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#### Introduction

Globalisation is a new word for an old phenomenon. At the end of the 19<sup>th</sup> Century, goods and services, money in the form of silver and gold, ideas, practices and people moved across state boundaries freely throughout most of the world. In recent years we have come something close to that world, except that the movement of people is now restricted, and that technology, especially in the speed of travel and communications, has created a completely new dimension to the economic, social and cultural integration of the modern world we now term 'globalisation'. On a regional basis, the EU is perhaps the closest replica of the circumstances prevailing at the close of the 19<sup>th</sup> Century, like an extended version of the Habsburg Empire but with greater complications, especially with EU enlargement<sup>1</sup>.

Many aspects of globalisation have attracted the attention of scholars apart from economic issues such as trade, labour practices, the emergent dominance of the service sector, migration, and the reduction of state authority in economic and social policy. Barriers have been lowered and blinds have been raised on fashions in art, music, films, clothing, cuisine, which have spread globally at an astonishing speed on the wings of media advertising, multinational enterprises and mass marketing techniques induced by the economies of scale. In this process, considerable convergence and even homogenisation of these various elements have taken place. Driving these developments is the greatly increased pressure of competition, forcing efficiency on organisations. And it is in this context that management plays a critical role.

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<sup>&</sup>lt;sup>1</sup> Visions of united Europe go back to Roman times with the crowning of Charlemagne as Emperor of the Holy Roman Empire in 800. For a brief historical background, see Noe, 2002.

The management of people is one of the most complex and, at the same time, the most important task of any organization. Complex, because managing people is to manage a factor of production with embedded attitudes and values – a culture – which may or may not respond to particular managerial practices; important, because the growth or survival of an organization depends on effective management. This is not a new problem. It goes back to the industrial revolution; but the philosophical, ideological and economic underpinnings of management principles have evolved over time under the pressure of competition in a changing environment of products, materials and technology.

My task is to review recent ideas on management philosophy and techniques in the context of globalisation, and to consider the forces leading to the transfer and convergence of these ideas and practices globally, as well as to the persistence of differences through cultural and other forces. Although the paper will focus on the EU as at present constituted, it will also try to consider the implications of EU enlargement on the convergence issue.

In recent years, the efficiency of Taylorism² with its emphasis on de-skilled operations and narrow job classifications, a management concept in vogue for most of the 20th Century to deal with mass production, has been questioned in the face of two reinforcing pressures – on the one hand, the emergent post-industrial information and knowledge-based society, affected by fundamental changes in technology brought about particularly by the electronic revolution; and, on the other hand, increased international competition arising from greater global economic integration involving the dismantling of trade protection and liberalisation of capital movements. In this competitive environment, productivity growth and other elements of economic efficiency such as reliability of quality and delivery, are critical factors in the survival of enterprises and the prosperity countries. To meet this challenge, attention has been focused on a more effective use of labour, and it is in this context that the human resource management (HRM) concept has been widely promoted as a basis for more efficient management.

#### Meaning and significance of HRM and IR

First, a brief explanation of the meaning and significance of HRM and industrial relations (IR). Perhaps it is easier to start with the older concept, IR.

Broadly, IR refers to the relationship between employers and workers, the issues that arise in the employment relationship – pay, working conditions and other terms of employment – and the processes for resolving these issues. The determination of these issues may take place on an individual worker basis, as they were in the early days of industrialization, or, more commonly these days, on a collective basis with workers being represented by unions – a

<sup>&</sup>lt;sup>2</sup> Named after the American Frederick Taylor whose writings on management issues were very influential in the first half of the 20<sup>th</sup> Century.

process providing a better balance of power between employer and employee. The right to collective bargaining and its associated right to strike, are social rights enshrined in two of the ILO's Labour Standards under Conventions 87 and 983, and many countries have enacted laws to give effect to these Conventions. Resort to collective bargaining obviously encroaches on the employer's right to manage; and the extent of encroachment depends on the interests of the parties and the price they are prepared to pay as to where the line is drawn

HRM is a comparative newcomer in the lexicon of management, sometimes referred to as a 'new way of managing employees' (*Storey*, 2001:4), developed in the US in the 1960s and 1970s. Obviously, any organisation where people are employed, involves the management of 'human resources', a somewhat pretentious term for 'labour'. But there are explicit and implicit overtones to the meaning and practice attached to HRM on which there is still a lively debate (Storey, 2001). Its immediate antecedent is personnel management (PM), also a US inspired development, which, it is said, lacks the analytical sophistication and strategic approach of HRM and is largely prescriptive. Others have argued that the downgrading of PM, largely by business consultants and academics, is unjustified and that the essential elements of HRM are inherent in a proper application of PM and that coherence with the overall strategy of the organization is not necessarily excluded in such application<sup>4</sup>. 'HRM is not a magic recipe making everything that preceded its announcement redundant' (Torrington, D., 1998:36; Grant, D. and Oswick, C., 1998; see also Sisson, 2001).

It is not fruitful for our purposes to engage in a 'largely abstract debate on definition' (Torrington, 1998:27). HRM is the new name of the game.

Storey's (p. 6) broad definition is useful.

Human resource management is a distinctive approach to employment management which seeks to achieve competitive advantage through strategic deployment of a highly committed and capable workforce using an array of cultural, structural and personnel techniques.

Elaborating on this definition and drawing out certain generic principles from it, the widely accepted view of HRM is that it places primary emphasis on human resources as the most important factor in efficient enterprise performance. This emphasis must be seen in the context of technological developments which have displaced the de-skilled processes assumed by Taylorism and call for the application of the scarcer higher skills. Importantly, HRM seeks to develop a culture of 'high commitment' to the organization from employees. It applies a strategic, pro-active and integrated approach consistent with the strategy of the

<sup>&</sup>lt;sup>3</sup> Forming part of the 1998 ILO Declaration on Fundamental Rights which are also set out in United Nations International Bill on Human Rights.

<sup>&</sup>lt;sup>4</sup> The continued influence of Taylorism, even in the service sector, is discussed in Taylor et al, 2002.

organization in its various sectional functions – finance, investment, production, marketing etc<sup>5</sup>. Further, it puts responsibility for the formulation and evaluation of the HRM policy on line management and not, as in PM, on the personnel department.

Drawing on the teachings of organizational behaviour and psychology, the processes associated with such policy are in the method of selection, training, career development, communication, performance appraisal, and reward systems. To give workers a sense of participation and empowerment, responsibility is devolved lower down the line. The management structure is less hierarchical, jobs are designed and workers are trained to facilitate semi-autonomous work groups, multi-skilling and flexibility in the use of labour<sup>6</sup>. This is of course an idealized academic constructed picture of HRM, based on the beliefs and assumptions of 'leading edge' practitioners, which has been presented by John Storey (2001:7) in a classified form. (Attachment 1).

Studies of applied HRM (or something substantially like it) in the US and UK appear to indicate that they have generally produced positive profit and productivity outcomes not only short term but also long term (Huselid, M. et al., 1997; Guest, D.E., 1997:263; Collins, J.C. and Porras, J.L., 1998) although the reliability of such conclusions are not without doubters (Storey, 2001:14). Moreover, the effect on the well-being of employees may be negative. There is evidence of increased stress among workers (Woodall and Winstanley, 2001:39) but it is not clear that this is necessarily due the application HRM techniques as such.

#### Transfers and the forces of convergence

The acceptance internationally of the main HRM practices, if not its philosophy, as a tool of efficient use of labour, is reflected in their promotion and application world-wide, but with significant variations. The transfer from the US of the concept and their application in part or in whole, was propelled by a number of interlinked forces.

First, increased international competition unleashed by globalisation in the last two decades, made improved organisational efficiency a condition for the survival of business enterprises, the economic growth of countries and rising living standards. In these circumstances, not surprisingly, managerial efficiency became a prime target for review, and HRM became the focus of special interest. It is to be expected also that international mobility of capital may provide pressure on workers and unions, threatened with closure or shrinkage of employment opportunities, to accede to HRM practices seen by their employers as providing them with a competitive edge.

<sup>&</sup>lt;sup>5</sup> 'Strategy' more simply means the plan by which certain integrated objectives of the organisation are to be achieved. For a fuller treatment of the meaning of 'strategy', see Purcell, J. (2001:65-66).

<sup>&</sup>lt;sup>6</sup> A convenient classification of the main elements of HRM is provided by Story (2001:7:Figure 1.1) Another classification – commitment, flexibility, quality and strategic integration - is suggested by Guest, D.E. (1991).

Second. the application of technological innovations is an essential means of securing competitive advantage. In recent years, the innovations which have spread internationally in manufacturing and service industries, have generated new products and new forms of work and work patterns, heralding a 'new industrial revolution . . . and the fragmentation of mass markets' (Piore and Sabel, 1984). This called for new approaches to management and industrial relations (Morley et al., 2000:202), providing the impetus for the application of HRM principles.

Third and perhaps the most explicit manifestation of HRM transfer mechanism, has come from MNEs which, partly because of their size and managerial resources, have the incentive to carry their HRM principles and their senior personnel to their subsidiaries in other countries, subject, of course, to any legal requirements in the host country. Some of these practices of the MNEs could be expected to spread to local organisations in the host country.

Finally, a veritable explosion of academic and professional publications, HRM courses in business schools, international conferences, management consultants, improved communications and publicity mechanisms generally – all of these, bearing the message of increased efficiency, have assisted the spread of HRM processes. The EC (European Commission 2001) and OECD (1998) have added to the flow of advice on efficient management of labour practices.

#### Persistence of differences

However, the persistent differences and resistance, at least in part, to the forces of convergence, come from several sources.

First, it should not be assumed that, even in the US where the concept was developed, the HRM principles are widely adopted – 'where rhetoric has so far outstrip[ped] reality' (Kochan and Dyer, 2001:273). Writing of the UK, Guest (2001) contends that perhaps in the majority of organizations in the private sector, there is a low level of HRM and no union presence, where managers 'may behave as tyrants or may display benevolent paternalism' (p. 111).

Second, because American literature dominates the subject and many of the early application of HRM were in non-union firms, it should not be assumed that there is a 'universal' or 'best practice' HRM model, often assumed to be the US model, which can be applied everywhere. While general or generic principles may be drawn from the text book exposition of HRM for application in an organization, they should obviously be tailored to the features and requirements of the particular workplace or industry under consideration, as well as to the level of economic development in the country concerned, to the availability of managerial capacity, the type of ownership, the resources of the organization, and to the

supply of appropriate skills<sup>7</sup>. Recent UK surveys show a low but increasing level of application of HRM practices (Guest, 2001:110).

Moreover, the relevance of many of the practices prescribed by HRM principles may be questioned for SMEs, which form the substantial majority of enterprises. A distinction needs to be made between policy and practice, rhetoric and reality (Legge, K. 1995). Not every element of HRM policy is capable of application even if so desired by management. Nor does it follow that wherever HRM policy is in place, workers do become fully committed to the organization (Storey, 2001:6). Thus, more commonly, the application of a number of parts of the total range of HRM practices, with modifications whenever necessary or expedient, may be a more common feature of its manifestation (Sisson, 2001:86). Or, as it has been put in other words (Adler et al, 1986), organisations are becoming more similar internationally in terms of their structure and technology while existing work related practices and worker preferences continue to be culturally-bound nationally<sup>8</sup>.

Third, cultural differences provide the most important source of resistance to HRM models drawn from other countries? Thus one authority (Communal and Brewster, 2003:5) has said:

People cannot be managed in a vacuum; they are managed within a context (e.g., cultural, social, educational, religious, geographical, legal, historical) The process of HRM is therefore not neutral; it is surrounded by cultural, social and other norms characteristic of human behaviour.

Culture is of course an imprecise term embodying a number of elements reflecting the attitude and values of people on particular issues. One suggested broad definition (Tylor, E. 1913, quoted in Petit, M. et al, 1994:169) is in the following terms:

Culture is a complex ensemble which includes the knowledge, beliefs, art, morals, laws, customs, and all of the other capacities and habits acquired by man as a member of society.

Others may prefer specify some of the elements separately, for example, legal requirements, for particular emphasis.

<sup>&</sup>lt;sup>7</sup> For a fuller list, see Salamon, M. (1997).

<sup>&</sup>lt;sup>8</sup> This view has been criticised by McGaughey and De Cieri (1999) on the (theoretical) grounds that it unduly simplifies the complex dynamics of the convergence process.

<sup>&</sup>lt;sup>9</sup> While we are concerned in this paper largely with transference matters in US and Europe, it is interesting to note that the importance of traditional culture in shaping HRM practices in developing countries (Jackson, 2003). Zhu and Warner (2003), point out that despite the pressure for greater managerial flexibility following the Asian financial crisis, traditional cultural characteristics (such as collectivism, harmony, loyalty, hierarchy, paternalism) are still a strong force in HRM in Japan and Taiwan.

#### **Industrial Relations**

In the area of management, the role of industrial relations and in particular, of collective bargaining and unionism is perhaps the most important source of inter-cultural difference especially between the US and EU countries. US management generally has had a longstanding philosophical objection to unionism and collective bargaining as an unwarranted encroachment on its 'right to manage'10; and in the years after the 1970s, it reverted to the pre-1930s anti-union stance (Barbash, 1985; Phelps Brown, H. 1983). Despite the 'New Deal' inspired legislation providing for collective bargaining and the right to strike, procedural tactics possible under the legislation, have tended to marginalize union power.

HRM developed in the US, and it came from personnel managers and consultants who were anti-union or ignored the relevance of unions in the design of HRM (Beaumont, 1991:300; Kochan et al., 1986:62). The early studies of HRM were generally conducted in non-union workplaces, for example, Hewlett Packard and IBM. The US Department of Labor (1993) lists of HRM characteristics, suggestive of a kind of 'best practice' statement, which does not include unions in the various management processes (Brewster, C. 2002:257).

The 'high commitment' concept which is at the heart of US HRM doctrine, assumes that the inherent interests of the worker and the employer are in complete harmony or can be made to be so – the 'unitarist' view (Storey, 2001:12); whereas IR assumes that, despite a wide degree of common interest and cooperation between them, there is a residual conflict on pay and conditions to be resolved from time to time as a natural rather than a pathological feature of employment relations – the 'pluralist' view.

Consistent with the unitarist assumption, HRM work practices are designed to strengthen the identification of the worker with the organisation and improve their performance in the interest of both sides<sup>11</sup>. Cases can be quoted of the success of such an approach<sup>12</sup>. On the other hand, there are US cases which show that workers and unions can be involved in strategic decision making, thereby increasing mutual trust with benefit to economic performance (Kochan et al., 1986:145). Thus, in such matters of training, performance evaluation, and reward systems, it is arguable that the participation of unions officials may be an effective way of ensuring trust in these practices. There is also evidence that increased commitment to the organisation need not necessarily mean reduced commitment to the

<sup>&</sup>lt;sup>10</sup> The advice of the international firm of management consultants, Arthur Anderson included: 'Managers must be free to manage' (Brewster, 2002).

<sup>&</sup>lt;sup>11</sup> Guest (1990) goes as far as to say that the philosophy of HRM is either to deny the existence of separate worker interest, or to subordinate them to subordinate it to the employer's interest.

<sup>&</sup>lt;sup>12</sup> In Australia, a large mining firm with a long tradition of collective bargaining, recently decided to embrace HRM philosophy by persuading most of its workers, under the inducement of better pay, to accept individual contracts, a form encouraged by a change in Australian labour law. The company was subsequently able to rationalise its workforce by downsizing and so increase productivity (Mackinnon Hearn, 2003).

union and to collective bargaining (Deery et al., 1994). Nor does it follow that union participation is inconsistent with higher productivity performance (Alterburg et al., 1998; Katz, I.F. 1986; Krueger, A.B. and Summers, L.H., 1988). A plea for bringing unions and public policy makers in the US into HRM processes as a means of raising productivity growth has been made by American academic writers (Kochan and Dyer, 2001:273).

Thus, it is arguable that conceptually and on practical efficiency grounds, there is no reason to suppose that HRM is incompatible with collective bargaining (Peetz, 1997). It could even be said that HRM and IR may be 'different perspectives on the same process' (Morley et al., 2000:207). Moreover, even the Harvard HRM model (Beer et al., 1984) includes unions among the stakeholders in the production process<sup>13</sup>.

All this may sound strange to EU ears, for whom it will be evident that the task of management goes beyond finding efficient methods of production. The stakeholders<sup>14</sup> in business activity are not only the owners of capital – the shareholders – but also those who supply labour services to the enterprise – the employees – as well as those who buy the products, and, where health, safety, welfare and environmental concerns are involved, the community at large. On this view, the task of management is to strive for a balance between economic efficiency, equity and the public interest. It follows that all three – HRM, IR and legislation – are relevant considerations (see Kochan and Dyer, 2001:274). This stakeholder approach is still well embedded in the EU social culture and provides a sharp contrast to that of the US. And it is increasingly argued that 'long term, sustained, competitive advantage is only feasible' (Storey, 2001:12) when the needs of the various stakeholders are taken into account.

The contrast between US attitude to unions and that of the EU countries (excluding the UK, for the moment) has an important bearing on how HRM processes may be expected to work in the EU countries. This can best be appreciated against the backdrop of the effects of globalisation on the EU states. Global competition has affected member states differently. The EU itself is a more complete form of economic integration on a regional basis than it is with the rest of the world, inter-member trade making up close to 90 percent of its GDP. In the circumstances, there is strong incentive, through pressure for harmonising economic and social policies as far as possible, to ensure that the openness of trade and labour mobility does not result in social dumping. To give effect to such a policy and to avoid undesirable social outcomes, corporatist and neo-corporatist processes, calling for dialogue and collaboration between governments, employers and unions, has been necessary; something

<sup>&</sup>lt;sup>13</sup> A useful reconciliation of HRM and IR is suggested by Gospel, H. (1992) by incorporating effectively within HRM, three elements – work relations, employment relations and industrial relations. Such an approach is also reflected in the European Commission's approach (European Commission, Final Report, 2002), about which more later.

<sup>&</sup>lt;sup>14</sup> The stakeholder approach was first advanced by R.E. Freeman (1984).

It is essentially a normative concept connected the 'property rights' of labour. It may also be considered to have an instrumental element for greater efficiency (Donaldson, T. and Preston, L. 1995).

far from any contemplation in the US. I should foreshadow here the incipient problems which could arise from EU enlargement.

Thus, subject to the adjustment problems which may emerge from EU Enlargement, it is reasonable to suppose that in the foreseeable future, industrial relations in the EU countries will continue to embody the concept of 'social partnership' involving social dialogue on economic and social issues and 'collective rights'<sup>15</sup>. In this process, national trade union bodies have remained powerful institutions and have maintained their authority to speak for workers and to be listened to by the employers and governments. Further, there is no challenge to the right of collective bargaining and its associated right to strike.

Moreover, it is important to note that the standing of unions and the commitment to social partnership at the national level, is reinforced at the EU level. The EU Charter on Fundamental Rights issued following the Nice Summit of December 2000 (European Union, 2001) committed member states to observe a whole range of rights – civil, social, political and economic. A number of social rights, including equal opportunity, have been incorporated into the laws of the member states and are enforceable in the European Court of Justice and the Court of Human Rights. Although the right of collective bargaining and to strike have so far not been incorporated and are subject solely to the rights of the states under the principle of subsidiarity, there is reason to believe that breach of such rights by a member state could invite a legal threat to its membership of the EU (Biffl and Isaac, 2002). Thus the ethos of the EU, backed by the law, imposes obligations on member states to ensure that union bargaining rights are respected.

But more than this. The institutional framework at the European level has been greatly strengthened by the 1997 Amsterdam Treaty (Sisson, 2003:fig. 1) which requires, *inter alia*, for the Commission to consult the social partners on socio-economic policy matters before bringing down legislation. Further, this point is reinforced by the EC social model (Szyszczak, 2000:164), based on a set of social values – including individual rights, democracy, free collective bargaining, social welfare, social solidarity and market economies – as stated in the White Paper on Social Policy (European Union, 1994). In addition, the mechanism for ensuring dialogue between the social partners on this issue is sustained by the requirement under the EC Treaty (Art. 138(1)) that the Commission 'shall take any relevant measure' to facilitate social dialogue between the partners 'by ensuring balanced support for the parties. The importance of such dialogue should not be underestimated as a device to bring recalcitrant States into line (Mosely, Keller & Speckesser, 1998). Furthermore, by an EU directive, successively smaller organisations are required to establish works councils across Europe (Communal and Brewster, 2003:8).

<sup>&</sup>lt;sup>15</sup> The European Union (2001), while advocating the HRM approach to work practices, goes out of its way to emphasise the importance maintaining the role of unions and social partnership concept in this development.

A further important development has been the establishment of European Works Councils covering some 650 MNCs agreeing to establish transnational machinery for information and consultation (Sisson, 2003:6). While this does not mean that the concept of a 'European industrial relations system' is a likely prospect in the foreseeable future, a platform exists at the European level for the European Trade Union Confederation to engage in dialogue with employers on industrial relations issues, providing the opportunity of at least resisting any dilution of the existing social rights principles 16. But there are sceptics who regards the social dialogue at this level as a time-wasting, ritualistic process, a 'matter of form rather than substance' (Hyman, R. 2001:290). Differences in industrial relations practices between EU states may be expected to persist, but the commitment to union collective bargaining and associated rights, sharply distinguishes the operation of HRM in EU states, from that in the US and a number of Anglo-Saxon countries (Biffl and Isaac, 2002) where the social partnership ethos is lacking<sup>17</sup>. Moreover, the States coming in under the European enlargement process will be expected to abide by the Copenhagen conditions which require the newly admitted States to adopt inter alia 'the common rules, standards and policies that make up the body of EU law'. But more of this later.

This leads us to consider the UK, a member of the EU and therefore bound by its Charter and the terms of the Amsterdam Treaty in particular. Under the Thatcher Government, restrictive laws were passed including those on picketing, strikes, union recognition, and union disciplinary powers on its members, which weakened union power in collective bargaining. Findings by the ILO supervisory bodies of violation of ILO Conventions, were repeatedly ignored by the UK Government. HRM techniques have been increasingly used to undermine the role of the union (Mayrhofer, W. et al., 2000:228). The Blair Government has reversed some of the restrictive laws and proclaimed the 'partnership' concept but it fits uneasily in the historical tradition of British industrial relations where even the works council concept is still treated with suspicion by management and unions.

It may be asked why so much importance has been placed on the difference between a culture which emphasizes the need for unimpaired 'management rights', relegating the role of unions to a nuisance factor, and one which accepts the partnership of unions in management. Apart from evidence drawn from UK experience that workers in non-union organisations work in places which have fewer health and safety representatives and suffer a higher incidence of accidents and injury rates, have more dismissal of a non-redundancy

<sup>&</sup>lt;sup>16</sup> The European Commission (2002b:32) has argued that, to cope with a more competitive knowledge economy, the role of industrial relations at local, regional or national level can be enhanced by developments at the European level particularly on those issues with a European dimension. The Report envisages substantial changes in work practices but insists that such changes should be brought about with the 'strong involvement of the social partners at all levels'

<sup>&</sup>lt;sup>17</sup> The dependence of Ireland on US private direct investment in developing the electronic industry, has led the Government to allow these companies to be absolved from honouring the social partnership concept, thus excluding the unions from their HRM policies (Green, R. 2003).

nature, have fewer grievance and disciplinary procedures and have generally fewer information/communications channels with management (Flood, P, 1998:62), there is the pertinent question of giving effect to 'social rights' and dignifying workers and their representatives with status as stakeholders in the production process. It may even result in the long term in more sustained efficiency. Moreover, the important conclusion from EU experience with HRM is that is that HRM is not intrinsically anti-union and that they 'can and do co-exist' (Mayrhofer, W., 2000:229). But as we shall see later, this may be an unduly optimistic conclusion.

#### Other differences

Apart from industrial relations, there are other differences in HRM between US and EU, worth noting. Mention has been made of the role of union and employer organisations in the formulation of social policy. The quest for 'flexibilisation' has resulted in decentralisation to varying extents and greater diversity in pay and conditions within member states. But unlike the US where decentralisation to the company or workplace level is universal, a 'complex multi-level system', managed centrally (Sisson, 2003), appears to have emerged, orchestrated partly by the national unions (Traxler, 1995). At the workplace, works councils continue to provide the basis for employer/worker/union consultation and workplace settlements in many Member States. These circumstances provide obvious scope for causing wage drifts and widening wage differentials for the same skills between industries and regions. Austria, for example, is among the countries with the highest wage differentials in Europe<sup>18</sup>.

Another difference between EU and US is in the readiness of EU governments to legislate and regulate industrial relations issues, including hours of work, equal opportunity and social security, although varying in the specific matters and forms on which regulations are enacted (Communal and Brewster, 2003:7).

A further difference between the US and EU is in the process of communication and consultation, which, as we have seen, are of the essence of HRM (Mayrhofer, 2000:230). This process can be on an individual or collective basis i.e. with unions. In the US, management has generally adopted the former, consistent with the unitarist philosophy; while both forms are employed in the EU and have increased substantially in recent years. Communication has been both verbally and through to the electronic media. Works councils in which, in a number of countries, union representation is in evidence<sup>19</sup>, are also widely used in Continental EU countries as a medium of communication and consultation; and this is

<sup>&</sup>lt;sup>18</sup> For a more detailed discussion, Biffl and Isaac, 2002.

<sup>&</sup>lt;sup>19</sup> Their power to restrict the right of management to manage is reflected in their right to seek legal restraint on managerial decision in matters such as recruitment, termination and changing work practices (Communal and Brewster, 2003:8).

prescribed by law in a number of countries<sup>20</sup>. Further, worker representation at the board level is also required by law in a number of countries<sup>21</sup> (Mayrhofer, 2000:226).

Comparative CEO earnings also reflect cultural differences on income inequality. The figures from various sources quoted here should be treated with caution because of differences in coverage, size of organizations, purchasing power parity, taxation rates and other differences for which some of the comparisons are not controlled. Nevertheless, they do show fairly significant differences which may be difficult to explain away by performance, responsibility and other such factors.

One study (Conyon, M.J. and Murphy, K.J., 2000) compares CEO earnings of the largest 500 UK and US companies in 1997. Including share options, they were on average 660,000 Pound and 6.3m Pounds. After controlling for size, sector and other characteristics, US total compensation is 190 percent higher that that of UK.

Another estimate (Smith, D., 1999) covering the top 10 companies, shows that in 1998, the average UK CEO compensation was 3.1m Pounds compared to 26.1m Pounds for the US.

Comparing a wider sample of CEO compensations, it has been estimated that in 2002, average US CEO compensation was some 440 times the average earnings of wage earners (AFL-CIO, 2003).

While these comparisons are startling, the difference with other EU states is even greater because UK CEOs earn rather more than their European counterparts. Comparing Germany (which is low in the CEO compensation pecking order) with the UK, it has been estimated that in 1994, the average compensation for a wide sample German CEOs was about 200,000 Pounds compared to 391,000 Pound for their UK counterparts (Conyon, J. and Schwalbach, J., 2000). Between 1968 and 1994, the growth rates in compensation were 1.36 and 7.5 percent, respectively. A comparison with average manufacturing wages in 1996, shows that German CEOs earnings were four times greater, while the figure for the UK was 15 times greater.

<sup>&</sup>lt;sup>20</sup> Belgium, Germany, France, Luxembourg, Netherlands, Portugal and Spain.

<sup>&</sup>lt;sup>21</sup> Denmark, Germany, France, Luxembourg, and Netherlands; while in state enterprises, the requirement also applies Greece, Ireland and Portugal.

Another comparison (BBC News, 2001<sup>22</sup>) shows the following average CEO pay in Pounds and the percentages of average manufacturing workers pay of the CEOs pay:

		Percent
UK	509,019	25
Australia	457,139	21
Japan	385,128	11
France	382,128	16
Sweden	311,400	14
Germany	298,223	11

A comparison of Western and Central-Eastern European salaries shows a big gap between them:

	('000 Pounds)		
	Western Europe	Central and Eastern Europe	
IT Sales Manager	48-64	28-35	
Finance Director	40-50	23-37	
Personnel Manager	32-45	11-14	
Network Analyst	30-38	23-26	

Source: Management Today Global Salary Survey August 2001.

#### Summing up the main differences between US and EU

Significant differences between US and EU HRM concepts have been highlighted in which cultural differences, reflected especially in the legal framework, both national and supranational, the role of trade unions and social partnership concept provide the distinguishing features between them. It has also been suggested that the 'common philosophies, structures and practices' in Europe, establish certain identifiable traits of management: EU is focussed on people, whereas in the US people are considered a 'resource' (Calori et al., 1994:32); EU takes a stakeholder rather than a shareholder approach (p. 35) and a willingness to negotiate with its internal management at different levels and employees, as well as external stakeholders (p. 36); EU appears to be more capable of managing international diversity because of greater familiarity and respect for cultural diversity (p. 38), and is less 'imperialistic' in the export of their management models (p. 39). This is not to say that European enterprises ignore profitability, rather they believe that 'you cannot have profit without fulfilling social responsibility' (p. 84).

<sup>&</sup>lt;sup>22</sup> Based on Management Today Global Salary Survey.

#### Convergence within EU?

The question now arises whether the forces of economic integration and competition within the EU and the Charter on Fundamental Social Rights and various harmonising provisions of the EU, provide grounds for expecting convergence of HRM/IR practices within the EU; or whether here, as in relation to the US, cultural forces offer resistance to convergence. The answer appears to be that there is considerable diversity within the substantially common character of EU HRM, even before EU enlargement (Communal and Brewster, 2003:4). This is despite the fact that MNEs operate with fewer restrictions within the EU and can bring about greater convergence of HRM and IR practices. Thus, some MNEs take a highly decentralised approach allowing subsidiaries to apply practices believed to be more compatible with national context for example, retail banking and electricity (Edwards, T. 2003). Even in the automotive industry, there is a significant degree of diversity in processes for determining changes in work practices within Europe<sup>23</sup> (Baldry, C., 1994). It should be noted that the OECD, ILO and the United Nations have issued guidelines for application by MNEs on labour, human rights and environmental standards (Murray, 2001) which are substantially consistent with related elements of the EU Charter<sup>24</sup>.

In this connection it is worth considering inter-cultural differences. The famous 1980 study by Hofstede (1980) provides an illustration. The work has been criticised as being rather broadbrush but it is nonetheless of interest in reviewing management issues – what the objectives of an organization should be, what motivates people, how they should relate to their colleagues and supervisors, and how people should be trained. He examined 53 world-wide IBM subsidiaries and surveyed thousands of employees, from which he drew the following classification of national cultural differences: (Attachment 2).

- 1. <u>Power distance</u> the higher score showing greater acceptance of hierarchy<sup>25</sup>.
- 2. <u>Uncertainty avoidance</u> higher score reflects greater risk averseness.
- 3. <u>Individualism</u> in contrast to collectivism higher score reflects greater acceptance that individuals (and their families) should rely on their own resources rather than on government or any outside assistance.

<sup>&</sup>lt;sup>23</sup> In Germany and Austria, the process is separated from wage bargaining, and entirely by national negotiation, while workers are consulted continuously on design and implementation via the works council. In the UK, the process is part of wage bargaining on a *quid-pro-quo* basis. In Spain, the changes are treated as a matter of management prerogative in which unions have no input at all.

<sup>&</sup>lt;sup>24</sup> I have found no record on how closely the specified standards have been observed. For a detailed study of control mechanisms of MNEs towards their subsidiaries in other countries and the processes involved, see Harzing, A.-W. K, 1999.

<sup>&</sup>lt;sup>25</sup> Maximum score 4. Thus, for example, worker participation arrangements would probably be ineffective where power distance factor was high, as in many developing countries.

4. <u>Masculinity</u> – higher scores reflect greater society attachment to 'male' characteristics: competitive, assertive, ambitious materialistic<sup>26</sup>.

Another attempt at identifying national differences in culture and institutions, affecting the philosophy and style of management in different EU countries may be cited. (Calori et al., 1994) The difference between the UK and Continental EU countries, especially on the place of unions, was mentioned earlier. It is submitted that, in broad terms, in Southern Europe (covering the Latin countries), compared to Northern Europe (which includes The Nordic and Germanic countries), management is more hierarchical and less formalized, there is more state intervention, and there are more family businesses, especially in Italy. Sub-dividing the broad Northern grouping, in Germany, business has strong links with banks and a system of co-determination with workers' representation on Boards. The Nordic countries differ from the Germanic countries and Benelux in having a larger public sector. Nordic management is said to be more concerned with the quality of working life while Germanic management is more concerned with performance and status. Benelux and Switzerland have developed a blend of European and Anglo-Saxon models. And so it goes on.

Another differentiating factor: the education and training systems of managers may have a bearing on differences in management practices (Tyson, S. and Wikander, L. 1994). It appears from a survey that 24 percent of German managers had a worker employment background, compared to 1 percent of their French counterparts. While 50 percent of French senior managers came from the middle and upper class, 33 percent did so in Germany; while 46 percent of French managers graduated from the prestigious 'Grandes Ecole', only 16 percent of German managers graduated from the equivalent schools (Calori and Seidel, 1994:64).

The influence of HRM managers at Board of Directors level varies between EU countries, reflecting the importance placed by the Board on the HRM function. It is more prevalent in France (88 percent), Sweden (79 percent) and Spain (77 percent) than in the UK (49 percent) and Germany (46 percent); although in Germany, the presence of an employee director (by law) makes up to some extent for the difference. In Sweden and the Netherlands, worker representation on Boards also occurs.

There are differences in Member State labour laws<sup>27</sup>, in the forms, structure, power and density of unions, in union ideologies and links with political parties, religious bodies, and

<sup>&</sup>lt;sup>26</sup> For example, where the masculinity factor was low, it could be expected that performance related pay systems would be ineffective or resented.

<sup>&</sup>lt;sup>27</sup> For example, contrary to most other EU countries, under Austrian, Belgium and UK laws, the right to strike is not explicitly allowed or restricted. Whereas in France, Italy, Spain and Portugal, the right to strike is written into the constitution. Most Member States, except UK/Ireland, draw a distinction between conflict of interest and conflict of rights disputes. On the latter, disputes are resolved by arbitration or by labour courts. The considerable divergence is regarded as a major barrier to harmonization and convergence (Szyszczak, E., 2000:33).

collective bargaining coverage<sup>28</sup>. 'Peace obligations' in collective agreements are not recognized or have no contractual status in some countries (France, Italy and the UK). Trade union density differs widely within the EU, ranging from around 10 percent in France and Spain over 70 percent in Sweden, Denmark and Finland<sup>29</sup>. It has declined considerably in many countries over the last 20 years. But while density figures are important as a reflection of union power, it has to be moderated by the extent of union membership presence at the workplace. Figures on union recognition are holding up and they vary far less across different EU countries than density (Morley et al., 2000:211). Further, perceptions of organizations about whether unions have grown in strength or not over the last few years vary. While the majority believe there has been no change, the Latin countries report an increase in trade union influence while the UK, Ireland and the Netherlands say the opposite.

Further, employment practices vary. Part-time workers, reflecting employment flexibility, feature more prominently in Sweden (37 percent) and the UK (33 percent), while in Germany and France, the figure is down to about 20 percent. Temporary workers make up around 20 percent of employment in Spain, Sweden and France, while it is very small in Germany (4 percent). Sweden and France spend about one-third of the wage bill on training compared to Germany and the UK about one-fifth, and Spain about one-tenth.

In addition to tax laws, important differences in social welfare philosophy and practices have persisted, varying in their priorities of protection against risks, composition of social expenditure, sources of funding, and the administration of welfare services. Four models have been distinguished: Anglo-Saxon (Ireland, UK), Continental European (Austria, Belgium, Germany, France, Luxembourg, Netherlands), Scandinavian (Denmark, Finland, Sweden), and Southern European (Spain, Greece, Italy, Portugal; Biffl, 2003b).

An analysis of the Cranet survey (Larsen, H. H., 2000; also Brewster C., 1994 in Brewster, C. and Hegewisch, A. 1994), found the following significant differences in management practices between countries:

 In the use of appraisal systems to determine individual and organisational training needs; promotion potential and career development; individual performance related pay; and the organisation of work.

<sup>&</sup>lt;sup>28</sup> Collective bargaining coverage varies from almost 100 percent in Austria and Belgium, to, at the lower end, the UK at 36 percent (Carley, 2002:6).

<sup>&</sup>lt;sup>29</sup> Union involvement in the administration of unemployment insurance (the 'Ghent system') in Sweden and Finland, provide workers with the incentive to join unions. But apart from the recruiting efficiency of unions, union density is affected by a number of factors which influence the propensity of workers to join unions – including industry structure, incidence of part-time and temporary workers, gender ratio, and ethnic composition.

- The location of primary responsibility for major policy decisions on training and development as between the HR department and line management<sup>30</sup>.
- As to whether jobs are made wider/more flexible.
- The incidence of no corporate strategy (written or unwritten) in organizations.

The considerable diversity in the level of training of the workforce has been analysed by the OECD (1999). Formal and continuing training is relatively low in Southern European countries (Greece, Italy, Portugal and Spain), while it is relatively high in the UK, France and most of the Nordic countries. There is also considerable variation between EU countries in the age of the trainees. In the Nordic countries (except Finland), older workers receive as much training as younger ones, while they receive less training in France, Greece, Portugal and Spain. A strong link has also been found between national levels of educational attainment and achievement on the one hand, and workforce training on the other, underlining the importance of schooling in later training.

Finally, evidence of diversity is shown in an extensive survey covering over 800 organisations, both private and public, employing more than 50 persons in 10 EU countries and 50 case studies<sup>31</sup>. The purpose of the study was to discover the extent to which, what it calls, 'new forms of work organisation' are being applied and what the obstacles and its underlying causes to this form of organisation are. In substance, the study defines 'new forms of organisation' in terms of the HRM model we discussed earlier with a strategic approach in which the various sections of an organisation are integrated and operate consistently to meet the objectives of the organisation<sup>32</sup>. This is referred to as the 'system' approach. The main results of the study are interesting.

- Only 10 percent are system users; 50 percent are 'transition' or partial users; and the rest are non-users.
- The penetration of users is higher in service and public sectors as compared with manufacturing, and higher in large organisations than in SMEs.
- Users are highest in the Nordic countries, followed by Spain, Italy, France, Germany,
  UK/Ireland and Benelux. The system users are highest in the Nordic countries and lowest
  in Spain.

<sup>&</sup>lt;sup>30</sup> Another earlier study shows the, on balance, the influence of line managers in IR matters has increased (Gunnigle, P. et al., 1994:150).

<sup>&</sup>lt;sup>31</sup> Entitled 'New forms of work organisation: the obstacles to wider diffusion', FINAL REPORT, October 2002, the study was sponsored by the European Commission and carried out by Business Decisions Limited with an advisory group mainly of academics

<sup>&</sup>lt;sup>32</sup> 'A group of inter-related and internally consistent work practices and human resource management policies' (p. 2).

- Only 5 percent of the sample were **not** aware of the concept. The bulk of non-users **were**aware of the concept but had rejected it; Benelux being at the top of list, the Nordic
  countries being at the bottom.
- Nearly half of the rejecters having considered the concept, rejected it mainly because it
  was not required to meet its customers' needs and/or were not under pressure to
  change.
- The single most important obstacle to the introduction of the scheme by organisations of all sizes, in all sectors, in all countries, but to varying degrees, is identified as the existing (Tayloristic) culture of the organisations<sup>33</sup>; the other 'internal' obstacles were resistance from employees, fearing being disadvantaged by change and lack of management competence, especially in smaller organisations. The 'external' obstacle was labour law and collective agreements; the study maintains that 'overall resistance from employees and their representatives is considered to be the second most important obstacle' (p. 45). This was found to be the case more importantly in large organizations, in the service rather than manufacturing sector, and in the UK/Ireland and Germany rather than elsewhere.
- These obstacles operate not only to militate against organisations embarking or proceeding further in workplace reforms, but are experienced by organisations when implementing them.
- Lack of financial resources are not perceived by the majority of organisations as a major obstacle.
- The perceptions of organisations to legislative obstacles to such changes as working time, job classifications, consultative processes and payment systems, vary significantly between countries. They are perceived more strongly but to varying degrees, in Germany, France, Italy and Benelux. In Germany, it is believed that inflexible labour laws and collective agreements are nearly as significant as cultural obstacles (p. 50).

Although the Report maintains that there is no single 'right' organisation or 'right' combination of new forms of work practices, it does argue for a 'system' approach as most likely to yield efficiency outcomes. And it refers to studies in Germany and the US to support this contention (p. 17). However, while it sees the scheme as promoting a closer relationship between management and employees, it is aware of the risk of 'potential intensification of work, and an erosion of traditional relationships between unions, workers and managers (p. 6). In this respect, it stops short of the US approach to unions. It claims that there is no evidence from its study to show that it is more difficult to implement changes where employees are

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<sup>&</sup>lt;sup>33</sup> The Taylorism tends to emphasise, among other things, hierarchy, narrow job classifications and skills, strong controls and limited worker responsibility Organisational cultures reflect and are derived in part, at least, from the general community culture (Scott and Meyer, 1994).

represented by trade unions. In fact, the case studies include cases where consensus solutions were implemented after consultations with employees and unions (p. 48). However, this conclusion seems to contradict the survey finding that the second most important source of resistance is from employees and their representatives (p. 45).

All in all, despite a central core of commitment, particularly on the place of unions and collective bargaining in management activity, there are significant differences in management practices among the EU countries<sup>34</sup>. Many of these differences have a historical basis, the lapse of time consolidating them into a cultural force. But are most of them critical to efficient management or simply alternative methods of management – the difference between Hungarian goulash and Irish stew, a matter of 'taste'? The answer is not clear and deserve to be investigated further. It may turn out that they work reasonably well in their particular settings.

Will any of these differences persist? One view on EU convergence, is that 'The idiosyncratic national institutional setting are so variable that no common model is likely to emerge for the foreseeable future' (Brewster, 2001:268). Another view is that 'while transfer will lead to change, it will not necessarily lead to convergence because transferred practices often go through a process of transmutation, in that they operate differently in the recipient unit from the way they had operated in the donor unit' (Edwards, T. 2003). Yet another view is that there will be a slow convergence as countries take from each other what is seen as the 'best characteristics of each culture . . . there will be a slow osmosis': 'The French won't change, the Germans won't change, but they will adopt good practices from their neighbours.' And there will further be a slow convergence of management systems world-wide 'especially between Europe and the United States' (Calori and de Woot, 1994:70-71).

## Concluding observations: the challenge to inter-cultural differences from economic and technological forces

While cultural differences can apply a brake on imported management philosophies and techniques, 'culture' is not static even if it changes slowly<sup>35</sup>. In this connection, while it is interesting to consider whether there will be greater convergence in such HRM practices as performance evaluation, reward systems, communications methods, etc., perhaps the most important question to ask concerns the character of industrial relations in EU countries. In particular, to what extent the role of unions will be compromised by the challenges facing them in the changing environment in which they operate – declining union density and

<sup>&</sup>lt;sup>34</sup> The roots of what has been called the 'European paradox' reflecting the tension arising from the co-existence of unity and diversity ('diverse but not adverse') is discussed in Noe, 2002.

<sup>&</sup>lt;sup>35</sup> The experience of a number of Anglo-Saxon countries, including Australia, New Zealand, the UK and Canada, all countries with long tradition of unionism, shows that changes in the political climate can bring down legislation less sympathetic to unionism on the pretext of the competitive pressures of globalisation.

power in most countries, growing unemployment and employment insecurity in the face of downsizing, outsourcing, relocation, sub-contracting and other segmentation devices facilitated by technology and the intimidating force of capital mobility internationally.

Further, pressure on the unions to conform has come from the spread of flexible work arrangements such as casual and part-time employment, fixed-term appointments, core and peripheral employees, home-based work, teleworking and other such arrangements for which union membership appears to have little appeal (Mayne, Brewster and Morley, 2000). Many of these practices have been associated with the adoption of HRM and new technology under global competition. In the circumstances, what is the future role of European unions in dealing with HRM practices? Are they simply likely to accede passively, to management demands for flexibilisation, being realistic about their loss of power vis-à-vis management in the competitive international economic environment? Will such 'nominal' union power result in a loss appeal of unionism and lead to a further decline in union membership?

The spectre of the 'Americanisation' of European industrial relations, at least towards it, under the pressure of the monetary and fiscal discipline of common currency, cannot be discounted. In this connection, one writer (Hyman, 2001:288-89) has argued that competitive market forces 'are tilting the balance of European social market economies away from the social'; and that the present diversity of industrial relations and the associated management practices, is the result of many decades of protectionism in which nation states had substantial power to determine economic policy. Globalisation has altered this context. And especially within EU, now with monetary union, Member States have effectively little room to manouvre on monetary and fiscal policy without violating the rules to which they are bound. These disciplines are 'inherently antagonistic to the principles of social protection and social partnership which underlie most European industrial relations systems' (Hyman, 2001:289). Can it be argued that even in the EU, the acceptance of unionism by management may be a thin veneer, held down by legislation and the present political forces which sustain it?

A further pertinent question: how will the present EU states be affected by EU Enlargement? Although productivity is generally lower in the Accession States, wages are also appreciably lower and hours longer than in the EU States. Will there be 'One Europe or Several'<sup>36</sup>? The answer to these questions must be in the nature of inferences drawn from the meagre factual material, with some inconsistencies, currently available about accessing states<sup>37</sup> (Biffl, 2002; European Commission, 2002)<sup>38</sup>.

<sup>&</sup>lt;sup>36</sup> The title of a research project sponsored by the European Foundation for the Improvement of Living and Working Condition.

<sup>&</sup>lt;sup>37</sup> For purposes of convenience we will refer solely to the CEECs.

<sup>&</sup>lt;sup>38</sup> There are no systematic studies of trade unionism, strikes, collective agreements and other industrial relations matters (European Commission, 2000:118).

However, on the information available<sup>39</sup>, the following points produce a picture of contrast with the EU:

- A high proportion of people of working age appear to be either self-employed or in the informal economy which has grown following the collapse of the command economies, some of the sharp increase in unemployment having been absorbed into the informal economy. It is estimated that between 30 and 50 percent of GDP is derived from this sector compared to 10 to 20 percent in the present EU members (Biffl, 2003a:1). On the reasonable assumption that productivity in this sector is lower than productivity in the formal economy, the proportion of persons involved in the former is higher than is indicated by GDP measures. This means that a large proportion of the working population have no legal or social protection.
- Unionism is weak, affected by political rivalry in some states, and weaker than is suggested by density figures<sup>40</sup> at the upper end, Slovenia and Slovakia (40 percent), and at the lower end, Hungary (20 percent), Poland<sup>41</sup> and Lithuania (15 percent) (Carley, 2002:2). The average rate of unemployment is twice that of EU member countries (Carley, 2002:8). Although the right to strike (except political strikes in some states) is protected under their constitutions (Nagy, L., 1996:16), many workers prefer to take multiple jobs, some in the informal economy, rather than strive to improve their positions through collective bargaining (European Commission, 2002:98).
- In the formal economy, 50 to 60 percent of employees work in enterprises with less than 50 workers. In Slovakia, 97 percent are units with less than 50, of which 80 percent employ less than 10 persons. In these small establishments, management practices must be assumed to be basic with nothing like the sophistication expected of HRM. The relative low pay of Personnel Managers noted earlier reflects the low status of HRM/IR. Worker training from employers is not common although compared to the EU members, a higher proportion of the population have been educated beyond lower secondary level (Carley, 2002:8).
- Collective bargaining is generally at the enterprise level. Most SMEs do not engage in collective bargaining.
- Many foreign investors are not in favour of collective bargaining.

<sup>&</sup>lt;sup>39</sup> Unless otherwise indicated, the data on the accession countries presented below are drawn from European Commission, 2002a.

<sup>&</sup>lt;sup>40</sup> Comparative figures should be treated with caution because of different definitions adopted, many of the unemployment figures are estimates, and the size of the informal sector would have affected the estimate of the size of the workforce.

<sup>&</sup>lt;sup>41</sup> In Poland, unions have become increasingly marginalized by channels of non-union representation such as workers' councils and employee representation on supervisory boards. *European Industrial Relations Observatory*, on line, August 2002.

- Except in Slovenia and Slovakia (Carley, 2002:3), collective bargaining is also impaired by union rivalry while there is no tradition of employers joining associations.
- Although there are legal provisions on labour standards and collective bargaining in line
  with ILO Conventions, enforcement is poor (Musiolek, 2002). In Hungary, the minimum
  wage is determined by regular tripartite agreements; and in the Czech Republic and
  Slovakia, wider issues are covered (Carley, 2002:3).

These are still early days. With the pressure of EU social principles, in time, greater convergence in the CEECs towards EU practices may be expected. However, this could take a long time. Meanwhile, the impact of trade and migration between EU and CEECs will produce changes in the structure of industry on both sides (Biffl, 2003). The relative abundance of unskilled labour in the CEECs, the relatively lower wages generally in these countries, and the opportunity afforded by technology for the export of services without a emigration, will draw certain industries away from the EU and produce unemployment there, unless those affected are re-skilled and/or are relocated – often easier said than done. In addition, the flow of unskilled migrant workers into the Member States, will compound the unemployment problems in those states as well as add to the size of the informal sector.

Although the adjustment problems should not be exaggerated, since the combined GDPs of the CEECs is less than 10 percent of the EU's GDP (Dyker, 2000:5), unless offset by significant trading complementarity, competition from accession countries in addition to global competition, could present a challenge to the EU's social economy, social partnership and stakeholder approach with their overtones of equity. This is particularly pertinent if the world slides into a major recession. In the circumstances, the convergence de facto of EU's HRM/IR towards the American philosophy, may not be altogether fanciful. This trend could be expected to take place more in some states than others, bearing in mind the substantial autonomy of the member states on labour law. Inter-cultural forces are not static, especially when they have to contend with economic and technological imperatives.

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#### Attachment 1

#### 1. Beliefs and assumptions

- That is the human resource which gives competitive edge.
- That the aim should be not mere compliance with rules, but employee commitment.
- That therefore employees should, for example, be very carefully selected and developed.

#### 2. Strategic qualities

- Because of the above factors, HR decisions are of strategic importance.
- Top management involvement is necessary.
- HR policies should be integrated into the business strategy stemming from it and even contributing to it.

#### 3. Critical role of managers

- Because HR practice is critical to the core activities of the business, it is too important to be left to personnel specialists alone.
- Line managers are (or need to be) closely involved as both deliverers and drivers of the HR policies.
- Much greater attention is paid to the management of managers themselves.

#### 4. Key levers

- Managing culture is more important than managing procedures and systems.
- Integrated action on selection, communication, training, reward and development.
- Restructuring and job redesign to allow devolved responsibility and empowerment.

Figure 1.1 The HRM model (from John Storey, 2001, Human Resource Management A critical Text,  $2^{nd}$  Edn Thomson Learning).

#### Attachment 2

#### National Cultures in the Workplace

Table 1.2: A selection of results from Hofstede's study

	Individualism	Masculinity	Power distance	Uncertainty avoidance
Austria	2	1	4	2
Germany	2	1	4	3
Switzerland	2	1	4	3
Finland	2	4	4	3
Norway	1	4	4	3
Sweden	1	4	4	4
Denmark	1	4	4	4
The Netherlands	1	4	4	3
United Kingdom	1	1	4	4
Ireland	1	1	4	4
Belgium	1	2	2	1
France	1	3	2	1
Spain	2	3	3	1
Portugal	3	4	2	1
Italy	1	1	3	2
Greece	3	2	3	1
USA	1	2	3	4
Japan	2	1	3	1
Japan	<b>~</b>	ı	3	'

Note: 1 signifies that the score of the country on this dimension belongs to the first (highest) quartile among the 53 countries studied.

- 2 signifies that the score belongs to the second quartile.
- 3 signifies that the score belongs to the third quartile.
- 4 signifies that the score belongs to the fourth quartile.

(From R. Calori and P. De Woot (Eds.), 1994, A European Management Model. Beyond Diversity, Prentice Hall, New York).

