MNCs, distance is the degree of similarity or difference between regulatory, cognitive and normative institutional domains of home and host countries (Kostova and Zaheer, 1999, p. 68). Consequently, the greater the institutional distance between home and host country institutions, the greater the challenges that institutional duality brings to the MNC (Tempel *et al.*, 2006, p. 154; Kostova and Zaheer, 1999, p. 72). This is because greater distance makes it more difficult for the MNC to interpret a host subsidiary countries' institutional environment and legitimacy requirements. Also, greater institutional distance increases pressure on host subsidiaries to adopt host country organizational practices and to conform with host country legitimacy requirements (Kostova and Zaheer, p. 68). This is a situation that can bring significant tensions between the MNC parent and host subsidiary when political and socio-economic ideologies clash. As an example, consider my situation where a MNCs subsidiary in the host country faces demands from a government with developmental ideologies and policies aimed at redressing historical imbalances. These policies contradict practices of developed nations where the parent company is based. Instances of institutional distance combined with other forms of distance significantly complicate host subsidiaries' bounded rationality problem and agency problems and a breakdown in trust can arise in MNCs (Kostova, Nell and Hoenen, 2016, p. 14). Where distance effects are marked, it is therefore only possible through skilful negotiation to establish and maintain trust relationships and meet legitimacy requirements when implementing a host subsidiary's public policy in the MNC.

Managers in MNCs can also work with organizational structures to manage bounded rationality and agency problems. This is possible because MNCs can effectively and efficiently transfer and exploit knowledge (Tallman and Chacar, 2011; Gupta and Govindarajan, 2000). Explicit or "leaky" knowledge is relatively easy to capture and disseminate, whilst "sticky" knowledge with a high tacit content is best captured and disseminated in organizations through Communities of Practice, or COPs, and Networks of Practice, or NOPs (Tallman and Chacar, 2011; Brown and Duguid, 2001). COPs are typically small groups of individuals in a local context who are jointly involved in an activity (Tallman and Chacar, 2011, p. 279). Foss and Weber (2016, p. 76) suggest that COPs reduce problems associated with bounded rationality of groups in hierarchies in organizations because they extend their activities

and interactions across boundaries in the organization. Such communities in organizations create knowledge in their local contexts and consequently, they develop different perspectives on their work and their organization (Bechky, 2003b). Therefore, COPs and NOPs through their structures and routines enable effective knowledge acquisition and dissemination in MNCs (Tallman and Chacar, 2011), and managers in MNCs could use these communities and structures to effectively manage stakeholder expectations and perceptions of trust and legitimacy when implementing complex policies. Furthermore, boundary objects used in processes and routines can enable organizational communities to bring or *make* strong perspectives when working together, and enables those communities to interpret and understand, or *take* perspectives (Boland and Tenkasi, 1995, own emphasis). In doing so, sensemaking, the process that enhances individual interpretation in events with uncertain outcomes (Maitlis and Christianson, 2014), happens and can help to address bounded rationality problems in MNCs. In making and taking perspectives, organizational communities promote shared understanding, thereby facilitating the delivery of complex requirements demanded in implementation activities in organizations.

Finally, the idea of social capital formation and exchange thereof amongst social structures and networks in the organization in cooperative activities (Kostova and Roth, 2003) is an informal approach that managers in MNCs can use to manage complex implementations. This is because social capital draws from and supports trust relationships through interactions in relationships (Burt, 1992). Social capital can be a private good that benefits the individual (Kostova and Roth, 2003; Burt, 1992) or it can be a public good in informal networks that enables coordination and establishes control across borders in the organization. Additionally, organizational structures in MNCs that encourage interdependence can be helpful in complex organizations (Kostova and Zaheer, 2003), particularly if key boundary spanning individuals who use their private social capital manage relationships across borders (Kostova and Roth, 2003). In this, boundary -spanning individuals transfer their experiences of social capital building to other social actors in the organization and so help to establish public social capital in and across units in the MNC. Also, building individual and unit-level social capital both encourages cooperation and boosts desirable behaviours in MNCs which eases coordination and control of activities (Kostova and Roth, 2003). Therefore, managers in MNCs can utilise social capital and informal, interdependent networks to manage trust and legitimacy to support negotiation for improved cooperation and coordination amongst actors and communities when managing complex implementations in organizations.

In concluding the review of MNC challenges to implement public policy, several issues were considered. A key problem for MNCs is to coordinate and control activities in a diverse and complex organizational, legal, political and cultural environment. Principally for MNCs who are required to implement policy in a subsidiary in a host country, managing complexities tied to the cross-border condition, liabilities of foreignness, multiple embeddedness, negotiating many and complex institutional demands, and managing bounded rationality of stakeholders are required. To do so, skilful negotiation to establish effective organizational structures, policies, processes, procedures and routines are required. In this, establishment and maintenance of agency relationships to build and maintain trust and to support organizational legitimacy are needed. This is possible by promoting interdependence and shared understanding to enable sensemaking in the organization. Additionally, informal approaches such as social capital management to help ease tensions between organizational actors and boundary spanning activities to bridge the many borders in MNCs can assist managers who manage complex implementations. Consequently, I must consider how others managed these challenges as I plan my project's activities, and the next topic considers literature on policy implementation.

2.2 Policy implementation research

As much as successful corporate policy development and implementation are essential activities for organizational success, studies of policy implementation are limited to fields of public service, specifically public administration and political science (Mischen and Jackson, 2008, p. 332). Therefore, knowledge of policy implementation in general management and how managers operationalise policy is sparse (Schofield, 2004, p. 284). Moreover, studies of policy implementation in MNCs are mostly limited to MNCs and subsidiaries in developed markets (Hoenen and Kostova, 2015), and North America in particular (Schofield, 2004, p. 286). Furthermore, studies of public policy implementation are generally quantitative and positivist in nature and examine implementation failures. However, such studies do not shed enough light on dynamic and complex implementations (Schofield, 2004, p. 286; deLeon, 1999). Hence, researchers see a need for qualitative studies of policy implementation because of its ability to provide context on the complex challenges actors face when implementing policy (deLeon, 1999; Menzel, 1987, p. 13). Consequently, these observations support my research project because it is a qualitative review of how to implement a developing nation's public policy in a subsidiary of a MNC, where the policy is directed by a need for social engineering to address the host country's developmental needs.

Schofield (2004, p. 288) describes policy implementation as "policy becoming action". These three words imply that something must happen, action must be taken, to implement policy. Furthermore, policy objectives generate actions in organizations. Schofield (2004) sees the establishment of organization and administration, in other words bureaucracy, as essential elements for policy implementation because it sets boundaries that help actors follow rules, act responsibly and accept accountability. Accordingly, I next consider how bureaucracy in the form of models or approaches can assist managers to implement policy in organizations.

The most common approach to policy implementation is the "stages" or "top-down" model of policy management, where implementation follows policy formulation (Hupe and Hill, 2016). In the top-down approach there are clear policy goals, a limited number of bureaucrats, and demands for change are limited (Kohoutek, 2013). Top-down implementation is associated with compliance-focused implementations (Lundin, 2007). Consequently, the intentions of the policy maker and its expectations of outputs must be well understood during the planning of policy implementation activities. In this study, because of the prescriptive nature of B-BBEE policy, the policymaker clearly had a top-down policy approach in mind for local companies who decided to implement the B-BBEE policy. This presents a problem to MNCs because of the hierarchical nature of the relationship between the parent and host subsidiary, where the local subsidiary is unlikely to dictate terms of the implementation through a top-down approach emanating from the subsidiary.

Furthermore, if there are significant levels of uncertainty, complex policy implementations are unlikely to benefit from a mechanistic implementation approach supported by top-down models. The ongoing amendments to the Codes of Good Practice (Government Gazette, 2013) and policy clarification notes issued from time-to-time by the Commission charged with enforcing the policy in South Africa introduce levels of uncertainty (B-BBEE Commission, 2018b; Government Gazette, 2018). As an alternative to top-down approaches, deductive or bottom-up approaches to policy implementation emerged. These appear when local actors "make" policy through their policy implementation activities (Holland *et al.*, 2016, p. 317). This suggests that policy evolves because of actions taken during policy implementation. Given the ambiguous setting of this study where public policy introduces conflicts with existing modes of working, for example when having to classify employees and suppliers based on race in the subsidiary company, a situation which is illegal given the MNC policy of non-discrimination on this basis as well as in the parent country, it seems fitting to consider how different

implementers in a MNC create policy through their actions in such an environment. It therefore seems that MNCs faced with demands for public policy implementation in a subsidiary will naturally opt for a bottom-up approach of policy implementation.

Alternatively, when policy changes regularly, McTigue, Monios, and Rye (2017) propose using a hybrid implementation framework for policy implementation that draws from both top-down and bottom-up approaches. Their advice (McTigue, Monios, and Rye, 2017, p.3) is to define policy objectives with clear targets, measures and monitoring mechanisms. In addition, organizations should ensure availability of adequate resources, specifically financial resources. They must also manage internal factors including inter-organization support and communication, organizational characteristics, bureaucratic power of members in the organization, and manage external factors including economic, social, and political demands and opposition, which lead to ambiguity and conflict. However, since these “hard” actions and activities in this “how-to” model for policy implementation appear inflexible, managers in MNCs must be cautious not to create a situation where policy implementation rules and targets are restrictive and become so institutionalised that it prevents innovation in the policy implementation process (Mischen and Jackson, 2008).

As well, the impact on policy implementation in the MNC when the policymaker initiates frequent changes, a situation that is found in this action research project, must be managed by managers in the MNC. To do so, close collaboration and interaction amongst policy makers and implementers are needed (McTigue, Monios and Rye, 2017). Therefore, managers of policy implementations marked by ambiguity and frequent change in requirements could benefit from regular interactions with policy makers to obtain first-hand insights to improve understanding of changing requirements.

Finally, bureaucracy for policy implementation can help in the management of the “hard” issues of policy implementation, but it cannot manage issues that arise from social interactions in organizations when policy implementation is complex and challenging. Therefore, how “soft” issues such as complexity, coordination and cooperation in complex implementations should be managed, are considered next. Bridwell-Mitchel and Sherer (2017) confirm that the existence of many and different logics in organizations contribute complexity during policy implementation. Hence, understanding and managing complexity is essential for implementation. Supporting the need for bureaucracy in policy implementation, Lundin (2007) proposes that complex policy implementation requires careful coordination of complex tasks and cooperation from many actors involved in this task. Furthermore, because there is a direct relationship between failed implementations and greater numbers of actors involved in policy implementations, Lundin (2007, p. 632) suggests that actors with common interests should work together to implement policy because common interdependence fosters cooperation. It therefore stands to reason that the more complex the policy that must be implemented, the greater the need for coordination and cooperation amongst implementers. Consequently, ways must be found to encourage these activities.

Lundin (2007) also observes that poor implementations are associated with weak relationship management amongst implementers. Conversely, good relationships help to focus intention to execute tasks within the scope of implementations (Lundin, 2007). These observations imply that managers in MNCs must foster good working relationships amongst the many experts from different occupational communities in MNCs involved in complex policy implementation. Implementers should also consider that policy implementation activities must be executed while normal duties are performed, and this complicates demands for cooperation (Lundin, 2007). Therefore, a clear understanding of existing tasks, workload and the impact of additional demands on implementers must be obtained. Cultivating good working relationships to ease negotiations when asking for

cooperation from actors and communities in complex public policy implementation activities could be a useful strategy for MNC managers to pursue.

Also, policy implementation is complex because of many interactions between different actors who try to understand and make sense of how their actions adds value (Siciliano, Moolenaar, Daly and Liou, 2017). Since sensemaking "... is a social and discursive process" (Weick, Sutcliffe and Obstfeld, 2005), it implies that individuals take time to work through and interpret requirements, and more so if those are ambiguous or complex. Bridwell-Mitchell and Sherer (2017) expand on how individual sensemaking evolves. To them, individuals, informed by their own opinions and attitudes, actively engage with and interpret requirements. Furthermore, unique characteristics of individuals including race or ethnicity, institutional logics, i.e. the rules and practices that originate from beliefs rooted in the culture in the workplace, affects interpretation of requirements for policy implementation. These are also influenced by the broader social context and are complimented by own processes of comprehension. Importantly, implementers use institutional logics to interpret, understand and order their work during policy implementation. Besides, collective sensemaking occurs when opinions of important members or "boundary spanners" influence understanding in informal and formal networks, which helps to regulate policy implementation (Siciliano, Moolenaar, Daly and Liou, 2017). Therefore, soliciting support from boundary spanners could benefit policy implementation efforts in MNCs. In addition, pre-existing and shared beliefs influence interpretations of policy implementation requirements (Siciliano, Moolenaar, Daly and Liou 2017). It is therefore clear that implementers must carefully consider and manage the many factors that may influence sensemaking during policy implementation, from those affecting the individual to those coming from a collective understanding amongst many actors.

Furthermore, institutional logics change as individual and collective beliefs evolve when employees make sense of the changes new policies bring (Siciliano, Moolenaar, Daly and Liou, 2017) and consequently, tensions may arise between different sets of institutional logics (Bridwell-Mitchel and Sherer, 2017). Such tensions may lead to policy implementation failure if it is not managed (Siciliano, Moolenaar, Daly and Liou, 2017). Therefore, clear understanding and careful management of the different institutional logics that exist amongst the host country implementers while managing perceptions of others in the MNC who are informed by their own institutional logics, are required. In South Africa with its divisive apartheid inheritance, this is probably a significant issue because many local actors have a worldview that is formed by experiences of social and economic inequality. Opposed to the logics of employees in the local subsidiary, implementers in the parent and other countries where the MNC works may have very different views, informed by their experiences in developed European countries that don't have similar legacies. Hence, there may be gaps in understanding that must be bridged to improve shared understanding at all levels in MNCs during policy implementation. In addition, since professions to which actors belong shape individual understanding of requirements when implementing policy, professions and their occupational communities in MNCs contribute to the construction of institutional logics (Bridwell-Mitchell and Sherer, 2017). Therefore, managers in MNCs must understand how professions and actors in their occupational communities in the MNC view requirements of policy implementation. As an example, one can ask how institutional logics of lawyers, accountants, professional managers, engineers and others in the organization affect individual and collective understanding and sensemaking during public policy implementation in a local subsidiary of a MNC.

Finally, we must recognise that there is a general perception that managers know how to implement policy, but this is not necessarily true (Schofield, 2004). Consequently, actors may have to learn how to implement policy (Schofield, 2004, p. 283). In her view, managers learn when they solve problems

and establish routines to operationalise policy by developing operational manuals and instructions (Schofield, 2004). This sentiment resonates with the idea of action learning (Pedler, 2008) which suggests that people learn through doing. In acting and solving problems, for example to develop policy manuals, instructions, organizational structures, and routines, managers benefit from action science's concept of double loop learning that goes beyond using technical competence only (Schofield, 2004). Therefore, learning is important because it helps to direct actions as people understand what is required from them. Accordingly, where there is a lack of competence of policy implementers, training is needed (Schofield, 2004, p. 304). Furthermore, training should focus on providing "deep" learning from experience, supported by regular feedback, especially if implementations are marked by uncertainty. This is because positive feedback encourages change whilst negative feedback reinforces boundaries and desired behaviours and forces a return to the status quo during policy implementation (Mischen and Jackson, 2008). Feedback therefore changes individual beliefs, which influence interpretations that lead to action (Siciliano, Moolenaar, Daly and Liou, 2017; Bridwell-Mitchell and Sherer, 2017). Consequently, feedback and its implications for changing behaviours of implementers in MNCs must be carefully managed for effective policy implementation.

Clearly, policy implementation in MNCs is difficult to manage. The literature suggests that I will need to attend to the establishment of management bureaucracy with focussed implementation strategies and models, structures and organizational policies as well as procedures and routines if I am to be successful with B-BEE policy implementation. These are "hard" tasks that skilled managers in MNCs are typically comfortable in managing and may be achievable. However, it is the "soft" issues arising from complexity and the need of actors for understanding and sensemaking that make the hard tasks difficult to execute, and this may be where I should focus my efforts. Therefore, the soft and ambiguous issues that cloud and complicate the hard tasks of policy implementation are considered next.

2.3 Bureaucracy for effective policy implementation in MNCs

So far, a recurring thread in the preceding reviews of policy implementation and the challenges of MNCs is the importance of effective bureaucracy, particularly because it eases the management of social interactions in organizations (Schofield, 2004). Bureaucracy does this because it enables cooperation and coordination of activities. Consequently, bureaucracy is essential to help manage complexity in organizations. Effective bureaucracy deploys policies, procedures and routines that help to coordinate activities by using different tools and artefacts. Since the research methodology in this study utilises concepts from activity theory to structure the research methodology, I am particularly interested in how routines and tools or artefacts are used to enable bureaucracy when implementing policy. Therefore, the remainder of the literature review reflects on relevant research of routines and artefacts.

In looking at how routines are used in organizations and why it is important for effective bureaucracy, it is useful to start by asking: what are routines? Routines are "... repetitive, recognizable patterns of interdependent actions, carried out by multiple actors" (Feldman and Pentland, 2003, p. 95). Importantly, repetitiveness is characteristic of routines (Feldman and Pentland, 2003, p. 107). In organizations, routines connect people, create common understandings of what to do, clarify why it is important, build networks, and coordinate work or activities to produce outcomes (Feldman and Rafaeli, 2002). In addition, routines support cognitive efficiency. Cognitive efficiency reduces complexity and conflict, improves managerial control, and lessens individual anxiety by providing ontological security to individuals (Feldman and Pentland, 2003, p. 97 - 98). Through repetitive use, routines also build and improve collective understanding between actors (Feldman and Rafaeli, 2002).

Uittenbroek (2016) suggests that routines embody complimentary, coordination, learning and adaptive expectation effects. Complimentary effects of routines emerge from synergies of economies of scale when resources and practices combine, and its coordination effects from having to manage the many actors that use a routine. Practical learning happens when routines are used, and routines embody adaptive expectation effects when actors conform to expected norms. Therefore, routines formalise organizational competences and knowledge (Feldman and Pentland, 2003, p. 98). Because of its ability to improve understanding and sensemaking amongst different actors who must work together to deliver outcomes, it is therefore clear that routines ease work in complex organizations because it helps to coordinate activities, ensures uniform outcomes from activities by setting a standard, and it assists with organizational learning.

Feldman and Pentland (2003) distinguish ostensive and performative aspects in routines. Ostensive aspects address the abstract idea or structure of the routine, and performative aspects relate to the actions or activities of specific people at specific times and in specific places (Feldman and Pentland, 2003, p. 95). In other words, ostensive aspects represent “routine in principle” and performative aspects “routine in practice” (Feldman and Pentland, 2003, p. 101). Furthermore, ostensive aspects of routines capture tacit knowledge whereas performative aspects display people’s actions at a point and time (Feldman and Pentland, 2003, p. 101). Another way to view the distinction between the ostensive and performative aspects of routines is to view the ostensive as the “idea” and the performative as “enactment” (Feldman and Pentland, 2003, p. 102). Hayes, Lee and Dourish (2011, p. 164) suggest that ostensive aspects address outcomes, and performative aspects concern the actual activities to perform a routine. Alternatively, Feldman and Pentland (2003, p. 94) propose that ostensive aspects of routines provide structure, and performative aspects bring routines to life because of peoples’ actions when using them (Feldman and Pentland, 2003, p. 94). It therefore seems safe to assume that performative aspects of routines will be relatively easy to manage in MNCs. However, managers must take care with routines’ ostensive aspects because it is subject to actors’ interpretation, and if it signals wrong intentions, stakeholder perceptions could be negatively affected, a situation which complicates or may even derail policy implementation.

Change is inherent to routines due to its nature (Feldman and Pentland, 2003). Furthermore, contrary to accepted views in change literature that bureaucracy and rules prevent change, routines can be a catalyst for change. Here, D’Adderio (2008, p. 770) suggests that routines are not unchanging “monolithic objects” but are “continuously emerging systems”. Feldman and Rafaeli (2002) argue that routines help with stability and generate change because it is flexible enough to deal with external and internal demands on the organization. Furthermore, D’Adderio (2008, p. 786) suggest that a reason for both acceptance and evolution of routines can be found in the variety and diversity of distributed agency from occupational communities and COPs in large organizations. Also, the source for change in routines lies in the exchanges between ostensive and performative aspects of routines and lead to variation, selection and retention of routines (Feldman and Pentland, 2003). Using a generative model of routines, Pentland *et al.* (2012) demonstrated how routines naturally adapt and change because of variation, selection, and retention of patterns of actions. Consequently, if managers build structured models of routines that mimic variation, selection and retention of patterns of action, they potentially have levers to manipulate to influence organizational routines and manage change (Pentland *et al.*, 2012, p. 1499). Therefore, managers should pay attention to how routines are designed and recognise and manage its natural tendency to vary over time. This implies that managers should monitor routines to detect unfavourable variations, but also that routines can be used to generate change if the elements that cause variation are subtly manipulated when needed.

Routines embody context and Howard-Grenville (2005) outlines various aspects to consider. For example, individuals and groups use routines for different purposes and reasons. They use what worked in the past or use what is useful for present performances, or they actively change routines for future use. As well, individuals use routines to advance both their own and organizational objectives. Furthermore, routines are embedded in all parts of organizations and are influenced by other organizational routines and dynamics. Routines which overlap with many structures are strongly embedded and may be difficult to change because of the significant impact on other routines, artefacts and expectations of actors throughout the organization. In addition, powerful individuals with vested interests in strongly embedded routines may strongly resist changing them. On the other hand, for weakly embedded routines, change is easier to implement because of the lesser impact on other routines, artefacts and expectations. The strength and nature of routine embeddedness also affect the past or future orientation of actors. For example, if routines are strongly embedded, a past orientation that resist change may prevail. Also, routines persist because they simplify choice, become habitual, and can suppress debate if circumstances change. Consequently, managers in MNCs should realise that context, routine embeddedness, and power of individuals and occupational communities affect whether routines remain stable or change. They could also identify powerful individuals who can, through their actions and use of power, prevent or encourage change in routines. Such individuals can therefore become useful allies if routines must be changed.

A last but important issue to consider is that routines coordinate tasks between actors from different occupational communities in complex organizations such as MNCs (D'Adderio, 2008). Routines therefore enable boundary-crossing between organizational communities because routines and their boundary objects convey perspectives and different understandings of actors, which combine to create common understanding and shared perspectives in organizations (Carlile, 2004; Feldman and Rafaeli, 2002, p. 315; Star and Griesemer, 1989). Shared perspectives shaped by organizational routines help to improve understanding about what must be done and why since it allows performance standards to be agreed, knowledge to emerge, and broader organizational context of goals and priorities to be better understood (Feldman and Rafaeli, 2002, p. 316 - 319). As discussed earlier, repeated use of routines and improved common understanding introduce both stability and adaptability to meet demands for change in organizations (Feldman and Rafaeli, 2002). Therefore, routines and the artefacts they use act as important boundary spanning enablers in complex, distributed organizations because of their ability to convey meaning and understanding. The role of artefacts in this context is therefore evaluated next.

Artefacts are man-made objects and are used to perform the tasks that routines require. Examples of artefacts include rules, standard operating procedures, arrangements of machines, tools, materials, computer systems, and representational forms such as language, text, and graphical representations, amongst others (D'Adderio, 2011, p. 199 - 208). Pentland and Feldman (2008, p. 242) note that artefacts represent either ostensive or performative aspects of routines and influence these aspects. For example, models used in routines are artefacts that express the ostensive and performative aspects of routines (Pentland and Feldman, 2008). Therefore, models shape routines, and this is an important consideration because models are extensively used to explain complex concepts and requirements in organizations. Although routines and artefacts are related and co-evolve, artefacts are distinct from routines (Pentland and Feldman, 2008, p. 242; D'Adderio, 2011, p.204). Because artefacts guide actions through users' interpretation of instrumental, visual or symbolic images, many outcomes of routines are possible (D'Adderio, 2008). This is because meaning and understanding in organizations exist in a "thick organizational web" that combine interpretations from people who use artefacts, tools and procedures (D'Adderio, 2008, p. 787). Furthermore, organizational actors and material artefacts in working together change routines to help solve complex problems, and artefacts

thus act as external memory and become central in transferring practices (D'Adderio, 2011). As well, the cognitive nature of artefacts is captured in forms, flowcharts, worksheets, schedules, graphs, rules of thumb, proverbs, mnemonics, and memorized procedures (D'Adderio, 2011, p. 208). Therefore, in MNCs, artefacts allow organizational communities to work together due to the shared understanding that evolves when it is used. Artefacts are also central to transfer knowledge and understanding and it facilitates change in routines because it opens debate and allows actors to demonstrate how routines work and can be improved. Consequently, artefacts translate and transfer organizational practices, improves understanding, conveys intent and meaning, mediates actions, creates knowledge, embeds practices and shapes routines.

Artefacts also act as boundary objects when organizational routines involve different actors and occupational communities to deliver distributed work. They do this by enabling cooperation and coordination of actions. Cooperation is an active social process when people work together and is essential to translate requirements and different understandings to improve collaboration. At organizational community boundaries, Carlile (2004, p. 556 – 557) observes that there are differences in the amount of accumulated knowledge, there is dependence amongst actors working together, and there is a requirement to share knowledge. In this, boundary objects become an important means of translation amongst the different social worlds of participants who cooperate to get work done (Star and Griesemer, 1989). Also, boundary objects have their own distinct identity, are adaptable to different viewpoints from different users, are weakly structured in common use but strongly structured when used in individual sites and can be abstract or concrete (Star and Griesemer, 1989, p. 393). Furthermore, boundary objects act as temporary or permanent bridges across boundaries (Star and Griesemer, 1989, p. 414). Consequently, managers in MNCs must pay attention to how artefacts as boundary objects can be powerful tools to enable cooperation and coordination in complex implementation activities.

Carlile (2004, p. 557) describes the importance of common knowledge as boundary objects in organizations and Bechky (2003b, p. 328) observes that problem-solving situations provide opportunities for boundary objects to enable effective knowledge transformation. In this, boundary objects such as common knowledge become knowledge artefacts (Bechky, 2003b). Furthermore, boundary objects not only create common understanding but also establish social relations between occupations through symbolism which promote beliefs in the legitimacy of a group's work and by formalising control over work practices (Bechky, 2003a; 2003b). Boundary objects can also strengthen the status of occupational communities and reinforce organizational structures (Bechky, 2003a, p. 746). Therefore, managers in MNCs who need cooperation from actors and communities and careful coordination of their activities should develop and use knowledge artefacts as boundary spanning mechanisms to not only convey understanding and meaning, but to also help manage the relationships between actors and communities in the organization that work to implement policy. In developing common knowledge, they should use concrete objects to convey meaning and understanding and create new knowledge. Of course, the challenge is how to create concrete objects that convey abstract ideas and meanings. Also, there is a need to carefully manage coordination of boundary spanning activities and objects to carry intended meanings across organizational boundaries, particularly when there are rapid and unplanned changes.

To coordinate boundary spanning activities for effective work to be delivered, Kellogg, Orlikowski and Yates (2006) recommend that complex organizations must realise that occupational communities in such organizations deliver work by interacting horizontally in diverse, interdependent and flexible heterarchies. This is different to how work is delivered in traditional, vertical hierarchies. In heterarchical organizations, there is a need for work to be visible and comprehensible, and

organizations can, through “... practices of display, representation, and assembly, ...” achieve this aim (Kellogg, Orlikowski and Yates, 2006). Therefore, managers in MNCs who coordinate complex activities and actions could find that, by encouraging individuals and occupational communities who operate in the MNC heterarchy (Kellogg, Orlikowski and Yates, 2006, p. 23) to openly share the results of their actions by showing how it was done, it becomes a powerful means to span organizational boundaries and to transfer knowledge.

In summary, literature suggests that routines and tools or artefacts enable bureaucracy and are essential to implement policy in organizations because it helps to coordinate tasks, captures context, fixes and transfers knowledge, generates change and enables boundary crossing between communities to create shared understanding in organizations. In this, routines and artefacts have both ostensive (or abstract) and performative (or real) aspects that inform and transfer knowledge and understanding, and where different communities must work together, boundary spanning must be managed actively. Therefore, at the start my project, I realised that I had to use routines and artefacts effectively.

2.4 Conclusion

Policy implementation in MNCs is marked by complexity, not only because of the policy implementation process itself, but also because of the complex challenges MNCs face throughout their distributed, geographically dispersed and diverse operations. My literature review reveals that actors and communities who are responsible for work in complex organizations such as MNCs benefit if they make sense of requirements for work (Weick, Sutcliffe and Obstfeld, 2005). This is because sensemaking facilitates understanding of complex requirements and understanding enables work (Bridwell-Mitchell and Sherer, 2017). In this, actors may benefit from learning to implement policy (Schofield, 2004). Furthermore, the activities of many actors and occupational communities who work across organizational boundaries in MNCs must be carefully negotiated and coordinated when complex tasks are performed, and cooperation is encouraged to ease coordination (Lundin, 2007). Also, boundary spanning activities require special attention and must be carefully coordinated (Kellogg, Orlikowski, Yates, 2006). In this, bureaucracy as good management practice is recommended (Schofield, 2004).

Bureaucracy in the context of policy implementation in MNCs includes the development and introduction of routines and its related artefacts to span boundaries between occupational communities, with routines and artefacts used as boundary objects (Carlile, 2004; Star and Griesemer, 1989). Additionally, crossing boundaries between communities in MNCs can be accomplished by using knowledge artefacts (Bechky, 2003a). However, routines and artefacts involve at least two aspects, the ostensive and the performative (Feldman and Pentland, 2003), and the challenge is to get actors involved in complex tasks such as policy implementation to make sense of and understand what the ostensive intends, and then to act and implement the ideas. In other words, how do actors put abstract policy ideas into practice? In the MNC, this could mean adapting existing routines using its tendency for natural variation, selection and retention of patterns of action to conform with new and ongoing demands for change (Pentland *et al.*, 2012; D’Adderio, 2008), or by introducing new routines and artefacts.

Furthermore, bureaucracy in MNCs is moderated by social context (Siciliano, Moolenaar, Daly and Liou, 2017; Bridwell-Mitchell and Sherer, 2017; Howard-Grenville, 2005), and understanding of social context is needed to support establishment of trust amongst individual actors (Jensen and Meckling, 1976), but also at the collective level between the parent and host subsidiary (Kostova, Nell and Hoenen, 2016; Hoenen and Kostova, 2015). Also, society has its own demands for legitimacy of MNC work practices rooted in its institutional duality (Kostova and Zaheer, 1999) and multiple

embeddedness (Meyer, Mudambi and Narula, 2011). Consequently, legitimacy demands must be carefully negotiated to ensure stakeholder expectations and perceptions are met.

Importantly, my literature review informed me that I needed to deploy a bottom-up policy implementation model and manage known MNC challenges by gaining the trust of project stakeholders, and that I needed to transfer complex knowledge to enable understanding and sensemaking in the occupational communities that worked with me to implement the B-BBEE ownership policy. This objective is achievable if bureaucracy, its routines and artefacts are deployed effectively. Therefore, at the outset of my action research project, I used a simple model to structure my thoughts that shows what MNC challenges I had to manage, and what literature suggests I should be cognizant of. Figure 1 shows my model and indicates how different topics from my literature review interact in the bottom-up implementation model I envisaged, where effective use of MNC bureaucracy was essential to facilitate policy implementation.

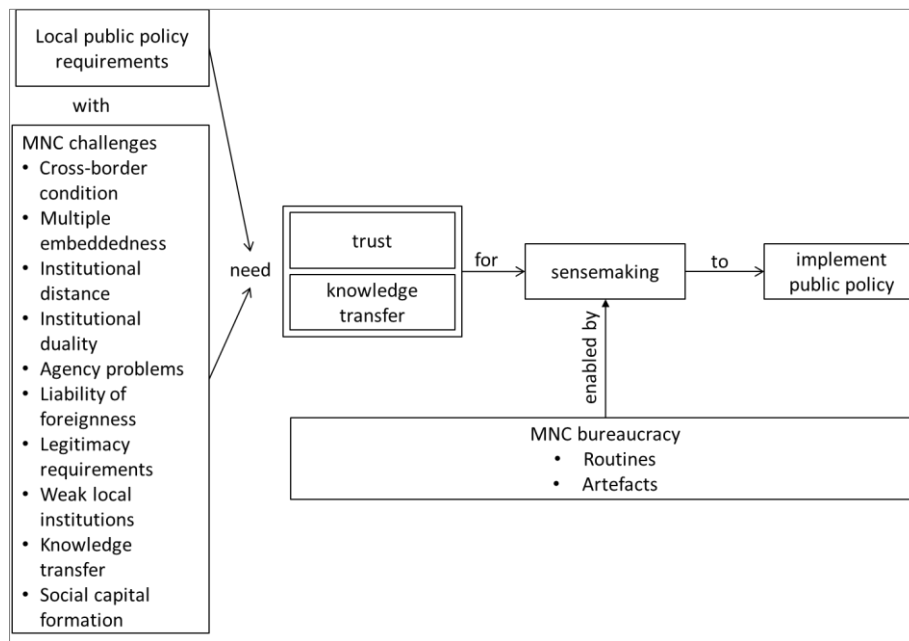


Figure 1: Bottom-up policy implementation model for B-BBEE policy implementation in my MNC

Having gained this knowledge, I was ready to design my research methodology, as I discuss in the next chapter of my thesis.

3 METHODOLOGY

In framing my challenge in the opening chapter, I described how I became interested in what I must do to manage tensions that arose from differences in understanding and expectations of communities and participants who assisted me in my action research project, and particularly how I could manage the following three issues, which are presented as subsidiary research questions to the overarching implementation of the local policy:

1. How do I engage different stakeholder communities to participate in the implementation of the local public policy in my MNC?
2. How do I facilitate the exchange of information and manage tensions between communities involved in my project?
3. How do I anchor the local public policy to meet different communities' expectations and goals?

Consequently, I designed my research method to supply these answers and to moderate the bottom-up policy implementation model I presented at the end of Chapter 2 to identify concepts that are most helpful. In what follows, I present my philosophical assumptions and justify why critical realism has a natural interface with action research, and why action research and CHAT as action research modality is appropriate to use in my research methodology. In this, I critically review the benefits of action research and CHAT. Thereafter, I present my research strategy, setting and approach, and I explain how I collected, generated and organized my data. This is followed by an explanation of my approach to data analysis, and before I conclude this chapter, I consider ethical issues which are pertinent because my action research project involves me working with participants and communities in a social work setting, as is clear in my overarching and subsidiary research questions listed above.

3.1 Philosophical assumptions

Our philosophical assumptions on management research are informed by how we perceive our world (ontology) and in how we understand what knowledge (epistemology) is. Specifically, our assumptions are formed by how we observe the nature of reality or existence and by how we interpret the knowledge we gain (Creswell, 2013; Easterby-Smith, Thorpe, and Jackson, 2012).

Reflecting on my philosophical influences, I am aware that I am strongly affected by my education and work experiences. Through those experiences, my understanding of research and problem-solving were formed by realist and positivist influences grounded in a scientific approach. However, the University of Liverpool's DBA programme taught me that there are many interpretations of truth and many ways to uncover facts (Easterby-Smith, Thorpe, and Jackson, 2012, p. 19). Consequently, I realise that I construct my reality and make sense of my environment and my experiences through cognitive processes when I interact in social situations (Cunliffe, 2008, p. 201). Therefore, I find that my philosophical assumptions changed to lie somewhere between strong versions of positivism and constructionism. This is the compromise position of critical realism (Easterby-Smith, Thorpe, and Jackson, 2012, p. 29). Consequently, critical realism best describes my philosophical position towards management research and therefore, my action research uses a critical realist perspective because it acknowledges that society impacts me and my actions impact society, and that we each have a different view of this reality, as I detail below.

A good reason for adopting a critical realist view relates to the extent to which we consider our world to be either open or closed systems. A strong positivist view considers the world a closed system with deterministic and stable properties, whereas the extreme constructionist view sees a world that we

create individually and collectively through the meaning we give to it (Burgoyne, 2008, p. 65). My research environment is an open system with constantly changing properties because my MNC has many internal and external interfaces. As a result, there are constant demands for change and renewal.

Key tenets of critical realism provide further justification for my adoption of this philosophy in my action research. The realist perspective in critical realism recognises that social conditions influence our lives, whether we observe it or not, and the relativist perspective acknowledges that our actions create social life which impact us (Easterby-Smith, Thorpe, and Jackson, 2012, p. 29). I do observe how these elements work together to create my world. Bhaskar's structuring of critical realism's ontology as consisting of three layers or domains of reality (Houston, 2014; Easterby-Smith, Thorpe, and Jackson, 2012, p. 29) provides useful categories through which to examine my reality. First, there is the *empirical* domain which recognises that I experience and interpret my world through my senses. Secondly, the *actual* domain acknowledges that I am affected by events outside my sensory perception. The third domain is the *real* or *causal* domain where mechanisms I cannot observe have visible effects on the empirical and actual domains of my social lives (Houston, 2014; Easterby-Smith, Thorpe, and Jackson, 2012, p. 29). In addition, Bhaskar's identification of two worlds in critical realism's epistemology (1978, cited in Houston, 2014), an *intransitive* or objective world and a *transitive* world which is our construct of reality, further helps me to appreciate how I construct my reality because my view of reality is one formed by my experiences and may not always be a true reflection of the world around me. Importantly, critical realism's acknowledgement of the existence of potential for causality to affect social events supports my analysis in this action research study since I observed and examined causes of actions and activities. However, it is important to recognise that critical realism does not propose automatic causation in the way strong positivism suggests (Easterby-Smith, Thorpe, and Jackson, 2012, p. 29). Also, critical realism recognises that there may be oppressive mechanisms operating at the causal level of reality that are not in our interest (Easterby-Smith, Thorpe, and Jackson, 2012, p. 29). In such instances, ethics demand that researchers must try to negate or at least expose those, thereby supporting human emancipation (Houston, 2014). These values resonate with my personal beliefs of fairness and justice and further supports why I adopted a critical realist ontology.

Finally, it is worth exploring if and how critical realism supports action research. Here, critical realism's inherent capability to uncover the causal mechanisms of events in social life, Bhaskar's retrodution method which seeks to understand how an event was caused by another (Houston, 2014), could help me in my analysis because of the information and knowledge I may uncover if I applied this thinking. In addition, retrodution helps researchers to combine insights from a variety of fields to examine multiple causes of many and linked social phenomena (Houston, 2014). Consequently, critical realism's retrodution could support me to understand what happens in the intertwined cycles of action research as I reflect on my and others' actions, thereby helping me to understand causes of problems (Houston, 2014) and the resultant actions that were needed to implement public policy in my MNC. Furthermore, because critical realism brings the ability to examine different levels of social phenomena, it aids many different approaches to research (Easterby-Smith, Thorpe, and Jackson, 2012, p. 29). Burgoyne (2008, p. 65) suggests that critical realism helps researchers understand "... what *stimuli* (including specially management actions) have triggered what *processes* and how those are affected by the *context* leading to what *outcomes* ...". In addition, critical realism is sceptical of established environments (Houston, 2014; Easterby-Smith, Thorpe, and Jackson, 2012, p. 29), something that challenged me to be critical in my observation and reflection. Therefore, critical realism provides a good basis for action research because it compliments not only reflection, but also observation for context-definition as used in action research cycles (Houston, 2014). Critical realism

and its retroduction will be used in my method to understand how events that create tension were the result of other events, so that the causes of tensions can be examined.

3.2 Research strategy

In this section, I explore and justify the suitability of action research as a strategy for my research project.

3.2.1 Action research

As a starting point to examine how action research is appropriate for me to use in my study, I examined the history and context in which action research evolved. Action research has its origins in the work of Dewey, Marx, Habermas, Gadamer, Rorty and others (Greenwood and Levin, 2007, p. 13), but Kurt Lewin (1890 – 1947) is generally acknowledged as the founder of action research (Hockley, Froggatt and Heimerl, 2012; Harris, 2008, p. 17; Greenwood and Levin, 2007) as he examined what causes social change. Lewin's suggestion of the researcher being both participant and inquirer with a practical aim of solving problems in real-life situations is definitive and fundamental to action research (Greenwood and Levin, 2007, p. 18). This situation applies to me where I act as project manager and researcher in my MNC to implement a subsidiary's public policy that causes social change. Lewin's action research ideas migrated from the USA to the UK and Europe and eventually to Japan, where researchers applied and adapted it to specific needs in different industries (Greenwood and Levin, 2007). Because of these influences and developments, action research to investigate management practice became an established research methodology (Harris, 2008, p. 17) and continues to evolve. An example of how action research evolves as it is used in industry comes from work by Habermas, Gustavsen and others who observed that it allowed a move from socio-technical thinking to include action research's inherent benefits of shared learning and improved communication (Greenwood and Levin, 2007, p. 26).

Not surprisingly, because of its wide exposure, action research incorporates many approaches and methods. Therefore, different classes of action research approaches were identified. An example is the grouping of action research based on traditions associated with developments in the northern and southern hemispheres (Coghlan and Brannick, 2014, p. 53/54). In the so-called northern hemisphere tradition, action research focuses on applied behavioural science and relationships in organizational contexts when solving problems. In the southern hemisphere tradition, action research tries to address social change in communities and socio-political systems and seeks emancipation of the oppressed by transforming the community and not the organization. Greenwood and Levin (2007) use these divisions to group action research's evolution into three categories: the first being industrial democracy, the second "Southern" participatory action research, labour organizing, community organizing, and civil rights, and the third, human inquiry and cooperative inquiry. However, one can question if the southern hemisphere tradition is not better described as social activism (Heller, 2004). Regardless, what is clear is that action research finds broad application in management research and continues to advance as experience is gained and new knowledge and insights are uncovered. Given its principles that lie in efforts to enable social change in a dynamic environment by involving those who are affected by the change in a way that benefits most, action research therefore resonates with how I normally work, which is to involve and work with those who will be affected by change my actions cause.

My perception of the good inherent to action research is confirmed in literature. For example, Greenwood and Levin (2007, p. 1) describe action research as a research strategy that allows for democratic knowledge creation through collaboration with diverse stakeholders to generate action, with the focus on learning through acting. In their view, action research contains three key elements: action, research and participation (Greenwood and Levin, 2007, p. 6). Harris (2008, p. 17) describes

action research in management practice as an informed inquiry into a managerial problem by an insider researcher who works with others in the organization to specify actions that will resolve the problem. In this process, new knowledge may be created for organizational members and other researchers. Similarly, Coghlan and Brannick (2014, p. xiii) describe action research as an approach used to produce action to solve a work problem, and to capture knowledge from this action as it happens through ongoing, repeated and collaborative efforts between researcher and researched (Coghlan and Brannick, 2014, p. xiii). Furthermore, in contrast to typical research that examine actions only, Coghlan and Brannick (2014, p.6) describe how action research happens whilst actions unfold, collaborative and democratic partnerships develop, and problems are solved. Finally, Easterby-Smith, Thorpe, and Jackson (2012, p. 49) incorporate Lewin's view of action research in their definition by pointing out that the best way to learn about social systems, such as organizations, is to try and change the system, and by involving those who are affected by the change as participants in the research process.

All these descriptions have in common a focus on a participant researcher who wants to cause action to solve problems in a social system such as an organization by involving those who are affected by the change where all learn in the process. Here, for the researcher the aim is to capture and share new knowledge that emerges. Importantly, action research is focussed on producing usable knowledge (Coghlan, 2011, p. 65) that emerges through actions taken (Brydon-Miller, Greenwood and Maguire, 2003) in a democratic process (Greenwood and Levin, 2007). Tellingly, what distinguishes action research from other approaches is the fact that it is aimed at producing results for a situation, where the outcomes are unique and not necessarily generally applicable.

Action research therefore is an ideal research strategy for my study where the aims were to manage the tensions that arose from my implementation of a public policy in a subsidiary of my MNC and to, in the process, generate useful knowledge. Additionally, since action research is democratic and cooperative in nature, it fits with how work is done in my MNC, and it brings benefits of sense-making and sense-giving to project participants and communities, thereby enabling change in my MNC that the implementation actions of my action research project needed.

3.2.1.1 Action research modalities

Raelin (2009, p. 18) suggests that action research modalities are distinctive and are formed by the traditions, interests, epistemology, values and philosophies of different researchers. Furthermore, each modality addresses different learning needs. He therefore argues that researchers must know which type of knowledge is required to help participants learn best. In doing so, Raelin suggests that one can differentiate between action research modalities that offer alternate ways in which participants can learn. This means that some need learning that teaches theoretical knowledge or "know what", others may want practical knowledge that teach "know how", and others may be interested in critical knowledge that teach "know why" (Raelin, 2009). Therefore, Raelin suggests that one can differentiate modalities in terms of the type of inquiry a modality supports, for example first-person inquiry where learning happens through individual reflection, second-person inquiry where inquiry and learning is mutual, and third-person inquiry which offers broader and deeper learning and contributes to a body of actionable knowledge (Raelin, 2009, p. 19). By considering levels of reflection, action research modalities also differ because of how they enable double and triple loop learning. Furthermore, in terms of a time orientation, Raelin (2009, p. 18) suggests that some modalities are focussed on the present, but others go further and looks to enable learning for the future, one of the aims of my action research project.

Consequently, given its broad and diverse application it is not surprising that separate action research modalities emerged over time. Coghlan (2011, p. 67/8) lists distinct action research modalities of

action learning, action science, appreciative inquiry, clinical inquiry/research, cooperative inquiry, developmental action inquiry, intervention research in France, and learning history. To this list, Raelin (2015) added cultural-historical activity theory (CHAT) as a distinct action research modality. CHAT interests me because of how culture, history and activity seem to be generally entangled in my work environment, and of how these attributes may be important to consider in my policy implementation project.

3.2.1.2 Critiques of action research

Those who prefer the dominant, scientific or positivist research approach are critical of action research as a research strategy. Their main objections lie in the fact that the researcher is immersed in the research, is not an impartial observer and can therefore not be fully objective in interpretation (Harris, 2008, p. 18; Greenwood and Levin, 2007, p. 79). Also, generality of theory is an expected outcome from traditional scientific research approaches (Coghlan, 2011) but action research is situation-specific with exclusive outcomes that cannot be generally applied. Critics also question the quality of data because the data is unique to the research context and cannot be used to replicate results when applied in other studies (Harris, 2008, p. 18). A further critique relates to the role duality of the researcher. Role duality in this context refers to the twofold role of the researcher, being both employee and researcher in the research environment. This has implications for research ethics and objectivity because the researcher has power relative to participants and in turn is subject to pressure from those who have more power in the organization (Holian and Coghlan, 2013; Hilsen, 2006). Furthermore, organization politics is an important issue that may affect the quality of action research (Björkman and Sundgren, 2005). The identity of researcher in a multi-cultural environment also has potential to introduce bias in the research effort (Kerstetter, 2012).

All these criticisms apply to me in my role as practitioner researcher in this study. To manage criticisms of lack of researcher objectivity, generality, data quality and ethicality in action research that can be levelled at my action research, I kept records and notes of important events, actions, and activities as evidence to support how I tried to manage different tensions in my project. Furthermore, I utilised research techniques such as journaling and reflection on observations (Coghlan and Brannick, 2014; Creswell, 2013). Additionally, my thesis structure and my reporting that captures my self-reflection and learning provide evidence of quality (Zuber-Skerrit and Perry, 2002). Moreover, my authenticity as researcher is demonstrated by me using the general empirical method which includes being attentive to data, intelligent when inquiring, reasonable when making judgments, and being responsible in making decisions (Coghlan and Brannick, 2014; Coghlan, 2008). Finally, as recommended by Björkman and Sundgren (2005), I actively worked to manage issues of power and politics through skilful negotiation of my action research setting's political environment. As evidenced in my reporting, I managed this challenge by developing and maintaining good relationships with those in power, by regularly disseminating information on results, and by building good support networks in the MNC.

3.2.2 Choosing an action research modality

The purpose of my study is to formulate recommendations to assist others with public policy implementation in a MNC. Furthermore, my observations and the bottom-up model for policy implementation I defined in Chapter 2 confirms the complexity of social interaction in my research project, and the likely tensions this will cause. Therefore, the choice of action research modality to apply is a critical consideration.

Generally, in a MNC people from different occupational communities must work together to implement policy where many activities must be coordinated. By focusing on activities and by

examining activity systems, it is possible to explore the nature of tensions and contradictions that causes instability and to identify what enables a return to more stable, functioning systems in collective organizational practices (Macpherson *et al.*, 2010, p. 305). Additionally, where people work together and perform activities, tangible and/or intangible tools (or artefacts) help them to transfer and communicate interpretations and understanding of their social world (Macpherson and Jones, 2008). In this, tools and artefacts help to externalise individual mental processes (Raelin, 2012). Such shared artefacts include "... tools, policies, procedures, regulations, processes, concepts and accepted practices ..." (Macpherson *et al.*, 2010, p. 305). Similarly, when tools or artefacts are used in activities that intersect boundaries between organizational communities, such mediating boundary objects convey meaning and learning (Carlile, 2004; Feldman and Rafaeli, 2002p. 315; Star and Griesemer, 1989) and therefore, boundary objects can through its sense-making and sense-giving abilities bring about the change needed to comply with new requirements. Furthermore, in this process of change, existing and new artefacts themselves can be transformed (Macpherson *et al.*, 2010; Macpherson and Jones, 2008) as it mediates social relationships in activity systems (Darwin, 2011). It is this realisation that guided me as I designed my bottom-up policy implementation model, in figure 1.

Consequently, the ability of tools or artefacts to mediate tensions in activity systems are clearly important to my action research and makes cultural historical activity theory (CHAT) the ideal action research modality for me to use because it allows me to examine the activity systems of my project where tensions emerged and had to be managed. This is because CHAT allows inquiry into activity systems as a unit of analysis (Eppich and Cheng, 2015; Darwin, 2011). Huxham and Beech (2003) in introducing tension theory suggests that tensions emerge where people from different cultures collaborate, that tensions are particular to a situation, and resolving these is what managers do. Therefore, they see value in analysing tensions to examine detail in a reflective approach (Huxham and Beech, 2003). Action research as reflective practice, and CHAT through its focus on activity systems, enable this. In addition, CHAT meets Raelin's (2009) requirement that it provides theoretical, practical and critical learning, it utilises second- and third-person inquiry, enables effective double and triple loop learning, and CHAT's learning has a future orientation. CHAT is therefore a distinctive action research modality because its learning attributes compliment how knowledge develops and is shared in complex organizations such as my MNC.

In closing, I also considered the appropriateness of other action research modalities in the context of my MNC. For reasons discussed in chapter 2, MNC challenges such as multiple embeddedness, institutional distance, agency problems, legitimacy needs, and knowledge transfer difficulties were considered in this evaluation. Although organization development was considered because my MNC uses and teaches many of its methods and techniques, since this modality draws from many disciplines of applied behaviour science (Coghlan, 2014) it is not as focussed as CHAT to examine organizational activities that policy implementation requires. Therefore, organization development's broad array of eclectic approaches, techniques and tools are not suited to a narrowly focussed study involving policy implementation. Then, I did not consider participatory action research because it focuses on social change of communities that seek to free themselves from restrictive situations by developing and applying their own knowledge (Coghlan and Brannick, 2014, p. 55; Greenwood and Levin, 2007), a situation that public policy implementation with its already defined prescriptions prevents. Furthermore, action learning, appreciative inquiry, clinical inquiry/research, cooperative inquiry and learning history are unknown modalities in my MNC and were therefore not considered. Also, institutional distance related to geography where project participants and communities are dispersed

and unable to work together in one physical environment means that these action research modalities cannot be used. Adding to this restriction, since project participants and communities changed often due to restructuring in my MNC, this situation would have caused disruption of research activities under these action research modalities. Additionally, limited financial resources prevented the hire of external consultants to assist with the action research activities that these modalities require. Therefore, CHAT as the action research modality is clearly best suited to my research. Consequently, the principles of CHAT and how it is used in research are explained next.

3.2.3 Cultural-historical activity theory (CHAT)

Vygotsky, Leont'ev and Luria developed activity theory to explain human consciousness and behaviour by examining the relationship between an individual's mental processes and their interactions in social settings (Er, 2014; Yamagata-Lynch, 2010). Vygotsky proposed that people, through their use of social and cultural artefacts such as language and tools in social interactions with others, internalise or store the experience in their minds, which enables learning and development of consciousness and finding new meanings of the world (Er, 2014; Mietinnen, 2008, p. 21). In this, artefacts, tools and other things mediate actions and help to unlock new meanings of the individual's world (Yamagata-Lynch, 2010, p. 16). Therefore, ongoing social interactions where artefacts are used rebuilds a person's consciousness and allows people to envisage new possibilities which, when shared with others, allows for new meaning to emerge and can lead to tools and artefacts being altered (Er, 2014; Yamagata-Lynch, 2010, p. 16; Mietinnen, 2008, p. 21).

As explained by Er (2014), activity theory proposes that a subject, being an individual or group of individuals, performs an activity or activities to achieve an "object" and results or outcomes. In this, the object causes the activity because it motivates the achievement of an outcome, and the activity is what interests the analyst. The activity system is therefore the essential unit of analysis (Eppich and Cheng, 2015; Er, 2014; Darwin, 2011). Importantly, the activity system's focus is on object-oriented actions and such actions are always "... characterized by ambiguity, surprise, interpretation, sense making, and potential for change" (Engeström, 2001, p. 134). Furthermore, the activities that follow from object-oriented actions use tools or artefacts that may be intangible. Non-tangible tools or artefacts are cognitive because they embody knowledge and contain signs that point to desired outcomes, thereby causing work to be performed. In this way, tools or artefacts mediate a subject's activities to achieve the object and resultant outcome. Also, because tools or artefacts are constructed, it embodies history and cultural context and they become cultural entities that are used in object-oriented actions (Engeström, 2001, p. 134). Hence activity theory adopts a cultural-historical view. In figure 2, the elements and interactions in a simple activity system are presented.

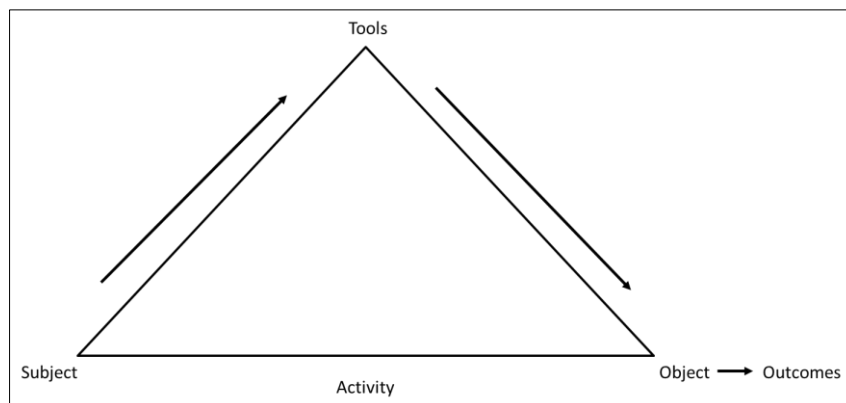


Figure 2: Basic model of activity (Coghlan and Brydon-Miller, 2014)

Moreover, activity theory acknowledges that workers in organizations collaborate as they work towards an outcome by sharing tasks or dividing labour to perform actions in the activity system for which single individuals may not be equipped because of a lack of knowledge, training and experience, and that individuals who work in communities allow their behaviour to be regulated by conforming to their community's formal and informal rules (Trust, 2017, p. 100). Consequently, Engeström expanded the basic model of activity in his model of activity systems analysis and CHAT to include the influence of community, rules and division of labour on the activity system (Yamagata-Lynch, 2010, p. 22). In this expanded model of activity, tools mediate the relationship between subject and object, rules mediate relationships between subject and community, and division of labour mediates the relationship between community and the object. Engeström's expanded model of activity (Er, 2014) is shown in figure 3.

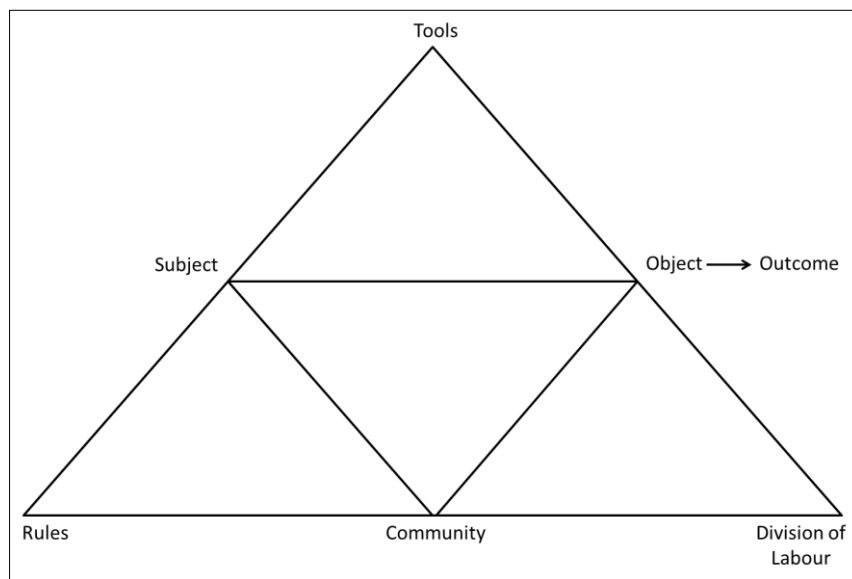


Figure 3: Engeström's model of activity (Er, 2014)

Leont'ev extended Vygotsky's activity model to that of human activity systems by broadening the view of individual activity to a collective level (Engeström, 2001, p. 134). Consequently, activity theory can be used to examine how internal contradictions and tensions are mediated in the complex relationships between a subject and his/her community in an activity system. Figure 4 shows this expanded activity model.

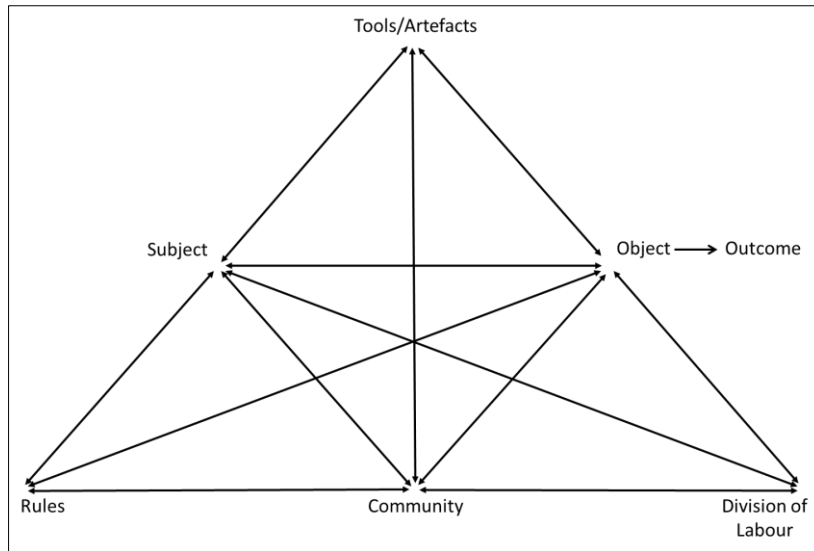


Figure 4: Structure of a human activity system adapted from Engeström (2001)

To present the effect of contradictions in activity system analysis, Engeström (2000, p. 965) superimposed a wavy line, as shown in figure 5.

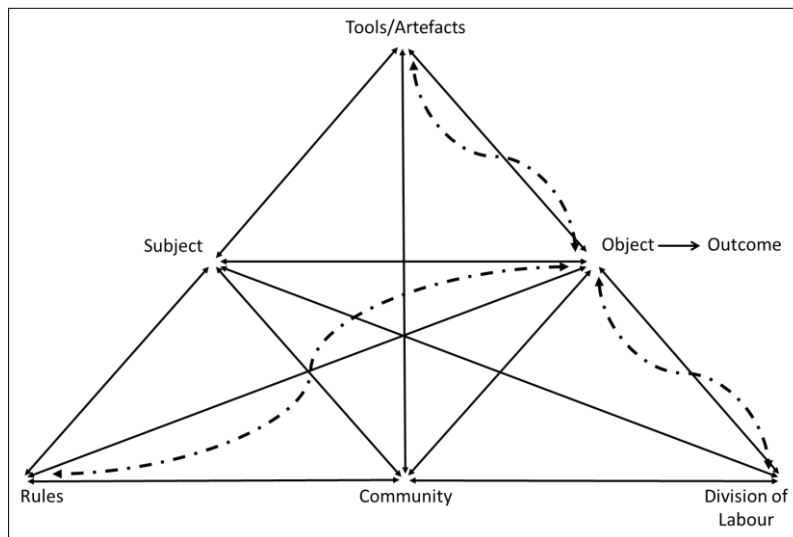


Figure 5: Structure of a human activity system adapted from Engeström (2000) showing contradictions between elements in the activity system as wavy lines

The ability of CHAT to examine tensions that emerge in activity systems is useful given the context of my study, where many occupational communities and stakeholders, each with different expectations and interpretations of requirements must cooperate to deliver public policy implementation outcomes. However, I would be remiss not to consider critiques thereof. CHAT is criticised by some for not eliminating dualistic language and because it cannot unify the human internalisation process with the external environment to explain human consciousness and behaviour (Darwin, 2011, p. 215; Yamagata-Lynch, 2010, p. 18). Therefore, since it is too focussed on the individual, it cannot explain cultural change (Yamagata-Lynch, 2010, p. 18). Since a study of human consciousness and of cultural change is not the object of my research, this criticism is not valid in my situation. Instead, I am interested to analyse and learn how contradictions and tensions were resolved in the activity systems of my action research project as we implemented a subsidiary company’s public policy in my MNC,

and CHAT provides a useful analysis framework for this. Additionally, CHAT is recognised as a valid theoretical research framework (Darwin, 2011, p. 217) and researchers acknowledge that CHAT is gaining support in the research community because it complements action research (Yamagata-Lynch, 2010, p. 23; Raelin, 2009).

Finally, CHAT provides context of work activities when analysing data. It does this by considering activity and the history of artefacts and objects used in mediational and multi-mediational activities (Eppich and Cheng, 2015, p. 384; Darwin, 2011, p. 215; Yamagata-Lynch, 2010, p. 26). Particularly, contradictions and the conflict it brings require change to resolve such tensions and drives transformation and learning in social systems (Eppich and Cheng, 2015, p. 384). Furthermore, since organizations use specialized labour systematized in occupational communities, found in my research setting, CHAT can be used to explore how conflicts were mediated in occupational communities (Eppich and Cheng, 2015, p. 384).

To conclude, CHAT is my chosen approach because of its focus on activity systems and elements in a cultural and historical context, where situations that give rise to tensions from different understandings and expectations of occupational communities who cooperate to deliver outcomes can be analysed to create new insight.

3.3 Research setting

As mentioned in Chapter 1, my MNC is an international ICT company and its South African subsidiary was my research location as I worked there. To provide additional context to my research setting, it is worth presenting a system view of my B-BBEE programme within which my action research project was situated, as I do in figure 6 below. This diagram shows the flow of demands for change on my MNC that the local public policy brought, of which the ownership sub-policy became the focus of my action research project. Particularly, it shows how demands from the external environment on the local subsidiary in the host country created demands on my MNCs internal organization and different occupational communities that perform work, as it manages its global operations.

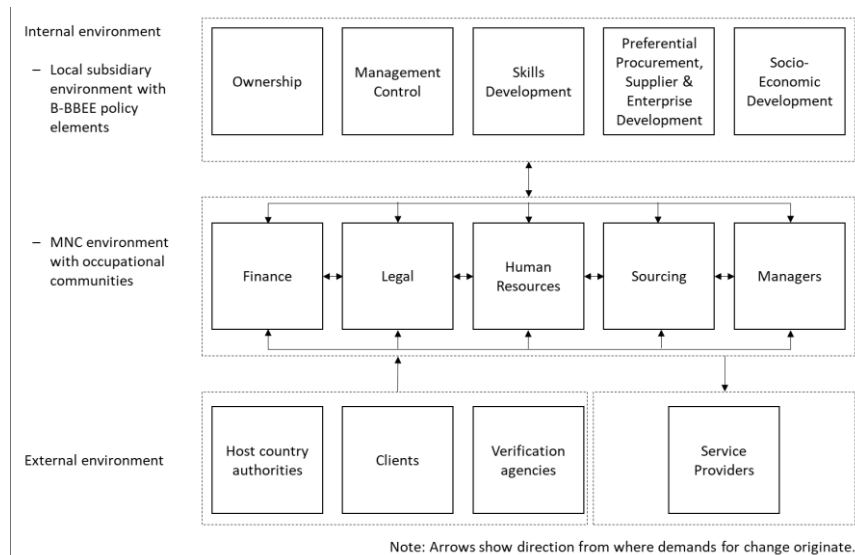


Figure 6: System view of my action research project environment

In figure 6, arrows show the direction from where demands for change originate. Demands from and to the MNCs external environment are one-directional, whereas change demands in the internal environment are multi-directional, as indicated by two-headed arrows. The diagram also shows the five B-BBEE policy areas of ownership, management control, skills development, preferential

procurement, supplier and enterprise development, and socio-economic development that the local subsidiary had to implement to comply with the requirements of the B-BBEE Codes (B-BBEE ICT Sector Council, 2016), of which the implementation of the ownership sub-policy is the subject of my action research project. Furthermore, the occupational communities in my MNC who assisted with actions and activities in my project included Finance, Legal, Human Resources, Sourcing (responsible for procurement-related activities) and many different managers in the organization who were involved in my project's public policy implementation of the policy's requirements. Host country authorities, clients, verification agencies, and service providers represent the external environment in my research setting.

In the system view of my action research project environment, there are many boundaries in my research setting across which many actions and activities were managed as time progressed, as I explain in case studies in chapters 4, 5 and 6. Consequently, considering the real-time longitudinal field study nature of my action research project and my critical realist view of management research, I chose process research for my research approach.

3.4 Research approach

Process research utilises narrative, visual mapping and temporal bracketing process research strategies, amongst others, to help make sense of messy process data (Langley, 1999). Therefore, it is appropriate for action research. This is because narrative strategy helps to organize data and provides context and history by telling the story of what happened, visual mapping strategy provides an overview of complex dimensions in process data, and temporal bracketing of process data in adjacent periods allows comparison of such units of analysis to explore ideas, for example how actions in one period provide context for actions in periods that follow (Langley, 1999). Therefore, process research supports my action research project because I can use narrative, visual mapping and temporal bracketing to observe how consecutive action research cycles in my project changed context of future periods and how changes in context generated actions in following periods, as Langley (1999) suggests.

Additionally, process research supports critical realism. As observed by Fairclough (2005, p. 922), the real and actual domains in organizations constitute the empirical domain of critical realism which affects participants in their social activities. This is because social practices mediate between the real domain of structures, which have causal powers embedded in them, and the actual domain of events and processes. This situation realised in my research setting where social practices of project participants mediated between the real domain of my MNCs organizational structures and the actual domain of events and processes that the B-BBEE public policy implementation introduced. Therefore, since process can be described as "... the actions and events that are embedded in and depend on the enactment of underlying structures" (Berends and Lammers, 2010, p. 1048), process theory allows me to examine how my project actions generated sequences of activities through the social practices that are contextually embedded in my MNC, its local subsidiary and the external environment (Berends and Lammers, 2010; Van de Ven and Poole, 2005; Langley, 1999; Pettigrew, 1990).

Consequently, as my research questions evolved, a process approach introduced both time and open systems dimensions in my research, as I could observe actions and activities in consecutive action research cycles over time. Furthermore, the processes within my project's action research cycles launched activity systems which I analysed using CHAT. By using CHAT to analyse my data, I could isolate tensions. This was possible because CHAT allowed me to examine object-orientation, tool mediation, intentions and relationships between elements, and contradictions in activity systems (Kaptelinin and Nardi, 2012). Thereafter, process research narrative strategy helped me to generate data for my final analysis. Additionally, temporal bracketing from process research theory enabled

triangulation of data and results to improve rigour in my study. Hence, my process research approach and method used CHAT as an action research modality to generate data that I could analyse. In the next section, I explain how I collected, structured and analysed my data.

3.5 Data collection

In planning my data collection, I considered interviews, but given constant changes in MNC, where participants and stakeholders changed, this was not feasible. However, as project manager of the B-BBEE ownership project, I initiated most of the actions and activities that were needed to realise my project outcomes. Therefore, since I was the subject in the activity systems of my action research project and because my project worked in the distributed, digitally facilitated organizational environment of my MNC, much of the data I generated and data I received from my project's participants were in digital form, which I saved in my MNCs secure enterprise server environment. Furthermore, because project participants consulted me on most matters of B-BBEE and MNC policies, procedures and routines, I am satisfied that my digital data is complete. Besides, I participated directly and indirectly in just about all project activities and I became the central node in my in my action research project through which most information and data moved. Subsequently, I was able to collect digital data of about 1 Gigabyte. My digital data consists of e-mail communication, records of meetings, meeting minutes, action plans, articles, regulator publications, reports, scorecards to show progress towards achieving B-BBEE targets, presentations, models and spreadsheets to support business cases and budgets, and meeting information from my Microsoft Outlook diary.

To complement my digital data, I recorded notes of decisions taken in meetings, actions we planned, and some of my observations and reflections which act as a memory of major issues that I had to manage in my project. Consequently, these became a journal of my action research project and a source of data. In total, I collected ten diaries which I refer to by the colour of their covers, as summarised in table 1.

Date	Description
1 September 2015 to 19 October 2015	Purple diary 1 (PD1)
2 November 2015 to 18 January 2016	Light blue diary (LBD)
4 February 2016 to 29 March 2016	Orange diary (OD)
4 May 2016 to 5 September 2016	Black manuscript diary (BMD)
7 September 2016 to 3 July 2017	Black diary (BD)
5 July 2017 to 18 April 2018	Purple diary 2 (PD2)
18 April 2018 to 1 March 2019	Red diary (RD)
26 February 2019 onwards	Black bank journal (BBD)

Table 1: My journal as data source

3.6 Data organization

To organize my raw data, I used process and activity theory conventions. First, I created a timeline (Appendix 1) which outlined key activities in my action research project to which I applied process research temporal bracketing strategy. This allowed me to define three periods in the lifecycle of my research project. Temporal bracketing allowed me to show how, in the first nine months of my project from September 2015 to May 2016, I organized and activated my project. In the six months from June to December 2016 I had to manage activities to establish the required minority shareholding in the local subsidiary to implement the B-BBEE ownership policy. Thereafter, project activities focussed on compliance, external verification and maintenance of the public policy as I worked to embed the policy in my MNC. Using verbs as descriptors for actions taken, I named the periods mobilizing, implementing and anchoring.

Once I reached this point, by using the principles of activity theory I defined the outcomes my project had to achieve in each period and action research cycle of my project, and the objects of activity of the activity systems in my project were then easy to define. This allowed me to observe the major action research cycles that my project utilised, which were aligned with the three periods in the lifecycle of my project, and the many smaller action research cycles that started as my project worked to address problems and issues. Coghlan and Brannick (2014) in referring to Lewin's original formulation of action research cycles when working towards a specific outcome describe how action research involves many consecutive and continuing spirals where each cycle starts with a pre-step to understand context and purpose. Then, steps follow to construct what the issues are by collaborating with others, planning actions to be taken, implementing the actions and evaluating the results thereof. Furthermore, like what Coghlan and Brannick (2014) observe about action research projects, my organizational environment certainly experienced ambiguity, messiness and ongoing change (Coghlan and Brannick, 2014) as it reorganized its operations and organizational structures throughout the life of my project, leading to changes in project participants who were often uncertain of what to do. At the same time, the B-BBEE Codes changed, and new guidelines were often unclear. This uncertain and fluid environment contributed to ongoing action research cycles and re-cycling at various levels of activity to address new problems and tensions. The results of the many actions and activities that resulted were collected by me as primary data, as explained earlier.

Consequently, I was able to discern and label actions, activities and events that happened in the action research cycles in each of the three periods of my project. This allowed me to create a hierarchy with actions, activities and events under each period of my action research project, as shown in table 2 below. This structure was replicated in a digital folder structure on my MNCs secure enterprise server and I moved the digital data I generated and collected into folders, named as in table 2. For example, references to digital data in the organizing period of my project range from folders numbered 01.01.01 to 01.04.02, those in the implementing period from 02.01.01 to 02.09.03, and in the anchoring period from 03.01.01 to 03.09.03. As a result, I was able to filter the digital data I collected in my project to create a smaller sub-set of data for my analysis.

	01.Organizing	02.Implementing	03. Anchoring
Actions	01.01 Set-up project 01.02 Get knowledge 01.03 Engage stakeholders 01.04 Raise awareness	02.01 Terminate incumbent B-BBEE advisor 02.02 Select new B-BBEE advisor 02.03 Evaluate minority shareholding alternatives 02.04 Build and evaluate business case for each option 02.05 Get buy-back approval (old minority shareholding) 02.06 Get divestment approval (new minority shareholding) 02.07 Buy-back minority shares (old minority shareholding) 02.08 Evaluate and select education trust (new minority investor) 02.09 Conclude divestment transaction	03.01 Appoint non-executive director from trust 03.02 Induct non-executive director 03.03 Make contribution to trust 03.04 Get verified by verification agency 03.05 Register major share transaction with regulator 03.06 Develop new MNC policies 03.07 Manage regulator and authority demands 03.08 Manage minority shareholder relationship 03.09 Manage MNC communities
Activities and events	01.01.01 Project approval 01.01.02 Project structure 01.01.03 Project governance 01.01.04 Project start 01.01.05 Project communication	02.01.01 B-BBEE advisor performance assessment 02.01.02 Incumbent B-BBEE advisor contract termination	03.01.01 Non-executive director nomination 03.01.02 Non-executive director acceptance by subsidiary board 03.01.03 Non-executive director registration with authorities
	01.02.01 B-BBEE act and codes review 01.02.02 Articles (internet search) review 01.02.03 External consultant workshops 01.02.04 MNC1 presentation 01.02.05 MNC2 presentation 01.02.06 B-BBEE training	02.02.01 New B-BBEE advisor RFP 02.02.02 New B-BBEE advisor appointment 02.02.03 New B-BBEE advisor start	03.02.01 Non-executive director induction session 03.02.02 Non-executive director Board participation 03.02.03 Non-executive director management participation
	01.03.01 Stakeholder analysis 01.03.02 Stakeholder communication 01.03.03 Stakeholder meetings	02.03.01 MNC parent expectations clarification 02.03.02 Minority shareholding alternatives presented 02.03.03 Minority shareholding alternative clarified 02.03.04 Preferred option selected	03.03.01 Rules for annual trust contribution 03.03.02 Approval of contribution to trust 03.03.03 Payment to trust
	01.04.01 E-mail communication 01.04.02 Meetings	02.04.01 Business cases (cost, funding, valuation, accounting) prepared 02.04.02 Business cases presented 02.04.03 Business cases refined	03.04.01 Verification preparation 03.04.02 Verification process 03.04.03 Verification result communication
		02.05.01 MNC parent company minority shareholding policy confirmation 02.05.02 Existing minority shareholder agreement review 02.05.03 Minority shareholding buy-back value determined 02.05.04 MNC parent company approval for buy-back 02.05.05 Minority shareholding buy-back negotiation and conclusion	03.05.01 Registration documentation preparation 03.05.02 1st major share transaction registration 03.05.03 2nd major share transaction registration 03.05.04 Regulator acceptance
		02.06.01 MNC parent company approval authority confirmed 02.06.02 1-pager for approval prepared 02.06.03 MNC parent company approval	03.06.01 New policies prepared 03.06.02 New policies approved 03.06.03 New policies communicated
		02.07.01 Minority shareholding buy-back negotiated and concluded	03.07.01 Regulator and authority communications 03.07.02 Regulator and authority meetings
		02.08.01 Eligible education trusts identified 02.08.02 Education trusts evaluated 02.08.03 Education trusts selected 02.08.04 Minority shareholding offered to preferred education trust 02.08.05 Terms of offer negotiated 02.08.06 Memorandum of Understanding (MoU) developed and agreed	03.08.01 Minority shareholder communication 03.08.02 Minority shareholder meetings 03.08.03 Minority shareholder changes
		02.09.01 Legal documents prepared 02.09.02 Legal documents signed 02.09.03 New minority shareholding registered	03.09.01 MNC community communication 03.09.02 MNC community meetings 03.09.03 MNC community changes

Table 2: My database structure and data folders

3.7 Data referencing

I used two types of referencing to distinguish data I refer to in my analysis. References to digital data in my analysis in Chapters 4, 5 and 6 use capital letters, “A”, “B”, “C”, and so forth. Each reference can be traced to Appendix 2, where I list where data can be found by making specific reference to the digital folder and filename in my database. In addition, I created a separate folder on my MNCs secure enterprise server where I stored copies of the digital data I refer to.

Then, to refer to data from my journal in my analysis in Chapters 4, 5 and 6, I use the designation JE to identify the data as a journal entry, followed by the colour of the diary as listed in table 1 above, and I add the date when I recorded the entry. For example, a reference designated “(JEPD1, 1 September 2015)” refers to purple diary 1 of my journal which contains my journal entry on that day, and “(JEOD, 4 February 2016)” refers to the event I recorded in my orange diary on 4 February 2016. In Appendix 3, I summarise how I refer to journal entry data.

3.8 Data analysis

3.8.1 Approach to data analysis

In my discussion of how I organized my data, I mentioned how I used process research strategies, activity theory and the concept of action research cycles to define objects of activity for each period of my action research project. Through this process, I was able to identify four objects of activity: one for each of the project’s organizing and anchoring periods and two under the implementing period. This allowed me to identify key processes or activity systems that worked as my project pursued objects of activity, and I was able to construct table 3 which shows the result of how I combined

temporal bracketing from process research with activity theory to recognize the activity systems in my action research project. For instance, my first object of activity in the mobilizing period, namely to organize the B-BBEE ownership project, is supported by data from processes when I designed and activated the project (P1), involved stakeholders to raise awareness of the B-BBEE policy requirements (P2), and replaced the incumbent B-BBEE advisor (P3). Similarly, in the implementing action research cycle and period, my second object of activity links to process or activity system P4, and the third object of activity to processes P5 to P8. My fourth object of activity from the anchoring action research cycle and period involved data from processes P9, P10 and P11. Once I had defined these activity systems, I was able to write a narrative to explain what happened as tensions surfaced and I then analysed data generated in this way by using CHAT, as I describe in Chapters 4, 5 and 6.

	Organizing	Implementing	Anchoring
Objects of activity	1. Organize B-BBEE ownership project	2. Obtain MNC approval for minority shareholding transactions 3. Execute minority shareholding transactions	4. Confirm and maintain regulatory compliance
Processes (Activity systems)	P1. Design and activate project 01.01.01 Project approval 01.01.02 Project structure 01.01.03 Project governance 01.01.04 Project start 01.01.05 Project communication	P4. Get approval 02.03.01 MNC parent expectations clarification 02.03.02 Minority shareholding alternatives presented 02.03.03 Minority shareholding alternative clarified 02.03.04 Preferred option selected	P9. B-BBEE verification 03.04.01 Verification preparation 03.04.02 Verification process 03.04.03 Verification result communication
	P2. Involve stakeholders to raise B-BBEE awareness 01.02.01 B-BBEE act and codes review 01.02.02 Articles (internet search) review 01.02.03 External consultant workshops 01.02.04 MNC1 presentation 01.02.05 MNC2 presentation 01.02.06 B-BBEE training 01.03.01 Stakeholder analysis 01.03.02 Stakeholder communication 01.03.03 Stakeholder meetings 01.04.01 E-mail communication 01.04.02 Meetings	P5. Evaluate options 02.04.01 Business cases (cost, funding, valuation, accounting) prepared 02.04.02 Business cases presented 02.04.03 Business cases refined 02.05.01 MNC parent company minority shareholding policy confirmation	P10. Share transaction registration 03.05.01 Registration documentation preparation 03.05.02 1st major share transaction registration 03.05.03 2nd major share transaction registration 03.05.04 Regulator acceptance
	P3. Replace B-BBEE advisor 02.01.01 B-BBEE advisor performance assessment 02.01.02 Incumbent B-BBEE advisor contract termination 02.02.01 New B-BBEE advisor RFP 02.02.02 New B-BBEE advisor appointment 02.02.03 New B-BBEE advisor start	P6. Exit existing 02.06.03 MNC parent company approval 02.06.02 1-pager for approval prepared 02.06.03 MNC parent company approval 02.05.04 MNC parent company approval for buy-back	P11. Maintain compliance 03.01.01 Non-executive director nomination 03.01.02 Non-executive director acceptance by subsidiary board 03.01.03 Non-executive director registration with authorities 03.02.01 Non-executive director induction session 03.02.02 Non-executive director Board participation 03.02.03 Non-executive director management participation 03.03.01 Rules for annual trust contribution 03.03.02 Approval of contribution to trust 03.08.01 Minority shareholder communication 03.08.02 Minority shareholder meetings 03.08.03 Minority shareholder changes 03.06.01 New policies prepared 03.06.02 New policies approved 03.06.03 New policies communicated 03.07.01 Regulator and authority communications 03.07.02 Regulator and authority meetings 03.09.01 MNC community communication 03.09.02 MNC community meetings 03.09.03 MNC community changes
		P7. Find and select new 02.05.02 Existing minority shareholder agreement review 02.05.03 Minority shareholding buy-back value determined 02.05.05 Minority shareholding buy-back negotiation and conclusion 02.07.01 Minority shareholding buy-back negotiated and concluded 02.08.01 Eligible education trusts identified 02.08.02 Education trusts evaluated 02.08.03 Education trusts selected 02.08.04 Minority shareholding offered to preferred education trust 02.08.05 Terms of offer negotiated 02.08.06 Memorandum of Understanding (MoU) developed and agreed	
		P8. Close deal 02.09.01 Legal documents prepared 02.09.02 Legal documents signed 02.09.03 New minority shareholding registered	

Table 3: Activity systems identified for CHAT analysis

Figure 7 visualises how I applied CHAT in my analysis of the activity systems I identified for the different objects of activity in each period of my action research project.

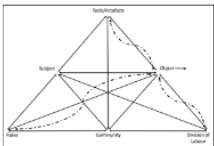
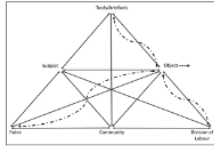
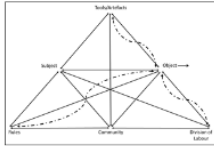
	Period/Action research cycle		
	Mobilizing (Sept. 2015 – May 2016)	Implementing (June – Dec. 2016)	Anchoring (Dec. 2016 onwards)
Object of activity	1. Organize B-BBEE ownership project.	2. Obtain MNC approval for minority shareholding transactions. 3. Execute minority shareholding transactions.	4. Confirm and maintain regulatory compliance.
Analysis			

Figure 7: Applying CHAT to my project's activity systems

As I reviewed what was happening in my project to learn and plan actions that started new action research cycles, I used Microsoft's Whiteboard application. Figure 8 shows the result of this process as I analysed the first of three tensions in the mobilizing period, the narrative I relate in Chapter 4. Due to the size and low resolution, this picture is embedded below figure 8.

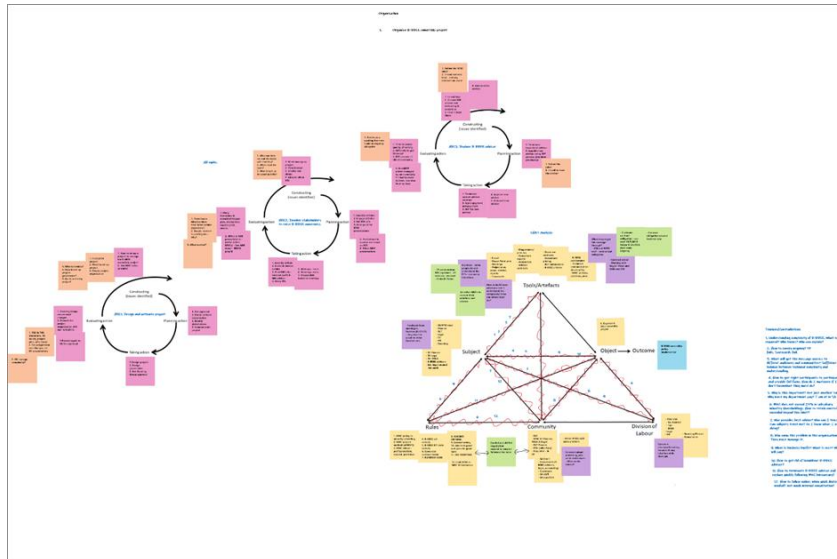


Figure 8: Using CHAT to learn and plan next actions



Organize B-BBEE
project.png

On the whiteboard, for each object of activity and the activity systems related thereto, I first considered how data was generated from action research cycle steps of issue identification, action planning, implementation, and result evaluation. Thereafter, I used the structure of a human activity system from figure 4 to perform a CHAT analysis for each of the activity systems working to realise the objects of activity under each period of my action research project, as shown in figure 8. This allowed me to identify and examine contradictions and tensions that arose where mediating actions were needed, and how these were resolved, so helping to create new knowledge that helped me as I managed successive action research cycles in my project. Throughout my research, I met regularly with my study supervisor and shared my results. This process assisted me to ensure quality of my data, and to preserve objectivity because of my role duality as both employee responsible for the policy implementation and as action researcher.

3.8.2 CHAT elements in my project

a. Outcome

The required outcome of this action research project is to implement the B-BBEE ownership public policy of a subsidiary in my MNC. Furthermore, outcomes related to each period and action research cycle of my project were to mobilize my project, implement the B-BBEE ownership policy, and anchor it.

b. Object of activity

Objects in the activity system of the B-BBEE ownership project are activities and events that subjects performed to deliver the project's desired outcome (Er, 2014; Kaptelinin and Nardi, 2012; Trust, 2017). As mentioned, in my action research project, objects included organizing the B-BBEE ownership project, obtaining MNC approval for the minority shareholding transactions in its local subsidiary, completing the minority shareholding transactions, and confirming and maintaining regulatory compliance.

c. Subject

Subjects are the individuals and communities who are involved in activity systems of the B-BBEE ownership project (Er, 2014; Trust, 2017) who want to achieve an object. Since I am the project manager of this action research project who managed the implementation of the B-BBEE ownership public policy in my MNC, I became the subject of my project's activity systems.

d. Tools

Tools or artefacts are used to mediate actions in activity systems (Er, 2014; Trust, 2017, p. 100). In the B-BBEE project, tools and artefacts included MNC policies, procedures, routines, scorecards, business cases, financial models, templates, presentations, action plans, digital communications, meetings and relevant documentation.

e. Community

In activity systems, communities are groups of individuals with a shared interest that work together (Trust, 2017, p. 100). In the B-BBEE ownership project, communities included the organization's occupational communities from Finance, Legal, Human Resources, and Sourcing/Procurement, and external communities such as the B-BBEE regulator, B-BBEE verification agencies and consultants who provided B-BBEE, legal and financial expertise, and customers.

f. Division of labour

In complex activity systems, specific expertise resides in different individuals and communities and labour becomes divided amongst them. In the B-BBEE ownership project, labour was divided amongst contributors from the organization's Finance, Legal, Human Resources, and Sourcing/Procurement occupational communities and different external experts whose services were contracted.

g. Rules

Rules are explicit or implicit agreements that regulate how participants and communities who participate in activity systems conform when working together (Trust, 2017, p. 100). In the B-BBEE ownership project, rules are those of my MNC, captured explicitly in its policies, procedures and ways of working, and implicitly in the way occupational communities performed activities. Furthermore, rules included external rules, namely that of the B-BBEE act (Government Gazette, 2013) and B-BBEE sector code (B-BBEE ICT Sector Council, 2016).

h. Contradictions and tensions

In social systems, contradictions in activity systems create tensions that must be resolved by changing or transforming the system (Trust, 2017; Eppich and Cheng, 2015). Specifically, contradictions are structural tensions that accumulate over time in and between activity systems (Engeström, 2001, p. 137). In the B-BBEE ownership project, CHAT was used to identify contradictions and tensions in my project's activity systems that had to be resolved to put policy into action in my MNC.

3.9 Ethical considerations

For my action research project, I complied with the University of Liverpool's requirements for research ethics approval by obtaining approval from my MNC to use the data I collected in my action research

project and through a signed non-disclosure agreement that prohibits me from disclosing confidential company and participant personal information. Hence, in my reporting, I anonymise data and I take special care not to disclose information that may be deemed company confidential or that may place the MNC at risk for litigation. Importantly, I do not disclose information about individuals. Instead, I refer to their general role and location, as necessary. I disclose detail of the public policy and the country that requires its implementation because its demands of my MNC and its local subsidiary provides important context and insight into the reasons for my action research project, actions taken, and the behaviour of project participants and communities.

Furthermore, as required by the University of Liverpool, I took care to store all my data securely. For example, I saved all my digital data in my MNCs secure server environment, and I stored my handwritten journals in a lockable safe.

3.10 Conclusion

From collecting and organizing my raw data, and through using process research and its narrative, visual mapping and temporal strategies (Langley, 1999), using literature and applying activity theory and CHAT, I isolated ten tensions in the activity systems of my action research project, as shown in figure 9.

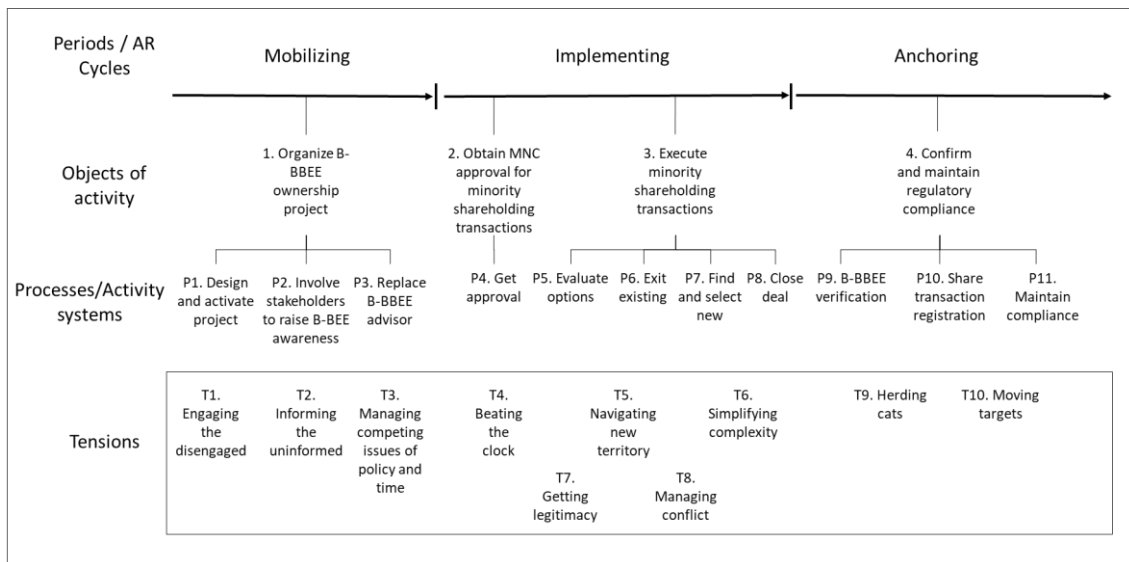


Figure 9: Tensions identified in my project’s activity systems

The results of my data analysis for each period of my project is presented in Chapters 4, 5 and 6. In these chapters, by using process research narrative, visual and temporal strategies, I relate and show how tensions in my action research project arose and what happened as I took actions to solve problems. In doing this, history provides a storyline for my research where narratives are reported as data, which include the process of data presentation, data evaluation and taking actions to solve problems which in turn initiated future actions. My CHAT analysis helped me to uncover new information to support my research objectives, as shared in the following chapters.

4 PERIOD/ACTION RESEARCH CYCLE 1 – MOBILIZING

Figure 10 shows the links in my action research project for each period/action research cycle, its objects of activity, the activities or processes used to manage actions, and the tensions that emerged in my project's activity systems in the first period of my project. The greyed-out area hides later events which are discussed in Chapters 5 and 6.

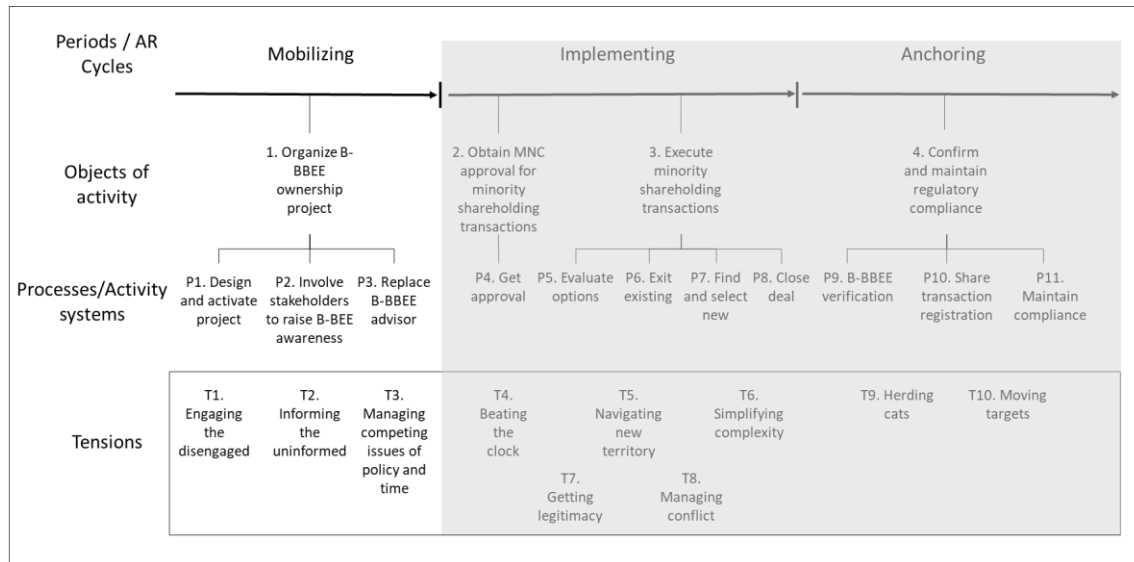


Figure 10: Period/action research cycle 1 and tensions identified

In this and subsequent chapters, by telling the story of what caused tensions in the activity system of my project in this period and how these tensions were managed, I use process research to generate data which is then analysed using CHAT. Thereafter, I consider what I had learnt in this period and action research cycle of my project, and how this creates new knowledge that helped inform actions in the second period of my project.

4.1 Introduction

The organizing period of my project began when I accepted the challenge to manage the B-BBEE Ownership project in September 2015. In this first period of my project, setting-up and activating the project was the object of my activity system. Consequently, I became the subject of this activity system. Being naïve and uneducated on the B-BBEE policy and its requirements, I planned for a quick start to my project. In this, I relied on experience of having managed many internal projects in the MNC. However, I did not anticipate it would take six months before my project was ready to start delivering actions. In the following three essays, I describe what caused delays, increased tensions, and the actions I took to manage those to keep my project on track. Detail of digital data referred to in my narrative and discussion are assigned a letter or letters in the alphabet and can be found in Appendix 2, whereas references to my journal data, designated JE, are explained in Appendix 3.

4.2 Tension 1 – Engaging the disengaged

The first tension in the activity system in this period of my project emerged as I set up and attempted to activate my action research project in my MNC. Here, tensions arose between me, the rules of my MNC, the project steering group as a key community, those who had to work in my project by contributing their expert labour, and the artefacts used to engage communities in this activity system, as the wavy lines in figure 11 shows.

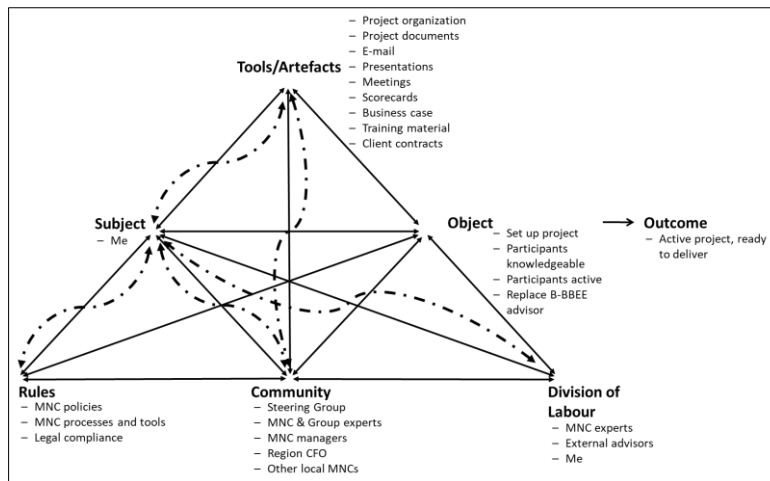


Figure 11: Tension 1 - Engaging the disengaged

To establish my project, I turned to my MNCs internal project process with its prescriptions on how to define project outcomes, deliverables and tasks, how to identify and involve stakeholders and participants, and how to manage and govern projects (A). The MNCs prescriptions embody the rules through which my MNC manages activity systems to deliver internal projects. However, two issues prevented project participants from engaging in project activities. These were the impact of an increasingly complex and uncertain work environment and the absence of a compelling reason, as I found out as I managed this first tension.

As a first step to activate the project, I needed support from senior managers in the organization, a requirement that introduced tension between subject and community in my project. Executive support is visible when executives and managers contribute actively and when they allocate staff from the occupational communities they control to work in internal projects. Furthermore, the contribution of labour in internal projects is typically divided amongst contributors from different expert occupational communities who must work together towards a common goal. Therefore, to engage executives and to get them to provide the support my project needed, I established a project steering group of five senior managers from different expert occupational communities in my MNC to provide guidance and to help monitor the project's progress. The first meeting of this steering group took place nine days after my project started (B). In preparation for this meeting, I consulted with the previous B-BBEE project manager and the incumbent B-BBEE advisor who was contracted to guide the policy implementation. Thereafter, I used internal project tools, or artefacts, which included completion of a project specification, a plan for governance, and a project organization design showing the different participant areas and individuals from whom I needed contributions. As is custom, these were summarised in a PowerPoint presentation that I used to direct the meeting. Because of their heavy workload and limited time, project steering group meetings were brief, and this forced me to reduce the number of slides I used to fourteen pages (C). This artefact had to convey much complex information and brought tension in my project's activity system between me as subject who had to prepare the artefact, and the community who had to interpret the information contained in this artefact in limited time.

Unfortunately, only three of five invitees accepted the meeting (B), with one cancelling at the last minute due to unforeseen commitments, and one failed to respond altogether. Poor attendance of steering group meetings would become a pattern, but at the time I did not realise how this demonstrated a low level of commitment to my project. At the meeting, invitees challenged the project organization I proposed by questioning the contributions from the different experts I wanted

and by suggesting additional participants or removing others. In the discussion that resulted, I managed the contradictions and tensions in this meeting by agreeing to make the changes suggested, as evidenced in subsequent presentations (C, D, E, F, G). However, an unresolved issue was to gain agreement from participants on the objective of the B-BBEE Ownership project, and new suggestions for participants were made between and in subsequent steering group meetings. For example, e-mail correspondence shows how members asked me to invite specific staff members to attend meetings (H), and as noted in my journal (JEPD1, 22 September 2015), the regional head of the MNCs legal function and country manager where the B-BBEE policy had to be implemented, a key stakeholder in my project, asked that I include the B-BBEE advisor and the company's external legal counsel in the steering group. This meant that the communities in my project's activity system now introduced external parties who became direct participants and represented a new community and new expert labour. Consequently, the project organization and specification changed, as evidenced in a progression of presentations and documents I prepared (C, D, E, F, G). Furthermore, I now had to be more careful to manage the MNC rules to ensure compliance with how I engaged communities and labour in my activity system because not all were working for the MNC, something that added to the tension between subject and rules in my project's activity system.

As I managed conflicts and tensions between me as subject and my project's steering group community, I engaged those who would work in my project by scheduling a project kick-off meeting a day after the first steering meeting (I). Twelve participants were invited of whom six accepted, four did not respond, and two were unsure if they could attend, which they did not. This meeting was essentially an information session where I informed attendees of the objectives of the project and what was expected from them. Since there were many questions on the B-BBEE policy, I agreed to arrange a second meeting a week later where the B-BBEE advisor and their consultants would be present to answer questions and provide guidance. Twelve participants and two consultants from the B-BBEE advisor team were invited to attend (J), but again, three important MNC participants failed to attend. Furthermore, most MNC participants had to leave the meeting at various times to attend to other work matters. These early symptoms of poor levels of participant engagement mirrored what I observed from steering group participants and introduced tension between subject and division of labour in my project's activity system. I was becoming frustrated because my project failed to start, and something had to be done. However, at this point, I also had to introduce new project participants from the group finance function based in the MNCs parent country after the regional CFO discussed the B-BBEE ownership policy requirements with the MNCs CFO and he asked that they become involved in my project.

A first meeting with this group took place when I was invited by a senior manager in the finance function from the group office to discuss the implications of the B-BBEE policy for the MNC (K). Hence, I had a new and important community to accommodate in the project, but this community had little understanding of local dynamics since they lived and worked in Europe. Also, this community included finance and other experts with expertise I didn't realise would be needed. For example, this introduced members from the MNCs mergers and acquisitions unit that guards the MNC policy for dealing with investment and divestment in the group's subsidiaries, as I found when I looked at the titles of others who attended the meeting (K). Future meetings with this community included experts with accounting, taxation and legal expertise, and the activity system of my project therefore became even more complex because of new communities, expert labour and new rules that had to be managed. This group was solely concerned with how the local B-BBEE ownership policy impacted on the parent company. Notably, the senior finance manager who invited me asked why the MNC should "give away" up to 51% of its equity in the local subsidiary and asked to see a "business case", as I noted in my journal from actions recorded in the meeting (JEPD1, 17 September 2015). A business

case is an essential tool for finance experts because it conveys information that affects business performance, and it dawned on me that the absence of a good commercial reason for implementing the public policy may explain why project participants were unengaged. Could a business case therefore be a missing artefact that mediates between communities and the object of my activity system because it conveys meaning and helps different communities and experts to understand why it was important for them to participate in the local public policy implementation? I left the meeting with this important insight and started to look for a way to construct the business case artefact that this community wanted.

After the meeting was concluded, the region CFO spoke to me and suggested that I should involve the team whom I had just met in the project steering group and the project delivery team, as they were important stakeholders, which I did as evidenced from their inclusion in future Steering Group meetings (L). His view was that this would help to manage the sensitive relationship that existed between the MNC parent and the local subsidiary organizations. This guidance proved invaluable when I needed to complete actions in the second period of my project, as I describe in the following chapter. However, four months after the project start date, the introduction of communities like these and other changes in the organization contributed further to a slow start of project activities, and worryingly, participant engagement worsened. For instance, a month and a half after the project started, only half of steering group members attended meetings, and one had never attended any meetings (L). I also had to constantly reschedule and change project meetings. Then, two months into the project in trying to enforce participation, I arranged a meeting where participants would report progress on their actions to steering group members. However, neither steering group members nor project participants could find the time to attend (M). I was becoming desperate and had to find out what caused this behaviour because the tension between me as subject and the community and division of labour in my activity system was becoming unbearable as I worried that my project would not get off the ground.

Reflecting on my own experience of the organization at this time and upon talking to participants, I realised a major problem was the effect a restructuring of the MNCs operations were having on us. Not only were all business areas in the MNC restructured, but ten regions merged into five market areas (N). Furthermore, specialist roles were increasingly concentrated in a few locales as the MNC further integrated its operations globally and as new organizational structures emerged (N). This meant many roles in the organization were becoming redundant and new ways of working were established. It was therefore not surprising that project participants were not interested in contributing to my project as they were concerned with surviving this turmoil. Not surprisingly, they focussed on delivering their key tasks, as I found when the steering group member who never attended meetings told me as she was about to leave the organization (JEBMD, 23 July 2016). Additionally, the narrow task-focus and new performance expectations the reorganization caused increased the workload of project participants and in many cases strengthened affiliation and association within occupational communities in the organization, to the extent that some participants no longer felt that they had to support the local subsidiary in its policy implementation, as mentioned to me over coffee one morning by a member of the finance community. Furthermore, networks of colleagues we could previously call upon for assistance were disrupted as many had left the MNC or found other positions in the organization, and we had to build new networks amongst the communities in my project's activity system. At the same time, we were dealing with new and constantly changing rules and my project had new participants. Therefore, it was now even more clear to me that project participants needed a compelling reason to engage in project activities that transcended occupational community, labour, and new and emerging rules and organizational boundaries. It was now obvious that project participants needed a business case, an artefact that

transcends borders in organizations, because a clear commercial justification would make my project important enough to them to justify their participation in my project.

Fortunately, two things happened to help fashion the business case I needed. The first was a contractual obligation the MNC accepted to conclude an important deal with a local subsidiary of a large global client the region CFO told me about (O). This required that the local subsidiary had to achieve, as a minimum, a prescribed percentage of black women ownership by 31 December 2016. If we did not reach this milestone the local subsidiary would have to pay a large percentage of the contract value as a penalty to the client. Being swamped with other tasks, I did not appreciate the value of this information at the time, but as I pondered the implications of failing to meet the client's demand, it gradually dawned on me that this was important information to share with project participants. If I could attach a monetary value of the cost of not meeting the contract clause, it might create the sense of urgency amongst project participants that I needed to improve their participation. To create the business case participants needed, I simply had to calculate the amount of penalty the MNC would have to pay if my project failed to implement the B-BBEE ownership policy, as agreed with the client. In this, the business case would become a key mediating artefact that conveys meaning and galvanize action, because participants understand the language of money. In this, language code became a key mediating artefact in my project's activity systems as I used every opportunity to share the business case, mostly verbally, and the monetary implications of failure to implement the policy. Furthermore, the urgency of the message became very clear to all when the local subsidiary's largest client introduced a similar contractual demand (P), which the MNC accepted. It was now very clear to all that failure to implement the public policy in the local subsidiary was a risk that could not be managed, and participation by all was needed to take the actions required to implement the public policy.

Consequently, a non-tangible artefact in the form of a verbal business case, supported by client contract demands and rules which threatened a loss of business and revenue for the MNC if it failed to adhere thereto, helped to focus attention on the object of my activity system, across community and labour boundaries. I had found a compelling business reason, in the form of a business language artefact, a business case, to justify why the B-BBEE policy implementation was important not only to the MNC, but to all project participants. Specifically, for project participants based in the host country, continued employment hinged on the need for the MNC to be successful in securing contracts with customers in the local subsidiary. Failure to implement the policy could therefore have severe repercussions if business was lost. In this way, the business case as language artefact helped me to manage the tension of engaging the disengaged. Furthermore, with a clear deadline for the B-BBEE ownership project of 31 December 2016 to work towards, I observed better engagement overall. However, there was now a great need amongst project participants to know what was needed from them, and for this, they needed policy information and knowledge. This necessity introduced the second tension in my activity system, as I explain next.

4.3 Tension 2 – Informing the uninformed

At the start of the B-BBEE Ownership project, I understood how important knowledge of the policy would be to promote awareness and understanding in my project's activity system. This is because the B-BBEE ownership policy has many intricate and demanding prescriptions and alternatives that must be weighed before effective decisions for action can be made. Therefore, my challenge was to raise awareness and to transfer knowledge of the B-BBEE policy to project participants. Personally, I was learning about the policy as I was activating the project, but how was I going to help the uninformed get the knowledge they needed, quickly and efficiently? My attempts to introduce the required knowledge introduced tensions in the activity system of my project between me as subject,

the artefacts needed to transfer knowledge, communities and those who contributed labour, again shown as wavy lines as in figure 12. In addition, a tension between rules and community emerged, as I will outline.

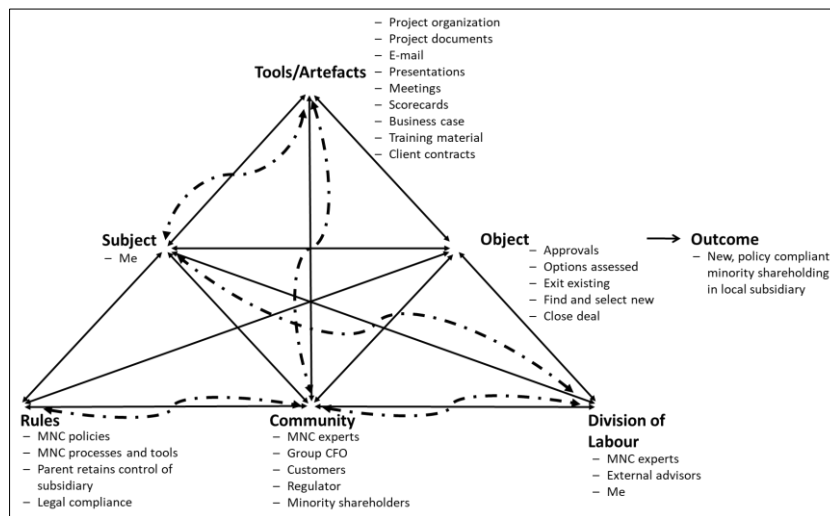


Figure 12: Tension 2 - Informing the uninformed

In the MNCs activity systems, scorecards are valuable tools to manage performance and to share information and knowledge. Scorecards depict progress towards targets, but in my experience, it is in the discussion around how to close gaps that emerge in the process to meet targets that knowledge is often transferred. Furthermore, scorecards are artefacts that span occupational community and labour boundaries in the activity systems in organizations where different communities rely on one another to achieve organizational targets. Therefore, I began to use the local subsidiary's B-BBEE scorecard in meetings to focus participants on the objective of my project. Unfortunately, I had to present two scorecards (Q, p.4). One was the current scorecard that reported results using the targets that were then in force, and the other a future scorecard that would mirror results for new but undefined targets that would be announced sometime later. The second scorecard was meant to show gaps to close in preparation of the new scorecard's implementation to replace the old scorecard that could be announced at any time. The announcement happened fifteen months after the B-BBEE Ownership project started (B-BBEE ICT Sector Council, 2016) which was about a month before my project had to implement the public policy. However, this ambiguity confused project participants who did not understand the policy's requirements as reflected in the two scorecards I presented. Therefore, the B-BBEE scorecard as artefact was not able to transfer knowledge in the way I hoped, and I realised that participants needed training on what the B-BBEE policy demanded and what the new codes were likely to require from the MNC in the near future. Furthermore, I faced the problem of deciding what form the training should take and what level of detail would be appropriate for participants from different organizational functions and occupational communities, some of whom were only involved in peripheral policy activities.

Drawing from experience where I had observed how knowledge can be transferred if one paired project participants to work on project tasks with knowledgeable experts, I asked the then B-BBEE advisor if they could work with MNC project participants and provide training material to those who needed in-depth knowledge of the policy. The advisor agreed (R) and I paired their consultants with MNC participants, as shown in later project organograms I prepared (Q, p. 2). I immediately scheduled workshops for joint project activities (L), but the B-BBEE advisor soon complained that MNC participants were unwilling to meet with their consultants to work on project actions. Again, the issue

of poor participant engagement surfaced, but this time it was due to the inability of the advisor's consultants to meet and work with MNC project participants at times that suited both parties. This tension was exacerbated by the lack of capacity of B-BBEE consultants from the advisor firm who had taken on too much new work, as shared with me in a private discussion by one of their consultants. Then, MNC participants complained privately to me that, where they did work with the consultants, the consultants were not very familiar with the new policy requirements and were unable to transfer knowledge. This confirmed my concern because I found it difficult to understand concepts in presentations by the B-BBEE advisor where they tried to explain different B-BBEE minority ownership options that the MNC should consider (R). Particularly, steering group meetings led to long discussions as we could not assess the implications of different options. Mostly, their presentations were too general, and I became concerned that it promoted a specific shareholder model as a solution (T, U) which would benefit the B-BBEE advisor because they had already spent time and money on an implementation method. Therefore, project steering group members and I became concerned that the B-BBEE advisor was not serving us well. This issue came to a head after presentations by MNCs who faced our problem of implementing B-BBEE ownership policy in the host country to members of my project's steering group I had arranged.

In the first presentation, my MNCs region CFO asked the presenter how important the B-BBEE advisor's contribution was to explain, investigate and recommend an appropriate ownership structure from those available under the B-BBEE codes. From earlier discussions I had had with him, I knew his concern was that our advisor strongly promoted one solution only (T, U), but despite me asking the advisor to present and consider all options, they did not (T, U). In his reply, the presenter said it was extremely important to consider all alternatives because decision-makers at "head office" who approve changes to subsidiary shareholding structures will ask the question. At the second event, a presentation by the local CFO of a MNC (V), it became obvious that our B-BBEE advisor was unable to provide the quality advice and guidance my project needed. This presentation impressed because it allowed the presenter to easily share the journey that brought them to a decision to implement a specific minority shareholding structure that met the policy rules and allowed the MNC to retain control of its local subsidiary. The presentation, prepared by their B-BBEE advisor, was of a quality and standard that explained difficult B-BBEE concepts and ownership alternatives, and it clearly outlined financial, legal and accounting implications for the MNC parent and its local subsidiary. The presentation demonstrated deep knowledge of the B-BBEE policy and its requirements, the implications for the business, and importantly, the change management needed for implementation. Immediately, we realised that this was the level of support our project needed. Also, project participants were impressed because it provided clear guidance to them of what the finance, accounting and legal activities and actions were that my B-BBEE Ownership project participants must deliver. As such, their presentation used technical language that expert participants in the project understood. This presentation was clearly a very useful artefact to transfer knowledge, unlike the artefacts our advisor produced. To my question, the presenter immediately recommended that we speak to their advisor, and readily admitted that their advisor had prepared the presentation he used. The following day, he sent me an e-mail with information of their B-BBEE advisor as well as the presentation (V) he used. I was now in possession of an artefact that contained information vital to share knowledge in my project's activity system, something the incumbent advisor could not do.

MNC project participants expected that our B-BBEE advisor should tell them what to do and why, with clear guidelines, but this did not happen. In one steering group meeting with the B-BBEE advisor in attendance, the head of the region's human resource function made it clear that members expected the B-BBEE advisor to "drive the process" to implement the policy. When I followed up with the B-BBEE advisor on this expectation, they referred to their proposal (W) that was accepted prior to me

becoming the project manager of the policy implementation. It was clear that they were only providing advice and that they did not have to deliver project activities. The classic problem of a misalignment in project scope and delivery expectations surfaced. Upon further investigation into how the agreement was accepted and the advisor appointed, I found that the process to appoint them was done in great haste and without following correct MNC procedure, as evidenced from the way the consultant's proposal was accepted (W). It was also done by people who did not know what was required to implement the B-BBEE ownership policy. Therefore, it was not surprising that expectations were not aligned. This situation was problematic, not only because my MNC was not getting value for the service it contracted, but also because non-conformance with MNC policies, processes, and procedures raises suspicions of negligence and impropriety, and I had to manage this tension between rules and community in the activity system of my project. This was because the non-conformance could lead to a situation where the motivations of employees in the subsidiary company could be questioned by the parent company, thereby causing further delays if the B-BBEE ownership project's activities were put on hold whilst investigations were done by executives in the parent company.

In summary, at this point I was concerned that my project would make poor recommendations that may lead to wrong and costly decisions for the MNC because we did not get the knowledge of the policy we needed. The only way to resolve this tension would therefore be to terminate the contract of the then B-BBEE advisor and replace them with a firm with a proven record. In this, I also had to ensure we complied with the MNC policies and procedures. As I focussed my attention on this action, the third tension in this period/action research cycle surfaced.

4.4 Tension 3 – Managing competing issues of policy and time

To replace the B-BBEE advisor and appoint a new one, I had to achieve two objectives. First, I had to terminate the advisor's contract. At the same time, I had to find, assess and appoint a qualified B-BBEE advisor very quickly. The pressure of time was brought on by the fast approaching project deadline of 31 December 2016 in the contract we concluded with an important customer (O), as I explained in the narrative of tension 1. In my haste to manage this process, tensions emerged in my activity system between me as subject and the rules of the MNC, the community and the labour I needed to execute actions, as one can see from the wavy lines indicated in my CHAT analysis in figure 13.

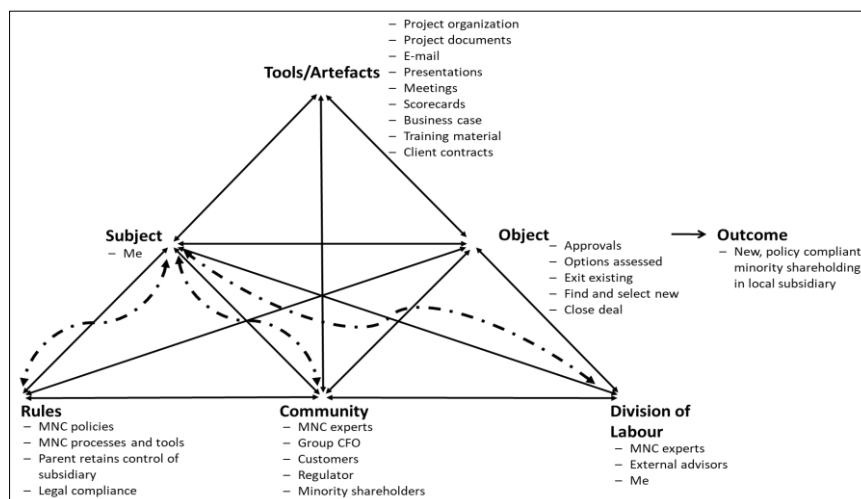


Figure 13: Tension 3 - Managing competing issues of policy and time

A principle I adopted when I accepted the challenge of my action research project was that it was important to ensure that I complied fully with the MNCs policies and procedures and that my actions were transparent. Therefore, I had to ensure that all MNC rules were followed, and that people with

the appropriate expertise and experience worked in my project. In this, I wanted to gain the trust of finance and legal project communities who worked in the parent company because they would advise the MNC executives who would make decisions and approve actions my project needed. From experience, I knew that trust in my project would be important because decision-makers would rely on information and advice my project provided. With the project's fast approaching deadline of 31 December 2016, because of the contractual obligation to a customer (O), any delays due to a lack of trust had to be avoided. However, I also knew that complying with policies, procedures and processes takes time in my MNC, and therefore I carefully and sometimes forcefully managed actions to resolve this tension. In this, I managed competing issues of policy and time.

To do so, I used my knowledge of the organization and its policies, processes and procedures and I sought the support of project steering group members to accelerate approvals and processes (X, Y, Z). For example, I met with the regional CFO and the local subsidiary country manager where I explained the problem we faced and what I needed to do. I asked for their approval and support of the actions I planned (Y). They agreed and instructed staff to work with me. In addition, they offered their help. I accepted this offer and immediately scheduled a meeting with the director of the incumbent B-BBEE advisor and the local subsidiary country manager, who also happened to be the head of the region's legal function. In the meeting, I outlined reasons for wanting to terminate the contract. As expected, the director said that they were not to blame for slow progress and that they had performed as agreed, but I was able to put forward our argument that they were not serving the project's needs. After some wrangling where the experience of the country manager and head of the regional legal function assisted greatly (X), the B-BBEE advisor agreed that termination would be advisable. With the help of the MNCs legal department, I prepared the terms of settlement (AA) and the contract was settled and terminated in less than two weeks. Pleasingly, my first objective had been achieved in surprisingly little time.

While I managed the contract termination, I started the process to find and evaluate a new advisor. Again, I engaged MNC communities and expert labour by using the MNCs procurement policies, processes and procedures. By now, everybody was alert to the contractual obligation we had to our customers and the business case for my project, and I used this to place pressure on individuals to work quickly through the MNCs processes and procedures. Where necessary, I instigated actions. For example, I prepared a specification (AB) which triggered a Request for Proposal (RFP) in the procurement process. Consequently, four global consulting firms already on the MNCs supplier list, the incumbent B-BBEE advisor, and the highly recommended advisor to the second MNC that presented how they managed to implement the B-BBEE ownership policy participated in the RFP. Of the respondents, two were invited to make representations (AC). One was a global consulting firm and the other was the B-BBEE specialist advisor recommended to us. Interviews were conducted by steering group members, including those from the group finance function based in the MNCs home country. This evaluation committee unanimously recommended the appointment of the B-BBEE advisor that was recommended to us (AC) because of their experience in working with MNCs, their well-developed and structured approach to implementation, and their competitive price. Also, the fact that the CEO of this firm would personally manage the assignment was comforting since a good rapport was built with him during the interview. While a typical supplier sourcing process in the MNC typically take months to complete, we managed this complex process in three weeks, in full compliance with the MNCs policies, processes and procedures. Again, I carefully balanced MNC policy rules and pressures of time and was delighted that my second objective had been accomplished in record time. In this, I was able to manage this third tension in my project's activity system.

Importantly, I could now go back and address the second tension of how to inform the uninformed because my project now had an experienced B-BBEE advisor on board. Not only could he assist me, but he was able to provide advice and knowledge to those who needed to advise decision-makers in the second period of my project, where we implemented the public policy. Also, the new B-BBEE advisor's methodology assisted project participants with their work to evaluate B-BBEE share ownership alternatives, as shown in the earlier presentation we had seen (V). Furthermore, he helped me to define key activities and actions that had to be completed in the second period of my action research project when a preferred minority ownership structure in the local subsidiary would be selected and implemented. At last, I felt my project had clear direction and could meet its deadline, now less than six months away.

4.5 Discussion

Where do you start when you have to manage a crisis of public policy implementation in a MNC when the rules are unclear? When nobody knows what to do, or when? How do you engage experts inside and outside the MNC who work in different organizations, settings and locations to resolve this crisis? Schofield (2004) suggests that you use bureaucracy in the form of policies, process, routines and its related tools and artefacts to implement policy. This is because bureaucracy eases the many social interactions that complexity of policy implementation brings (Schofield, 2004), thereby helping to coordinate and control activities. Bureaucracy enables cooperation by connecting people and building networks, and it promotes common understanding in organizations through routines used (Feldman and Rafaeli, 2002). Furthermore, in MNCs, bureaucratic routines help to coordinate tasks between occupational communities that hold expert knowledge (D'Adderio, 2008). By using this advice and using the established bureaucracy in my MNC, bureaucracy contributed to help me resolve the three tensions in this first action research cycle of my project.

For example, to engage the disengaged and start project activities, bureaucracy allowed me to create structures such as the project steering group through which I could get guidance, support and resources for the B-BBEE Ownership project. Here, I used routines and artefacts associated with the internal project process to good effect to actively engage senior executives as steering group members. The progression of presentations I used to show the project organization and project participant list demonstrate how an artefact from the bureaucratic routine of regular steering group meetings helped to share information, enabled engagement and became a mechanism through which I collected new information. This artefact, a PowerPoint presentation (C, D, E, F, G), was instrumental to create collective understanding amongst this group's members because it generated discussion and exploration. To resolve my second tension to source and transfer B-BBEE policy knowledge that would enable effective decision-making in the next period of my project, implementation of the policy, I used MNC bureaucracy to communicate policy targets through an artefact in the form of a scorecard (Q, p.4). Its failure and my next actions to find a more effective alternative, again using the MNC bureaucracy, helped me to realise at an early stage that the B-BBEE advisor was not making the contribution I needed and had to be replaced. Then, to resolve the third tension, I actively managed the termination of the previous advisor's contract and found and appointed a new advisor by using MNC bureaucracy and tools, in record time and in full compliance with the rules that these activities required. Here, by actively managing the legal and procurement processes and by complying with the MNCs procurement policy rules, I coordinated specialist labour from occupational communities in a transparent process that helped me attain levels of legitimacy amongst stakeholders and the project participants I needed to assist as we approached this project deadline. But what was the most effective way in which MNC bureaucracy served me in the organizing period of my project? It was through the creation of a simple, easy to communicate and easy to understand boundary spanning artefact.

As discussed, a major problem for my project was the low levels of attendance in project meetings and activities, and an intangible language artefact turned out to be very effective to engage those who were not interested in participating in my project. This artefact emerged when I articulated a business case that explained, simply and clearly, why it was in the interest of the MNC and project participants to implement this local public policy. By offering client contracts and the rules of the contract, where failure to implement the local public policy would lead to financial loss, an artefact was constructed that everybody in the MNC understood. In doing so, a commercial justification helped to focus participant attention. Project participants were drawn in by a narrative accompanying the business case that offered some job protection in an uncertain work environment, provided they helped the MNC avert financial loss through their contribution to implement the local public policy. Although the business case was abstract rather than concrete, as an artefact it spurred interest amongst project participants because it was adaptable to each participant's interpretation, possibly in a way Star and Griesemer (1989) foresaw. It became a model that communicated both ostensive and performative aspects of routines (Pentland and Feldman, 2008) and ended up shaping the routines used in this first tension I managed. The cognitive nature of the business case as artefact was therefore the key to change existing practices in this action research cycle of my project because it allowed debate and exploration in the project's activity system, a feature of artefacts observed by D'Adderio (2011).

Furthermore, the business case as artefact became a boundary object that conveyed meaning to project participants across occupational and community boundaries in the MNC because it enabled shared understanding and sensemaking for participants from different social environments who contributed to the project; it also formalised control over work practices which helped to form the foundation for legitimacy (Bechky, 2003a; 2003b) of my project. In this, my business case, which was easy to understand became a translator between the occupational communities and experts in the MNC who had to work together to start my project, perhaps in the way Carlile (2002) envisaged. Therefore, a business case as boundary object focussed actions and encouraged collaboration to get my project started. Specifically, this artefact formed the basis for common knowledge amongst project participants and others in the MNC (Carlile, 2004) and guided participant actions (D'Adderio, 2008). By formulating and presenting a business case that participants could understand and relate to, I helped participants to interpret, understand and plan their policy implementation actions. In doing so, I became a boundary spanner who enabled collective sensemaking in the formal and informal networks that exist to connect occupational communities in the MNC because I influenced understanding, thereby contributing to policy implementation as Siciliano, Moolenaar, Daly and Liou (2017) recommend. Therefore, the benefit of formulating and presenting a business case as artefact in my project confirms how artefacts as objects cross organizational boundaries because of its ability to share perspective and create common understanding (Carlile, 2004; Feldman and Rafaeli, 2002, p. 315; Star and Griesemer, 1989). This theme emerged again, as I found in the second period of my project, where I had to make the business case tangible and deliver a far more complex financial model of my project's business case.

In the telling of my story of how I negotiated the first tension in the organizing period of my project, I mentioned the guidance I received from the region CFO. He suggested that I should include important members of the parent company finance function in the project steering group and involve them in project activities. By doing so, it assisted my project because it allowed those participants to reduce the information asymmetry that existed at the time. The information imbalance came from the B-BEE Ownership project steering group, participants and me who lived and worked in the local subsidiary's country and who understood the context that caused the policy, and the lack of understanding by those who did not. These are typical problems that MNCs face due to trust and legitimacy issues from their institutional duality (Kostova and Zaheer, 1999) and multiple

embeddedness (Meyer, Mudambi and Narula, 2011) which emerge because the MNCs corporate strategies are challenged by demands from external authorities such as governments and institutions who regulate business practices of local subsidiaries. A senior manager from the group finance function's question of why they the MNC parent company should offer up to 51% of the local subsidiary company shareholding to local investors and risk losing control of its operations (JEPD1, 17 September 2015) and the discussion that followed elevated this problem. In MNCs and their subsidiary operations, the parent and local subsidiary have an agency relationship where authority to act is delegated to the subsidiary by the parent company, and tension arises because of efforts to manage opportunistic agent behaviour and to address problems of information asymmetry (Jensen and Meckling, 1976). Furthermore, subsidiary-level agency relationships in MNCs can be problematic due to subsidiary self-interest and bounded rationality problems (Kostova, Nell and Hoenen, 2016). Essentially, agency problems have trust problems at its core, and this can be alleviated by providing enough information to limit information asymmetry. The inclusion of the finance team from the MNC group office was therefore a useful strategy because I could reduce information asymmetry, limit bounded rationality problems, and build trust to help manage the agency problem that typically exists between parent and local subsidiaries in a MNC. The request of the local country manager and head of the regional legal function to include external legal counsel in the project steering group (JEPD1, 22 September 2015), a trusted service provider he worked with often and trusted, may also be indicative of him being careful to trust me and project participants only. Here, the suggestion to accumulate and exchange social capital from social interactions (Burt, 1992), and how it can be used to increase trust amongst project participants who work across organizational boundaries (Kostova and Roth, 2003) was useful. Especially, the social interactions that followed after I included the group finance and legal community in my project's steering group and project activities, for example by getting them to assist in the evaluation and selection of a new B-BBEE advisor (AC) as I resolved the third tension in this period of my action research project, helped to build social capital and improved trust across the distance that separated the parent company and local project participants, as I found in the second period of my project.

4.6 Moving forward

With my project finally active, what did I learn from this first action research cycle, and how can my identification of events and assessment of patterns at various levels in my process data, as Langley (1999) suggests, help me manage the second action research cycle of my project? First, I realised the value of using MNC bureaucracy and its policies, procedures, processes, routines and artefacts to manage a legitimate and transparent project because it helps to coordinate activities and is therefore efficient. Next, I learnt how important good artefacts are to help participants make sense of policy requirements and how it conveys meaning across occupational boundaries, thereby helping to get the levels of engagement from project participants I needed. And finally, I recognised the importance to build trust through good relationships amongst project participants because it eases social interactions when people contribute their expert labour from their occupational community in the MNC, thereby alleviating the typical agency problems of information asymmetry and bounded rationality. Chapter 5 will reveal if I used this advice and if it was helpful to my project.

5 PERIOD/ACTION RESEARCH CYCLE 2 – IMPLEMENTING

Figure 14 positions the implementation period in the lifecycle of my project and presents the tensions I identified using CHAT as action research modality. As before, my process research narrative of how I managed each tension provides the data for my CHAT analysis in this chapter.

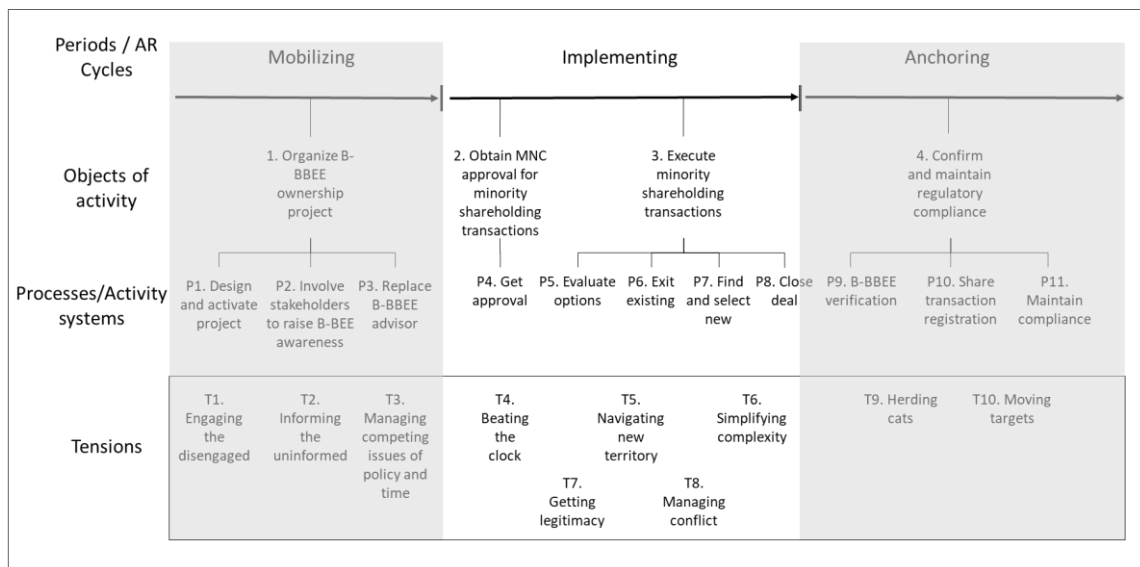


Figure 14: Period/action research cycle 2 and tensions identified

5.1 Introduction

Following the organization period of my project, the pressure on me and my project became intense as I now had less than six months to implement a new B-BBEE ownership structure in the local subsidiary. At least, I now had the support of more committed colleagues who had a much better understanding of the B-BBEE policy, and we had an experienced and professional B-BBEE advisor to guide us. In a perfect world, I would have managed project implementation activities and actions one after the other, in the sequence of five processes I present in Figure 14, but of course this was not possible as we sprinted towards this period's deadline of 31 December 2016. As in the first period of my project, many activities and actions happened simultaneously. In the first process, my project needed approvals from the parent company to repurchase shares from existing minority shareholders and to sell a larger number of shares to new B-BBEE shareholders. A second process evaluated different ownership options. In the third process, we had to repurchase shares of the local subsidiary from existing minority shareholders. For the fourth process, my project had to find, evaluate, select and offer the minority shareholding to a new minority investor, and manage the sale of shares. Finally, we had to register the new minority share transaction (B-BBEE Commission, 2017) before the authorities in the host country closed their offices for the holiday season.

Therefore, as I immersed myself in coordinating activities and actions, I again found myself the subject of my project's activity system who managed many tensions that unfolded. Of these, five tensions stand out, as I explain in my account of what happened during the implementation cycle of my action research project. Again, note that references to digital data in my narrative and discussion are assigned a letter or letters in the alphabet, explained in Appendix 2, and my journal data references are designated JE, explained in Appendix 3.

5.2 Tension 4 – Beating the clock

The slow start when I organized my project meant that the timeline for implementation of the B-BBEE policy in the MNCs subsidiary was much shorter than I wished. With every passing day, I was aware of the clock ticking. We had to move and move fast. Furthermore, I faced the problem that project participants who worked in the northern hemisphere traditionally take long summer vacations whilst participants from the southern hemisphere where the subsidiary is located typically took their leave in December. Furthermore, the authorities who registered share transactions in the host country closed their offices early during the vacation season, and we lost nearly three weeks on the project’s timeline as a result. Such additional complications made me feel hemmed in from all sides, a bit like someone running down a narrowing tunnel where the door at the end was closing, as I pushed myself and participants to complete actions and activities in time for us to meet the deadline in this period. In this race against time, I not only once more had to actively and forcefully manage competing issues of time and policy in the MNC, but I had to manage actions and activities of external project participants who provided legal, financial and accounting advice to my project. Consequently, it was inevitable that tensions would arise between me as the subject in my project’s activity system and other activity system elements of rules, communities, and the division of labour. As in chapter 4, these tensions are indicated as wavy lines in the schematic from my CHAT analysis in figure 15.

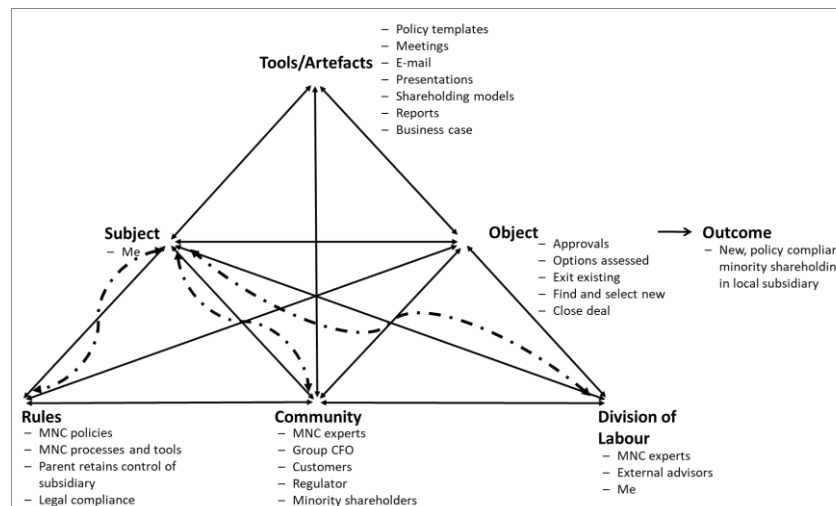


Figure 15: Tension 4 - Beating the clock

Because we had to be fast out of the starting block at the start of this race against time, tension arose when I had to find out what the rules for the implementation period were, what actions we had to perform, and who to involve. I started by searching for the MNC policy that regulated the sale and reacquisition of subsidiary company shares and tension surfaced between subject and rules in my activity system, as the wavy line in figure 14 shows. Finding the rules turned out to be a challenge as I could not locate the policy document on the MNCs intranet. I then turned to project participants for guidance and they told me to search for the “mergers and acquisitions policy”, but still, I could not locate the document. Eventually, participants from the group office mailed the policy to me and I realised the policy was titled “Acquisitions and Divestments (“M&A”)” (AD). Furthermore, the document was filed as “Group Directive for MA decisions” (AD), which explains why it was difficult to locate. This was not a good start because time was lost, and pressure kept building. Once I had the policy, I was able to identify the MNCs approval hierarchy, essential knowledge to ensure compliance. Next, I looked for guidance on the actions we had to complete to satisfy the information needs of those who would give approval, only to discover that the MNC policy (AD) did not describe the rules for the sale or repurchase of shares in its subsidiaries. Instead, it had guidelines on how to deal with

the acquisition of new businesses and explained what to do when my MNC sold parts of its business. Consequently, the MNC policy offered little help to my project and I again asked project participants from the group finance and mergers and acquisitions units for advice. They suggested that I had to start by filling in a so-called “one-pager template” (AE), which they sent to me. This document summarised key information that approvers needed. I was pleased to receive the template, but the slow process of getting the information I needed from the community of experts at the group office introduced the second tension in my project’s activity system, between subject and community, as the wavy line in figure 15 indicate. This was because I was frustrated with this unnecessary delay and for having to rely on others who had the information I needed.

Once I received the one-pager document (AE), I could see why this artefact was the key deliverable for the implementation period of my project because it summarised important commercial information needed by approvers. Therefore, in my project’s activity system, this document turned out to be the critical artefact to help mediate tensions between activity system elements. Accordingly, I had to make sure it captured enough detail and provided answers to ease decision-making and approval actions. However, the one-pager template (AE) contained four simple but ambiguous headings. For instance, a heading like “benefits to ...” (AE) does not specify what is required, be it direct financial benefits, softer measures such as client satisfaction, meeting regulatory demands, or more. I could write an essay on the benefits to my MNC if it implemented the host country’s B-BBEE ownership policy, for example. Therefore, the one-pager template did not give clear guidance on what information my project had to supply and the level of detail MNC approvers required. What was more concerning was that my MNC rules were not clear, and therefore, my project had to define the rules. This unexpected challenge caused tension between me as subject and the rules in my project’s activity system. This meant that I had to find unwritten or hidden rules in the MNC that governed the sale and reacquisition of shares in its subsidiaries or define those. Furthermore, if we wanted to beat the clock, I had to find a quick way to develop the new rules the MNC policy for divestments and acquisitions lacked. Therefore, I decided to use a trial and error approach to collect the hidden and unrecorded information my project needed.

Consequently, I decided to gradually populate and build the one-pager template by adding whatever information I had, however imperfect, and sending it to project participants from the group office’s finance and merger and acquisition units for comment and suggestions. In weekly meetings with group office experts I noted new requirements and added those to create a more comprehensive template, as evidenced from the notes in my journal after each meeting (JEBMD, 1 July 2016, 20 July 2016). In those meetings, we reviewed the latest template I prepared and some of the discussions went into great technical detail, for instance our discussions on legal (JEBMD, 13 July 2016, 23 August 2016), financial, taxation and accounting concepts (JEBMD, 17 August 2016; JEBD, 25 October 2016). In these and other meetings, I learnt about issues that were important to the MNC but not explicitly stated, for example the need for the parent company to retain control of the local subsidiary (JEBMD, 13 July 2016, 17 August 2016), and for new shareholders to meet corporate compliance standards (JEBD, 28 October 2016). With such new knowledge, I would then change the draft template and start the cycle again until eventually a sufficiently comprehensive and detailed document existed. Senior managers in the MNC reviewed these later versions of the template and they would suggest further improvements. Through this process, I not only uncovered hidden knowledge and made it explicit, but it helped me to test if the artefact we were building would meet the expectations of different communities in my project and the MNC. Eventually, many draft versions later, official versions A to G of the one-pager document were created (AF, AG). Although laborious and slow, this action helped to manage the tension between me and the MNCs rules as hidden requirements became clearer and we constructed the quality artefact approvers needed. Through this action of mine, I also managed

the tension between subject and community as I succeeded to get the group office community to actively participate in project actions. This tactic seemed to improve working relations and participation in my project, as evidenced by the high level of attendance at meetings, as I noted in my journal (JEBMD, 13 July 2016; 20 July 2016). In hindsight, this process through which I collected and captured the unwritten rules my project needed simulated succeeding action research cycles as each iteration involved a process of identifying issues, planning action, taking action, and evaluating action, in the manner suggested by Coghlan and Brannick (2014). Therefore, these mini-action research cycles which enabled evolution of a key artefact in my project can be visualised as in figure 16.

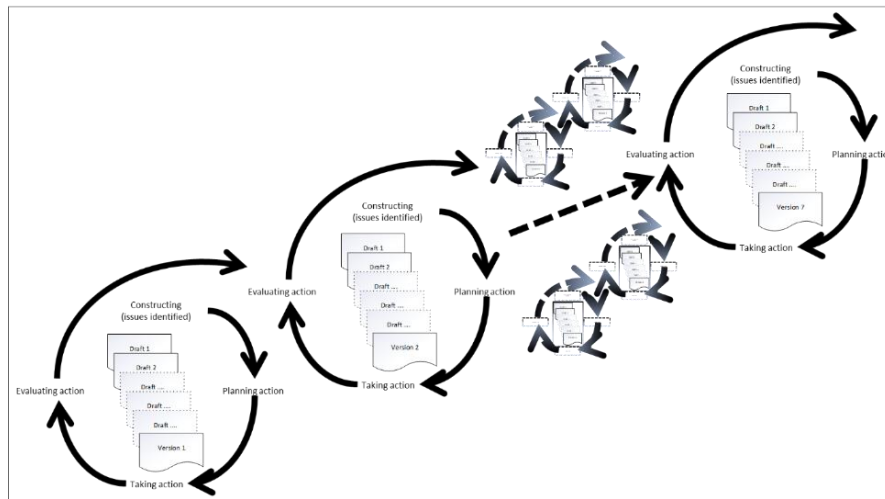


Figure 16: Development of a key artefact through successive action research cycles (adapted from Coghlan and Brannick, 2014)

By collaborating with key stakeholders and gradually constructing my project system’s key mediating artefact in this action research cycle of my project, I was also able to facilitate the tension in my project’s activity system between subject and division of labour, shown as a wavy line between these two elements in figure 15. Here, tension arose as I needed quick actions from expert participants. As I uncovered new requirements, I could more precisely define actions and outputs that project participants had to deliver, as evidenced from my “To Do” lists in my journal (JEBMD, 13 July to 5 September 2016; JEBD, 7 September to 7 December 2016). In addition, through this learning process in meetings, I was able to identify important actions my project had to deliver. For example, I soon realised we needed to establish the economic value of the local subsidiary so that we could determine the price of its shares, and hence the value of the share transactions for which we needed approval (JEBMD, 20 July 2016). However, this new requirement caused a new tension in my project’s activity system, this time between me as subject, MNC rules and the accounting firm who had to value the local subsidiary company.

Tension between subject and rules came from me having to use the MNCs procurement process to appoint the accounting firm, but as I explained in Chapter 4, this process can be slow. Fortunately, having learnt from the organization period of my project how to actively manage the MNCs procurement policy, processes and procedures, I used my new knowledge to rapidly move the process along and a firm was appointed shortly after I started the process. Again, by actively managing the MNC bureaucracy I eased this tension relatively quickly, but my good fortune at gaining some time did not hold because the group office wanted to assess the impact of a change in the local subsidiary’s commercial model that would affect its future revenues. As a result, the accounting firm now had to perform two valuations of the local subsidiary, one for each model the group office wanted to evaluate

(AH). Consequently, pressure built between subject and the division of labour in my project's activity system as I needed the economic valuation for the many project actions that required this information. However, there was little I could do to speed up this activity as valuations of this nature takes time to complete. Instead, I decided to complete as much as possible of the one-pager template. When the valuation activity was complete, I would add the transaction values. Consequently, by the time the price of a share in the local subsidiary was available for the two scenarios, the one-pager template was largely complete, and it was a simple task to add the price information. We now had about two weeks left before the new shareholder transaction had to be completed, and I was pleased to present the final recommendation and the price of the share transaction (JEBD, 22 November 2016), which my MNC CFO approved (AI). In managing this issue, the versions of the one-pager template I created (AF, AG) turned out to be the key mediating artefact that helped me to manage the tension between rules, communities and division of labour in the activity system of my project as we raced towards the project deadline in this period. In the end, the one-pager template was instrumental to my project's success in this period as it helped me to orchestrate activities and actions and share information across organizational boundaries

Finally, I knew from experience that approvers in the MNC hierarchy typically delegate actions to subordinates because of their workload and limited time. Therefore, these delegees effectively become gatekeepers who could delay approvals if they are not adequately informed or equipped to relay information to their superior. Thus, I had to work with this informal, hidden network if I wanted to prevent a delay in the final approval process. However, to uncover this informal network proved challenging and created tension between me as subject, the community and the division of labour in my project's activity system, as indicated in figure 14. Frustratingly, I was only able to uncover the hidden network when I received an e-mail (AJ) from a project participant from the group finance function asking for a risk analysis on what would happen if the MNC halted the policy implementation. This happened about three weeks before we were due to conclude the new B-BBEE minority share transaction. The e-mail mentioned discussions with several senior MNC group office executives whom I did not know, but who were clearly part of the hidden network I was looking to uncover. Also, in my journal I did record the names of individuals who were part of the hidden network, for example the name of a senior manager who directly advised the MNC CFO (JEBD, 22 November 2016), but at the time I did not realise the importance of this information because I was too busy attending to other matters. In addition, the e-mail I received (AJ) revealed that a senior finance manager in the host country was part of the informal network of CFO advisors. It was frustrating to find out at this late stage in my project's implementing period that I could have involved him earlier, but with the deadline so close I hastily arranged a discussion with this individual where I outlined the risks if the B-BBEE policy implementation was stopped. He then informed the hidden network and they agreed that my project must continue. Fortunately, this action helped to manage the tension between subject, community and the division of labour in my activity system as I could engage a key member of the hidden network directly. Therefore, my project managed to beat the clock and we registered the new shareholding just in time to meet this project deadline.

5.3 Tension 5 – Navigating new territory

In its global operations, my MNC has legal entities in many countries and typically owns all the shares of those local subsidiaries. Therefore, selling shares in local subsidiaries happens rarely and only in exceptional cases, as I confirmed in e-mails and meetings with others in the MNC (AK; AL). In fact, at the time there were only three other subsidiaries where small local minority shareholdings existed. Since this happened seldom, it is no surprise that detailed rules for MNC divestment of its subsidiaries were not well developed and my project therefore had to navigate its way through unknown territory. The absence of rules in the MNC policy to guide my project caused tensions in the activity systems

between me as subject, MNC experts who worked in the project, and the object, as I indicate in the wavy lines in figure 17.

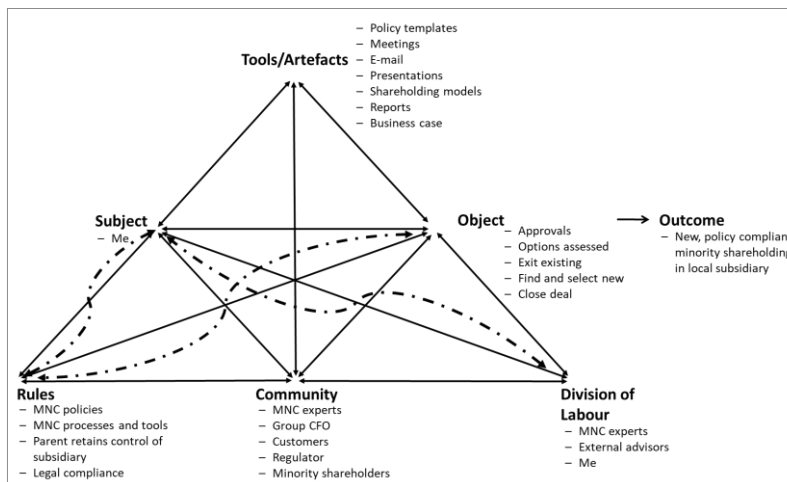


Figure 17: Tension 5 - Navigating new territory

Thus, to resolve the tension between subject and rules and rules and object, I had to create new rules to guide project participants in their actions. However, the challenge was where to start and what to do. Fortunately, the new B-BBEE advisor and the external legal counsel we employed were able to support me, and I created a B-BBEE policy document (AM) which captured important principles and rules for B-BBEE ownership in the local subsidiary of the MNC. As before, I involved important project stakeholders and participants by asking them to review and comment on the local policy document I created, and I slowly developed the rules the MNC policy lacked. Furthermore, this artefact became a repository of important decisions in my project. For instance, it made clear that the local subsidiary wants "... to ensure true "broad-based" participation by investors in the company." as opposed to "... a "narrow base" of a few Black investors ..." (AM, p.1). By developing rules for my project, I helped to diffuse the tension between subject and rules in this activity system and it became a guide to help my project navigate its way through the unknown.

Also, I was now able to build artefacts to guide the actions of project participants, thereby managing the tension between subject and division of labour in the activity system. For instance, I was able to construct a checklist to assist decision-making in workshops where participants had to choose between different B-BBEE ownership options. Although the checklist was useful to uncover the MNC parent company's preferences for a minority B-BBEE shareholder and structure in its local subsidiary, it formed the foundation for my project to recommend a shareholding structure and to identify a preferred shareholder in the local subsidiary. Figure 18 shows the checklist, with relevant detail redacted to maintain anonymity.

REASONS FOR EQUITY OWNERSHIP TRANSACTION		POTENTIAL 'BLACK' SHAREHOLDER OPTIONS	
Question	Conclusion	Question	Conclusion
Do we need to raise more equity / need cash? (See p. 11, 12, 13 of B-BBEE advisor presentation)	No. Subsidiary is funded by parent company, our holding company.	Do we know of Black individuals who could make a direct investment (i.e. cash - no loans to fund transaction)?	No, not at this point.
Do we want to help current investors in MNC realize value from selling their publicly listed shares? (See p. 1 of B-BBEE advisor presentation)	No. MNC Group shares are listed on NASDAQ. Subsidiary is not listed. This is not an action.	Do we know of Black Families or their Trusts who could make a direct investment (i.e. cash - no loans to fund transaction)?	No, not at this point.
Is SCR in danger of not being an "Empowering Supplier"? (See p. 14 of B-BBEE advisor presentation)	No. This exists, but we actively monitor and take action to ensure subsidiary maintains "Empowering Supplier" status.	Should we reconsider an Employee Share Ownership Programme for Black subsidiary employees management and staff?	Yes. This is an option. We will confirm MNC's view (person leads the action) and we will build a model for South Africa (person takes the action). Unlikely?
Is there a strategic opportunity to acquire assets/customers or reduce competition through the purchase of a competing business? (See p. 14 of B-BBEE advisor presentation)	No, not at this point. In subsidiary country.	What is our appetite for setting up an Education or Community trust? Which do we prefer?	Subsidiary prefers an Education Trust.
Do we want to realize some value or reduce the risk associated with our current Equity Investment? (See p. 14 of B-BBEE advisor presentation)	No, not at this point. MNC does not envisage exit from host country at this stage.	Should we consider funding from Commercial Investors (Seed Funders, Angel Funders, Venture Capitalists, Private/Corporate Equity Funds)?	No, not at the moment.
Do we want to exit the business in host country? (Full Exit)	No. It is always an option, but not MNC's tradition.	Are there Trade Partners that can provide funding?	No. MNC wants to maintain its independence as a "neutral" supplier. Also, no appetite that we have at the moment can provide funding.
Is there pressure to secure Black Ownership related BEE points?	Yes. We signed an undertaking with customers to secure >30% Black Women Ownership. Customer wants >51% Black Ownership.	Should we consider applying for EEP approval from DTI?	No. The cost of EEP may be prohibitive and negotiations with the Department of Trade and Industry (DTI) is likely to be protracted.
Do we want to move cash from host country to an off-shore destination? (See p. 9 of B-BBEE presentation)	No. Subsidiary does not hold cash. At this point.		
Do we see a transaction as "business value adding" or a "SCIP" contribution? (See p. 10 of B-BBEE advisor presentation)	Business value adding, but SCR goes with this. MNC always acts as a responsible corporate.		

Figure 18: Redacted version of checklist (AN)

Another important artefact I constructed was an assessment matrix (AO) to guide the selection of a minority shareholder in the local subsidiary. An accounting firm we used also used this matrix to guide their independent assessment of my project’s findings and recommendations. In the matrix, I listed familiar commercial criteria including the results from a review of public information of potential shareholders, confirmation of their legal standing, a review of their finances, and other evaluation standards. Figure 19 is an extract from the document, again redacted to maintain anonymity.

Criterion	Issues to consider	Rating			Comments
		Yes	No	Don't know	
Due diligence - Public Records review	Were any concerns identified?				
	Do the trust deeds meet MNCs requirement for BBEE (i.e. are the beneficiaries Black Women)?				
Legal review - Trust deeds	Do the trust deeds adequately govern ethical behaviour of trustees / Do the trust deeds prevent abuse by trustees?				
	Are the trusts registered by local authorities?				
	Did the trusts disclose any pending litigation?				
Trustee interests	Did the trustees declare interests in other companies/business?				
	Are trustee interests affiliated with MNC subsidiary competitors, political or religious interests?				
Financial	Are audited AF5 available?				
	Are investments disclosed?				
	Were we given permission to speak to auditors?				
	Are there investments that raise concerns?				
	Are there loans that raise concerns?				
	Are there expenses that raise concerns?				
	Has bank information and statements been provided?				
Business Model	Are bank balances positive (in credit)?				
	Is the "business model" of the trust clear?				
	Does the "business model" of the trust meet MNC subsidiary's requirements (i.e. are benefits managed for Black Women to study in the MICT industry)?				
	Do we understand the trust investment strategy?				
Taxation	Do we understand the trust's governance structures?				
	Is the trust registered as a PBO?				
	Has a tax clearance certificate been provided?				

Figure 19: Redacted version of assessment matrix (AO)

Furthermore, since this artefact listed actions and familiar concepts, it helped to calm tensions in my activity system between subject and division of labour because it clarified what participants had to do and what they had to consider when they performed their assessment. Critically, it also assisted my project to confirm the credibility of the work we did when a senior manager from our group office insisted on an independent evaluation of our work, as I noted in my journal (JEBD, 28 October 2016). Fortunately, the independent evaluation reached the same conclusion as my project. Therefore, my actions to identify and capture rules that did not exist therefore not only helped us to complete our tasks on time, but it gave credibility to our work and assisted my project to get the approvals we needed to implement the B-BBEE ownership policy. Also, the artefacts I developed were efficient because it guided important decisions and recommendations. Consequently, the new rules and artefacts I developed helped my project and my MNC to navigate new and unknown territory and assisted us to meet the project deadline in this period.

5.4 Tension 6 – Simplifying complexity

Because my project dealt with complex public policy, financial, commercial, and legal concepts, it introduced another significant tension in the implementation period of my project. This was to find ways to communicate and transfer complex information and knowledge to MNC executives and project participants who had to make decisions, but who had limited time due to their workload. This problem exposed tensions in my activity system between me as subject and the tools or artefacts we used to transfer information and knowledge to the communities who needed this, again indicated through the wavy lines in figure 20.

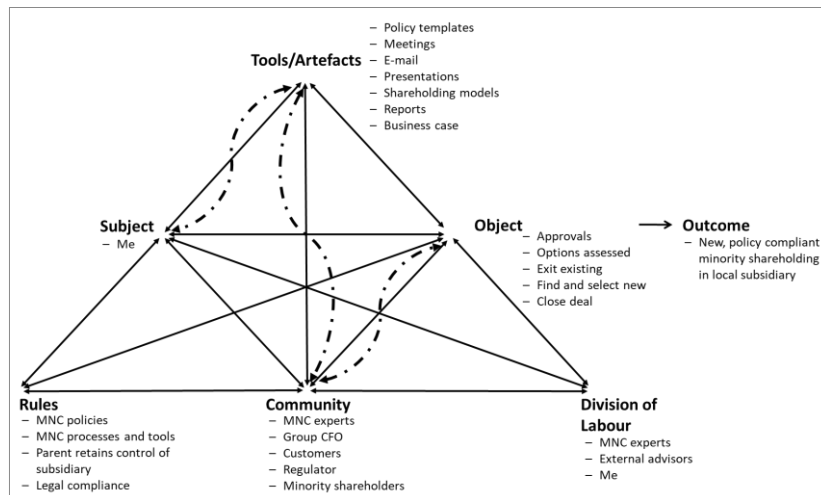


Figure 20: Tension 6 - Simplifying complexity

From reading widely about the B-BBEE policy requirements for ownership, I knew that there were many complexities to understand before effective decisions could be made. Furthermore, decisions to implement the B-BBEE ownership policy would have significant legal, financial and other commercial implications for my MNC. Therefore, tension in my project’s activity system developed between me as subject and the many knowledge artefacts available to me. Similarly, tension developed between communities who needed knowledge and the complex information artefacts available to them in my project’s activity system. With this awareness, I realised that I had to find or build simple knowledge artefacts that effectively translated complex B-BBEE policy requirements, ideas and concepts. Furthermore, such artefacts had to retain its explanatory ability regardless of how it was shared in the MNC and it had to include terminology that occupational communities and MNC experts recognised. Without this, my project faced the risk that the approvers in the activity system’s community could delay the project as they sought clarification, and the object and outcome of my activity system would therefore not be achieved.

An opportunity to develop a valuable information artefact came when my project had to assess B-BBEE ownership options and make a recommendation to the MNC. A suggestion by the regional CFO to build a “decision matrix” as noted in my journal (JEBMD, 29 June 2006) prompted me to construct a simple decision tree that guided the process to choose the best option for the MNC and its local subsidiary. This artefact was effective because it was visual, easy to explain and debate, and easy to transfer amongst different forums in the MNC, as figure 21 shows.

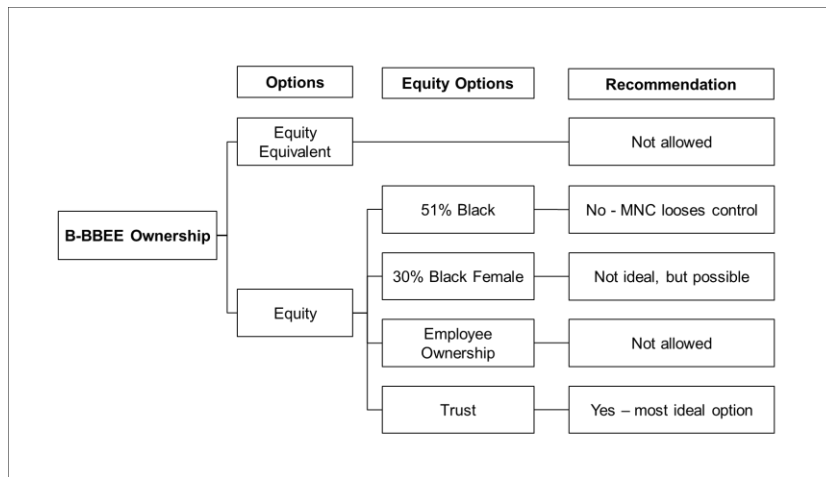


Figure 21: Information artefact to simplify complex information (AN, p. 4)

Ultimately, this artefact successfully managed the tensions between subject and artefact and community and artefact in the activity system because it explained complex detail in simple technical language that decision-makers understood, and it assisted my project to agree on a preferred B-BBEE minority shareholder structure we could recommend to the MNC CFO.

Another valuable information artefact we developed to simplify complexity in my project's activity system was a model to demonstrate the effect on my MNC of the share divestment in the local subsidiary. Since my MNC wanted to retain control of its local operation, a key consideration as I noted in my journal (JEBMD, 13 July 2017), it was necessary to evaluate how a share divestment would affect its ability to govern its local operation. Again, this artefact visually presented complex information and was easy to share. By adding familiar technical terminology, this picture not only supported decision-making in my project, but also addressed other information needs from occupational communities, for example by informing understanding of how the local subsidiary's financial results would be consolidated in the MNCs financial statements. By constructing a simple picture that presented complex information, in figure 22, this information artefact helped to manage the tension of making complex information easy to understand and transfer.

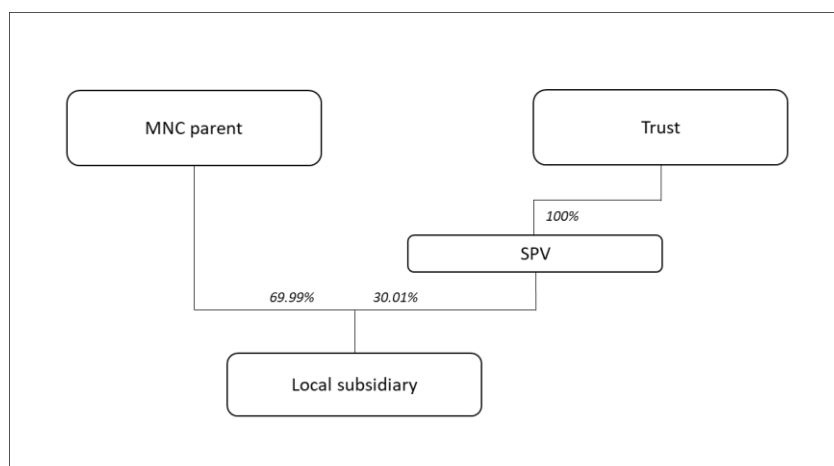


Figure 22: Visual display of complex information (AP)

Then, as in the first period of my project, a simplified business case showing costs and benefits to the MNC and its local subsidiary of implementing the B-BBEE ownership policy became a knowledge artefact that eased understanding and spurred action. In building the business case, I constructed a

detailed financial model to show costs and benefits of implementing the B-BBEE ownership policy in the MNC (AQ). This model included many variables, for example cost estimates, assumptions on growth, inflation rates, exchange rates and many other factors extending ten years into the future, but this made the business cases complex and difficult to share. Therefore, I had to simplify the business case if I wanted to transfer important information and knowledge quickly and effectively. As before, I collaborated with important project participants to test their understanding as I simplified new versions of the business case and gradually, a simpler model emerged. Instead of having many variables in a complex model that were difficult to explain, the eighth and final version contained a few key financial indicators such as revenue projections, immediate and future costs and benefits to the MNC and its local subsidiary (AQ). This was much easier to understand, and this artefact became instrumental to manage a difficult situation when my MNCs regional executives responsible for the local subsidiary’s operations questioned the benefit to the MNC (AR). I promptly supplied the answers they needed, and this important community thereafter strongly supported my project.

5.5 Tension 7 – Getting legitimacy

When my project started, I noted in my journal (JEPD1, 17 September 2015) that project participants who did not know me and who lived in my MNC parent country may be concerned if my project steering group and I truly served the interests of the MNC. Obviously, self-interest could drive us to make recommendations that helped us to secure our positions in the organization and to protect our employment in the host country. Since participants in the parent country had no understanding of complex B-BBEE policy requirements and were removed from the local context, this situation caused tensions between activity system elements of subject, this community, and the tools and artefacts the project provided, shown in the wavy lines from my CHAT analysis in figure 23.

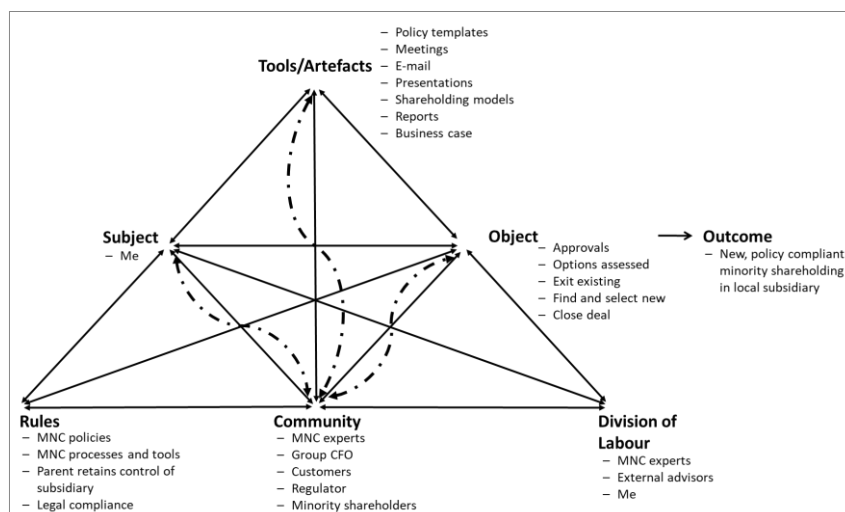


Figure 23: Tension 7 - Getting legitimacy

Consequently, I realised the group office needed independent confirmation of the validity of my project’s actions and our recommendations to the MNC. To achieve this, I shared the B-BBEE advisor’s high-quality reports and presentations (AS; AT) with them, and I used it to explain technical, financial and legal complexity the B-BBEE ownership policy introduced to our MNC. Similarly, reports from external legal counsel (AU) and from the independent accounting firm (AV) that assisted my project were valuable. Clearly, these independent knowledge artefacts were needed to comfort the MNC group office community, as I noted in my journal and in an electronic message (JEBD, 28 October 2016; BC) when I reflected on the request from them to have an independent evaluation of my project’s

final recommendation for a preferred B-BBEE shareholder (AW), something I discussed in my narrative of tension 5 earlier.

This need for my project’s work to gain legitimacy was again confirmed when a senior finance manager from the group office wanted to present recommendations from my project to his manager. He specifically asked that I request the information from our B-BBEE advisor (JEBMD, 22 June 2016; BC). Although I had already prepared the material he needed, I realised he was in a difficult situation because he admitted to me that he was “nervous” to do the presentation, as I noted in my journal (JEBMD, 22 June 2016). I therefore sent him the material he needed when I received it from the B-BBEE advisor (AT). This set him at ease and thereafter, he regularly asked for “two or three slides” from me whenever he prepared for B-BBEE presentations he had to make (JEBD, 28 October 2016). Later, he started sharing his own presentations with me, and my external project participants’ material featured prominently (AX). Furthermore, I invited the project’s external advisors to participate in project meetings where their expert opinions added legitimacy as they clarified difficult concepts to group office participants. Although their involvement meant I had more complexity to deal with to coordinate actions in my project, it was worth the effort because it became noticeable that this community increasingly consulted me and other local project participants as my project progressed, as trust between us was being established. Therefore, independent, good knowledge artefacts of external participants enabled the legitimacy my project’s activity system needed. By gaining legitimacy, tensions between subject, community and object in my activity system eased and my project was able to obtain approvals for our actions as my project worked to implement the public policy in my MNC.

5.6 Tension 8 – Managing conflict

Conflicting stakeholder interests introduced a last but significant tension to my project’s activity system in the implementation period. These conflicts came from communities within and from outside the MNC who made demands that opposed the principles for B-BBEE ownership my project had developed (AM). Consequently, it introduced tensions from contradictions between activity system elements of community, me as subject, MNC experts and the realisation of our object, as in the wavy lines in figure 24.

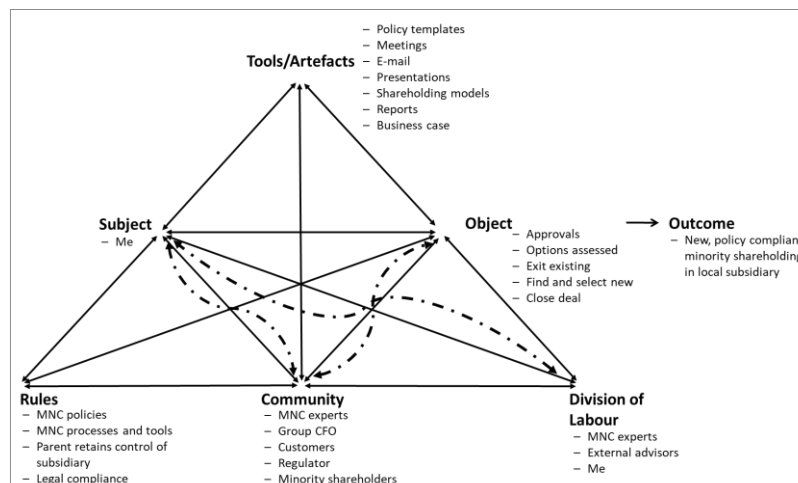


Figure 24: Tension 8 - Managing conflict

The external community who brought conflict was a client who wanted my project to implement their preferred B-BBEE minority shareholder structure. If we accepted their request, my MNC risked losing control of its local subsidiary, and we would not adhere to the principles for a minority B-BBEE

shareholding (AM). I became aware of this client demand when an account manager forwarded a meeting invitation from the client to me (AY). I explained to the account manager that this risk was unacceptable, as I noted in my journal after meeting with her (JEBMD, 7 June 2016). Thereafter, the account manager contacted the local country manager and said my MNC could be "... disqualified for future business" (AZ). Consequently, conflict from an internal community was introduced in my project's activity system because the MNCs sales team wanted my project and project participants to agree to the customer's request. This would benefit them because they could maintain their relationship with the customer, and they hoped to secure future sales. Therefore, to manage this tension, I agreed to attend the customer meeting. The meeting was difficult because the customer's representatives were hostile as they openly questioned my MNCs ability to implement the B-BBEE ownership policy. In fact, some of their attendees laughed when I stated we would deliver a new B-BBEE compliant minority ownership structure by 31 December 2016. They said that "it is impossible to do that by the end of the year", as I noted in my diary (JEBMD, 8 June 2016). Of course, I was pleased to prove them wrong. After this meeting, I made a point to inform the sales team of the progress my project made as we implemented the B-BBEE ownership policy. This action and my refusal to compromise on the rules that my project had developed assisted me as I managed this tension in my project's activity system.

5.7 Discussion

I delivered the object and outcome of the activity system of my project's implementation period exactly on time when legal agreements were lodged for registration with authorities in the host country minutes before they closed offices in December 2016. In this, we achieved what many considered impossible. In less than six months, my project received MNC group office approvals for two share transactions in the local subsidiary company, we bought back shares from existing minority shareholders, confirmed the most appropriate B-BBEE minority ownership structure in the local subsidiary, and we concluded the sale of shares to a new B-BBEE investor. Throughout, my project followed MNC rules and, where rules did not exist, my project created new rules. Furthermore, when problems arose that threatened to derail my project, I negotiated those complications and kept project activities and actions on track. So, what did I learn from the implementing period of my action research project?

As I reflected on my story of this period in my project's lifecycle, I recognised how I used knowledge from the first action research cycle when I mobilized my project. For instance, I used the MNC bureaucracy to coordinate and control project activities. Then, where bureaucracy failed, I strengthened the MNC policy by developing new rules to guide the sale and repurchase of shares in local subsidiaries, thereby introducing new routines to transfer knowledge, as suggested by Uittenbroek (2016) and Feldman and Pentland (2003). Also, I developed good information artefacts to transfer complex knowledge across occupational and organizational boundaries, inside and outside the MNC. Furthermore, I nurtured trust amongst communities and participants working in my project to ease social engagements amongst those who had to deliver difficult actions under time pressure in a complex project environment. Therefore, the knowledge I gained from how I organized my project in its initial stages was essential to help me ease the many tensions between different elements in the activity systems in the implementing period of my project.

However, my belief in critical realism's philosophy of experiences, perceptions, events and actions that are causal and affects our lives (Easterby-Smith, Thorpe and Jackson, 2012), prompted me to delve deeper into literature. I was concerned about how to manage the effects of bounded rationality problems in the communities and participants I worked with in my project, how to construct effective information artefacts to mediate tensions caused by bounded rationality in my project's activity

systems, the role of boundary-spanners to release tensions in complex policy implementations, and in how social capital formation can ease pressures in complex implementations.

5.7.1 Bounded rationality

Simon (1955; 1947, cited in Cristofaro, 2017, p. 27) recognised that individuals cannot be rational in their interpretation of their world. This is because we have limited understanding of what happens around us, and this combined with our social conditioning binds how we perceive reality. Consequently, we observe our world through biased lenses and react predictably because of our social programming. These limits explain why we often make poor or inappropriate choices. Cristofaro (2017, p. 172) attributes this problem to three restrictions identified by Simon, namely that individuals have limited information, are unable to visualise the outcome of future actions, and don't understand how human behaviours influence our actions. Therefore, although we think our decisions are rational, we fail to understand that that our inherent need to satisfy our desires are determined by our social environment, and that our social environment and our conditioning therefore binds our reality. Consequently, we choose based on what we know, but we cannot accommodate all choices because of what that we don't know. Thus, it is important for project managers who must implement public policy in a MNC to recognise, understand and manage the effects of bounded rationality of project participants and communities in the activity systems to enable good outcomes from participant actions, as I learnt.

In my narrative of tension 4, I explained how tensions arose from project participants' bounded rationality as my project raced to beat the clock. For example, I was frustrated because I could not find the MNC rules and guidelines I needed, only to discover that the MNC policy was incomplete when somebody mailed it to me. My frustration came from my perception that group office project participants failed to appreciate my need to complete actions quickly due to the time-pressure my project faced. Why did these participants not see that existing rules were inadequate and why did they not value my project's need for speed? It seems the key characteristic that makes MNCs unique, namely the cross-border condition (Hoenen and Kostova, 2015) and its associated problem of how to effectively coordinate actions between parent and host subsidiary contributed to this problem. Furthermore, since cross-border coordination and control problems were likely compounded by barriers caused by distance in the MNC (Ghemawat, 2001), it is therefore possible that different interpretations of requirements were affected by issues related to cultural, administrative, economic and geographical understanding of different participants. These distance effects fix cognitive and normative understanding and perceptions that were different for participants in the home and host countries of the MNC, confirming findings by Kostova and Zaheer (1999). Additionally, differences amongst project participants grounded in our different task roles in the MNC may also have influenced expectations of performance (Roth and Kostova, 2003). Hence, the cross-border condition and distance effects were probably at the root of the bounded rationality problems amongst subject, communities and division of labour in the activity system of my project because of limits to available information, our inability to perceive how our actions impact others, and how these factors combined to change the outcomes in my project, precisely the three elements Simon suggests that binds our rationality (Cristofaro, 2017, p. 172). In this example, it seems that group office participants failed to recognise and interpret my need because of their rationality being constrained by their social environment, occupations and experience in the MNC, whilst I failed to anticipate this situation because of my own bounded rationality, constrained as it was by my socialisation and experience.

Furthermore, as Kostova, Nell and Hoenen (2016) warn, failure to effectively manage problems from bounded rationality can cause subsidiary-level agency relationships in MNCs when combined with the problem of information asymmetry between participants. In the activity system of my project, it is

likely that the subsidiary-level agency relationship that existed between participants from the group office and those of us who worked in the local subsidiary's host country contributed to the misaligned expectations that caused tensions in my project's activity system. Good examples of bounded rationality problems causing subsidiary-level agency problems are found in my stories of what happened in tensions 4 and 7. In the narrative of tension 4, I discussed how I could not uncover the hidden, informal approval network, and my narrative of tension 7 described how my project struggled to get legitimacy and needed validation of the work we did from independent, external project participants. Again, these issues arose because of a lack of trust between project participants who did not know each other, where the absence of trust was influenced by perceptions and biases formed from participants' bounded rationality.

5.7.2 Information or knowledge artefacts

In my discussion of tension 4, I described how the project one-pager template became the key mediating artefact to manage tensions between elements in my project's activity system. The importance of developing and using information or knowledge artefacts also emerged in my retelling of how I developed new rules to guide my project through unknown territory in the MNC when I used a simple checklist to collect preferences for a minority B-BBEE shareholding structure in the local subsidiary. Furthermore, the value of good information artefacts was illustrated in how I managed tension 6 when there was a need to simplify complex information to enable decision-making and knowledge transfer. Here, a simple decision tree and a picture of the future shareholding structure not only improved decision-maker understanding and enabled the transfer of knowledge in the MNC, but also aided project participants because it defined actions my project needed to implement the policy.

Specifically, the information artefacts I used in the implementing period of my project confirmed observations by D'Adderio (2008) that visual or symbolic images guide participants' interpretations and enables actions to perform routines. Importantly, where work is delivered by flexible heterarchies (Kellogg, Orlikowski and Yates, 2006, p. 23) in organizations, of which my project was a good example, it is necessary not only to make work visible, but also to make it understandable, and this can be effectively done through display or representation (Kellogg, Orlikowski and Yates, 2006). Furthermore, another benefit of my information artefacts was that it served a dual purpose in my project. To some interpreters, it explained ostensive, abstract and complex aspects of routines that had to be performed, whilst for others it conveyed meaning of the performative aspects or actions the routines required. In this, these artefacts met the standard set by Pentland and Feldman (2008) for artefacts as enablers of routines. Additionally, the information artefacts I created enabled discussion and debate amongst project participants, confirming the cognitive nature of artefacts (D'Adderio, 2011). Also, as recommended by Mietinnen and Virkkunen (2005), my representational artefacts became epistemic objects or objects of enquiry that enabled change in my MNC through their mediating ability. Since information artefacts can help to transform knowledge between occupational communities in organizations as different communities examine it, it becomes a boundary object that helps to create common understanding amongst communities that work together (Bechky, 2003b). Knowledge artefacts as boundary objects helped to change existing practices in my MNC because it enabled negotiation between participants and communities through which understanding improved and it allowed transformation of domain-specific knowledge to change the way work is delivered in complex organizations (Carlile, 2004) such as my MNC.

In my project, the value of good information or knowledge boundary artefacts as a catalyst for change and as a mediating mechanism for easing tensions are clear. For example, it was through collaboration and consulting with participants that I constructed simple, easy to interpret pictures and displays.

These mediated tensions and facilitated the process to get approvals for the transactions my project needed as we implemented the public policy in the MNC. Also, information artefacts as objects of enquiry helped me to collect and capture information to improve MNC policies, as when I created a B-BBEE ownership policy document (AM) to manage tension 5, thereby strengthening the MNCs bureaucracy. Finally, these boundary artefacts helped to transform understanding and created common ground amongst occupational communities from finance and legal domains in my MNC who had to integrate the B-BBEE policy's novel demands in their existing way of working, confirming how routines and artefacts enable routines and transform practices (D'Adderio, 2008; Pentland and Feldman, 2008) and transfer knowledge (Uittenbroek, 2016; Feldman and Pentland, 2003).

5.7.3 Boundary spanning individuals

In my role as project manager and subject of the activity systems of my project, I realise that I was a boundary spanner. Typically, boundary spanners or translators are individuals who worked in different occupational communities in their careers and who understand the operations of communities separated by organizational boundaries (Brown and Duguid, 2001, p. 208). Furthermore, in activity systems of complex organizations, some participants not only work on many tasks simultaneously to deliver their domain-specific work, but they may also participate in work of multiple communities of practice and become boundary-spanners where they manage different contexts and introduce the ability to find compromise solutions (Engeström, Engeström and Kärkkäinen, 1995). Also, successful boundary spanning individuals effectively use boundary crossing objects and artefacts to create shared concepts (Engeström, Engeström and Kärkkäinen, 1995). Importantly, boundary spanning individuals manage social relationships in organizations by managing social capital (Kostova and Roth, 2003).

Boundary spanning is what I did as I managed tension 4 when I built the project one-pager template and engaged different communities to get the information I needed for the template. In this process, I relied on my experience of having worked in different functions and having managed many cross-functional projects both inside and outside my MNC. This experience enabled me to provide direction to project participants and to participate in their activities. In tension 5, where I had to define the direction for my project as it navigated new terrain, my role as boundary-spanner facilitated the process when I developed and used artefacts to quickly and effectively collect important information from those who held it. In the same way, by building and using simple information artefacts to transfer complex knowledge across occupational boundaries in the MNC, I was successful in helping my project reach compromises that protected the MNCs interests whilst ensuring we implemented a compliant B-BBEE ownership policy. Finally, to manage tension 8, it was my ability to understand complexities and interests from different domains that helped me to engage and manage a difficult customer as well as the MNCs sales team, thereby helping to settle conflicting demands. Therefore, complex public policy implementations in MNCs will probably benefit if there are participants who act as boundary spanners to coordinate and manage activities of different occupations and communities. However, I also recognise that I used and managed social capital to facilitate social interactions in my boundary spanning role, something I explore next.

5.7.4 Social capital

Burt (1992) suggests that social capital is essential to build and support trust in social relationships, and Putnam (1993) sees how social capital as a public good is useful to strengthen communities that rely on social networks for it to function. Similarly, Kostova and Roth (2003) recognised the value of social capital when managing and coordinating actions across borders in multifaceted organizations. Nahapiet and Goshal (1998, p. 242) credits successful firms with having “dense” social capital as they create and share intellectual capital. Although many have described social capital, no definitive

definition exists. However, most have in common social relationship networks and the assets used to maintain those networks (Nahapiet and Goshal, 1998, p. 243; Burt, 1992). Furthermore, Nahapiet and Goshal (1998, p. 243) proposed that social capital has three dimensions: structural, relational and cognitive. The structural dimension encompasses the set-up of links in social networks. The relational dimension concerns how behaviours such as “trust and trustworthiness, norms and sanctions, obligations and expectations and identity and identification” (Nahapiet and Goshal, 1998, p. 243) attach people to social networks. The third, cognitive dimension of social capital is concerned with the resources used in social networks such as shared codes and language and shared stories. The important benefits of social capital that Nahapiet and Goshal (1998) identify are that it improves the efficiency of action and that it improves creativity and learning in organizations, whilst its trust-building properties may limit the need for expensive monitoring processes because high levels of trust reduces the chances for opportunistic behaviour by individuals in social networks.

As I alluded to throughout my narrative of the mobilizing and implementing periods of my action research project, I was acutely aware of the need to build trust between me, the local subsidiary community and the MNC group office community. This was because I knew that the complexities of the public policy’s requirements that we had to implement were such that delays from having to clarify issues would impact our ability to meet my project’s deadline. Therefore, participants had to trust the legitimacy and validity of the work my project delivered and the recommendations we made. This could only be achieved if there was enough social capital to trade in the social networks of my project’s activity system. The way I structured my project and set-up networks to deliver our work addressed the structural dimension of social capital in my project and was relatively simple to do, but it was not enough for strong social capital formation. The reason is because I did not actively work to nurture the relational and cognitive dimensions of social capital in my project, and I therefore observed mixed results. For example, in my story of tension 4, I mention that I was frustrated because I could not identify the hidden network of approvers in my MNC until very late in this period of my project. Also, in managing tension 7, I needed to get legitimacy for the work we did from external participants who were trusted by our group office participants. The story of how I supported a senior manager who felt uncomfortable presenting project information and outcomes that I prepared and who preferred the same information to be supplied by external experts, is a case in point. Fortunately, there were some successes when I built effective information artefacts to manage tensions 5 and 6 when I developed new rules for my MNC, and when I simplified complex information and created boundary objects that helped to transform knowledge as we implemented the B-BBEE ownership policy. In this, I partly addressed the cognitive dimension of social capital by establishing codes and language that I shared across boundaries.

In hindsight, I recognise I did not fully comprehend how important it was to engender trust amongst project participants and I now realise that managing social capital formation better in my project could have helped with this. Had I done so, I may have experienced less anxiety in this demanding period of my project, and project participants may also have experienced a less stressful work environment.

5.8 Moving forward

Now that my project had implemented the B-BBEE ownership policy in the MNCs local subsidiary, the third period, to anchor the policy, was ready to start. This required that my project had to undergo a B-BBEE verification, register the share transaction with the regulator, and that we had to embed routines and activities in the organization to maintain the public policy. Therefore, what did my analysis in this chapter contribute as I prepared for the final period of my project?

Four insights emerged in the implementing period of my project. First, I had better awareness that bounded rationality influences trust in social relationships. Consequently, I should actively work to

prevent situations where expectations of actions are not clear, and I must clarify and promote understanding amongst project participants. To do this, the second important lesson from this period was to ensure I used effective boundary spanning artefacts to transfer and transform knowledge about the public policy in my MNC, so that existing practices may change. For this to happen, I realised that my role as boundary spanner, who work with contributors from different occupations and communities in the delivery of project actions to anchor the policy, will be increasingly important. Finally, I could improve the relational aspect of social capital in my project and so promote trust amongst project participants, to ease social interactions and the tensions that would emerge.

With improved understanding from having managed the first two periods of my action research, I realised that much of what literature informed on the challenges of MNCs was mostly irrelevant. For example, issues related to problems from their cross-border condition, multiple embeddedness, the effects of institutional distance and institutional duality were secondary contributors to the tensions that emerged in my project's activity systems. Rather, social relationships as I worked with occupational communities and other stakeholders, both inside and outside my MNC, now featured prominently in my research. Chief amongst those were the need to manage trust caused by agency problems, the need for legitimacy of me and my project for the work we delivered, managing the uncertainty caused by a weak regulator, and transferring complex knowledge effectively at organizational boundaries. Therefore, the use of boundary spanning where people used social capital to ease tensions, with efficient boundary objects and artefacts that enabled bureaucracy and routines, were now my primary areas of focus as I needed to anchor the public policy in my MNC and its operations.

6 PERIOD/ACTION RESEARCH CYCLE 3 – ANCHORING

In figure 25, anchoring is the final period in the life of my project. As in Chapters 4 and 5, this figure presents how the object of activity of this period, to make sure the local subsidiary of the MNC remained B-BBEE policy compliant, involved three processes or activity systems. From these, two major tensions emerged that I had to handle in my action research project. As before, I used process research to generate data for my CHAT analysis.

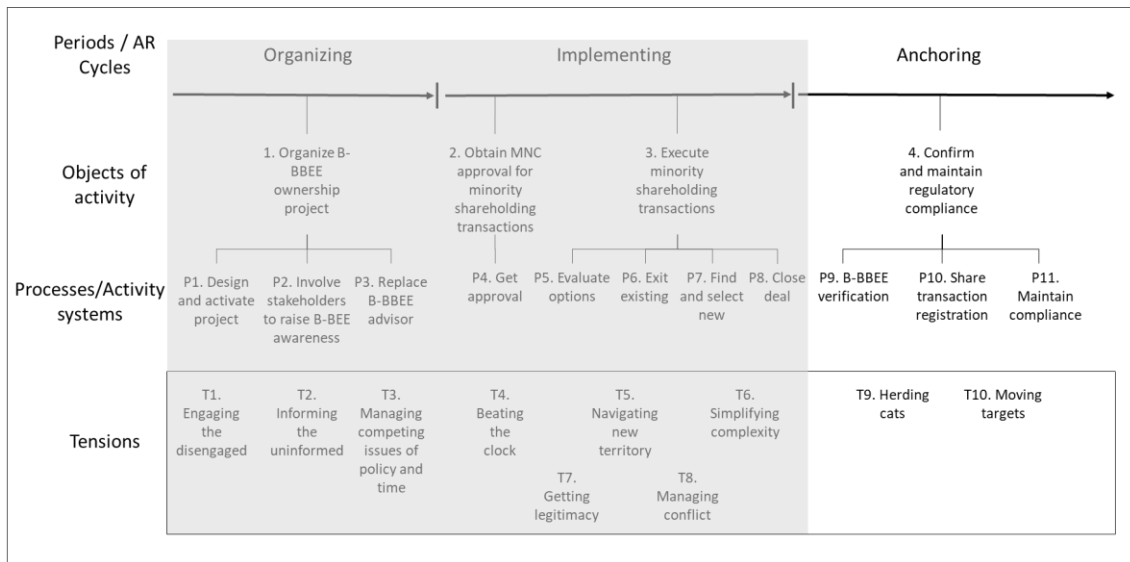


Figure 25: Period/action research cycle 3 and tensions identified

6.1 Introduction

Now that my project had implemented the local subsidiary's public policy in my MNC, the next challenge was to confirm policy compliance and to ensure the organization remained compliant. In a stable organizational environment where policy requirements are clear and rules seldom change, such objectives would probably be challenging to deliver, but as I found out, anchoring the policy when the organization constantly changes makes this far more difficult. Furthermore, novel interpretations of untested public policy rules by the regulator introduced further complications as I tried to embed the policy in my MNC, therefore prolonging uncertainty in policy regulation.

If I thought my action research project was in the home stretch in our race to introduce the B-BBEE ownership policy in my MNC, I was sorely mistaken as I found when two key tensions surfaced in this period, the longest in my project's lifecycle. The first arose as I worked to direct and focus activities in the MNC to integrate the policy in its operations, and the second when local regulators changed the rules of the B-BBEE ownership policy, a situation that threatened the work my project had done up to this point. Furthermore, since I had for all intents become the owner of the policy in my MNC, I experienced intense pressure because I was now clearly established as the subject in the activity systems of my action research project, as my narrative tells.

6.2 Tension 9 – Herding cats

At the start of 2017, my colleagues and I were caught in the turbulence when the MNC restructured its operations, merging 10 regions into five global market areas (BA). The merger of operations in Sub-Saharan Africa and the Middle East affected me because my position in the expanded market area changed. I now had to deliver new tasks, and I had to continue with the implementation of the local

subsidiary's public policy. Furthermore, I had a new manager to report to who was not based in the same office or country where I worked from. Also, since the centre of power in the new market area had moved from the host country where my action research project was implementing the B-BBEE ownership policy to the Middle East, I lost the benefit of direct access to executives in my office who had assisted my project up to now. Moreover, in my new evolving organization communities and participants changed as people moved into new positions or left the organization. Additionally, this uncertainty caused people in the MNC to focus narrowly on new priorities and helping to anchor the public policy of a local subsidiary was not high on their list of things to do. Therefore, as I continued to coordinate and direct actions and activities to anchor the policy in my MNC, I felt at times that I was trying to herd cats as I had to constantly engage new people who had no understanding of what my project needed from them, and little interest. However, I was now so committed to my action research project that I could not let things slip and, as I generated action in the changing organization to embed the B-BBEE ownership policy, I had to manage new tensions that emerged in the activity systems of my project

Examples of actions that generated tensions include what happened as I worked to appoint a new B-BBEE verification agency, coordinated activities to conclude B-BBEE verifications, introduced new shareholders as board members of the local subsidiary, had to register the new shareholding and deal with the subsequent rejection thereof by the regulator, all whilst working to integrate the policy in my MNC. In addition, I faced new demands from the regulator to change the shareholding my project had implemented. Specifically, since I had much less time to work on my action research project in my restructured MNC, I wanted to ensure that the policy became so integrated in its operations that my MNC and its local subsidiary would always be policy compliant and that it achieved the points it needed on its B-BBEE scorecard annually. So, as I continued to guide actions of people with divergent interests in the emerging MNC and my new market area, it was therefore unavoidable that tensions would emerge between me as subject of my project's activity systems in this period and new communities, project participants, rules, and the tools or artefacts my project used. These tensions between activity system elements are again presented as wavy lines in figure 26.

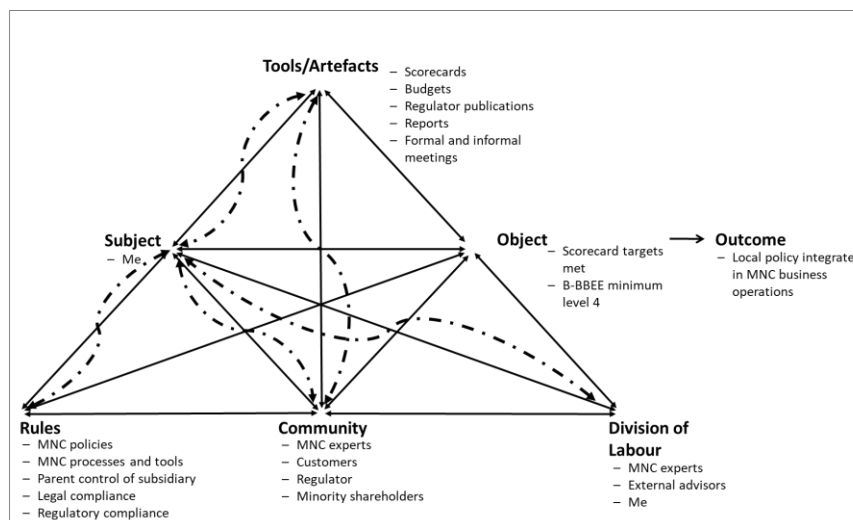


Figure 26: Tension 9 - Herding cats

Unsurprisingly, the restructuring of my MNC organization (BA) introduced tension as I introduced and directed the actions of new communities and new stakeholders who had little if any understanding of the local subsidiary's B-BBEE policy requirements. Furthermore, many of us had not worked together before and new working relationships had to be established. In addition, communities I worked with

previously were rearranged as new, lean, centralized organizational structures formed in new locations across the globe. For example, of the original steering group that guided my project through the organization and implementing periods, only the local country manager retained his position in the new market area, as evidenced from the steering group chart I presented in 2018 (BD, p. 2). Besides, the organizational networks my project had established and utilised to deliver our work disintegrated as many colleagues changed roles or were retrenched. Although I had knowledge from earlier periods in how to mobilize people, how to engage the disengaged and how to inform the uninformed, I was challenged to use this in my new MNC organization to manage the tensions that emerged between me, new communities and new participants in the activity systems of my project.

Luckily, I had some guidance, as a conversation with the local country manager illustrates. In our discussion of my project challenges, we agreed that I needed the support of the new leaders in our new market area (JEBD, 18 May 2017). Therefore, to engage them, I reconstituted my project's steering group with these new members, as updates of my presentation to explain the B-BBEE policy shows (BB). From experience, I knew the new members would be busy as they reorganized their operations and focussed on business-critical delivery, and therefore I had to engage them such that they would prioritise steering group meetings. An opportunity presented itself when the new head of my market area visited the local office and spoke to staff about the changes happening in our MNC. She shared her strategy for the market area and then invited questions. I used this chance to ask her how the new management team planned to manage local public policy implementations such as the B-BBEE policy, as I noted in my diary (JEBD, 22 May 2017). She said she knew about the policy but had to find out more about its implications for our operations. This opened the door for me to mention that policy compliance was a contractual client requirement and if we failed, we could lose business with important clients. She promised to investigate this because "... maintaining customer relationships is one of my top priorities ..." (JEBD, 22 May 2017). This brief engagement paid off later that day when the head of my new market area discussed the policy and its requirements with the local country manager. He told me later that he was able to provide a quick overview of the B-BBEE policy and its implications for our MNC, and he also discussed the need to form a new steering group that included members of her new executive team (JEBD, 22 May 2017). She agreed and must have informed them to expect my invitation because all attended the first meeting of this new project steering group (JEBD, 2 June 2017).

In this meeting, I used the presentation that explained the background to the policy and its requirements (BB) to provide context and set expectations, and thereafter it was relatively easy to engage this community when I needed their support for my project's activities. They also informed their staff to participate in my project. Importantly, they never refused to approve requests for funding, despite the increased focus on cutting costs in our new MNC. A second opportunity to focus attention on my project presented itself when I asked the outgoing CFO, my manager at the time, to brief the market area's new CFO about the B-BBEE policy. He did and used the business case artefact (AQ) I had developed earlier to engage the disengaged when I mobilised my project. Since the business case explained the financial impact of lost revenue if our MNC failed to implement and maintain the policy, the new CFO was immediately interested and asked me to continue with my project. As an important member of the new market area leadership team, the new CFO's support became invaluable as I aligned the divergent interests of project participants. Consequently, the tensions between me, communities and project contributors became easier to manage as I worked on new project actions and activities.

While I was working to involve and engage my new organization's executives in my project, I used what I learnt from the earlier periods of my project when I experienced how useful good information

artefacts are to transfer complex ideas across organizational boundaries. To do this, I refined and improved artefacts I used before, when I worked to share knowledge and information about the B-BBEE policy in my new organization. For example, from the time my project started, I continuously worked to improve a presentation (BB) I developed to share information about how the B-BBEE policy intended to change the way business operated in the host country, and to explain what was required from my MNC. As a result of my ongoing crafting and moulding of this information and knowledge artefact, at the beginning of 2020, I had produced at least 22 versions of this presentation. The latest version consists of a presentation with six pages of key policy issues listed in short, simple statements and pictures, and it turned out to be a very good mediating tool that I used to ease tensions between me, new communities and project participants. In fact, after using this artefact in a meeting with a new MNC executive and members of her team, she remarked that it was it one of the best presentations she had seen that effectively explains a complex public policy (JEBBD, 1 November 2019). Also, I started using this artefact to explain why the B-BBEE policy implementation needed their support when I needed them to approve my project’s actions and costs. Invariably, the presentation triggered lively discussion, as I observed in my journal (JEBD, 2 June 2017) when I took notes during the first new project steering group meeting with the leadership of my new market area when attendees asked, “Why must we...” questions (JEBD, 2 June 2017). Importantly, the presentation included a simple diagram as fig. 27 shows, that outlined how the policy supported good business management practices, something that business managers in my MNC wanted.

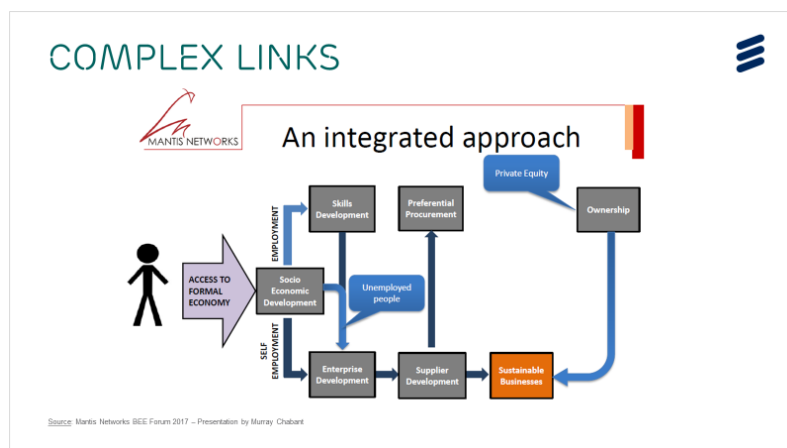


Figure 27: B-BBEE policy as integrated approach

The debates my knowledge artefact caused assisted in easing tensions in my project as issues were clarified and understanding improved, as I noted in my journal (JEBD, 2 June 2017). I made a point to share the presentation with communities and project participants, and I was pleased to find out that participants from the accounting and legal community in my project shared it with their new communities in the organization (BT, BU, BV), thereby helping release tensions as knowledge of the policy was shared.

In addition to this information and knowledge artefact, I used two other artefacts to manage the tensions with communities and project contributors in this period. These were the quarterly B-BBEE scorecard (BE) and the B-BBEE budget (BF). The scorecard displayed the progress my project made as we worked to reach our B-BBEE targets, and the budget showed estimates and actual costs of the B-BBEE policy implementation. Figures 28 and 29 show how these artefacts which are familiar management tools in my MNC, although simple in appearance, included much information that elicited debate, thereby helping to transfer information, but also assisted with transforming knowledge as difficult concepts were explained in answer to questions.

Scorecard Item	Weight	Probable Score	Worst Case	Best Case	Last Cert.
Ownership	25	25.00	25.00	25.00	25.00
Management Control	23	8.98	8.98	8.98	9.29
Skills Development	20 + 5	18.42	18.42	23.07	12.84
Enterprise and Supplier Development					
Preferential Procurement	25 + 2	27.00	25.00	27.00	21.07
Supplier Development	10	10.00	10.00	10.00	10.00
Enterprise Development	15 + 3	9.60	9.60	9.60	12.30
Socio-economic Development	12	9.18	9.18	9.18	9.53
TOTAL	130 + 10	108.18	106.18	112.83	100.03
BEE LEVEL		4	4	3	4
DISCOUNTED BEE LEVEL		4	4	3	4

Figure 28: Quarterly B-BBEE scorecard

Area	ZAR			Points		
	Target 2017 (Max)	Spend @ Oct	To spend	BEE Target 2017	Current Level	Gap
Ownership	-	-	-	25,00	17,00	8,00
Management Control	-	-	-	21,00	13,98	7,02
Skills Development	12 887 124	10 981 503	1 905 621	25,00	12,51	12,49
Preferential Procurement	440 143 828	432 487 448	7 656 380	22,00	24,38	-
Supplier Development	3 118 288	3 697 720	-579 432	10,00	10,00	-
Enterprise Development	4 677 432	461 251	4 216 181	15,00	-	15,00
Socio-Economic Development	2 338 716	2 338 807	-91	12,00	7,83	4,17

Figure 29: B-BBEE budget

Such engagements also allowed me to share how the MNC benefitted from the B-BBEE ownership policy my project had implemented. For example, I could motivate the benefits that selecting an education trust as the minority shareholder of my MNCs local subsidiary brought. This came from being able to recruit new female employees from the bursary holders of the trust, all of whom were receiving education in ICT. I was pleased that I could support this incentive when a beneficiary of the trust was subsequently employed by the local subsidiary (BG), and I could share the success others achieved by winning international study awards (BH). Therefore, without realising it at the time, my knowledge artefacts eased tensions in the activity system of my project about cost and value at a time when my MNC worked hard to create a more profitable organization, and consequently I was able to obtain approvals for actions and expenditure that my project needed as I worked to ground the policy in my MNC.

Another effective action I took that helped to manage the tension between me as subject and the division of labour in my project's activity system was to employ B-BBEE policy experts who supported new project contributors in my project. Many new project members did not have the resources or time to participate at the level my project needed if we wanted to embed the policy in our organization. Hence, I hired expert resources to deliver activities and actions that my project needed to anchor the B-BBEE policy in my MNC, for instance to help collect evidence for the annual B-BBEE verification and to maintain the quarterly B-BBEE scorecard (BE), but this came at a cost. Naturally, this action of mine introduced tensions between subject (me) and new MNC procurement rules that wanted to reduce cost in the organization and forbid the use of external consultants. Fortunately, by now I was well equipped to sketch a new business case to justify why the cost of external specialists was significantly cheaper than employing new people in the organization to do the work that my project needed. I did this in an email (BI) that explained the benefit and subsequently, received approval from my market area head and CFO to buy this service. Again, an artefact that used

commercial language that approvers in the MNC understood was effective to manage the tension between subject and rules and subject and division of labour in my project's activity system.

Finally, as I multi-tasked and herded my project's many participants towards our goal in this period, I sometimes had to perform actions when participants could not. For instance, I drafted a policy compliant bursary agreement (BJ) that our B-BBEE verification agency needed when project participants from the legal department could not do so, due to a heavy workload. The draft took legal experts little time to review when I presented it to them for approval, thereby saving much time to deliver an urgent action. By me acting to deliver an artefact that only needed an expert to review and approve it, I eased tensions between me and project participants in my project's activity system. Consequently, despite tensions such as this, mediating artefacts helped me to direct actions of project participants and communities in my project. However, new challenges emerged that threatened the success of my project when the regulator in the host country moved B-BBEE policy goals, as I explain in the final story of my action research project.

6.3 Tension 10 – Moving targets

In Chapter 5, I mentioned how my MNC manages its operations in many countries through local subsidiary companies, and that it generally owns all the shares of those entities. This gives it full control to direct the activities of its subsidiaries. Therefore, to divest shares in a subsidiary is a unique and significant event. Consequently, my project made sure that we considered all B-BBEE ownership options and recommended one that ensured my MNC would retain control of its local business. At the end of 2016 I was confident that we had achieved this goal. However, I then learnt that the policy environment was unstable because the local regulator continued to make changes to the B-BBEE codes and regularly issued notices to clarify interpretations of the policy rules, as one can see from the many explanatory notices and guidelines it published on its website (B-BBEE Commission, 2018b). Furthermore, some of the regulator's guidance contradicted what the rules allowed, and our legal advisor stated in a meeting that "They are wrong in law", as I noted in my journal (JEBBD, 27 July 2019). This ambiguous situation therefore caused much tension in the activity system of my project in this final period of its lifecycle. Furthermore, my project's B-BBEE advisor confirmed in this meeting that the regulator justifies their actions by citing the need to "interpret the rules in the spirit it was intended by the policy maker" (JEBBD, 27 July 2019). Therefore, the regulator's actions which caused uncertainty in the B-BBEE policy rules effectively caused my project's targets to move.

Inevitably, this created tensions in my project's activity system between me, the subject of this activity system, the regulator's and my MNC rules, communities, the division of labour, and the artefacts I used to guide actions. As before, these conflicts or tensions are presented in the wavy lines in the CHAT model in figure 30.

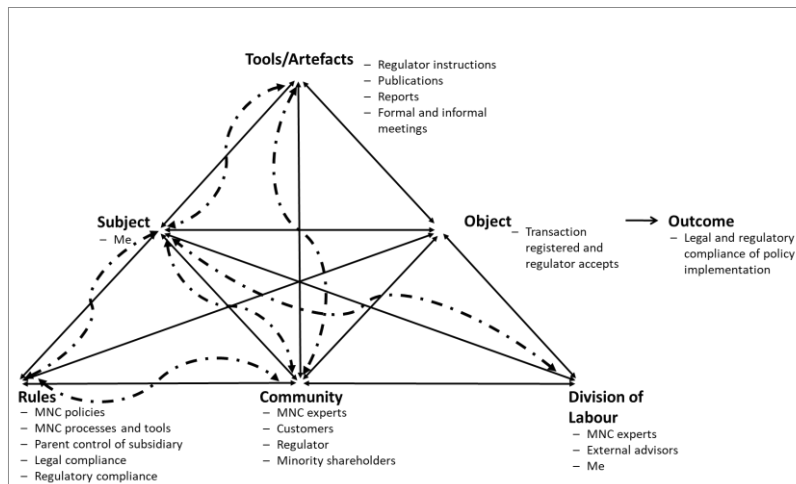


Figure 30: Tension 10: Moving targets

The first hint of instability in the policy's regulation was when the verification agency my project used in 2016 told me they could no longer provide this service. Later, at a conference I attended (BK), I discovered that the reason for this was because the policy regulator changed the rules that regulated B-BBEE verification agencies, to direct the interpretation of the policy rules and therefore its implementation. The regulator started this process when it announced that organizations had to apply for accreditation by the local standards authority in the host country if they wanted to work as B-BBEE verification agencies (BK). Henceforth, accredited verification agencies would be subject to quality reviews to assess their adherence to the policy rules, as outlined in a B-BBEE verification manual (BK). For many accounting firms who provided B-BBEE verification services up till that time, this requirement caused conflict because their activities were already regulated by their profession's regulatory authority in the host country. In a telephonic discussion, the lead assessor of the accounting firm my project used at the time confirmed that this situation was the reason why her firm would stop their B-BBEE verification service. Later, my project's B-BBEE advisor explained that the regulator, constrained in its ability to change legislation, had to use mechanisms such as notices, verification manuals, registration requirements and enforcement actions to direct the implementation of the policy by businesses in the host country (JEBBD, 1 August 2019). As one can imagine, explaining such subtleties to communities and project participants who lived and worked outside the host country was difficult and required careful and sensitive management if I wanted to release the tensions in my project's activity system. Therefore, I made sure to share this insight with important MNC stakeholders who needed context to understand how B-BBEE regulations were enforced in the host country. Such discussions helped to calm the tensions between me and the communities and participants in my project's activity system, and they continued to support my project once they understood the intricacies of regulation of the policy.

Since we had lost the services of our B-BBEE verification agency, my project had to find and appoint a new verification agency. Again, I had to use the MNC procurement bureaucracy, but by now I had enough experience in this and I managed the tension with rules in my project's activity system without too much effort. I prepared a specification of what my project needed from a B-BBEE verification agency (BL), allowed the MNC routine to follow its course, and a new B-BBEE verification agency was appointed in October 2017. When this new agency conducted the local subsidiary's first B-BBEE verification, it was the first time they applied the rules of the new B-BBEE ICT sector code (B-BBEE ICT Sector Council, 2016) in a verification. Therefore, they were extremely thorough in their audit and when I asked why, the lead assessor told me he expected that the regulator would assess the quality

of this verification. This situation confirmed my observations that the regulator was determined to direct policy interpretation and implementation through the power it exerted on verification agencies. Unfortunately, this cautious approach caused strain in the activity system of my project as the verification agency continued to ask for more and more information and evidence, which my project's participants had to provide at short notice (BM). Fortunately, at this point in my project's lifecycle, most project contributors had a good enough understanding of the B-BBEE policy and its implications for our MNC. Therefore, when I spoke to them, they reprioritised their work and provided the new information I needed. In this way, I managed the tension the uncertainty about policy rules introduced in my project.

A next incident that caused tensions in the activity system of my project in the anchoring period came from an amendment to the B-BBEE Act (Government Gazette, 2014). The revision required that companies who concluded a minority B-BBEE share transaction had to register the transaction by submitting details to the regulator if the transaction exceeded a specified value. The threshold was announced in the middle of 2017 (Government Gazette, 2017) and companies were given three months to submit details to the regulator. Since our B-BBEE share transaction exceeded the limit we submitted details of the transaction. At the time, I was confident that we complied with the policy. So, imagine the alarm caused when we received a letter from the regulator to inform us that the transaction could not be registered. Immediately, I asked the local country manager to ask the regulator what had caused this problem (BN) and the regulator replied and told us that this was due to a technicality. The B-BBEE certificate we submitted to support our application for registration was issued under the old ICT sector code, but the regulator wanted a certificate where the rules of the new B-BBEE ICT sector code (B-BBEE ICT Sector Council, 2016) was assessed. This requirement was not outlined in the amendment to the act or subsequent notices the regulator issued and demonstrates how ambiguity in public policy rules complicated my project's attempts to be compliant. Predictably, this situation caused an uproar in my MNC and tensions between me, communities and participants in my project's activity system escalated. Therefore, once I had identified what caused the rejection of our registration application by the regulator (BW), I shared this new knowledge and I spoke to important stakeholders to explain what had happened. Luckily, we were given another opportunity to submit the details of the B-BBEE minority share transaction. By then, we had received the first B-BBEE certificate where the rules of the new ICT sector code (B-BBEE ICT Sector Council, 2016) were used to assess my MNCs policy compliance, and I was able to attach the correct B-BBEE certificate with the registration. This time the regulator accepted our submission (BO). As I reflect on this incident, I realise that my actions to engage the regulator as we sought clarification and my ongoing updates to communities and participants in the activity system of my project eased tensions that vague policy rules caused.

Finally, a third event caused much turmoil in my project's activity system. This happened when the regulator again moved policy targets. In fact, at the time of writing this part of the story, the situation is still not resolved. When the regulator unexpectedly informed the local subsidiary that the B-BBEE share transaction my project had implemented was non-compliant (BP), tension erupted. In the regulator's opinion, ownership of the minority B-BBEE shares in the local subsidiary by an education trust was not what the lawmaker intended (BP). This confirmed earlier advice we received from a B-BBEE consultant who told me that a public official privately said to him that the intention of the B-BBEE ownership policy was not to "teach people to fish", but "to give them the fish to sell" (JEBD, 12 June 2017; BQ). This analogy confirmed the regulator's view, expressed in a letter to us, that "... the purpose of the ownership element is to ensure that black people own and/or control enterprises and productive assets of the economy ..." (BP, section 5.1). As soon as we received the letter, I agreed with the local country manager that we should inform my project's communities and contributors (BR; BS).

After doing so, I convened a meeting to discuss the issue so that we could plan our next actions. In the meeting, which I managed from the market area's head office in the Middle East where I was working at the time, both our legal and B-BBEE advisors told us that the regulator's letter contradicts what the B-BBEE ICT sector code (B-BBEE ICT Sector Council, 2016) allowed, but that none of their MNC clients who used similar minority shareholder structures as we did were prepared to challenge the regulator because of the cost of legal action, and because it may not be politically expedient (JEBBD, 17 October 2019). Therefore, we had to find a compromise solution. After exploring different alternatives, we decided to propose a solution where we would ask the minority shareholder to change the trust from an education trust to an ownership trust. This proposal was submitted to the regulator and as I write, we are waiting for a response.

Understandably, this threat to my project's public policy implementation raised tension in my project's activity system, as evidenced by a flurry of e-mails and requests for information and meetings from my project participants and communities (BR; BS). Therefore, I decided to take actions I had employed earlier where I managed tensions that uncertainty caused, and that is to communicate and share information and new knowledge with the communities and participants in my project as it becomes available. So far, my actions of reaching out and sharing available information with them has calmed tensions, but more than likely the regulator's response will trigger new tensions and new action research cycles in my project as we continue to work to anchor the B-BBEE policy in my MNC.

6.4 Discussion

My analysis and reflection in this final period of my action research project brought two realisations. The first is how my actions in prior action research cycles equipped me to deal with challenges which caused tension in my project's activity system. In planning actions and acting, I had the benefit of past learning and generally I succeeded in easing tensions by using what had worked before. Without this advantage, I doubt my project would have progressed much in this final stage of its lifecycle, especially given the turbulent, fluid organizational environment in my MNC, and a host environment marked by new and weak local institutions with unclear public policy rules that change often. Had I not learnt to use the MNC bureaucracy effectively, my project would have struggled to get support, people and funding for important and urgent project actions. For example, without knowledge of how to manage the MNC bureaucracy of procurement procedures and routines there may have been delays in replacing the B-BBEE verification agency, in turn leading to delays in the local subsidiary receiving the B-BBEE certificate it needed. Such a situation would have prevented the registration of the minority share transaction with the local regulator, as my story of how I managed tension 10 tells. In addition, the local subsidiary would have breached customer contract conditions that always require a valid B-BBEE certificate (B-BBEE Commission, 2018a). Fortunately, I could use my experience from earlier action research cycles in my project to let my MNCs procurement bureaucracy work for my project. Also, from learning how effective a project steering group comprised of senior executives in my MNC is to secure project resources, my project was able to deliver the actions we needed to anchor the policy in the organization. For instance, without their support the hiring of external B-BBEE experts to do work that MNC employees were unable to deliver due to other commitments, a situation I relate as I describe the story of tension 9, would have been impossible.

My second realisation is how my role as a boundary spanner became increasingly important as I moved my project through periods of mobilization, implementation and anchoring of the local public policy in my MNC. In Chapter 5, I became aware of how I was a boundary spanner in my project, but now I realised how my central boundary spanning role was essential to move my project along in its lifecycle and how I used my technical knowledge, my experience of managing internal projects in organizations, my ability to build and use social capital to manage relationships across organizational boundaries,

and my improved skill to construct and use boundary objects and artefacts to transfer complex knowledge across the borders that separate communities in my MNC. In hindsight, I recognise how essential the role of a boundary spanner is to direct the actions and activities in complex organizations such as my MNC where distributed resources deliver work. Also, and maybe as important, when I consider my situation as I reflected on the history of my project, I see how critical my role was to provide stability when my project had to deliver work in our ever-changing organizational environment. In addition, since my project had to implement and ground a local public policy implementation in my MNC, my role as boundary spanner also extended to communities and project participants outside my MNC, as I connected regulators, authorities and external service providers and their actions and activities to those of my project.

Recognizing my central boundary spanner role prompted me to explore literature further because my initial literature review lightly touched this topic. This introduced new and highly relevant theory into my research. Aldrich and Herker (1976, p. 127) observed that boundaries define organizations and that those in boundary roles link organizations with their environment. Espinosa, Cummings and Pearce (2003, p. 158) go further and describes boundaries as imaginary lines within and around teams and organizations. Furthermore, Espinosa, Cummings and Pearce (2003) recognise that many types of boundaries exist in society, including geography (where people are separated by distance), temporal (where people work asynchronous due to time zones, work hours, etc.), functional (where many areas of functional expertise work together), identity-based (where people work in multiple projects), organizational (where people from different organizations work together, for example when expertise is bought and services outsourced), expertise-related, cultural, historical, social and political. As my narrative tells, such boundaries existed amongst communities who contributed to my project. However, without knowing it at the time, I became a translator between my project's communities and participants as I directed project actions, hence becoming the classical boundary spanner Brown and Duguid (2001) may have had in mind. Interestingly, Williams (2013, p. 19) is critical of the view by early organizational theorists that boundary spanners are simply an interface between their organization and its environment. In his opinion, this view does not recognise the important role of boundary spanners in organizations today who must actively collaborate with agencies and others outside the organization. Given my experience in my action research project so far, I agree with this view. For instance, the situation I managed when I had to find out why the local regulator would not register the B-BBEE share transaction and what we needed to do to accomplish this, as well as the ongoing situation where the regulator now wants my project to change the B-BBEE shareholder we chose to work with to implement the B-BBEE ownership policy, detail I related in my story of tension 10, shows how I actively collaborated and caused collaboration with the regulator, external service providers and the new B-BBEE shareholder. In this, I did exactly what Williams (2013) recommends boundary spanners must do. For example, I worked with the local country manager to engage the regulator for clarity on their view of this matter and at the same time my project participants and I worked together with our legal and B-BBEE service providers to develop alternatives that may be compliant with the new regulator demand.

As I look back on how I managed the tensions in the activity system of my project in this anchoring period, the root cause of many tensions could be blamed on the unstable organizational environment of my MNC and the uncertain regulatory environment in the host country. Therefore, as complexity in the environment increased and formal structures of control and coordination broke down, I created informal structures by engaging new communities and key stakeholders, both inside and outside my MNC, to foster collaboration so that we could manage our business. For instance, by arranging to outsource some of my project's actions and activities to embed the policy in the organization as I resolved tension 9, I bridged the divide between units inside and outside my organization who had to

work closely together to accomplish tasks. In this, I filled the critical role of boundary spanning that Kostova and Roth (2003) recognised. It is also through the relationships I established with my project's communities and participants that I was able to understand different contexts, an essential ability without which I could not have negotiated and created compromise solutions to ease tensions. For example, without good understanding of the local country's laws, I could have missed important nuances in the legal advice my project received. If this happened, I would not have been able to start negotiations with the new B-BBEE shareholder to work on a compromise solution to present as an alternative to the regulator, as I narrated in tension 10.

By understanding different contexts in the communities I worked with in my action research project, I was able to create more cognitive and richer forms of interaction than simple written or verbal instructions to coordinate and control work in my project, something Kostova and Roth (2003) consider an important boundary spanning ability. Furthermore, I generally managed to create shared meaning as I transferred knowledge across community boundaries through my easy to understand knowledge artefacts. In this, I created essential boundary spanning tools that my communities understood and could use (Engeström, Engeström and Kärkkäinen, 1995). Furthermore, as Phelps and Reddy (2009) suggest, my boundary objects helped to transfer large quantities of information between communities, encouraged collaboration amongst teams, provided organizational memory, and has become a stable source of information. Significantly, my boundary objects improved trust amongst team members (Phelps and Reddy, 2009). How useful my boundary objects as knowledge artefacts were to help ease the tensions in my project's activity system is clear in my narration of tension 9. Without business cases, scorecards and budgets, it would have been difficult to get the support, resources and money my project needed for our policy-anchoring activities.

Furthermore, since Carlile (2002) suggests that the value of knowledge artefacts lies in its ability to allow learning and transforming of knowledge at organizational boundaries to solve issues at the boundary (Carlile, 2002, p. 442), my knowledge artefacts as boundary objects were essential in this anchoring period of my project. Carlile (2004; 2002), in presenting three progressively complex barriers across which communication and knowledge sharing takes place in organizations, illustrated how each involves a different process as the uniqueness of knowledge becomes more complex. Starting at the basic level Carlile suggests that, when knowledge is simply transferred, a syntactic or information-processing barrier is crossed. This happens when a shared language evolved, and the information being transferred is understood as common knowledge and is easy to process. At the semantic level, even if there is a shared language but issues are not clear and there is uncertainty, interpretation is needed which through a translating process creates shared meaning, typically through negotiating and agreeing on common interests. Finally, at the most complex level, a pragmatic barrier is found that need political processes to allow transformation of knowledge as difference, dependency and uniqueness of knowledge threaten the interests of different actors and communities in the organization, and changes must be negotiated. If this is achieved, a transforming process transforms knowledge and changes existing ways of working. Furthermore, boundary objects are used in crossing the syntactic, semantic or pragmatic boundaries because boundary objects guide interpretations (D'Adderio, 2008), often through display or representation (Kellogg, Orlikowski and Yates, 2006). Therefore, as Mietinnen and Virkkunen (2005) suggest, such objects are effective to enable change in organizations and support common understanding where communities work together (Bechky, 2003b).

Considering this knowledge, I recognise how my knowledge artefacts mediated tensions in the activity systems in tension 9 of my project. For instance, by applying Carlile's (2004) model, I could assess the efficacy of each in helping to bridge the divide between syntactic, semantic and pragmatic barriers.

Here, an image of the B-BBEE certificate I included in the presentation I created to explain what the B-BBEE policy was (BB) may simply have transferred knowledge across a syntactic barrier because it told my audience that the local subsidiary was assessed and that a certain rating was obtained. In the same way, the B-BBEE budget (BF) and B-BBEE scorecard (BE), both familiar management tools in my MNC, acted to transfer information to most project participants and communities. It informed them what progress was being made to reach targets, and information processing was possible because the syntactic barrier was easy to bridge. In some cases, as project communities and participants reviewed the scorecard and budget results, a process which generally led to questions and discussions in meetings, these two artefacts also helped to bridge Carlile's semantic barrier by helping to clarify issues and by creating shared understanding as common ground was found when I provided answers and explained issues.

Also, business cases (AQ) were effective to span semantic and pragmatic barriers because it created shared meaning and in some instances, enabled political decisions in my MNC that changed the way work was performed, for example as when I received permission to employ outside resources to support important policy anchoring actions. Similarly, a simple graphic in the six-page PowerPoint presentation (BB) I created was effective to explain how the policymaker uses the B-BBEE policy to bring social change and transformation of business in the host country. This artefact helped my project participants and communities in their knowledge transfer across Carlile's pragmatic barrier when they used it, and relieved tensions between me, communities, participants and rules in the activity system of my project in this period. Figure 31 shows how the public policy has a "trickle-down" effect on business in the host country because government controls who receives licenses to operate in key commercial sectors of the host economy, and license conditions are aligned with the requirements of B-BBEE policy. Therefore, licensees need their suppliers to be B-BBEE policy compliant. Generally, upon viewing this picture people understood why some of the routines in my MNC had to change, and they supported my project. Again, this confirms the value of building and using good boundary artefacts to transfer knowledge when implementing complex policies in organizations.

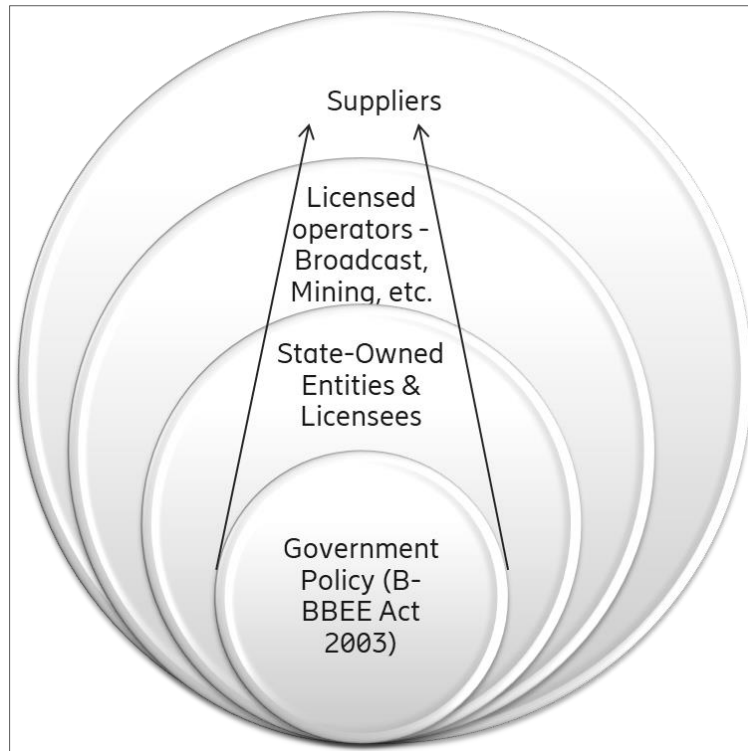


Figure 31: Policy impact on business in host country

However, it was not only my role as boundary spanner and my use of good boundary objects that helped ease tensions in this final period of my project. Building and exchanging social capital was equally useful. In chapters 4 and 5, I discussed what literature teaches about this concept and how I used social capital to ease tensions in my action research project. Particularly, I used social capital to build on the trust my boundary objects induced in my relationships with project participants and communities, and so I converted my private social capital into a public good in my project, perhaps in the manner suggested by Kostova and Roth (2003). By building trust through using and exchanging social capital, I bridged distance in my project and in my MNC. Additionally, following recommendations by Levina and Vaast (2005), I gained legitimacy for my role as boundary spanner amongst the communities I connected because I used social capital and my understanding of their practices, and I was recognised as an honest broker in negotiations where compromises were needed to change existing work practices in my MNC.

Furthermore, I hope that some of my personal attributes supplemented my role as boundary spanner, which includes my intellectual expertise, having many social contacts and a personality that can work with diverse groups of people, as suggested by Cross and Prusak (2002, p. 110), and being socially sensitive (Levina and Vaast, 2005, p. 338). Therefore, as boundary spanner in my action research project I recognise how I integrated the four roles Williams (2013) attribute to boundary spanners which are that of reticulist, where I used skills and attributes to relate to others, entrepreneur, where I worked to facilitate the development of novel solutions to difficult problems, being a socially sensitive interpreter and communicator, and as a coordinator who started and managed collaborative processes. Without wanting to sound presumptuous, my key insight at this point in my project's lifecycle is that my ability to transact across boundaries in my MNC and in my project, informed by my understanding of accounting, auditing and business, my experience of managing internal projects in my MNC, and my understanding of the organization and the many different domain contexts that were involved assisted me, communities and participants in my action research project.

Finally, although it took most of four years to reach this stage of the journey in my project, my process research approach over this long period allowed me to generate rich detail and data for my analysis. Without this time in which to work and reflect, I would not have gained the insights I needed to create new knowledge. To substantiate and in closing the narrative of my action research project, I have two last observations as I look back at my project's journey over the past four years.

The first is that I cannot imagine how I could be an effective boundary spanner if I did not have the technical or domain expertise I have. This is because many tensions that the public policy implementation introduced in my project's activity system required a deep understanding of, amongst others, accounting and legal concepts. Without that background, I would not have been able to create the knowledge artefacts and boundary objects I used in my project. Literature is generally silent on how boundary spanners should have deep technical or domain skills to implement complex policy in complex organizations. This insight may be useful to those who are interested in further research on the role of boundary spanners who work in organizations, and their skills.

My second observation is that the role of a boundary spanner is difficult because a boundary spanner not only manages without power (Williams, 2013, p. 26), but must have knowledge of multiple domains and be socially sensitive. They also face the risk of marginalisation in their organization because they typically don't belong to either of the domains or communities with which they are involved (Levina and Vaast, 2005). In my experience, a risk of marginalisation is real in my multifaceted, globally integrated MNC because my colleagues generally did not understand what I accomplished as a boundary spanner as I managed this complex local public policy implementation. Despite this risk, I recognise on a personal level that I need the challenges and intellectual stimulation that boundary spanning brings as I continue my journey of learning and development.

7 CONCLUSION

7.1 Introduction

When I submitted my proposal for my action research study, I said I wanted to find out how I could use artefacts to help me manage the implementation of a local government policy in my MNC. This was because I realised at the time that a major challenge in my action research project would be to create a common understanding of complex policy information and requirements amongst my project participants and my MNC communities. From experience, I knew that knowledge artefacts are effective tools to use at my MNCs organizational boundaries to transfer information and knowledge. After my manager asked me to implement the local public policy in my MNC, I thought that, once project participants and communities understood what the B-BBEE policy required, they would take actions to implement and maintain the policy whilst I would merely coordinate their activities. I would therefore function as a classic programme manager and I did not expect that I would get as involved in this project as I did. Consequently, in my proposal I suggested that I wanted to learn which artefacts would be effective to transfer complex knowledge and understanding across organizational boundaries in my MNC, and what made them effective. As a basis for measurement, I wanted to use the framework of Carlile (2004; 2002) for knowledge transfer at organizational boundaries. As discussed earlier, Carlile (2004; 2002) proposed that knowledge in organizations is transferred using three increasingly complex processes of transfer, translation and transformation, as three increasingly complex barriers labelled syntactic, semantic, and pragmatic must be bridged in organizations who change their business practices. As it turned out, I used Carlile's model in my analysis in Chapter 6 where I considered how knowledge artefacts were effective in processes of transfer, translation, and transformation as complexity of information and knowledge increased in my action research project. However, my action research project extended beyond testing Carlile's model, as I learned.

I now realise how I anchored my project and kept activities on track to meet demanding deadlines as my project implemented and worked to embed the policy in my MNC at a time when everything around us changed. In my action research project, I became the subject of my project's activity systems as my CHAT analysis in Chapters 4, 5 and 6 reveal. This is because my actions caused tensions and problems for project participants and communities. Generally, as my CHAT analysis shows, I managed to ease tensions and solve problems when I acquired new knowledge and when my project stakeholders gained new insight as my actions allowed them to make sense of what was needed. As a result, my actions helped to transform knowledge at organizational boundaries and existing business practices in my MNC were subsequently transformed. Furthermore, I gradually became aware of how my role had changed from merely being a programme manager who initiated and coordinated actions to that of a boundary spanner who managed tensions and solved problems by causing learning and knowledge transformation amongst different communities and participants in my project. Consequently, my research interest changed. I now wanted to understand what I had to do to manage tensions from different understanding and expectations of communities and participants in my action research project, and this became my central research question. Then, as my action research project processed through periods of mobilizing, implementing and anchoring, I needed to find out how to engage different stakeholder communities who had to implement the B-BBEE policy in my MNC, how to facilitate exchange of information to relieve tensions between my project communities, and how to anchor the policy so that different communities' expectations and goals could be satisfied.

7.2 Discussion and findings

My narrative, grounded in process research, provided data for my CHAT analysis, and my analysis of tensions in the activity systems of my project helped me to recognise what skills and tools I used to ease tensions and solve problems, and what skills I lacked. Generally, tensions diminished, and

problems were solved when my actions caused learning and knowledge transformation amongst project stakeholders and communities in my MNC. It is also clear from my analysis that, as difficulty in my project increased in each period, I used Carlile's (2004; 200) three increasingly complex processes of information and knowledge transfer, translation, and transformation to reduce tensions. For example, in the mobilizing period of my action research project, I had difficulty to get communities and participants in my project to understand what the public policy required and to get them to participate. In this period, I succeeded by communicating information in a simple transfer of knowledge. In the implementing period when approvals from senior executives in my MNC were needed and we had to take actions to implement the new minority shareholding in the local subsidiary, translation of knowledge became more important. Then, in the anchoring period where we worked to embed the policy, transformation of knowledge and learning was needed because my MNC had to change its practices to accommodate the local public policy's requirements.

Consequently, using Carlile's (2004; 2002) model of how to transfer knowledge and learning at organizational boundaries, I was able to position the three major action research cycles for each period of my project in Carlile's increasingly complex knowledge transfer processes, as shown in figure 32. By doing this, I was able to observe the skills and tools I used in each of the temporal periods of my project as my actions activated ongoing action research cycles. Also, I could see how I acquired new skills and tools, and how skills and tools I already used changed in importance as complexity increased throughout each period of my project's lifecycle.

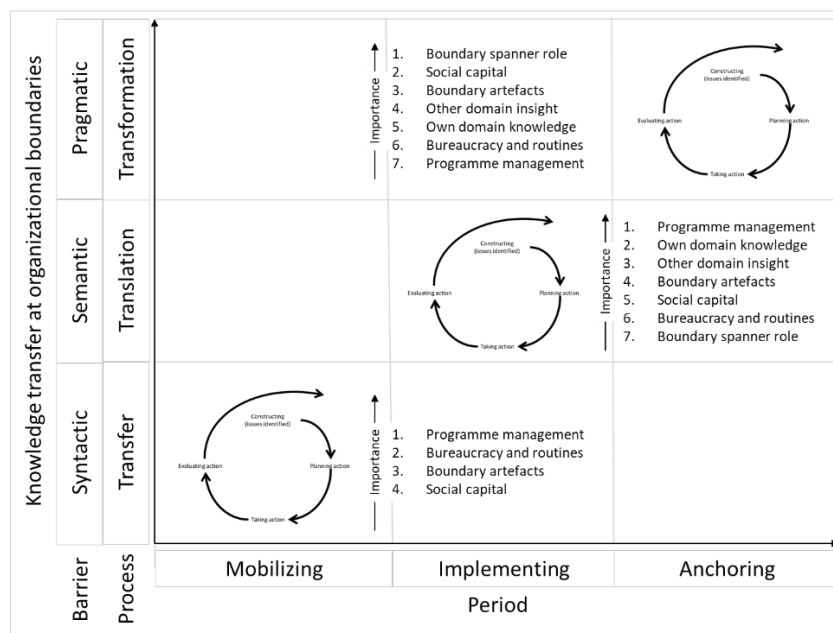


Figure 32: Skills and tools for knowledge transformation to ease tensions in my project

From left to right, the matrix in figure 32 shows the temporal development of my project through its increasingly complex periods of mobilizing, implementing and anchoring. From bottom to top, I show Carlile's (2004; 2002) increasingly complex processes of transfer, translation, and transformation as the uniqueness of information and knowledge transformation became more complex in my project. Then, inside the matrix, I list the skills and tools I used to negotiate tensions and solve problems in the action research cycles of each period of my project, ranked in order of perceived usefulness. Evidently, usefulness and importance of skills and tools changed much over the life of my project.

In answer to my central research question, answers to my first supplementary research question of how I was able to engage different stakeholder communities to participate in the implementation of the B-BBEE ownership policy in my MNC provides insight. These are found in my narration and CHAT analysis in Chapter 4. There, it shows that I used programme management skills, my MNC bureaucracy (Schofield, 2004), routines (Uittenbroek, 2016; D'Adderio, 2008; Carlile, 2004; Schofield, 2004; Feldman and Pentland, 2003; Feldman and Rafaeli, 2002; Star and Griesemer, 1989), and boundary artefacts (D'Adderio, 2011; Pentland and Feldman, 2008; Bechky, 2003b; Star and Griesemer, 1989) together with social capital (Kostova and Roth, 2003; Nahapiet and Ghoshal, 1998; Putnam, 1993; Burt, 1992) to negotiate tensions to engage the disengaged, inform the uninformed, and to manage competing issues of policy and time. For instance, as I involved people and communities in my project and secured their support and participation, I removed an unsuitable B-BBEE advisor and replaced them with one more skilled, and I communicated and transferred the public policy's requirements in my MNC.

To manage problems and tensions these actions caused, I used my experience of programme management and my knowledge of my MNC bureaucracy and routines to establish a supportive project steering group of senior executives, and I engaged skilled advisors who assisted to transfer information of the B-BBEE ownership policy to project stakeholder communities. Furthermore, I used simple boundary spanning artefacts such as business cases that confirmed the potential loss of revenue if my MNC failed to implement the local public policy. This tool was instrumental to obtain the level of support and participation my project needed. Also, without realising it at the time, I started building and exchanging social capital to ease tensions, as I did when I engaged my project's steering group to support my project.

Answers to my second supplementary research question, to understand how I facilitated exchange of information and how I managed tensions between my project's communities and participants, presented itself in my story and analysis in Chapters 5 and 6. In these chapters, I discuss how I reduced tensions and solved problems to beat the clock as we implemented the B-BBEE ownership policy and how new policies to navigate uncharted territory in my MNC were established as I used simple boundary spanning artefacts to assist with exchange of information and transfer of knowledge (D'Adderio, 2011; Pentland and Feldman, 2008; Bechky, 2003b; Star and Griesemer, 1989). In addition, I described what I did to gain legitimacy for me and my project to improve trust as issues related to the classic agency problem (Kostova, Nell and Hoenen, 2016; Hoenen and Kostova, 2015; Jensen and Meckling, 1976) and subsidiary-agency level relationships (Foss and Weber, 2016; Wiseman, Cuevas-Rodriguez and Gomez-Mejia, 2012; Lubatkin *et al.*, 2007; Aguilera and Jackson, 2003; Granovetter, 1985) emerged and contributed to tensions, and how increased trust and legitimacy eased tensions.

Furthermore, chapters 5 and 6 also tells the story of how I recognised and used new boundary spanner skills and tools. In addition to programme management, I used bureaucracy and routines, boundary artefacts and social capital (Kostova and Roth, 2003; Nahapiet and Ghoshal, 1998; Putnam, 1993; Burt, 1992), but my own specialist domain knowledge and my knowledge of how other domains work in my MNC became more important. In my programme management role, I became the central boundary spanner in my project, a role identified by researchers including Siciliano, Moolenaar, Daly and Liou (2017), Kostova and Roth (2003) and Brown and Duguid (2001), though I did not appreciate this until the final period of my project. While my programme management skills remained dominant as I pushed for actions to be completed to meet project deadlines in the implementing period, as complexity increased, I had to translate knowledge across community and occupational boundaries, following Carlile's (2004; 2002) recommendations. For this, I needed my domain knowledge as accountant and auditor to help me translate requirements to project communities. Increasingly, I

relied on my knowledge of how other domains worked as I built knowledge artefacts to use as boundary objects that not only transferred knowledge but also enabled translation, as I did when I gradually constructed the one-pager document my project needed to get approval for the share transactions we had to complete.

Moreover, increasingly I used social capital as I worked to gain legitimacy for my project and myself, to receive recognition as honest advisors to my MNC decision-makers. All the while, I used my MNC bureaucracy and its routines to manage key actions, for example when I appointed an external service provider to value the local subsidiary so that my project could price the share transactions we had to complete. Then, although I recognised towards the end of the implementing period of my project that boundary spanning was critical, I did not explore this area because I was too busy coordinating and performing actions and activities in my project, as figure 32 shows where it ranks low on my list of tools that were useful to me at the time.

In Chapter 6, my story and analysis of my work to anchor my project offer answers to my third supplementary research question, that of how to anchor the local public policy to meet different internal and external communities' expectations and goals. In this chapter, I share how I continued to use skills and tools from earlier in my project to manage tensions and solve problems. However, as my project now needed to transform organizational practices in my MNC to embed the local public policy, my boundary spanner role, social capital and boundary artefacts emerged as more important skills and tools I needed, with programme management relegated on my list. Furthermore, from my analysis, I identified that boundary spanners require many skills, including programme management and knowledge of how to use bureaucracy and boundary spanning tools to facilitate the transfer of large quantities of information amongst communities to not only encourage collaboration, but to also capture organizational memory and provide a stable source of information (Phelps and Reddy, 2009) in organizations.

Additionally, boundary spanners must know how to apply their own domain knowledge and have an understanding of what happens in other domains and their practices, as they utilize boundary artefacts and use social capital to manage complex projects (Williams, 2013; Levina and Vaast, 2005; Cross and Prusak, 2002). In this, boundary spanners ease tensions that come from different expectations and demands of diverse communities in complex public policy implementations. As boundary spanner, I used my programme management skills and knowledge of my MNC bureaucracy and routines of different domains in my MNC to enable actions, as I did when I appointed external service providers to my project. Also, I drew from my domain knowledge and my understanding of what happens in other domains when I steered my project through the uncertainty new regulator demands introduced. Throughout, I needed the essential skills of a boundary spanner who creates good boundary artefacts to transform learning and knowledge at organizational boundaries, as I did when I needed steering group support and backing to employ consultants for my project. Of course, without building and exchanging social capital between me, my project communities and project participants, this would not have been possible.

In conclusion, CHAT as an action research modality (Raelin, 2015) combined with process research (Langley, 1999) to generate data and my CHAT analysis helped me to find answers to my central research question and its three supplementary questions. Furthermore, my boundary spanning skills and tools, my ability to build and exchange social capital, and the boundary artefacts I crafted to assist with knowledge transformation in the occupational communities in my MNC emerged as key contributors to the public policy implementation in my MNC.

7.3 Contribution to knowledge

My journey into action research allows me to contribute to management research and business management knowledge because I used action research in a qualitative study, where I used process research’s narrative, temporal and visual strategies to generate data for analysis. Therefore, my first contribution is that I combined CHAT as action research modality with process research. My second contribution is that I applied Carlile’s (2004; 2002) recommendations to transfer knowledge at organizational boundaries across syntactic, semantic, and pragmatic boundaries by using different boundary spanner skills and tools at different times in my project, with increasing reliance on my role as boundary spanner as complexity in my project increased.

A third contribution comes from being able to moderate the policy implementation model for B-BBEE policy in my MNC which I had designed at the end of my literature review (figure 1). This amended model could serve as a guide to others who must implement policy at a local level in a MNC. In reassessing my original model, I found that of the typical MNC challenges which I anticipated I had to carefully manage in my action research project, many did not contribute directly to tensions in my project. These include the MNC cross border-condition, multiple embeddedness, most aspects of what gives rise to institutional distance, institutional duality and a liability of foreignness. Reasons for this could be because my MNC uses advanced ICT and it therefore has greater flexibility to integrate its global operations such that it makes local contexts visible and easier to manage, and because my MNCs operations are deeply integrated in the economy of the host country in my research setting. Hence, distance effects and my MNC being “foreign” in the local context was therefore not that significant. Instead, MNC issues of trust related to the agency problem, legitimacy requirements, uncertainty from weak institutions, knowledge transfer across organizational boundaries and social capital formation were the major challenges I dealt with. Furthermore, I added the role of programme manager who is a boundary spanner with skills and tools to enable sensemaking in occupational communities in complex organizations such as MNCs. Figure 33 presents my amended model, after removing topics from literature that had a limited contribution to tensions in my action research project, with the addition of the critical boundary spanner function needed to manage the public policy implementation in my MNC.

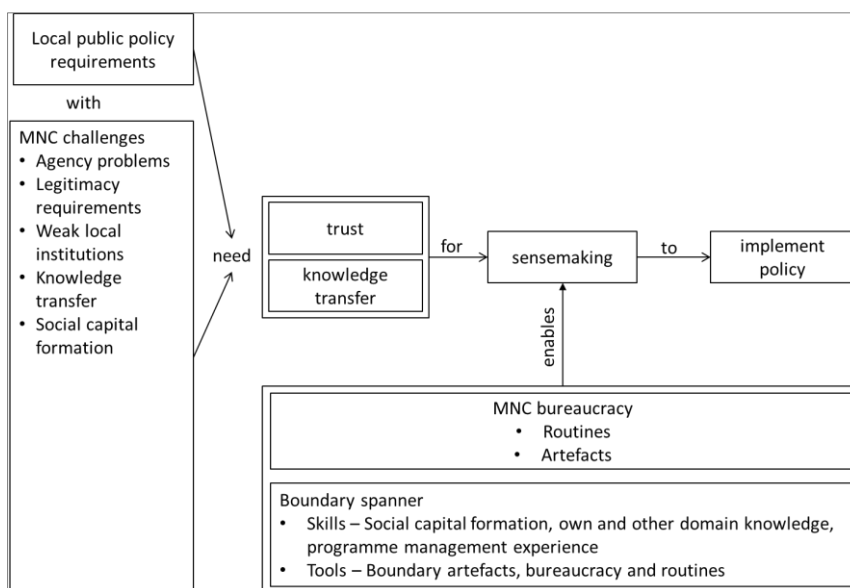


Figure 33: Amended bottom-up policy implementation model for B-BBEE policy implementation in my MNC

My final contribution to knowledge is that I identified that a programme manager who is responsible to implement complex public policy in a MNC must be a boundary spanner and that this role in this context not only uses traditional boundary spanner skills and tools, but also requires a programme manager who brings specialist domain knowledge relevant to the public policy. The example in my project is the benefits my training as an accountant and auditor brought. Consequently, in figure 34 I list boundary spanner skills and tools I identified from literature, and my addition of own domain knowledge.

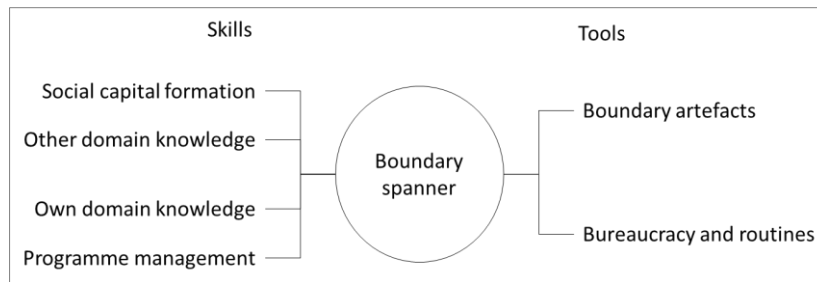


Figure 34: Boundary spanner skills and tools used in my project

7.4 Limitations of my study

My study has many limitations. Foremost, it is limited by my experience working in one MNC in a host country with unique social challenges, where a local public policy had to be implemented. Therefore, it may not be replicable in other MNCs and countries. Also, a weak regulatory environment caused by ambiguous rules that change frequently to accommodate different political agendas, where enforcement of public policy happens through agencies who develop their own rules as they try to interpret the regulator’s wishes, typifies my study. Where host institutions are strong with clear rules and with well-regulated environments, the outcome of a project such as mine may well be different. Furthermore, my study was conducted in an environment where I had limited resources. In contrast, where resources are adequate and organizational structures can be established to support the implementation and anchoring of a local policy, the role of a boundary spanner may not be necessary and a traditional project or programme manager may be able to manage the implementation and anchoring of a local public policy in a MNC. Finally, since I live and work in the social setting where I implemented the local public policy, I am not an impartial researcher. This is because the policy affects the society where I live and because its success in my MNC has implications for my continued employment in the organization. However, I trust that my efforts to adhere to ethical research principles and my research supervisor’s advice and guidance act to counterbalance any bias this situation may have introduced.

7.5 Future research

New research into public policy implementation and boundary spanning in complex organizations such as MNCs can contrast my experience to confirm if this context brings unique challenges that require new skills and tools from managers. It can also investigate if the role of a boundary spanner in the context of public policy implementation is significant and if the role should be formalised in organizations. Researchers could also use my public policy implementation model for MNCs as the basis of a more comprehensive model. Finally, in MNCs where work is distributed and digitally mediated, the use of technology to create digital knowledge artefacts that help transfer and transform information and knowledge at organizational boundaries may present an interesting research topic.

7.6 Final remarks

In closing, at the outset of what turned out to be a long and lonely expedition into academia, I had a limited expectation of what I may learn from my action research project or of how I could contribute to management knowledge. Furthermore, I faced challenges in my research caused by changes in my work environment that forced me to request a six-month hiatus. These included the global restructuring of my MNCs operations that affected my role and my work and added new tasks and responsibilities, including that I had to implement all B-BBEE sub-policies in my MNC. However, the delays this caused in my research brought the benefit of time to collect and generate rich data with much detail for my analysis which improved the robustness of my findings.

Having gained experience as an insider-researcher, I now appreciate how action research in a qualitative research setting produced results and new knowledge for my situation in my MNC, but also how this knowledge may be more generally useful in management. When I started, I hoped to contribute knowledge on how to use artefacts to help me span occupational boundaries in the digitally mediated work environment of my MNC, but in the end I was able to contribute more knowledge than I anticipated. This include:

- my combination of different research approaches and methods in my research,
- how I applied Carlile's (2004; 2002) model of knowledge transfer at organizational boundaries to observe how different skills and tools were used to mediate tensions in the activity systems of my project, how these became more or less useful over time, and how my boundary spanner role became more important as complexity increased in my project,
- how some MNC challenges may no longer be as relevant today as in the past as I found when I contrasted my theoretical implementation model against my moderated model that accounts for my experience, and
- my identification of the need for a programme manager in policy implementation to be a boundary spanner who uses boundary spanner skills and tools and who possesses own specialist domain knowledge relevant to the policy being implemented.

REFERENCES

- Aguilera, R. and Jackson, G. (2003) 'The Cross-National Diversity of Corporate Governance: Dimensions and Determinants', *Academy of Management Review*, 28, 3, pp. 447-465.
- Aldrich, H. and Herker, D. (1977) 'Boundary spanning roles and organization structure', *Academy of Management Review*, 2(2), pp. 217-230.
- B-BBEE Commission (2017) *Explanatory Notice 1 Of 2017: Submission of Documents in Registering a Major B-BBEE Transaction*. Available at: <https://www.bbbeeecommission.co.za/wp-content/uploads/2017/06/Explanatory-Notice-1-of-2017-B-BBEE-Transactions-Registration.-13-June-2017.pdf> (Accessed: 21 February 2019).
- B-BBEE Commission (2018a) *Practice Guide 01 of 2018*. Available at: <https://www.transcend.co.za/wp-content/uploads/Transcend/BEE%20Resources/BEE%20Best%20Practice%20Guidelines/BEE/2018-09%20Practice%20Guide%2001%20of%202018-Determining%20Validity%20of%20a%20B-BBEE%20Certificate.pdf> (Accessed: 1 November 2018).
- B-BBEE Commission (2018b) *Publications*. Available at: <https://www.bbbeeecommission.co.za/publications/> (Accessed 8 March 2020).
- B-BBEE ICT Sector Council (2016) *Amended Broad-Based Black Economic Empowerment (B-BBEE) ICT Sector Code*. Available at: <http://www.ictsectorcouncil.org.za/sector-code/> (Accessed: 9 February 2019).
- Bechky, B. A. (2003a) 'Object Lessons: Workplace Artefacts as Representations of Occupational Jurisdiction', *American Journal of Sociology* 109(3), pp. 720-752.
- Bechky, B. A. (2003b) 'Sharing Meaning Across Occupational Communities: The Transformation of Understanding on a Production Floor', *Organization Science* 14(3), pp. 312-330.
- Berends, H. and Lammers, I. (2010) 'Explaining Discontinuity in Organizational Learning: A Process Analysis', *Organization Studies*, 31(08), pp. 1045 – 1068.
- Björkman, H. and Sundgren, M. (2005) 'Political entrepreneurship in action research: learning from two cases', *Journal of Organizational Change Management*, 18 (5), pp.399-415.
- Boland, R. J. and Tenkasi, R. V. (1995). 'Perspective making and perspective taking in communities of knowing', *Organization Science*, 6(4), 350-372.
- Bridwell-Mitchell, E., and Sherer, D. (2017) 'Institutional Complexity and Policy Implementation: How Underlying Logics Drive Teacher Interpretations of Reform', *Educational Evaluation and Policy Analysis*, 39(2), pp. 223-247.
- Brown, J.S. and Duguid, P. (2001) 'Knowledge and Organization: A Social-Practice Perspective', *Organization Science*, 12, pp. 198-213.
- Brydon-Miller, M., Greenwood, D., and Maguire, P (2003) 'Why action research?', *Action Research*, 1(1), pp. 9 – 28.
- Burgoyne, J. (2008) *The Sage Dictionary of Qualitative Management Research*. London: Sage.
- Burt, R.S. (1992) *Structural Holes: The Social Structure of Competition*. Harvard University Press. ProQuest Ebook Central. [Online] Available at:

- <https://ebookcentral.proquest.com/lib/liverpool/detail.action?docID=3300361> (Accessed: 4 September 2018).
- Cambridge Dictionary (2019) Available at: <https://dictionary.cambridge.org/dictionary/english/> (Accessed: 9 February 2019).
- Carlile, P.R. (2002) 'A Pragmatic View of Knowledge and Boundaries: Boundary Objects in New Product Developments', *Organization Science*, 13 (4), p. 442-455.
- Carlile, P.R. (2004) 'Transferring, Translating, and Transforming: An Integrative Framework for Managing Knowledge across Boundaries', *Organization Science*, 5, p. 555.
- Coghlan, D. (2008) 'Authenticity as first person practice: an exploration based on Bernard Lonergan', *Action Research*, 6 (3), September, pp.351-366.
- Coghlan, D. (2011) 'Action research: exploring perspectives on a philosophy of practical knowing', *Academy of Management Annals*, 5, pp.53-87.
- Coghlan, D. (2014) *The SAGE Encyclopedia of Action Research*. [Online]. DOI: 10.4135/9781446294406 (Accessed: 3 January 2019).
- Coghlan, D. and Brannick, T. (2014) *Doing action in your own organization*. 4th Edition. London. Sage.
- Coghlan, D. and Brydon-Miller, M. (2014) *The SAGE Encyclopedia of Action Research*. [Online]. DOI: 10.4135/9781446294406 (Accessed: 3 January 2019).
- Creswell, J. (2013) *Qualitative inquiry and research design: choosing among five approaches*. 3rd ed. London: Sage.
- Cristofaro, M. (2017) 'Herbert Simon's bounded rationality: Its historical evolution in management and cross-fertilizing contribution', *Journal of Management History* 23 (2), pp. 170-190.
- Cross, R. and Prusak, L. (2002) 'The People Who Make Organizations Go - or Stop.' *Harvard Business Review*, 80(6): pp. 104-112.
- Cunliffe, A.L. (2008) *The Sage Dictionary of Qualitative Management Research*. London: Sage.
- D'Adderio, L. (2008) 'The Performativity of Routines: Theorising the Influence of Artefacts and Distributed Agencies on Routines Dynamics', *Research Policy*, 37, pp. 769–789.
- D'Adderio, L. (2011) 'Artefacts at the centre of routines: performing the material turn in routines theory', *Journal of Institutional Economics*, 7(2), pp. 197-230.
- Darwin, S. (2011) 'Learning in activity: exploring the methodological potential of action research in activity theorising of social practice', *Educational Action Research*, 19(2), 215-229.
- Davison, E.D. (2015) *Multinational Management. Research Starters: Business* [Online]. Available at: <http://eds.b.ebscohost.com.liverpool.idm.oclc.org/eds/detail/detail?vid=10&sid=dac71f9e-07a6-4f9d-8b2c-6b8bdee1c164%40sessionmgr103&hid=108&bdata=JnNpdGU9ZWRzLWxpdmUmc2NvcGU9c2l0ZQ%3d%3d#AN=89163878&db=ers> (Accessed: 5 March 2016).
- deLeon, P. (1999) 'The missing link revisited: Contemporary implementation research', *Policy Studies Review*, 16(3/4), p. 311.

- Durand, R. and Jacqueminet, A. (2015) 'Peer conformity, attention, and heterogeneous implementation of practices in MNEs', *Journal of International Business Studies*, 46(8), pp. 917-937.
- Easterby-Smith, M., Thorpe, R., and Jackson, P. (2012) *Management Research*. 4th ed. London: Sage.
- Engeström, Y. (2000), 'Activity theory as a framework for analyzing and redesigning work', *Ergonomics*, 43(7), pp. 960 -974.
- Engeström, Y. (2001) 'Expansive Learning at Work: Toward an activity theoretical reconceptualization', *Journal of Education and Work*, 14(1), pp. 133 -156.
- Engeström, Y., Engeström, R. and Kärkkäinen, M. (1995) "Polycontextuality and Boundary Crossing in Expert Cognition: Learning and Problem Solving in Complex Work Activities", *Learning and Instruction*, 5, pp. 319 -336.
- Eppich, W. and Cheng A. (2015) 'How Cultural-Historical Activity Theory can inform interprofessional team briefings', *Clinical Simulation in Nursing*, 11(8), p. 383 – 389.
- Er, M. (2014) *The SAGE Encyclopedia of Action Research*. [Online]. DOI: 10.4135/9781446294406 (Accessed: 3 January 2019).
- Espinosa, J.A., Cummings, J.N., and Pearce, B.M. (2003) 'Team Boundary Issues Across Multiple Global Firms', *Journal of Management Information Systems*, 19(4), pp. 157 – 190.
- Fairclough, N. (2005) 'Discourse analysis in organization studies: The case for critical realism'. *Organization Studies*, 26(6), pp. 915 - 939.
- Feldman, M.S. and Rafaeli, A. (2002) 'Organizational Routines as Sources of Connections and Understandings', *Journal of Management Studies*, 39(3), pp.309-331.
- Feldman, M. S. and Pentland, B.T. (2003) 'Reconceptualizing Organizational Routines as a Source of Flexibility and Change', *Administrative Science Quarterly*, 48, pp. 94–118.
- Foss, N. and Weber, L. (2016) 'Moving opportunism to the back seat: Bounded rationality, costly conflict, and hierarchical forms', *Academy of Management Review*, 41, pp. 61-79.
- Ghemawat, P. (2001) 'Distance still matters: The hard reality of global expansion', *Harvard Business Review*, 79(8), pp. 137-147.
- Government Gazette (2004) *Broad-Based Economic Empowerment Act 53 of 2003*. Available at: https://www.environment.gov.za/sites/default/files/legislations/bbbee_act.pdf (Accessed: 23 November 2015).
- Government Gazette (2013) *Broad-Based Economic Empowerment Act: Codes of Good Practice*. Available at: <http://www.polity.org.za/article/broad-based-black-economic-empowerment-act-codes-of-good-practice-gazette-36928-notices-1019-2013-10-11> (Accessed: 23 November 2015).
- Government Gazette (2014) *Broad-Based Economic Empowerment Act: Amendment of section 1 of Act 53 of 2003*: Available at: https://www.gov.za/sites/default/files/gcis_document/201409/37271act46of2013.pdf (Accessed: 8 March 2020).
- Government Gazette (2017) *Notice No. 551 in Government Gazette No. 40898*: Available at: <https://www.thedti.gov.za/gazettes/40898.pdf> (Accessed: 8 March 2020).

- Government Gazette (2018) *Draft Statement 000, Code Series 000 of 2018 for 60 day Public Commentary*. Available at: <https://www.thedti.gov.za/gazettes/41546.pdf> (Accessed: 29 March 2018).
- Granovetter, M. (1985) 'Economic action and social structure: The problem of embeddedness', *American Journal of Sociology*, 91, pp. 481-510.
- Greenwood, D.J. and Levin, M. (2007) *Introduction to action research*. 2nd ed. Thousand Oaks, California: Sage.
- Gupta, A., and Govindarajan, V. (2000) 'Knowledge flows within multinational corporations', *Strategic Management Journal*, 21: 4, p. 473-496.
- Harris, E. (2008) *The Sage Dictionary of Qualitative Management Research*. London: Sage.
- Harzing, A. (2000) 'An empirical analysis and extension of the Bartlett and Ghoshal typology of multinational companies', *Journal of International Business Studies*, 31, pp. 101-120.
- Hayes, G., Lee, C., and Dourish, P. (2011) 'Organizational routines, innovation, and flexibility: The application of narrative networks to dynamic workflow', *International Journal of Medical Informatics*, 80, pp. 161-177.
- Heller, F. (2004) *Essential Guide to Qualitative Methods in Organizational Research*. Sage.
- Herbert, B. and Anderson, K.J. (2000) *Prelude to Dune: House Harkonnen*. Hodder and Stoughton.
- Hilsen, A.I. (2006) 'And they shall be known by their deeds: ethics and politics in action research', *Action Research*, 4 (1), March, pp.23-36.
- Hockley, J., Froggatt K., and Heimerl, K. (2012) *Participatory Research in Palliative Care: Actions and Reflections*. Oxford University Press. [Online]. DOI:10.1093/acprof:oso/9780199644155.001.0001 (Accessed: 10 January 2019).
- Hoenen, A. K. and Kostova, T. (2015) 'Utilizing the broader agency perspective for studying headquarters-subsidiary relations in multinational companies', *Journal of International Business Studies*, 46, pp. 104-113.
- Holian, R. and Coghlan, D. (2013) 'Ethical Issues and Role Duality in Insider Action Research: Challenges for Action Research Degree Programmes', *Systemic Practice & Action Research*, 26, 5, pp. 399-415.
- Holland, J.H., Green, J.J., Alexander, L., and Phillips, M. (2016) 'School Health Policies: Evidence-based Programs for Policy Implementation', *Journal of Policy Practice*, 15(4), pp. 314-332.
- Houston, S. (2014) *The SAGE Encyclopedia of Action Research*. [Online]. DOI: 10.4135/9781446294406 (Accessed: 3 January 2019).
- Howard-Grenville, J. A. (2005) 'The Persistence of Flexible Organizational Routines: The Role of Agency and Organizational Context', *Organization Science*, 16, pp. 618-636.
- Hupe, P.L., and Hill, M.J. (2106) "And the rest is implementation.' Comparing approaches to what happens in policy processes beyond *Great Expectations*', *Public Policy and Administration*, 31(2), pp. 103-121.

- Huxham, C., and Beech, N. (2003) 'Contrary Prescriptions: Recognizing Good Practice Tensions in Management', *Organization Studies*, 24(1), pp. 69 – 93.
- Hybels, R.C. (1995) 'On legitimacy, legitimation, and organizations: a critical review and integrative theoretical model', *Best Papers Proceedings of the Academy of Management*, pp. 241-245.
- Isenberg, J. (1986) 'Group polarization: A critical review and meta-analysis', *Journal of Personality and Social Psychology*, 50: 6, pp. 1141-1151.
- Jensen, M. C. and Meckling, W. H. (1976) 'Theory of the firm: Managerial behavior, agency costs and ownership structure', *Journal of Financial Economics*, 3, pp. 305-360.
- Kaplan, S. (2008) 'Framing Contests: Strategy Making Under Uncertainty', *Organization Science*, 19:5, pp. 729-752.
- Kaptelinin, V. and Nardi, B. (2012) *Activity Theory in HCI: Fundamentals and Reflections*. Morgan & Claypool Publishers [Online]. Available at: <http://www.morganclaypool.com> (Accessed: 13 April 2019).
- Kellogg, K., Orlikowski, W. and Yates, J. (2006) 'Life in the Trading Zone: Structuring Coordination across Boundaries in Postbureaucratic Organizations', *Organization Science*, 1, p. 22.
- Kerstetter, K. (2012) 'Insider, Outsider, or Somewhere In Between: The Impact of Researchers' Identities on The Community-Based Research Process', *Journal of Rural Social Sciences*, 27, 2, pp. 99 - 117.
- Khanna, T., and Palepu, K. (1997) 'Why Focused Strategies May Be Wrong for Emerging Markets', *Harvard Business Review*, 75(4), pp. 41-51.
- Kohoutek, J. (2013) 'Three Decades of Implementation Research in Higher Education: Limitations and Prospects of Theory Development', *Higher Education Quarterly*, 67(1), pp. 56-79.
- Kostova, T. and Zaheer, S. (1999) 'Organizational legitimacy under conditions of complexity: The case of the multinational enterprise', *Academy of Management Review*, 24(1), pp. 64–81.
- Kostova, T. and Roth, K. (2003) 'Social capital in multinational corporations and a micro-macro model of its formation', *Academy of Management Review*, 28, pp. 297-317.
- Kostova, T., Roth, K., and Dacin, M. T. (2008) 'Institutional theory in the study of multinational corporations: A critique and new directions', *Academy of Management Review*, 33, pp. 994-1006.
- Kostova, T., Nell, P.C., and Hoenen, A.K. (2016) 'Understanding Agency Problems in Headquarters-Subsidiary Relationships in Multinational Corporations: A Contextualized Model', *Journal of Management*, 1. [Online] (pp. 27). DOI: 10.1177/0149206316648383.
- Langley, A. (1999) 'Strategies for Theorising from Process Data.', *Academy of Management Review*, 24(4), pp. 691-710.
- Levina, N. and Vaast, E. (2005) 'The Emergence of Boundary Spanning Competence in Practice: Implications for Implementation and Use of Information Systems', *MIS Quarterly*, 29(2), pp. 335 – 363.
- Liou, R-S. and Rao-Nicholson, R. (2017) 'Out of Africa: The role of institutional distance and host-home colonial tie in South African Firms' post-acquisition performance in developed economies', *International Business Review*, 26, pp. 1184 – 1195.

- Lubatkin, M., Lane, P. J., Collin, S., and Very, P. (2007) 'An embeddedness framing of governance and opportunism: Towards a cross-nationally accommodating theory of agency' *Journal of Organizational Behavior*, 28, pp. 43-58.
- Luiz, J. and Gaspari, R. (2007) 'The Indigenization of Business Ownership In An Emerging Market: Doing Business In South Africa'. *International Business & Economics Research Journal*, 6(12). [Online]. Available at: <http://www.cluteinstitute.com/ojs/index.php/IBER/article/view/3440/3487>. (Accessed: 2 February 2016).
- Lundin, M. (2007) 'When Does Cooperation Improve Public Policy Implementation?', *Policy Studies Journal*, 35(4), pp. 629-652.
- Macpherson, A. and Jones O. (2008) 'Object-mediated Learning and Strategic Renewal in a Mature Organization', *Management Learning*, 39(2), pp. 177 – 201.
- Macpherson, A. Kofinas, A., Jones, O., and Thorpe, R. (2010) 'Making sense of mediated learning: Cases from small firms', *Management Learning*, 41(3), pp. 303 – 323.
- Maerki, H. U. (2008) 'The globally integrated enterprise and its role in global governance', *Corporate Governance: The International Journal of Business in Society*, 8(4), pp. 368-373.
- Maitlis, S. and Christianson M. (2014) 'Sensemaking in Organizations: Taking Stock and Moving Forward', *The Academy of Management Annals*, 8(1), pp. 57-125, DOI: 10.1080/19416520.2014.873177 (Accessed: 10 May 2020).
- McTigue, C., Monios, J., and Rye, T. (2017) 'Identifying barriers to implementation of local transport policy: An analysis of bus policy in Great Britain', *Utilities Policy*. [Online] (11pp). DOI:10.1016/j.jup.2017.12.002.
- Menzel, D.C. (1987) 'An Interorganizational Approach to Policy Implementation', *Public Administration Quarterly*, 11(1), pp. 3-16.
- Meyer, K.E., Mudambi, R., and Narula R. (2011) 'Multinational Enterprises and Local Contexts: The Opportunities and Challenges of Multiple Embeddedness', *Journal of Management Studies*, 48(2), pp. 235-252.
- Mietinnen, R. (2008). *The Sage Dictionary of Qualitative Management Research*. London: Sage.
- Mietinnen, R. and Virkkunen, J. (2005). 'Epistemic Objects, Artefacts and Organizational Change', *Organization*, 12(3), pp. 437 – 456.
- Mischen, P.A., and Jackson, S.K. (2008) 'Connecting the Dots: Applying Complexity Theory, Knowledge Management and Social Network Analysis to Policy Implementation', *Public Administration Quarterly*, 3, p. 314.
- Nahapiet, J. and Ghoshal, S. (1998) 'Social Capital, Intellectual Capital, and the Organizational Advantage', *Academy of Management Review*, 23(2), pp. 242 – 266.
- Palmisano, S.J. (2006) 'The Globally Integrated Enterprise', *Foreign Affairs*, 3, p. 127.
- Pedler, M. (2008) *Action Learning for Managers*. Surrey. England. Gower Publishing Company.
- Peng, M.W., Sun, S.L, Pinkham, B. and Chen, H (2009) 'The Institution-Based View as a Third Leg for a Strategy Tripod', *Academy of Management Perspectives*, 23:3, p. 63 – 81.

- Pentland, B.T. and Feldman, M.S. (2008) 'Designing Routines: On the Folly of Designing Artefacts, While Hoping for Patterns of Action', *Information and Organization*, 18, pp. 235-250.
- Pentland, B.T., Feldman, M.S., Becker, M.C., and Liu, P. (2012) 'Dynamics of Organizational Routines: A Generative Model', *Journal of Management Studies*, 49(8), pp. 1484-1508.
- Pettigrew, A. M. (1990) 'Longitudinal field research on change: Theory and practice'. *Organization Science*, 1(3), pp. 267–292.
- Phelps, A. F. and Reddy, M. (2009) "The influence of boundary objects on group collaboration in construction project teams." *Group'09: Proceedings of the ACM 2009 international conference on supporting group work*, pp. 125-128.
- Putnam, R.D. (1993) 'The prosperous community: Social capital and public life', *The American Prospect*, 4:13. pp. 35-42.
- Raelin, J. (2009) 'Seeking conceptual clarity in the action modalities', *Action Learning: Research and Practice*, 6(1), [Online] (pp. 17-24), DOI: 10.1080/14767330902731269 (Accessed: 11 January 2019).
- Raelin, J. (2015) *A Guide to Professional Doctorates in Business & Management*. London. Sage. [Online] Available at: <https://uk.sagepub.com/en-gb/eur/a-guide-to-professional-doctorates-inbusiness-and-management/book242918> (Accessed: 10 January 2019).
- Raelin, J.A. (2012) *Action Learning in Practice (4th Edition)*. London. Gower Publishing Ltd. [Online]. Available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=1973568 (Accessed: 10 January 2019).
- Roth, K. and Kostova, T. (2003) 'The Use of the Multinational Corporation as a Research Context', *Journal of Management*, 29 (6), pp. 883 - 902.
- Schofield, J. (2004) 'A Model of Learned Implementation', *Public Administration*, 82(2), pp. 283-308.
- Siciliano, M., Moolenaar, N., Daly, A., and Liou, Y. (2017) 'A cognitive perspective on policy implementation: Reform beliefs, sensemaking, and social networks', *Public Administration Review*, 77(6), pp. 889-901.
- Simon, H.A. (1955) "A behavioral model of rational choice", *The Quarterly Journal of Economics*, 69(1), pp. 99-118.
- South Africa (no date). *Department of Finance. Growth, Employment and Redistribution: A Macroeconomic Strategy*. Available at: http://www.gov.za/sites/www.gov.za/files/gear_0.pdf (Accessed: 3 July 2016).
- South Africa (2012). *National Planning Commission. National Development Plan 2030*. Available at: <http://www.gov.za/issues/national-development-plan-2030> (Accessed: 3 July 2016).
- Star, S. and Griesemer, J. (1989) 'Institutional Ecology, 'Translations' and Boundary Objects: Amateurs and Professionals in Berkeley's Museum of Vertebrate Zoology, 1907-39', *Social Studies of Science*, 3, p. 387.
- Tallman, S. and Chacar, A. S. (2011) 'Knowledge accumulation and dissemination in MNEs: a practice-based framework', *Journal of Management Studies*, 48, pp. 278–304.

- Tempel, A., Edwards, T., Ferner, A., Müller-Camen, M., and Wächter H. (2006) 'Subsidiary responses to institutional duality. Collective representation practices of US multinationals in Germany and Britain', *Human Relations*, 59, pp. 1543–1570.
- Trust, T. (2017) 'Using cultural historical activity theory to examine how teachers seek and share knowledge in a per-to-peer professional development network', *Australasian Journal of Educational Technology*, 33(1), pp. 98 – 113.
- Uittenbroek, C. (2016) 'From Policy Document to Implementation: Organizational Routines as Possible Barriers to Mainstreaming Climate Adaptation', *Journal of Environmental Policy & Planning*, 18(2), pp. 161-176.
- Van de Ven, A.H. and Poole, M.S. (2005) 'Alternative Approaches for Studying Organizational Change', *Organization Studies*, 26(9), pp. 1377 – 1404.
- Weick, K.E., Sutcliffe, K.M. and Obstfeld, D. (2005) 'Organizing and the process of sensemaking', *Organization Science*, 16(4), pp.409-421.
- Williams, P. (2013) 'We are all boundary spanners now?', *International Journal of Public Sector Management*, 26(1), pp. 17 – 32.
- Wiseman, R. M., Cuevas-Rodríguez, G., and Gomez-Mejia, L. R. (2012) 'Towards a social theory of agency', *Journal of Management Studies*, 49, pp. 202-222.
- Yamagata-Lynch, L.C. (2010) *Activity Systems Analysis Methods: Understanding Complex Learning Environments*. SpringerLink [Online]. Available at: http://link.springer.com.liverpool.idm.oclc.org/chapter/10.1007/978-1-4419-6321-5_2 (Accessed: 4 July 2016).
- Zuber-Skerrit, O. and Perry, C. (2002) 'Action research within organisations and university thesis writing', *The Learning Organization*, 9(4), 171-179.

APPENDIX 1: Journal and diary summary and project timeline

Date	Description
1 September 2015	Meeting to request that I take the role of project manager of the B-BB-BBEE policy implementation. I accepted.
4 September 2015	Meeting with previous B-BBEE driver to understand what was done to date, and to obtain context.
7 September 2015	Review of B-BBEE guidance documents and start planning
9 September 2015	First Steering Group meeting
10 September 2015	B-BBEE Kick-off meeting
11 September 2015	New customer contractual obligation, to be at least B-BBEE Level 4 with at least 30.01% black women ownership.
17 September 2015	Continue project planning.
18 September 2015	B-BBEE workshop where B-BBEE ownership project identified as a priority.
22 September 2015	MNC colleagues demand a Business Case.
29 September 2015	Presentation by advisors on different minority shareholding options.
30 September 2015	Meeting with external legal counsel to get their view of legality of different options.
12 October 2015	Discussion with region CFO and Finance colleagues on ownership alternatives and the need for external company valuation.
14 October 2015	Social and Ethics Committee meeting to provide feedback on B-BBEE.
4 November 2015	B-BBEE ownership options discussed with local Finance.
9 November 2011	IBM presentation to re. Equity Equivalent ownership which provided insights into MNC challenges for B-BB-BBEE ownership implementation.
11 November 2015	Involve Group Finance to confirm MNC policy requirements for minority shareholding in subsidiary companies.
12 November 2015	Review funding options with external legal counsel and B-BBEE advisor.
23 November 2015	Group Finance and M&A meeting to explain and discuss B-BBEE ownership requirements.
7 December 2015	Advisor shared that date for new ICT Sector Codes' implementation not clear.
18 January 2016	A B-BBEE meeting with customer where they outline expectations.
5 February 2016	"Old ICT codes" verification for 2015 commences.
16 February 2016	Meeting with Nordic country representatives to assess B-BBEE policy impact on MNCs.
19 February 2016	Decision to terminate existing B-BBE advisor service.
No date (but in February 2016 sequence)	Meeting with Group Finance and M&A where corporate requirements and approval actions confirmed.
Bi-weekly and then monthly	Steering Group meetings to report progress and agree actions.
13 March 2016	Meeting with potential Black investors.
No date, but May 2016	Meeting with B-BBEE advisor where termination proposed and accepted.
4 May 2016	Meeting with CFO from ABB to review their minority shareholding structure.

Date	Description
6 May 2016	Need identified to build at least two business cases, i.e. Split vs Flow market scenarios, and tax implications to consider.
12 May 2016	Start process to appoint a new B-BBEE advisor.
2 June 2016	New B-BBEE advisor appointed.
4 June 2016	Meeting with key customer to present B-BBEE planning for ownership.
5 and 22 June 2016	Meeting with local and Group Finance team to present new minority shareholding alternatives proposed by new B-BBEE advisor.
8 July 2016	Meeting with existing minority shareholders to present the MNC restructuring and impacts on local subsidiary, and to assess their willingness to terminate their minority shareholding.
13 July 2016	B-BBEE ownership meeting with expanded MNC stakeholder team.
26 July 2016	B-BBEE training workshop for key project participants.
3 August 2016	Results of 2015 B-BBEE verification received.
17 and 23 August 2016	Meetings with expanded MNC stakeholder community, external legal counsel and B-BBEE advisor to review ownership recommendations. Decision to implement a structure with an education trust that is 30.01% black women owned.
31 August 2016	Attend Parliamentary Portfolio Committee meeting in Cape Town.
16 September 2016	B-BBEE update presentation to key customer.
21 September 2016	MNC CFO approves divestment (i.e. buy-back of existing minority shareholding).
24 September 2016	Confirm scope of subsidiary valuation by external accounting firm as basis for share transactions.
26 September 2016	Process to evaluate trusts that meet requirements as new minority shareholder starts.
4 October 2016	Meeting with local and Group Finance to discuss accounting treatment of buy-back and divestment – IFRS 2.
21 October 2016	Presentation to head of region and leadership team on B-BBEE ownership progress.
24 October 2016	Company valuation report received.
28 October 2016	All stakeholder meeting together with external legal counsel to select preferred trust to be invited as minority investor.
31 October 2016	Meeting with Group Finance and Legal to finalise new minority shareholding structure and confirm Trust to be invited to become new minority shareholder.
15 November 2016	External legal counsel confirms legality of a trust as minority owner.
21 November 2016	External accounting advisor opinion on accounting treatment of share transactions received.
22 November 2016	Final valuation of subsidiary agreed with MNC corporate stakeholders.
22 November 2016	New shareholders' agreement received from external legal counsel.
30 November 2016	Memorandum of Understanding to manage relationship with Trust prepared and presented to the Trust.
Evening of 5 December 2016	Trustees sign legal documents to become new minority shareholder in subsidiary.
9 December 2016	Lodge new share transaction for registration by authorities.
12 December 2016	Confirmation received that transaction lodged for registration with CIPC on 9 December 2016.

Date	Description
3 January 2017	Meeting with ICT Sector Council to explain the new minority share transaction.
31 January 2017	Trustee from Trust appointed as director to subsidiary board.
16 February 2017	Subsidiary B-BBEE directive drafted.
20 February 2017	First payment to Trust to fund bursaries, as per Memorandum of Understanding.
10 April 2017	New director from Trust induction session.
27 April 2017	Commission an independent review of minority ownership compliance with B-BBEE requirements in view of B-BBEE Commission reports in the South African press.
6 June 2017	Feedback from independent ownership review received.
2 August 2017	New B-BBEE verification agency appointed.
7 August 2017	Submit major share transaction to B-BBEE Commission for registration
2 November 2017	2016 B-BBEE verification start where new minority shareholding structure assessed.
16 February 2018	First B-BBEE certificate on new ICT sector codes received and required B-BBEE Level 4 awarded.
19 February 2018	B-BBEE Commission advises that technical issue related to B-BBEE certificates and dates prevent registration of new shareholder transaction.
28 February 2018	B-BBEE Commission acknowledges registration of new shareholder transaction.
2 October 2018	Trustee meeting to review concerns.
22/23 January 2019	B-BBEE verification for 2017 commences.
28 January 2019	Group Compliance review of minority shareholding.
15 March 2018	2017 B-BBEE certificate received reflecting B-BBBEE level 3.

APPENDIX 2: Digital data references

Below is a table that cross-references digital data used in my analysis to where it can be found in my digital database.

No.	Folder No.	Date	Type	Title/name
A	01.01.03	2105/09/04	Folder	TG Decisions
B	-	2015/09/09	Meeting invite - digital diary	BBBEE Project - Steering Group Meeting
C	01.01.01	2015/09/09	PowerPoint presentation	RSSA BBBEE - TG 2 and 3 Presentation
D	01.01.02	2015/09/17	PowerPoint presentation	RSSA BBBEE - Project Organisation
E	01.01.02	2015/09/28	PowerPoint presentation	2015_09_28 "MNC" BBBEE Initiative - Project Organisation
F	01.01.02	2016/02/22	PowerPoint presentation	2016_02_22 "MNC" BBBEE Initiative - Project Organisation
G	01.01.02	2016/03/10	PowerPoint presentation	2016_03_10 "MNC" BBBEE Initiative - Project Organisation
H	01.01.01	2015/09/14	E-mail	RE Action - RSSA BBBEE - TG23 Presentation - Please comment - xxx reply
I	-	2015/09/10	Meeting invite - digital diary	"Subsidiary" - BBBEE Project Kick-off
J	-	2015/09/18	Meeting invite - digital diary	BBBEE Project- Workshop with BEE "consultant"
K	-	2015/09/17	Meeting invite - digital diary	BBBEE
L	-	2015/10/19	Meeting invite - digital diary	RSSA BBBEE Project - Steering Group Meeting
M	-	2015/11/05	Meeting invite - digital diary	BBBEE - presentation by stream drivers to SG members on how to close gaps
N	01.04.01	2016/04/21	PowerPoint presentation	MNC accelerates transformation to drive growth and profitability
O	01.01.01	2015/09/23	E-mail	BBBE - Client requirement
P	01.03.01	2016/03/16	E-mail	FW: BBEEE commitments to "large client"
Q	01.03.03	2016/03/10	PowerPoint presentation	2016_03_10 RLT Feedback - BBBEE Project
R	02.01.02	2015/10/06	Excel spreadsheet	"MNC" Consultation Timed Plan
S	02.01.01	2015/09/04	E-mail	RE "consultant" Advisory Ownership Solution Presentation
T	02.01.01	2015/09/03	PDF document	"MNC" ownership solution 03Sept2015
U	02.01.01	2015/09/29	PDF document	"MNC" ownership solution 22Sept2015
V	02.01.01	2106/02/29	PowerPoint presentation	"MNC" - Ownership Presentation - March 2016
W	02.01.02	2015/09/09	PDF document	Proposal
X	02.01.01	2016/04/15	E-mail	RE BEE Online Ericsson response (Urge

No.	Folder No.	Date	Type	Title/name
Y	-	2016/04/06	Meeting invite - digital diary	"Consultant" issue and "new Consultant" "on-boarding"
Z	-	2016/04/08	Meeting invite - digital diary	"Consultant" - Strategising on a way forward
AA	02.01.02	2016/04/26	Microsoft Word document	"Consultant" Termination Agreement Rev C 26.04.2016 (2)
AB	02.02.01	2016/01/14	Microsoft Word document	"Subsidiary" - Scope of BBBEE services
AC	02.02.01	2016/06/30	PowerPoint presentation	RFP Evaluation
AD	02.05.01	2016/06/06	Microsoft Word document	Group Directive for MA decisions
AE	02.06.02	2016/06/06	Microsoft Word document	"Subsidiary" BBBEE - One pager
AF	02.06.03	2016/08/18	Folder and E-mail	Early versions
AG	02.06.03	2016/11/16	Folder	Final approval
AH	02.03.02	2016/08/10	Meeting invite - digital diary	Split contract – "Host country"
AI	02.06.03	2016/12/08	E-mail	CFO approval – Divestment in "host country"
AJ	02.06.03	2016/11/07	E-mail	BBBEE
AK	02.03.01	2015/10/13	E-mail	FW: Malaysia - local equity
AL	02.03.01	2015/10/20	Meeting invite - digital diary	Meeting invite – Malaysia, Indonesia and Philippines equity discussion
AM	02.03.02	2016/09/04	Microsoft Word document	"Subsidiary" - Directive on Ownership for Broad-Based Black Economic Empowerment
AN	02.06.03	2016/06/06	PowerPoint presentation	BBBEE Project- Divestment overview – A
AO	02.08.02	2016/10/26	Excel spreadsheet	Trust Evaluation Sheet
AP	02.03.04	2016/10/24	PowerPoint presentation	"Subsidiary" Ownership - Suggested
AQ	02.04.02	2016/07/18	Folder	Cost of ownership
AR	02.04.01	2016/08/02	E-mail	RE: RLT Meeting Agenda & APs
AS	02.03.02	2016/07/07	PDF document	"MNC" - Equity Ownership Report - Version 1 - 7th July
AT	02.03.02	2016/10/12	PowerPoint presentation	Ownership Options - 2016_10_12
AU	02.04.01	2016/12/02	PowerPoint presentation	BEE Presentation - Notional Vendor Funding in BEE Transactions_(7595914_1)
AV	02.04.01	2016/12/13	PDF document	BBBEE Valuation report vFinal_signed
AW	02.08.02	2016/11/17	PDF document	Engagement Letter - Trust evaluation
AX	02.03.03	2016/11/07	PowerPoint presentation	Minority Share divestment (3001%) in "MNC" Draft 7 November 2016
AY	02.03.01	2016/06/07	Meeting invite - digital diary	Meeting invite to explain ownership - Major client
AZ	02.03.01	2016/06/01	E-mail	Major client demand
BA	03.09.03	2017/05/16	PDF document	"MA" Structure Information Pack (003)
BB	01.04.01	2016/09/09	Folder	BBBEE explained

No.	Folder No.	Date	Type	Title/name
BC	02.06.03	2016/07/07	Skype conversation in Outlook	'Subsidiary' Equity Ownership Transaction Options Report - Version 1
BD	03.09.01	2018/0524	PowerPoint presentation	2018_05_24 BEE in "Subsidiary"
BE	03.09.01	2018/03/04	PDF document	"Subsidiary"- B-BBEE Score Progress Monitoring Final Report - 03-04-2018 - Final 2017
BF	03.09.01	2017/11/14	Excel spreadsheet	2017 BEE Budget and Expenditure
BG	03.09.01	2017/11/29	Skype conversation in Outlook	"Trust" Bursars - Re. availability of bursar for recruitment
BH	03.09.01	2019/06/24	E-mail	"Subsidiary" - Info - Bursary holder – "Bursa" - Team won
BI	03.09.03	2019/01/04	E-mail	Urgent approval needed BEE Scorecard Monitoring Proposal
BJ	03.08.01	2017/06/19	Microsoft Word document	"Trust" Draft Contract June 2017 ("Legal" Comments)
BK	03.07.01	2017/08/10	PDF Document	3 SANAS _ Role of Commissioner – From workshop October 2017
BL	03.04.02	2017/07/27	E-mail and Excel spreadsheet	BEE Verification responses.xlsx
BM	03.04.02	2019/03/10	E-mail	"Subsidiary" - Outstanding documents
BN	03.05.02	2017/09/19	E-mail	RE: Major B-BBEE Transaction
BO	03.05.04	2018/03/08	PDF document	Registration certificate (ito Regulation 18 2 b)
BP	03.07.01	2019/07/23	PDF document	"Subsidiary" Transaction not compliant
BQ	02.03.03	2017/06/15	PDF Document	Report from "consultant"
BR	03.07.01	2019/10/22	Email	RE: ESA BBEE Commissioner response - Urgent Update
BS	03.07.01	2019/10/23	Email	My further update to CFO
BT	03.09.02	2019/09/02	Email	RE Action - B-BBEE presentation for MNC Compliance Office – "Name"
BU	03.09.02	2017/08/28	Email	BEE presentation - book meetings - see latest update attached.
BV	03.09.02	2017/10/17	Email	RE Query from "Name"
BW	03.05.02	2017/09/18	Email	RE: "Subsidiary" -Feedback from BEE Commission - FW: Major B-BBEE Transaction - Your advice, please2

APPENDIX 3: Journal entry data references

The table below explains how I refer to my journal entry data.

Date	Description	Reference
1 September 2015 to 19 October 2015	Purple diary 1 (PD1)	JEPD1, date
2 November 2015 to 18 January 2016	Light blue diary (LBD)	JELBD, date
4 February 2016 to 29 March 2016	Orange diary (OD)	JEOD, date
4 May 2016 to 5 September 2016	Black manuscript diary (BMD)	JEBMD, date
7 September 2016 to 3 July 2017	Black diary (BD)	JEBD, date
5 July 2017 to 18 April 2018	Purple diary 2 (PD2)	JEPD2, date
18 April 2018 to 1 March 2019	Red diary (RD)	JERD, date
26 February 2019 onwards	Black bank journal (BBD)	JE BBD, date

A reference designated “(JEPD1, 1 September 2015)” refers to purple diary 1 that contains my journal entry on that day, whilst “(JEOD, 4 February 2016)” refers to the entry in my orange diary on 4 February 2016.