



Richard Hyman

Trade union research and cross-national comparison

Originally published in European journal of industrial relations, 7 (2). pp. 203-232 © 2001 SAGE Publications.

You may cite this version as:

Hyman, Richard (2001). Trade union research and cross-national comparison [online] London: LSE Research Online.

Available at: <http://eprints.lse.ac.uk/archive/00000757>

Available online: May 2006

LSE has developed LSE Research Online so that users may access research output of the School. Copyright © and Moral Rights for the papers on this site are retained by the individual authors and/or other copyright owners. Users may download and/or print one copy of any article(s) in LSE Research Online to facilitate their private study or for non-commercial research. You may not engage in further distribution of the material or use it for any profit-making activities or any commercial gain. You may freely distribute the URL (<http://eprints.lse.ac.uk>) of the LSE Research Online website.

This document is the author's final manuscript version of the article, incorporating any revisions agreed during the peer review process. Some differences between this version and the publisher's version remain. You are advised to consult the publisher's version if you wish to cite from it.

<http://eprints.lse.ac.uk>

Contact LSE Research Online at: Library.Researchonline@lse.ac.uk

TRADE UNION RESEARCH AND CROSS-NATIONAL COMPARISON

Richard Hyman

ABSTRACT: This article is concerned with problems of comparative research and analysis in industrial relations, and in particular with cross-national comparison of trade unions. Comparison is of both practical and theoretical importance, but is fraught with difficulties, in part because of the paradox involved in attempting to generalise concerning national instances which are in so many respects unique. The author considers three different approaches to analysis, in terms respectively of institutions, functions and issues. In conclusion the article emphasises the iterative nature of research and analysis and insists that even if the goal of satisfactory cross-national comparison may be unattainable, its pursuit is both necessary and valuable.

In this article I address the questions why, how – and perhaps more fundamentally, whether – one can apply cross-national comparison to the study of trade unions. This is based in part on reflection, in part on discussion of some of the literature on this theme. I deliberately focus mainly on English-language sources.

I begin by suggesting that much supposedly comparative work in industrial relations fails to match its pretensions, for comparison requires the deployment of cross-national evidence for purposes of systematic analysis, with the objective of generating plausible explanation of patterns of similarity and difference. In the following section I consider some familiar controversies concerning the nature of comparative method(s), identifying rival conceptions which reflect the well-known confrontation between nomothetic and idiographic methodological traditions. Here I suggest that an iterative approach combining aspects of both traditions is necessary and possible. In the third, and longest section I discuss some of the distinctive problems of comparative research on trade unions, stemming from the emergent and contested nature of trade union identities; and I go on to review three main types of approach: institutional, functional and issue-oriented. Challenges to inherited national distinctiveness, I suggest, may provide a basis for the integration of these different approaches. Finally I consider some problems which stem from distinctive national research tradition – and from nationally-specific modes of conceptualising industrial relations processes – and call for an openness to mutual understanding, both across nations and languages and between trade unionists and academic analysts.

1] Issues in comparative industrial relations

Why should students of trade unionism (or of industrial relations more generally) be concerned with cross-national comparison? There are two familiar answers to such a question, one analytical and the other practical.

First, comparative analysis is necessary if we are to develop robust explanations and encompassing theories. The literature of industrial relations is littered with generalisations which are assumed to be universal but which are in fact conditioned by the circumstances of time and place. So, for example, American writers in the 1950s and 1960s often identified a dynamic of 'union maturity' whereby the early radicalism of labour movements became marginalised or ritualised, political objectives largely discarded, and militancy abandoned or compartmentalised, as union leaders concentrated on the routines of collective bargaining and accomplished sufficient material improvements to keep the rank and file content. Serious comparative analysis would have shown that US experience was in many respects exceptional, and conditioned by distinctive features of American trade unionism and of the economic and political environment in which it operated. (In retrospect it is also clear that the period constituted a purely temporary accommodation between 'big capital' and 'big labour', made possible by an expansionist phase of 'Fordist' production and by US global hegemony; without these preconditions, 'institutionalised' industrial relations fell into disarray.) More recently, and in a much more sophisticated manner indeed, Kochan (1980) produced an industrial relations textbook which offered many generalisations on the basis of US practice without any attempt to test their applicability elsewhere. Yet only by investigating experience in other environments can we discover whether our explanatory arguments are context-bound; if they apply in a diversity of times and places, we may assume that we have identified

a robust generalisation; if not, we are led to explore which situational factors may explain the differences (Przeworski and Teune, 1970; Bean, 1987).¹

A second rationale for comparative research is its potential role in deriving 'lessons' and identifying 'best practice'.² To take some simple examples: the experience of the German IG Metall in 1984-85 in its struggle for a shorter working week was closely studied by its British counterpart before initiating its own campaign at the end of the decade. The 'Accords' between the Australian union confederation and the Labour government in the 1980s were to a large degree modelled on European ideas of 'social partnership' (which contrasted radically with more militant Australian industrial relations traditions). Italian unions, and in particular the main confederation (the formerly communist CGIL), have looked to both Sweden and Germany in their search for new policy directions. In the 1990s, the British TUC and many of its member unions have been assessing the innovative organising campaigns of their American and Australian counterparts as they struggle to halt and roll back almost two decades of membership decline. (We might ask in passing: how far are the 'academic' and the 'practical' motives for comparative research compatible? If we consider the unity of theory and practice to be more than an empty slogan, they must surely be complementary. The history of industrial relations in many countries is marked by the failure of heavy-handed efforts to 'transplant' policies and institutions which proved successful elsewhere, without adequately understanding the contextual reasons for this success.)

Comparative industrial relations is a much abused notion. Comparison surely means the *systematic* cross-analysis of phenomena displaying both similarities and differences. As indicated above, it both contributes to and is informed by theory and generalisation. Against this criterion, much work which is presented as comparative does not justify the title.³ Non-authentically comparative industrial relations can take at least five different forms.

The first is the multi-national study, which involves sequential accounts of separate national experience (in edited volumes, often by different authors) but with little or no attempt to provide comparative analysis. The popular text of Bamber and Lansbury (1987) is one obvious example. In the specific context of trade union research, the weighty studies of the 'Harvard' team in the early 1980s (Lange et al., 1982; Gourevitch et al., 1984) may also be viewed in this light: the lengthy country-specific accounts are barely utilised for comparative purposes.

A second approach is taxonomic. Here, the aim of assigning national cases to categoric boxes overwhelms any attempt at analysis and explanation. One much-cited instance is the essay by Cella and Treu (1993), in which classification is seemingly the principal objective of the authors.⁴ This is also the case with the supposedly comparative analysis by Poole (1986), who uses a neo-Weberian conceptual framework as an organising device rather than as an explanatory instrument.

A third approach is very familiar: what might be termed the 'catalogue of diversity'. The characteristic of this genre is that national differences are identified, but with little systematic attempt at explanation. For example, Sturmthal (1972) offers an interesting overview of different national patterns of development; while Banks (1974) provides a series of contrasting pairs of countries with a focus on specific aspects of union organisation and action; but neither provides effective instruments for generalisation. Windmuller (1974), in a 'comparative study' introducing a set of national accounts of collective bargaining developments, documents the variety of institutions and practices,⁵ while von Beyme (1980) offers a particularly wide-ranging survey of national experience; again, if there is any underlying argument it is the extent and the persistence of variation. Of course, an intellectually defensible position is that diversity is the primordial essence of trade unionism: each national movement (or each individual union, or workplace organisation...) is a special case, subject to distinctive causal dynamics, and hence generalisation is impossible. Such an argument (and perhaps some variants of the 'societal effects' school could be interpreted in this way) is possible, though it seems to entail that cross-national research is pointless; but those who adopt the 'catalogue of diversity' approach do not explicitly assert this.

A fourth variant of 'not-really-comparative-analysis' involves elaborate mathematical games with cross-national data sets. Trade union membership statistics offer fertile material for such exercises. The typical approach is to present complex models of the relationship between a range of variables and to subject these to regression analysis; this is followed by a *very* brief discussion of the results.⁶ The primary objective of such work seems more to *establish* statistical relationships than to *explain* them.

One exception which deserves note, a study which fits the 'institutionalist' approach discussed below, is the attempt by Blanchflower and Freeman (1992) to account for the severe decline in US trade union membership from the 1970s in contrast to the greater resilience of unions in most other OECD countries. Here, statistical analysis is complemented by the presentation of a causal argument: the decentralised structure of American collective bargaining has resulted in a far higher difference in labour costs between unionised and non-union workplaces than in countries with more centralised bargaining or with machinery for the extension of collective agreements, giving employers in hard times a strong economic incentive to pursue union exclusion policies. The authors consider, and seek to overcome, two possible objections to this argument: that the Canadian case contradicts their explanatory logic, and that the direction of causality might be the reverse of that proposed. Whether or not one finds this account persuasive, methodologically it represents an exemplary application of comparative analysis.

Fifth, there is a long tradition of work which draws selectively, and often somewhat arbitrarily, on cross-national evidence to reinforce what is in essence a nationally-based analysis. An early example was the use by Michels (1915) of a variety of hardly systematic foreign illustrations to support the thesis of an 'iron law of oligarchy' based above all else on disillusion with the social-democratic labour movement in Germany. Conversely, Cole (1913) depicted the 'world of labour' in support of an implicit agenda of the need for industrial unionism, a transformatory social project and a readiness to mobilise collective action. In all these respects, a stylised account of foreign practice could be counterposed to the stultifying reality of British trade unionism. In more recent times, the study by van de Vall (1970) could be regarded as a more sophisticated variant of the same approach. His central thesis is a tension between a growing emphasis by trade unions on socio-economic regulation in the centralised national arena, and an increasing preoccupation on the part of ordinary workers with parochial and individual interests; the internal disjuncture, in his view, is bridged by a 'polyarchic' system of control in which national officials and local activists share common perspectives. The issues identified – and presented as universal tendencies within labour movements – were arguably particularly characteristic of Dutch industrial relations in the first post-war decades. Though analogous tensions could be discovered in other national contexts, the available evidence scarcely justified a confident generalisation of the Dutch example.

2] Comparative method(s)

What is to count as 'real' comparative research, and in what ways is it distinctive? There can be no straightforward answers to these questions, which have long provoked immense controversy. 'All the eternal and unsolved problems inherent in sociological research are unfolded when engaging in cross-national studies,' comments Øyen (1990: 1).

The terms 'comparative' and 'cross-national' (or 'cross-societal') are conventionally treated as synonymous; and I have followed this usage. But of course, it is frequently argued that *all* social science is comparative; even if the focus is within a single country (or conversely, if the degree of abstraction is such that no concrete national context is considered), an approach is scientific to the extent that it seeks to establish, and account for, similarity and difference in the cases investigated. Hence what, if anything, is qualitatively different about cross-national research?

One common answer is that cross-national comparison is functionally analogous to experimentation in the natural sciences. In physics or chemistry it is possible to vary certain conditions while holding others constant and to establish the variation in outcomes, as a means of generating and testing causal propositions. Such manipulation of the object of investigation is rarely possible in the social sciences; but one may approximate the experimental method by comparing national cases similar in some respects and different in others. So, for example, if it were suggested that the traditional strength of communism within French trade unionism stems primarily from a combination of late industrialisation and the historical cleavage between forces of catholicism and laicism, one might examine union movements in countries whose histories have involved different combinations of early/late industrialisation and strong/weak lay-catholic cleavages and map these against communist influence. In simplified form, this resembles the strategy adopted by Lipset and Rokkan (1967) in their classic study of the dynamics of party systems, a strategy formalised by Przeworski and Teune (1970) and Ragin (1987) with the use of Boolean algebra.

Underlying this model of comparative method is a specific conception of what is comparable. For Przeworski and Teune, indeed, the essence of genuine cross-national comparison is that national identifiers should be replaceable by 'decontextualised' descriptions which permit potentially universal theoretical propositions of the form: *if x, then y*. Likewise, Rose insists (1991: 447) that 'in order to connect empirical materials horizontally across national boundaries, they must also be connected vertically; that is, capable of being related to concepts that are sufficiently abstract to travel across national boundaries'. Hence, for example, a comparative study of membership patterns in European trade unions should aim to generate such conclusions as: where unions have a statutory role in the administration of unemployment benefits, there membership will be higher and more stable than where they do not.

Implicit here is the assumption that nations or societies are aggregates of variables which can in principle be isolated analytically. A contrary view is that the *interrelationship* among the elements of each societal ensemble makes these inescapably context-bound, so that every national case must be analysed holistically; by implication there are no variables, only differences. Comparison can explore *how* things function differently according to national context, without being able to isolate the reasons *why*. From this perspective, if German works councils contribute to plant-level cooperation in enhancing productivity, this may in part reflect dynamics which could be predicted wherever the law constitutes institutions with the portfolio of rights and responsibilities assigned to German works councils (nowhere else in the world, in fact) but which also reflect an ideological inheritance, economic structure and political history incapable of replication. The researcher could indeed render all the features considered of explanatory importance in terms of abstract concepts; but in combination they could apply only to Germany. We can only speculate what would happen if German works councils were replicated in a newly democratic country such as Hungary or South Africa (what has actually been established in the former, and is contemplated in the latter, is an immensely weaker institution); and were the experiment made, the outcome would tell us next to nothing of the implications for countries like Britain or the United States.

The methodological confrontation between advocates of these two positions relates to more general debates on the nature of social science: is it nomothetic (seeking to generate generalisations of an abstract and law-like character) or idiographic (seeking holistic understanding of what is contextually unique)? Many, of course, would argue that social science is an attempt to do both: 'although dramatically different, these should not be seen as antithetical, irreconcilable or mutually exclusive' (Galtung 1990: 108).

Thought, and language, presuppose categories of a general nature which include all cases sharing certain characteristics and exclude others which do not. Individual cases can be described only in terms which are general in application. This does not mean however that all instances similarly classified (union representative, strike, collective agreement...) are identical. 'Classes do not impute "real sameness", but *similarity*.... Any class, no matter how minute, allows for intraclass variations' (Sartori 1994: 17). To make an analogous point, any generalisation oversimplifies, but such oversimplification is unavoidable if we are to comprehend our world and act within it.

In discussing the implications for cross-national comparison, Rose (1991: 447) uses the concept of 'bounded variability': 'anyone who engages in comparative research immediately notices differences between countries. Yet anyone who persists in wide-ranging comparative analysis also recognizes boundaries to these differences.' Similarly, Dogan and Pelassy (1990: 10) make the point that one must 'conceive of imperialism in general in order to perceive what is particular about Roman imperialism, British colonial imperialism, Soviet imperialism by satellites, or American economic imperialism'. Two implications of this argument are, first, that the cross-national application of analytical categories is not necessarily ethnocentric (though it may well be so: as with much of the literature on 'economic development' a few decades ago). Hence it is commonly argued that Tocqueville's *Democracy in America* is an important comparative work in that his themes and categories, shaped by European experience (and in particular the problems of democracy in post-revolutionary France), provided powerful insights into *both* American *and* European society.⁷ Second, it is an objective of cross-national research to test and explore the limits of uniqueness. 'Paradoxically, uniqueness can only be demonstrated through systematic comparison that differentiates a country from all others as a deviant case in a given universe' (Rose 1991: 450); the 'exceptionalism' often attributed, say, to French industrial relations or the United States labour movement needs to be interrogated through comparative analysis.

An important implication is that comparative research is an *iterative* process driven in part by the confrontation between different methodological approaches. So, for example, explanatory propositions (hunches?) developed in idiographic research can be 'tested'⁸ systematically by nomothetic researchers; outliers and deviant cases (or dubious categorisations) evident in the work of the latter can be explored in depth by holistic analysis. In part, this can be seen as one instance of transcending the often sterile confrontation between quantitative and qualitative research (Bryman 1988). It is also a response to the insistence of Sartori (1994: 15) that the purpose of comparison is not to explain but to 'control (verify or falsify) whether generalizations hold'. Here, the obvious rejoinder is: where do generalisations (explanations) come from? Formulating and 'testing' explanatory generalisations are necessary, and reciprocally conditioning, elements in comparative research. In the process we may attain a deeper and more sensitive understanding of difference-in-similarity, similarity-in-difference.

3] Key issues in comparative trade union research; and some responses

So far I have been referring interchangeably to comparative trade union research and comparative industrial relations. Yet is the former simply a part of the latter, or does it involve at least in important respects a distinctive agenda? There are significant problems in constituting trade unions as research objects. Above all else, unions are *contested* organisations: within any union can be found conflicting views of its underlying purpose, its priority objectives, the appropriate forms of action, the desirable patterns of internal relations. Such ambiguities are compounded when we attempt cross-national analysis: the questions *what is a trade union?* or *what does it mean to be a trade union member?* will receive very different answers according to national context. There can be no innocent definition of trade union identity.

Indeed this difficulty is not unique to trade unions. Any organisation is an emergent social entity, a terrain of internal and external struggles to define and delimit aims and activities. The current fashion for 'mission statements' – which are in essence attempts, usually futile, to foreclose such struggles – demonstrates that there can be no taken-for-granted understanding of what it means to be a company, a university, a government department. Nevertheless what differentiates unions from most other organisations is their *representative* logic, together (in most cases) with an explicit commitment to *democratic* policy determination. An authoritative specification of purpose and character is particularly elusive.

In the body of this section I will offer a selective survey of responses to this problem: examples of comparative research with a focus on institutions, on functions or on issues. I then briefly address the argument that the national level is no longer the appropriate unit of analysis for cross-national comparison.

Institutions

If there is a dominant analytical premise of recent Anglo-American research it is the principle that 'institutions matter'. The institutional framework of industrial relations, established either by law or by 'historic compromises' between the organisations of workers and employers (Sisson, 1987), generates norms, practices and mutual expectations which acquire considerable inertia (Olson, 1982; Streeck, 1987). Hence national differences in industrial relations behaviour – or 'outcomes' – tend to persist, resisting subsequent pressures to convergence.

In relation to trade unions, Clegg (1976) develops what is probably the most systematic application of this approach. His explicit argument is that such key features of union organisation and action as membership density, structural form, internal distribution of power and strike behaviour are derivative of the nationally-specific system of collective bargaining (at least in those countries – and there are of course many exceptions – where collective bargaining itself is a major priority of trade unionism). He distinguishes between the extent of bargaining (the proportion of the workforce covered), its level (degree of centralisation), its scope (the range of issues encompassed) and its depth (the degree to which the bargaining parties actually control what occurs in the workplace), and argues that in combination these characteristics of national industrial relations systems explain the distinctive features of trade unionism in the six countries he examines. Whatever the limitations of Clegg's argument,⁹ this is a genuine example of systematic comparative analysis. A line of causality from industrial relations institutions to trade union characteristics

or behaviour is a common theme in much recent literature. Much of the discussion of (changes in) union density – for example, Kane and Marsden (1988) and Visser (1988) – includes institutional variation as at least one important explanatory variable. Unions themselves are of course institutions, and their own structural characteristics may form part of the analysis: for instance Hancké (1993) speaks of the ‘union regime’ – by which he means the strength of organisation at both central and local levels, and the degree of articulation between the two – as the key explanation of variations in union density; while Abrahamson (1993) treats union ‘jurisdictions’ as the primary factor explaining organisational change.

A study which is influenced by Clegg’s approach, but addresses in particular the national cases external to Clegg’s model, is that by Martin (1989), who heroically allocates trade union movements in 27 countries to five categories on the basis of their relationship to the state and to political parties. Martin’s approach is not merely taxonomic, since he does address systematically the question of explanation; but he does so briefly and his ‘theory’ is neither particularly informative nor sensitive to key issues of variation and change *within* his categories.¹⁰

Many institutional approaches to comparative analysis involve a high degree of structural determinism. As Visser (1994: 84) has argued in relation to theories of union membership, ‘structuralist explanations of union decline... leave little room for unions as active organizers of their membership markets, let alone as strategic actors capable of changing the dynamics of these markets’. One approach which however claims to avoid such determinism is the ‘neo-institutionalism’ developed in the field of comparative politics and increasingly applied in industrial relations research.

Two features which distinguish the ‘new’ from the ‘old’ institutionalism are a broad understanding of institutions and an emphasis on their emergent and relational character. Hall (1986: 19), in his comparison of the economic role of the state in Britain and France, defines institutions as ‘the formal rules, compliance procedures, and standard operating practices that structure the relationship between individuals in various units of the polity and economy.... They have a more formal status than cultural norms but one that does not necessarily derive from legal, as opposed to conventional, standing.’ The relational focus of this approach involves a central concern with ‘the ways institutions structure relations of power among contending groups’ (Thelen and Steinmo 1992: 7). Since institutions are treated as both frameworks and objects of contest, institutional change (which for ‘old’ institutionalism was exogenous to the research problematic) can be regarded as endogenously generated.

Neo-institutionalism provides the explicit starting point for Turner’s comparative study of trade union involvement in economic restructuring. His key argument is that ‘institutions condition the effects of intensified economic competition’ (1991: 224): the specific frameworks of industrial relations in Germany and Sweden have obliged employers to respond to union concerns in the restructuring of work and production to an extent which contrasts with the other countries studied (USA, Britain, Italy, Japan). There are close parallels here with Pontusson’s call (1992: 12) for ‘an organisational approach’ to comparative trade union studies: ‘organizational structures affect more than the way union members and officials define wage earner interests; they also impinge on the strategic options available’. There are also analogies with Visser’s application of resource mobilisation theory to the comparative analysis of unionism (1994).

There is a close family resemblance between neo-institutionalism and strategic choice approaches (Kochan et al. 1984). The latter emphasise both the constraining effects of contextual forces (which include nation-specific institutional arrangements) but also the existence of strategic options within any set of circumstances. The ‘feedback’ between structure and action is viewed as a source of potential change, in much the same way that Thelen and Steinmo interpret ‘institutional dynamism’. Gardner (1995) for example argues that variations in collective bargaining structure between Australia, New Zealand and the USA created very different strategic options for trade unions in influencing economic restructuring; but that the strategies adopted (notably in the Australian case) caused structural changes which reconfigured the strategic possibilities. And if it is possible to distil one core argument from Crouch’s complex study of the politics of industrial relations in western Europe (1993), it is that inherited institutional configurations may permit or preclude certain forms of union representation of workers’ interests at societal level; but that (partly because of their own achievements) such configurations may be precarious. Likewise, Adams (1995) in his broad cross-national overview stresses the importance of early ‘strategic choices’ made by

employers, unions and governments, creating a bias towards distinctive patterns of industrial relations in each national context; but he also insists that the mutual understandings underlying established institutions remain effective only insofar as they are 'continually renewed' (163), and hence that 'institutions once considered to be immutable can change fundamentally in a short period of time' (181).

Neo-institutionalism has the virtues of flexibility: while highlighting the explanatory importance of institutional arrangements it avoids mechanical determinism. Its strengths are however also its weaknesses: it implies no theory of *which* institutions are important – contrast Streeck's appeal (1992) for 'supply-side institutionalism' with the more common focus on distributive institutions – and *why*. In effect, most neo-institutionalist approaches involve a form of contingency theory which says little more than that if we wish to explain cross-national variations in outcomes, looking for institutional differences may be as good a starting point as any other.¹¹

Functions

One response to this lack of specificity is to make *functions* the basis for comparison. 'The point of departure of international comparison cannot be an institution as such, but must be the functions it carries out.... We must compare functions and not institutions' (Schregle 1981: 22-3). One possible implication of this argument is that elements of functional equivalence may be expected across countries despite institutional differences.

One application of this approach which is of considerable analytical interest (even if empirically and methodologically suspect) is the study by Hibbs (1978) of the 'political economy of distribution'. He starts from the assumption that the central function of trade unions is to shape the distribution of income in the interests of employees (thereby, one should note, neglecting worker and union concern with such issues as job security and the organisation of work). His thesis is that where the state is relatively detached from the labour market and employers possess considerable autonomy in wage determination (as in north America and to some extent Britain), a 'business union' logic will predominate and industrial conflict will take the form of 'collective bargaining' disputes. In countries where the state intervenes to strengthen the labour market position of employers (many southern European countries in the early post-war decades) unions are likely to pursue workers' interests through political protest and pressure, and explosive politicised conflicts are common. By contrast, where the state pursues redistributive intervention (notably in the Nordic social democracies) the unions are likely to follow a mainly peaceful strategy of neo-corporatist bargaining. The analysis of Korpi and Shalev (1979) presents close analogies (though also important differences): strongly organised labour movements possess a repertoire of strategic options which include the non-militant pursuit of 'long-run class interests in the political arena'. What emerges from these comparative accounts is that the same underlying function – defending and advancing workers' economic interests – will be pursued by unions in very different fashion according to the environment in which they operate and the power resources at their disposal.¹²

A very different example of a functional approach to comparative analysis is the IRES/WSI study of workplace representation in France and Germany. The key conclusions (Hege and Dufour 1995: 85-6) are that despite the evident institutional differences between the two countries (the strongly entrenched legal rights of *Betriebsräte* as against the much weaker position of *comités d'entreprise*, the unitary structure of German unionism as against pluralist division in France) the actual process of interest representation has marked similarities in the two countries. In particular, in each case employee representatives derive their legitimacy and hence their effectiveness on the one hand from their handling of mundane day-to-day issues on the shop floor, on the other from their integration with the outside trade union.¹³

Reflecting on these findings, Hege (1996) has developed a critique of institutional approaches to cross-national comparison. National institutions of interest representation are not appropriate units for comparative analysis, for they are differently constituted, differently experienced and differently set in motion according to specific national context.¹⁴ To establish a more suitable basis for comparison it is necessary to move from the concrete to the abstract: the *process* of representation itself, and the *relationships* which lie behind this process. And to pursue comparative analysis of this type, it is essential to dissolve taken-for-granted (and ethnocentric) understandings of the nature and meaning of institutions in order

to explore the complex and often contradictory dynamics of their functioning within a broader *ensemble* of (in some respects nationally specific) social relations.

It is in this light that one may read Regini's comparative discussion of the changing pattern of economic regulation in Europe. His starting point is that the erosion of common post-war frameworks of (Keynesian/Fordist) political regulation has opened spaces for new types of 'micro-social regulation'. In a period when diverse company-level initiatives are restructuring the organisation of production and the dynamics of management-employee relations, formal (national) institutions of industrial relations diminish in significance and 'indirect and therefore less visible mechanisms' gain in importance (133). Whether employee representatives are able to gain leverage within these mechanisms is a question of will, intelligence and organisational capacity. Regini shows how, in both Germany and Italy, representatives have succeeded in wielding effective influence within processes of 'micro-concertation': achieving similar outcomes by very different routes and from very different points of origin.

Despite the strengths of functional approaches to comparison and the rich insights which can result, there are also inherent problems. Most fundamentally: how do we establish what are the common and significant functions of trade unions? For Engels, and for many subsequent Marxist interpreters, trade unions were 'schools of war' and their activities were to be analysed in this light. Specific propositions (for example, the distorting impact of the 'aristocracy of labour' or the 'trade union bureaucracy') were developed to explain those (increasingly common) situations in which unions did not seem to function as vehicles of class struggle. Almost diametrically opposite was the approach of Perlman (1928), who insisted that unions were 'organic' responses to employment insecurity, providing a collective basis for defending occupational interests in the face of employer encroachments and market uncertainties. Any broader socio-political ambitions were the result of the ultimately destructive interventions of socialist intellectuals. On a broader canvas, Martin (1989) identifies five distinct conceptions of trade union purpose which have proved historically influential. From yet another perspective, Waterman (1993) shows how the concept of *social-movement unionism* can provide a new orientation to cross-national comparison, and one which fits the concerns of many activists and officials in a diverse range of countries.

There is no evident 'scientific' criterion for endorsing or rejecting any such theorisations of the functions of trade unionism and the implied or explicit methodological prescriptions for comparative analysis. Many formulations may be regarded as to some extent ethnocentric readings which fail to recognise and appreciate the *diversity* of forms and functions of union action. Hence research which emphasises the function of trade unions as collective bargainers and the subordinate or auxiliary role of political action typically focuses on experience in advanced industrial societies with established processes of democratic politics and where representative institutions of capital and labour have established some form of 'historic compromise'.¹⁵ Conversely, writers who stress the more fundamentally socio-political function of trade unionism (Cohen 1987; Munck 1988) tend to draw their evidence from quite different national contexts. Research design is never innocent of policy and politics.

Issues

An approach which has some affinities to the functionalist framework of comparison (indeed cannot always be clearly distinguished) may be called issue-oriented. This approach is advocated by Rothstein (1992: 51), who insists that 'institutional theory is not enough. The reason is simply that one needs a theory about *what kind* of institutions are important for *what issues*.'

An example of such an approach is the paper by Ross (1981) comparing national union responses to the declining capacity of Keynesian demand management to underpin favourable labour markets. Unions, he argues, can respond to this issue with strategies which may be 'progressive' or 'regressive'; but what fits these categories will vary from country to country. His catalogue of strategic options (some of which, a decade and a half later, not surprisingly appear dated) involves different kinds of 'Keynes-plus' packages. Those he considers progressive involve some form of union intervention (possibly militant) to influence investment decisions, either at company or at macro level. National traditions and institutions may facilitate certain types of intervention which obstructing others.

Very different in some respects, not least in the countries which frame its analysis, but in interesting ways pointing to analogous conclusions, is the study by Valenzuela (1989)

of the role of labour movements in transitions to democracy. The issue is a stark one: where an authoritarian regime faces possible breakdown, how can union movements intervene in ways which strengthen the position of 'reformists' within the power structure without provoking repression from its 'hard-liners'? And if the struggle for political liberalisation succeeds, how can unions help secure the democratic achievement while at the same time winning long-term advances for labour? On the basis of systematic cross-national comparison, Valenzuela is able to draw clear if cautious conclusions – which interestingly can now be 'tested' against subsequent experience in eastern Europe and South Africa.¹⁶

Another issue-oriented study (in this case a detailed two-country comparison of German and Swedish unions) is that by Swenson (1989). His central thesis is that unions play a key role in constituting a 'moral economy' which imposes social norms on the labour market, influencing both the share of national income accruing to labour and the distribution of wage income among categories of worker. His core issue is how changes in the structure of employment and of union membership (manual and white-collar, private- and public-sector) in combination with government and employer responses to declining competitiveness and budget deficits affect this 'moral economy'. He demonstrates how differences in national context (including the internal structure of each trade union movement) caused tensions which in the Swedish case led to bitter inter-union conflicts but in Germany were more manageable.

More recently, Golden (1997) has examined different union responses to mass redundancies. Why in some circumstances have unions mounted fierce struggles which they had no realistic prospect of winning, which resulted in worse outcomes for the affected workers than might have been achieved through compromise, and which inflicted severe damage to their own organisational capacity? Golden's own approach, which examines two disputes in the motor industry (at British Leyland in 1979-80 and Fiat in 1980) and in coal-mining (in Japan in 1959-60 and Britain in 1984-85) is based on rational-choice analysis. Her conclusion is that in each case the union policy-makers pursued strategies which were logically derived from mistaken information. This is not altogether satisfactory. Golden does not adequately emphasise the fact that rationalisation at British Leyland did *not* result in protracted strike action (partly because of the unwillingness of national union leaders to support this), and does not consider other contexts where the handling of redundancies was negotiated peacefully; hence she provides no basis for assessing whether miscalculation is a sufficient explanation of 'heroic defeats' (let alone why union leaders miscalculate in some situations and not others). A plausible alternative interpretation might be that what is apparently the same issue – large-scale job loss – actually *means* something very different according to context.

This is indeed the explicit thesis of Locke and Thelen (1995). Ostensibly similar issues, they argue, vary markedly in significance according to national circumstances and traditions; while apparently dissimilar issues may have analogous implications. More specifically, the historical formation of distinctive national union identities shapes those issues which are likely to provoke conflict and those which are not. Hence, they suggest, the task must be to develop 'contextualised comparisons' which involve in each national case the choice of issues which present equivalent challenges to union identities. 'By focusing on the way different institutional arrangements create different sets of rigidities and flexibilities, we can identify the range of possible "sticking points".... We find that those that generate the most intense conflicts are those which are so bound up with traditional union identities that their renegotiation in fact sets in motion a much deeper and fundamental reevaluation of labor's "project"' (342).

Hence in the USA, they argue, 'the institutional anchors of labor rights within the firm' (340) rest on the outcome of the struggles of the 1930s and 1940s, a system involving rigid job definitions and a prescribed seniority-based hierarchy of promotion opportunities and job security. In consequence, employer demands for more flexible forms of work organisation challenge principles of union action in ways which do not arise in most European countries. By contrast, in Germany the pressures for more flexible organisation of working time and for greater company-level discretion in wage determination 'clash more directly with the institutional or ideational foundations of union power' (343). Conversely, in both Sweden and Italy (though in very different ways) egalitarianism has been a vital component of postwar trade union identities. In consequence, pressures for increased pay differentials between and within sectors in the one case, the abolition of the *scala mobile* in the other, had disruptive effects which would not have occurred in different national contexts. By focusing on such

issues, the authors insist, it is possible to develop genuinely comparative analysis and at the same time to develop more profound understandings of the roots of national distinctiveness.

There is much in this argument that is methodologically exciting. Institutions matter, but in different ways in different contexts; the task of comparative analysis is to explain how and why. Nevertheless there are problems. To focus on issues of existential crisis for trade union movements may indeed yield profound insights yet at the cost of a considerable narrowing of the analytical agenda. Most trade union activity revolves around the prosaic and routine; yet it is at least in part on such everyday practice that organisational capacity and identity are founded. In any case, to define 'traditional union identities' – and hence the issues which pose radical challenges – is itself problematic. As was argued earlier, trade unions are contested organisations: in any country there will be disputes both between and within unions as to what constitutes the central trade union 'project'. In many respects there is a *post hoc* character to the approach of Locke and Thelen: by researching moments of intense conflict (perhaps 'heroic defeats' in Golden's terms) we can comprehend the inner nature of national labour movements, in ways which seem to permit no independent validation. In other words, there is an implicit circularity. Finally, it is questionable how far 'contextualised comparisons' are in fact comparative. Rather, the logic of this approach would seem to be that each context is unique and that the dynamics of each national trade union movement must be analysed in their own terms.

The de-nationalisation of industrial relations?

Common to all three approaches surveyed is normally an assumption that the national level of regulation is the appropriate unit of analysis for comparative industrial relations. Several decades ago, convergence theorists (most notably Kerr et al. 1960) argued that distinctive national systems of employment regulation were historical residues the significance of which would progressively diminish in the face of common economic and technological pressures towards an increasingly uniform model of 'pluralistic industrialism'. Much subsequent work in comparative industrial relations involved attempts to document and account for the seeming failure of this prediction: the continued, or even increased, evidence of distinctiveness in national industrial relations systems.

In the 1990s, it has been common to argue that forces of economic 'globalisation' – involving in particular the intensification of product market competition, the key role of transnational corporations and the liberalisation of currency and financial markets – threaten the persistence of national industrial relations regimes. In contrast to the former convergence theories, which posited the emergence of an increasingly homogeneous model of employment regulation, globalisation theories anticipate increasingly serious threats to *any* kind of institutional regulation: the capacity of unions to constrain employers' policies, or of governments to impose cost-increasing controls on the labour market, presupposed a degree of national economic autarchy which is disappearing (Altvater and Mahnkopf 1993; Jacoby 1995).

While it may be argued that international economic trends are more complex and contradictory than some globalisation theorists suggest (Hirst and Thompson 1996), there is an emerging consensus that a reconfiguration is indeed in process which involves increasing differentiation of industrial relations regimes within countries and some elements of convergence across countries. Locke and Kochan (1995: 380-1) raise the question: do national industrial relations systems still exist? While insisting that 'this question is impossible to answer in the abstract,' the logic of their analysis is that a focus at sectoral and company level is essential for informative comparative analysis. This is consistent with the thesis of Wever (1995b) that 'segmented competitiveness' is encouraging a complex diversification of models. This complexity emerges clearly from the systematic comparative study by MacDuffie of change in work organisation in the motor industry in the USA, Europe and Japan. His plant-level studies indeed indicate that the distinctiveness of national employment regimes has been undermined by the globalisation of markets, the technological innovations which permit flexible automation, and the diffusion of 'lean production' principles. Yet the outcome has not been a process of standardisation across countries; rather there have been different company-specific patterns, reflected in the speed and thoroughness of transformation, and the degree to which change has been negotiated or imposed. These differences can be attributed to the timing and severity of the 'competitiveness crisis' which all companies have experienced, the industrial relations background and the trade union response to management initiatives.

Hancké (1993: 606) has stressed that intra-national diversification has important implications for comparative analysis of trade unions: 'there is no logical reason why the nation-state should be the most important unit of analysis. Methodologically, the local union is probably the most useful perspective. We will probably find, once we begin to use this new perspective, that the variation in industrial relations arrangements *within* countries and *within* industrial sectors is probably as large as that *between* industries and countries.'

Locke (1990: 372) has drawn similar conclusions and has also stressed the problems which diversification implies for union *practice*. 'Unions mean different things to different groups of workers within sectors and within nations not just across them,' and the trend towards company-specific industrial relations regimes reinforces such particularisms. 'The reemergence of these differences – especially at a time when the unity of the labor movement could determine its future viability – is the most salient feature of labor politics today.' I share his conclusion that unions today have to find new ways of articulating the perception and representation of distinctive interests in a heterogeneity of local and company-level milieux. The different responses to this challenge, both within and between countries, are a vital theme for comparative research.

4] Some concluding thoughts

Good research is a collective process (even when it takes the form of individual researchers utilising, and building on, the evidence and analysis of others). The importance of collective endeavour is particularly evident in the case of comparative work: achieving the necessary breadth and depth of information and understanding (and in comparable form) normally requires structured cross-national collaboration.

Here, a key problem is the national specificity of research traditions, extending to the very conceptualisation of the terrain of research and analysis. Researchers – and also trade unionists – operate with distinct conceptual maps which both reflect and reinforce different social and material realities. It is extremely difficult to speak the same language, and not only in the most obvious sense. The very idea of industrial relations is itself an anglophone peculiarity,¹⁷ and the emergence of the concept and the associated field of academic study is comprehensible only because in both Britain and the United States the regulation of employment in the first half of this century developed in the absence of direct and systematic state intervention (Hyman 1995). British trade unionists, and British academics, have traditionally perceived the world of work through the conceptual focus of 'free collective bargaining'; the notion that labour markets and work organisation were subject primarily to their own internal dynamics, and that the sphere of 'industrial relations' was largely autonomous from that of 'politics', was in tune with national realities but also imposed significant constraints on the choices inherent in trade union objectives and public policy.

Other contexts, other concepts. In France, for example, a key instrument of analysis (barely comprehensible in English) is that of *rapport salarial*. We may link this to two other important concepts: *protection sociale* and *espace qualificacionnel*. In an important sense, working life in France is as much a relationship with the state as with the employer; and trade unions are in an important sense more concerned (and almost certainly more influential) in shaping the public provision of welfare benefits than in negotiating collective agreements. Within the direct sphere of employment, the dependence of career opportunities on a distinctive system of vocational education and training, and the key significance of formalised hierarchical wage structures, necessarily frame the perspectives of workers, union representatives and academic analysts.¹⁸ The intellectual construction of the object of research is inevitably shaped by national realities.

Germany provides another example: consider the familiar notions of the social market economy (*soziale Marktwirtschaft*) and of the 'works constitution' (*Betriebsverfassung*). Employment regulation occurs within the framework of an (until recently barely contested) assumption that equity and efficiency alike require the external control of labour and other markets, with collective bargaining performing only one (albeit important) part in this process. Within the workplace itself, an elaborate and legally prescribed institutional framework is designed both to assign workers a form of 'industrial citizenship' and to encourage the cooperative pursuit of productivity and innovation. These realities shape the mind-maps of trade unionists and help define the agenda of researchers. Thus central to most approaches to industrial relations (a term which has only recently become accepted within German academic discourse) is a preoccupation with the implications for social practice of a high degree of institutionalisation and 'juridification', the contradictory integration – at national,

sectoral and company levels – of interest opposition and ‘social partnership’, the nature of technological innovation as a socially constructed and negotiated process.

Such examples could be multiplied almost indefinitely.¹⁹ Thus how, if at all, are mutual comprehension and communication possible? Perhaps cross-national comparison is a Sorelian myth, an unattainable ideal the pursuit of which nevertheless yields valuable results. Again we may identify an iterative process: through our inadequate attempts to understand the ‘peculiarities’ of ‘the other’, we can better appreciate our own uniqueness, constructing a basis for a better approximation to truly comparative knowledge.

It is interesting to compare this notion with the comment by Maurice (1989: 185) that ‘in the “societal effects” approach non-comparability no longer constitutes a limit to analysis but rather becomes its object’ [*dans l’approche sociétale la non-comparabilité n’est plus constituée comme limite, elle devient plutôt objet d’analyse*]. In more ways than most other organisations, trade union movements are unique social formations. It is a familiar argument that the radical national contrasts in membership density (within Europe, from under 10 to over 80 per cent) are matched by no other socio-political indicator; and that this suggests that unions are in fundamental respects *non-comparable* across countries. Certainly the implication is that policy-oriented trade union research can yield few ‘lessons’ beyond the negative one that strategies and practices are unlikely to function in the same way in other national contexts as they do on their home ground. Yet it is also true that both researchers and trade unionists, if they are to adapt and innovate in the face of rapid change, can and must learn from each other – both within and across national boundaries. In my own work (for example, Hyman 1996) I have tried to follow the logic of this maxim by exploring the idea of nationally-specific trade union identities: inherited patterns of ideology, discourse and programmatic commitment. Such identities bias contemporary responses to challenges and opportunities, but they contain internal tensions and contradictions which create the possibility of change.

In moving towards an interim conclusion, it is useful to identify three key questions in contemporary industrial relations with significant implications for both theory and practice. The first issue is the relationship between form and substance. To give one example, a well-known statistic is that 90 per cent of French workers are covered by collective bargaining. What does this mean in practice, given that French trade union membership density is one of the lowest in Europe and unions barely exist in most of the private sector? To generalise the question, how far is our understanding of trade union organisation and practice in other countries (and indeed our own) largely a matter of official record from which reality may have increasingly diverged? Second, and relatedly, most countries have seen two contradictory trends in industrial relations – ‘globalisation’ and decentralisation – which together have hollowed out the efficacy of the traditional levels and institutions of employment regulation. What different strategies have union movements pursued, and with what success, to intervene both *above* and *below* the traditional locus of collective bargaining, and to establish some articulation between the different levels of representation? Third, how important is history? How rigid a constraint do inherited institutions impose on current choices (and hence, one might add, what is the meaning of institutionalism)? If employers (and some governments) have so far been most determined and effective in escaping the ‘traditions of all the dead institutions’, can trade unionists learn to do the same?

In addressing such questions, all three approaches discussed above – focusing respectively on institutions, functions and issues – have strengths and weaknesses. Institutional arrangements vary significantly across countries, in ‘normal’ circumstances possess considerable resilience, and clearly do affect behaviours and outcomes. Nevertheless, as ‘intermediary organizations’ at the interface of a contradictory relationship between workers, employers and governments, unions display some commonalities in their functioning which transcend national institutional differences. And the relative importance of different institutions – and of threats to these – indeed appears to be issue-specific. The implication is that effective comparative analysis may usefully draw on insights from each approach (and indeed much work is difficult to classify unambiguously in any one category). It may also be the case that the appropriateness of different approaches may differ according to the unit of analysis (national movements or confederations, individual sectoral or occupational unions) and the choice between depth and breadth of national cases examined.

Is this a recipe for eclecticism? Perhaps. Trade union research, and comparative trade union research in particular, is an art rather than a science. As comparative researchers, our main contribution to understanding lies in our ability to tell a plausible and

elegant story, one which illuminates both our own national context and that of the 'other'. Our concern with the unfamiliar (together with our willingness to perceive what is strange in the familiar) can indeed assist us in unearthing new and important types of evidence. How we move from this to comparative argument and explanation will always involve a certain alchemy.

This conclusion is also relevant to the relationship between theory and practice. 'A good theory will always have some empty boxes for the reality not yet there,' writes Galtung (1990: 102). 'In fact, the theory should serve as a bridge from the empirical to the potential.' Our concern as committed researchers is surely not only what trade unions are but what they *might become* – and how. Our search for comparative understanding, even if impossible, may help build bridges both between nations and between reality and potential.

Notes

An initial version of this article was presented at a *séminaire de clôture* at the Institut de Recherches Economiques et Sociales (IRES), Paris in June 1997. I am grateful for their comments to participants in this seminar, and also to Roy Adams.

¹ Rose (1991), in a paper I encountered only after writing the initial version of this essay, refers to such analysis as 'false universalism'. Kochan himself has subsequently followed the logic of this argument by helping organise a number of cross-national research projects.

² For a variety of discussions of cross-national policy-oriented research see Hantrais and Mangen 1996.

³ This is not a problem specific to industrial relations. Sartori (1994: 14-5), discussing a discipline with a well-established tradition of supposedly comparative research and teaching, insists 'that a field called comparative politics is densely populated by noncomparativists, by scholars who have no interest, no notion, no training, in comparing'.

⁴ This essay first appeared in an edited volume in 1982 and was reissued virtually unaltered in the subsequent editions.

⁵ In another study published around the same time, on the authority of national trade union confederations, Windmuller (1975) does offer a systematic comparative analysis, assessing national peak organisations according to three criteria and considering a range of possible explanations for the patterns identified.

⁶ An example, chosen more or less at random, is Wallerstein 1989.

⁷ Rose (1991: 454) refers to this as an 'extroverted case study'. Smelser (1976) begins his discussion of pioneer comparative theorists by examining Tocqueville's writing, though here he juxtaposes the latter's quite separate works on America and France.

⁸ I use the notion of 'testing' with reservations, since I see the task and potential of research as to qualify and refine generalisations; definite verification or falsification is impossible (Hyman 1994).

⁹ For one powerful critique see Shalev 1980.

¹⁰ His key conclusions are, first, that totalitarian states entail subservient unions; second, that countries with 'polarising' (normally meaning communist) parties have divided and politicised union movements. To my mind this does not greatly advance understanding, though Frenkel (1993) finds it a useful framework for his comparison of trade unionisms in the Asian-Pacific region.

¹¹ Another problem is that – as Adams (1996) has argued – we lack the systematic cross-national information on key institutional aspects of trade unionisms which is a precondition of effective comparison.

¹² There are some parallels in the approach of Shorter and Tilly (1974: 343) who analyse strikes (and by extension, trade unionism?) as 'an instrument of working-class political action'; but in their case the specifically economic dimension of union action seems to disappear.

¹³ There is an interesting parallel with the argument of Wever in her comparison of industrial relations innovation in Germany and the USA (1995a: 88). She argues that her case studies confirm the view 'that works councils cannot strategically shape outcomes or achieve full codetermination at the workplace simply on the basis of their legal rights, they also show that there is more to representing employee interests than legal rights. For a council to carry out its job effectively, it must be able to capitalize on cognitive resources such as the capacity to

plan, strategize and anticipate, To do this, the council must be able to draw on external resources, particularly the union.'

¹⁴ One is reminded of the familiar argument that a trade union is not *un syndicat* is not *eine Gewerkschaft* is not *un sindacato*....

¹⁵ It is on this basis that Taylor, for example, is able to conclude (1989: 45) that 'remarkably, despite their varying structures and relationships with governments, unions have a common ideology' – the essence of which appears very similar to the British notion of 'free collective bargaining'.

¹⁶ There are some interesting affinities between Valenzuela's analysis and the detailed historical comparison by Collier and Collier (1991) of the evolution of relations between state and labour in eight Latin American countries. Applying the notion of 'critical junctures' proposed by Lipset and Rokkan (1967) they indicate how, often early in the twentieth century, distinctive national patterns were set which nevertheless displayed some commonalities. They also consider how far recent changes constitute a new 'critical juncture'. Their discussion of 'incorporation' offers interesting insights for research in other regions of the world.

¹⁷ In most other languages, those who refer to industrial relations reformulate the concept. French Canadians, who have adopted the Anglo-American term in literal translation, are the exception; in France itself the normal expression is *relations professionnelles*.

¹⁸ For an informative Anglo-French comparison of the impact at workplace level of grading and wage structures see Gallie 1978.

¹⁹ For instance, a major concern of Italian industrial relations scholars has been the process of 'political exchange' (*scambio politico*), a concept only comprehensible against the background of an Italian state which is pervasive but lacking in social legitimacy; postwar governments have persistently been driven to seek a negotiated relationship with unions in order to borrow from them greater social acceptability. Neither the theory nor the practice of Italian industrial relations can be grasped without an understanding of this process.

References

- Abrahamsson, B. 1993 Union Structural Change, *Economic and Industrial Democracy*, 14, 399-421.
- Adams, R. J. 1995 *Industrial Relations Under Liberal Democracy*. Columbia: University of South Carolina Press.
- Adams, R. J. 1996 Comparing Unions Cross-Nationally: a Research Agenda, *International Journal of Employment Studies*, 4, 127-43.
- Altvater, E. and Mahnkopf, B. (1993). *Gewerkschaften vor der europäischen Herausforderung*. Münster: Westfälisches Dampfboot.
- Bamber, G. J. and Lansbury, R. D. (eds) 1987 *International and Comparative Industrial Relations*. London: Allen and Unwin [2nd edn 1993]
- Banks, J. A. 1974 *Trade Unionism*. London: Collier-Macmillan.
- Bean, R. 1985 *Comparative Industrial Relations*. London: Routledge. [2nd edn 1994]
- Bean, R. 1987 International Comparisons in the Study of Industrial Relations, *Employee Relations*, 9, 6, 3-7.
- Blanchflower, D. G. and Freeman, R. B. 1992 Unionism in the United States and Other Advanced OECD Countries, *Industrial Relations*, 31, 56-79.
- Bryman, A. 1988 *Quantity and Quality in Social Research*. London: Routledge.
- Cella, G. P. and Treu, T. 1993 National Trade Union Movements. In R. Blanpain and C. Engels, eds, *Comparative Labour Law and Industrial Relations in Industrialised Market Economies*, 3rd edn, 281-314. Deventer: Kluwer. [original edn 1982]
- Clegg, H. A. 1976 *Trade Unions Under Collective Bargaining*. Oxford: Blackwell.
- Cohen, R. 1987 Theorising International Labour. In R. E. Boyd, R. Cohen and P. C. W. Gutkind, eds, *International Labour and the Third World*, 3-25. Aldershot: Avebury.
- Cole, G. D. H. 1913 *The World of Labour*. London: Bell.
- Collier, R. B. and Collier, D. 1991 *Shaping the Political Arena*, Princeton: Princeton UP.
- Crouch, C. 1993 *Industrial Relations and European State Traditions*. Oxford: Clarendon Press.
- Dogan, M. and Pelassy, D. 1990 *How to Compare Nations* (2nd edn). Oxford: Blackwell.
- Frenkel, S. 1993 Theoretical Frameworks and Empirical Contexts of Trade Unionism. In S. Frenkel, ed., *Organized Labor in the Asia-Pacific Region*, 3-55. Ithaca: ILR Press.

- Gallie, D. 1978 *In Search of the New Working Class*. Cambridge: Cambridge UP.
- Galtung, J. 1990 Theory Formation in Social Research. In E. Øyen, ed., *Comparative Methodology*, 96-112. London: Sage.
- Gardner, M. 1995 Labor Movements and Industrial Restructuring. In K. S. Wever and L. Turner, eds, *The Comparative Political Economy of Industrial Relations*, 33-70. Wisconsin: IRRA.
- Golden, M. 1997 *Heroic Defeats: The Politics of Job Loss*. Cambridge: Cambridge UP.
- Gourevitch, P., Martin, A., Ross, G., Allen, C. Bornstein, S. and Markovits, A. 1984 *Unions and Economic Crisis: Britain, West Germany and Sweden*. London: Allen and Unwin.
- Hall, P. A. 1986 *Governing the Economy*. Cambridge: Polity.
- Hancké, B 1993 Trade Union Membership in Europe, 1960-1990, *British Journal of Industrial Relations*, 31, 593-613.
- Hantrais, L. and Mangen, S. (eds) 1996 *Cross-National Research Methods in the Social Sciences*. London: Pinter.
- Hege, A. 1996 *Trade Union Identity and Workplace Representation: Do Works-Councils Make a Difference?* Coventry: IRRU, University of Warwick.
- Hege, A. and Dufour, C. 1995 Decentralization and Legitimacy in Employee Representation, *European Journal of Industrial Relations*, 1, 83-99.
- Hibbs, D. 1978 The Political Economy of Long-run Trends in Strike Activity, *British Journal of Political Science*, 8, 153-77.
- Hirst, P. and Thompson, G. 1996 *Globalization in Question*, Cambridge: Polity.
- Hyman, R. 1994 Theory and Industrial Relations, *British Journal of Industrial Relations*, 32, 165-80.
- Hyman, R. 1995 Industrial Relations in Europe: Theory and Practice, *European Journal of Industrial Relations*, 1, 17-46.
- Hyman, R. 1996 Union Identities and Ideologies in Europe. In P. Pasture, J. Verberckmoes and H. De Witte, eds, *The Lost Perspective? Trade Unions Between Ideology and Social Action in the New Europe, Volume 2: Significance of Ideology in European Trade Unionism*, 60-89. Aldershot: Avebury. [French version: La géométrie du syndicalisme, *Relations industrielles*, 52, 7-38]
- Jacoby, S. M. 1995 Social Dimensions of Global Economic Integration. In S. M. Jacoby, ed., *the Workers of Nations*, 1-29. New York: Oxford UP.
- Kane, E. and Marsden, D. 1988 The Future of Trade Unionism in Industrialised Market Economies, *Labour and Society*, 13, 109-24.
- Kerr, C., Dunlop, J. T., Harbison, F. H. and Myers, C. 1960 *Industrialism and Industrial Man*, Cambridge: Harvard UP.
- Kochan, T. A. 1980 *Collective Bargaining and Industrial Relations*. Homewood: Irwin.
- Kochan, T. A., McKersie, R. B. and Cappelli, P. 1984 Strategic Choice and Industrial Relations Theory, *Industrial Relations*, 23, 16-39.
- Korpi, W. and Shalev, M. 1979 Strikes, Industrial Relations and Class Conflict in Capitalist Societies, *British Journal of Sociology*, 30, 164-87.
- Lange, P. M., Ross, G. and Vannicelli, M. 1982 *Unions, Change and Crisis: French and Italian Union Strategy and the Political Economy*. London: Allen and Unwin.
- Lipset, S. M. and Rokkan, S. 1967 Cleavage Structures, Party Systems and Voter Alignments. In S. M. Lipset and S. Rokkan, eds, *Party Systems and Voter Alignments*, 1-64. New York: Free Press.
- Locke, R. M. 1990 The Resurgence of the Local Union, *Politics and Society*, 18, 347-79.
- Locke, R. and Kochan, T 1995 Conclusion: The Transformation of Industrial Relations? In R. Locke, T. Kochan and M. Piore, eds, *Employment Relations in a Changing World Economy*, 359-84. Cambridge: MIT Press.
- Locke, R. M. and Thelen, K. 1995 Apples and Oranges Revisited: Contextualized Comparisons and the Study of Comparative Labor Politics, *Politics and Society*, 23, 337-67.
- MacDuffie, J. P. 1995 International Trends in Work Organization in the Auto Industry. In K. S. Wever and L. Turner, eds, *The Comparative Political Economy of Industrial Relations*, 71-114. Wisconsin: IRRA.
- Martin, R. M. 1989 *Trade Unionism: Purposes and Forms*. Oxford: Clarendon Press.
- Maurice, M. 1989 Méthode comparative et analyse sociétale, *Sociologie du travail*, 2/89, 175-91.
- Michels, R. 1915 *Political Parties*. New York: Dover.

- Müller-Jentsch, W. 1985. Trade Unions as Intermediary Organizations, *Economic and Industrial Democracy*, 6, 3-33.
- Munck, R. 1988 *The New International Labour Studies*. London: Zed.
- Olson, M. 1982 *The Rise and Decline of Nations*. New Haven: Yale UP.
- Perlman, S. 1928 *The Theory of the Labor Movement*. New York: Macmillan.
- Pontusson, J. 1992 Introduction: Organizational and Political-Economic Perspectives on Union Politics. In M. Golden and J. Pontusson, eds, *Bargaining for Change*, 1-41. Ithaca: Cornell UP.
- Poole, M. 1986 *Industrial Relations: Origins and Patterns of National Diversity*. London: Routledge.
- Przeworski, A. and Teune, H. 1970 *The Logic of Comparative Social Inquiry*. New York: Wiley.
- Ragin, C. C. 1987 *The Comparative Method*. Berkeley: University of California Press.
- Ragini, M. 1995 *Uncertain Boundaries*. Cambridge: Cambridge UP.
- Rose, R. 1991 Comparing Forms of Comparative Analysis, *Political Studies*, 39, 446-62.
- Ross, G. 1981 What Is Progressive About Unions?, *Theory and Society*, 10, 609-43.
- Rothstein, B. 1992 Labour Market Institutions and Working-Class Strength. In S. Steinmo, K. Thelen and F. Longstreth, eds, *Structuring Politics*, 33-56. Cambridge: Cambridge UP.
- Sartori, G. 1994 Compare Why and How. In M. Dogan and A. Kazancigil, eds, *Comparing Nations*, 14-34. Oxford: Blackwell.
- Schregle, J. 1981 Comparative Industrial Relations: Pitfalls and Potential, *International Labour Review*, 120, 15-30.
- Shalev, M. 1980 Industrial Relations Theory and the Comparative Study of Industrial Relations and Industrial Conflict, *British Journal of Industrial Relations*, 18, 26-43.
- Shorter, E. and Tilly, C. 1974 *Strikes in France 1830-1968*, Cambridge: Cambridge UP.
- Sisson, K. 1987 *The Management of Collective Bargaining*. Oxford: Blackwell.
- Smelser, N. J. 1976 *Comparative Methods in the Social Sciences*. Englewood Cliffs: Prentice-Hall.
- Streeck, W. 1987 The Uncertainties of Management in the Management of Uncertainty, *Work, Employment and Society*, 1, 281-308.
- Streeck, W. 1992 *Social Institutions and Economic Performance*. London: Sage.
- Sturmthal, A. 1972 *Comparative Labor Movements*. Belmont: Wadsworth.
- Swenson, P. 1989 *Fair Shares: Unions, Pay and Politics in Sweden and West Germany*. Ithaca: Cornell UP.
- Taylor, A. J. 1989 *Trade Unions and Politics*. London: Macmillan.
- Thelen, K. and Steinmo, S. 1992 Historical Institutionalism in Comparative Politics. In S. Steinmo, K. Thelen and F. Longstreth, eds, *Structuring Politics*, 1-31. Cambridge: Cambridge UP.
- Turner, L. 1991 *Democracy at Work*. Ithaca: Cornell UP.
- Valenzuela, J. S. 1989 Labor Movements in Transitions to Democracy, *Comparative Politics*, 21, 445-72.
- Visser, J. 1988 Trade Unionism in Western Europe, *Labour and Society*, 13, 125-82.
- Visser, J. 1994 European Trade Unions: the Transition Years. In R. Hyman and A. Ferner, eds, *New Frontiers in European Industrial Relations*, 80-107. Oxford: Blackwell.
- van de Vall, M. 1970 *Labor Organizations*. Cambridge: Cambridge UP.
- von Beyme, K. 1980 *Challenge to Power: Trade Unions and Industrial Relations in Capitalist Countries*. London: Sage.
- Wallerstein, M. 1989 Union Organization in Advanced Industrial Democracies, *American Political Science Review*, 83, 481-501.
- Waterman, P. 1993 Social Movement Unionism, *Fernand Braudel Center Review*, 16, 245-78.
- Wever, K. S. 1995a *Negotiating Competitiveness*. Boston: Harvard Business School Press.
- Wever, K. S. 1995b Markets, Strategies and Institutions in Comparative Perspective. In K. S. Wever and L. Turner, eds, *The Comparative Political Economy of Industrial Relations*, 181-92. Wisconsin: IRRRA.
- Windmuller, J. P. 1974 *Collective Bargaining in Industrialised Market Economies*. Geneva: ILO. [2nd edn 1987]

Windmuller, J. P. 1975 The Authority of National Trade Union Confederations. In D. B. Lipsky, ed., *Union Power and Public Policy*, 91-107. Ithaca: Cornell University.

Øyen, E. 1990 The Imperfection of Comparisons. In E. Øyen, ed., *Comparative Methodology*, 1-18. London: Sage.