Teaching Comparative Industrial Relations

edited by

Mark Bray

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Introduction

Mark Bray

Comparative research is vital to the development of all social science disciplines. Indeed, many scholars have argued that the making of comparisons is the only method by which explanations of social behaviour and the development of theory occur. For example, the author of one comparative study of economic development in 'settler' societies argued:

Only one analytical method is to be found anywhere in the social sciences: the comparative method. We cannot choose whether or not to make comparisons (between societies or between eras in the same society); we can only choose the items which are to be compared, and whether to proceed with more or less caution and self-consciousness. (Denoon, 1983, 8)

The value of research comparing different societies has certainly not gone unnoticed by industrial relations scholars (for example, Perlman, 1949; Kerr et al., 1960; Sisson, 1988; Martin, 1989; Fener, 1989). Indeed, it could be argued that many of the major initiatives in industrial relations theory have emerged from comparative endeavours (Dunlop, 1958; Clegg, 1976; Šhalev, 1980).

The inspiration for the present monograph, however, is the enormous contribution comparative analysis can make to the teaching of industrial relations. The collection of papers presented here arises from a conference convened by the Australian Centre for Industrial Relations Research and Teaching (ACIRRT) at the University of Sydney on 2 November 1990. The conference sought to bring together scholars engaged in the teaching of comparative industrial relations in order to exchange views, to explore the contribution of comparative analysis to teaching, and to work towards the development of better courses in comparative industrial relations.

Themes of the Monograph

A number of important themes run through the papers presented in this volume and, indeed, provided the focus of discussion at the preceding conference. The first concerned the range of countries which should be examined in comparative industrial relations courses. On the one hand, Castles presents a persuasive case for restricting study to a relatively small
number of Western capitalist countries and using these countries to develop a better understanding of Australian society in general, and Australian industrial relations in particular. The argument here is that students' understanding of Australian industrial relations can be expanded by comparing the different institutional structures which have developed to regulate industrial relations in countries which are fundamentally similar to our own, in terms of economic and political systems, standard of living, and even culture. This approach parallels the 'most similar' strategy used in comparative research. Bray argues that there are also pragmatic reasons for adopting a relatively restricted teaching agenda, especially with undergraduate students in their early years of study. These more pragmatic factors probably explain the predominance of these countries in comparative industrial relations courses, as demonstrated by the surveys conducted by both Adams and Jenkins.

On the other hand, in contrast to the arguments of Castles and Bray, most of the other papers in this volume either implicitly or explicitly advocate examination of a broader range of countries, including Communist (or previously Communist) countries, Newly Industrialised Countries (NICs) or the Less Developed Countries (LDCs) of the Third World. Strong pedagogic reasons are offered for this broader approach by Haworth and Beresford & Kelly. Leggett also identifies clear policy grounds arising from the economic vitality of the Asia/Pacific region and Australia's increasing links with this region. Littler further contends that the pragmatic problems associated with exposure of students to a large number of diverse countries can be overcome through the use of models. Models, he argues, serve to simplify the complex reality of different groups of countries and allow comparisons to be made between models, while at the same time providing the opportunity to explore the unique features of individual countries within each model.

The second main theme concerns the issues or topics to be addressed in comparative industrial relations courses. Here, there is widespread agreement that simple country-by-country 'tours' of industrial relations institutions are inadequate, even if those institutions are placed in proper socio-economic context. Despite the importance of students acquiring a grasp of the institutional details in each country, the great advantages of comparative courses cannot be exploited without explicit comparisons being made and, perhaps more controversially, without the comparative method being clearly articulated to students. However, even when this argument is accepted and explicit comparisons are made in courses, there are further questions about the level of analysis and the issues to be compared. Most comparative texts and courses focus almost exclusively upon the level of national systems of industrial relations. While this is perfectly legitimate and useful, it was felt by contributors and conference participants alike that there was much untapped potential in exploring comparisons at the more decentralised levels of industry, company or workplace. It was also acknowledged that a preoccupation with unions and collective bargaining arrangements, common in most courses, neglected a plethora of useful and stimulating topics.
The third theme to emerge concerns theory. Does the conventional industrial relations approach, associated with institutional studies and 'systems' theory, provide a satisfactory basis for the study of comparative industrial relations? Although it was not actually argued below, a positive answer to this question is possible, so long as industrial relations analysis remains at the level of descriptive accounts of industrial relations institutions in the Western capitalist countries. As Walker (1967) argued, the systems approach at least provides a series of categories which are useful in organising comparative data. In fact, as Adams found, most comparative industrial relations courses adopt without much question a systems-type approach.

However, the adequacy of conventional theory is seriously questioned by the papers in this volume, especially when analysis moves to explanation rather than description or when the focus moves to non-Western countries. For example, Haworth's paper directly challenges the conventional approach. He argues that conventional theory has been strongly 'eurocentric' and that once attention is focused upon non-European countries, the failures of that conventional theory become more apparent. Its preoccupation with collective bargaining neglects alternative processes of control and conflict resolution apparent in NICs and LDCs - a point on which Beresford & Kelly provide additional support. Systems theory also fails to explain the peculiar patterns of industrial relations which have developed in such countries. Haworth advocates an alternative 'political economy' approach centred on the concept of accumulation and the role of industrial relations institutions in the accumulation process - an approach which is not dissimilar to that offered by Beresford & Kelly.

This rejection of conventional industrial relations theory raises some very important issues and leads to at least two very different responses. On the one hand, some well established critics of the conventional approach would agree that systems theory is at fault, although they may not accept the charge of 'eurocentrism'. After all, writers such as Korpi & Shalev (1979) did not need to look beyond Europe to realise the limitations of systems theory - they have long criticised systems theory's analysis of Western societies because of its artificial separation of industrial relations institutions from the wider political economy within which they operate. These writers, however, would probably agree with Haworth and Beresford & Kelly in regarding political economy as an alternative universal approach capable of overcoming the inadequacies of systems theory, irrespective of whether it is used to scrutinise the Western countries or others.

On the other hand, Littler goes one step further by suggesting that systems theory is not alone in failing to develop effective and universally applicable theory - all theories are biased by the historical location and policy preoccupations of its authors. This leads him to argue that there may be no universal theories capable of explaining industrial relations in all societies.
Introduction

The task of teachers, then, is to ensure that students understand the biases embodied in different theories and the historical/policy milieu in which they were created.

A final theme emphasises the potential of comparative research in developing a better understanding of Australian industrial relations, in assisting better policy formation and in contributing to the teaching of comparative industrial relations. Castles makes the point that very little systematic research has been conducted comparing Australian social relations with those in other countries, and the same point has been made previously about industrial relations research (Blain & Plowman, 1987, 309-10). There are some signs that this as yet untapped potential has been recognised, especially with the initiation of policy-oriented research of this kind, but little is yet published and there are limitations to research which is caught up in controversial policy issues. Until significant, theoretically-based research emerges, teachers of comparative industrial relations must use the available resources. The papers below debate the best methods of exploiting such resources.

The Schema of the Monograph

The papers in the collection are arranged in three parts. Part A comprises two papers on the broad subject of the uses and abuses of comparative method. Castles draws on his experience as a researcher and teacher in political science to catalogue the advantages to be gained by comparing Australia with other countries. He identifies four such advantages: to describe and classify the Australian experience; to account for the Australian experience; to explore the Australian experience; and to evaluate the Australian experience. Castles' argument, reflecting his research background, emphasises the 'most similar' strategy whereby these advantages are best realised by comparing Australia with the developed Western countries, since they are the countries with which Australia has most in common and, more pragmatically, they are the countries for which comparable research data are abundant. In contrast, Haworth advocates a more global approach to comparative study. His familiarity with LDCs, especially in Latin and South America, leads him to argue that the study of developed Western countries should be complemented with analysis of NICs and LDCs - an approach with profound implications for theory generally and teaching in particular.

Part B comprises four papers which seek to identify the various types of comparative industrial relations courses and explore some of their respective strengths and weaknesses. Chapter 3 by Adams reports the results of an

1 Witness the unpublished case studies commissioned by the Business Council of Australia and conducted by the National Institute of Labour Studies (Drago et. al., forthcoming); a comparative study of productivity in Kodak plants around the world (Bureau of Industry Economics, 1990); and comparative work in progress sponsored by the Department of Industrial Relations and co-ordinated by Richard Gough.
informal, international survey of comparative industrial relations courses, supplemented by Adams' considerable personal knowledge and experience. Chapter 4 by Jenkins is the result of a more formal, Australian survey conducted as part of ACIRRT's Review of Industrial Relations Teaching in Higher Education. The two papers come to many similar conclusions, such as the solid base of comparative courses, especially in institutions with specialist industrial relations department or schools; the dominance of conventional systems approach; and the preoccupation of most courses with the Western developed countries. However, there are also some interesting differences between the two surveys. Perhaps reflecting his North American base, Adams identifies a trend away from comparative industrial relations towards comparative human relations management (HRM) and little challenge to the dominant theoretical framework. Jenkins was unable to comment on any trend towards HRM in Australia, but she did emphasise a move towards the incorporation of Asian/Pacific countries into comparative courses and the emergence of an alternative 'political economy' approach to some courses in comparative industrial relations. Clearly, the authors of several chapters in this collection seek to accelerate these developments.

Chapters 5 and 6 represent attempts to describe and advocate particular approaches to the teaching of comparative industrial relations. The surveys by Adams and Jenkins suggest that most existing courses resemble that advanced by Bray. The scope of this course is limited to a small number of Western countries, while it is organised according to a combination of country-by-country and comparative topics. The pragmatic and pedagogic demands of first-year undergraduates, he argues, make such a course particularly relevant, provided that it is informed by clear theoretical themes. In contrast, Littler's approach is more innovative, seeking to expand the range of countries studied through the construction of models. He argues that models provide an opportunity to explore important theoretical issues at the same time as satisfying the need of students for descriptive knowledge of the countries studied.

Part C is devoted to the special issue of industrial relations in the Asian/Pacific countries - clearly a topic of increasing importance to teachers of comparative industrial relations in Australia. These countries are divided, perhaps rather arbitrarily and with some overlap, into the ASEAN countries and the NICs of East Asia. Beresford and Kelly address the former group in Chapter 7, arguing that the ASEAN countries should be regarded as both similar and different to other capitalist countries. The similarities arise from their common mode of production, which creates similar imperatives and contradictions in the employment relationship. The differences arise from divergent levels of economic development, which produce varying labour processes, and from different historical and cultural experiences. Once these similarities and differences are recognised, they continue, the interactions between capital, labour and state in these countries can be satisfactorily revealed to students. Leggett's discussion of the NICs of East Asia in Chapter 8 demonstrates the theoretical and practical relevance of these countries for
Australian students of industrial relations, before exploring some of the valuable and stimulating themes which can inform courses incorporating these countries. Leggett also includes a useful Selected Bibliography as an appendix to his chapter.

Conclusions

Thus, this collection of papers offers new data on how comparative industrial relations is presently taught and a range of views about comparative industrial relations should be taught. It is hoped that this combination provides food for thought for teachers in this area. If the monograph makes a contribution to improving the quality and scope of teaching in comparative industrial relations, then it will have achieved its goals.

References

1 Why Compare Australia?

Francis G. Castles

Despite the forests of Australian hardwoods sacrificed annually in the cause of Australian scholarship, there are important ways in which we remain truly Australis Terra Incognita, a land largely unknown to others and, in a significant sense, unknown to ourselves. That is because, with rare exceptions, commoner early in the century than later, and, in any case, usually emanating from overseas rather than native commentators (see, for example, Metin, 1977; Reeves, 1902; and Bryce, 1921), we have been content to describe the Australian experience without explicit reference to developments in other comparable, western democratic nations. As a consequence, we have tended either to assume that things Australian were much as things elsewhere (an ordinariness metaphor) or that aspects of the Australian experience were wholly unusual (an exceptionalism metaphor), the crucial commonality of such views being their assertion on the basis of assumption rather than demonstration. From the outside, the Australian experience becomes either commonplace or an unexplained oddity; seen from the inside, it becomes a matter of parochial concern, but unattached to or unlocated in terms of developments elsewhere.

The fundamental objective of comparison, whether employed as a pedagogic technique or a tool of research, is to replace assumption by demonstration. In this paper, we shall seek to show that by locating Australia in a cross-national context, we are the better able:

- to describe and classify the Australian experience;
- to account for the Australian experience;
- to explore the Australian experience;
- to evaluate the Australian experience.

To illustrate these advantages of examining Australia from a comparative viewpoint, we shall utilise examples ranging across the social science disciplines that seek to comprehend the character of the Australian experience, although we make at least some reference to industrial relations and/or labour market phenomena under each heading.
Describing and Classifying the Australian Experience

In fact, it is not merely a matter of comparison assisting us in describing and classifying the Australian experience; without some kind of comparison it is impossible to characterise that experience at all. Essentially, the manner in which we describe and classify aspects of social reality is by making statements that depend on an assertion of similarity and/or difference. When, for instance, we describe contemporary Australia as a welfare state, we may imply one of two possible meanings: that Australian public policy has become far more concerned than it once was with the needs of the poor and helpless or that Australia is one of a group of countries which put such objectives to the forefront of its policy agenda. The first comparison is cross-temporal and the second cross-national. To locate adequately the nature of any aspect of the Australian experience, we require comparisons of both types. That is so, because the information we gain from the two types of comparison is quite different in kind. We may be much more welfare oriented than we once were - certainly, Australians have a far more extensive range of social services available than they did even twenty years ago (see Graycar & Jamrozik, 1989, 2) - but, at the same time, we have ceased to be a welfare pioneer, as we were between 1900 and 1910. Compared with the majority of advanced democratic states, Australia is now a low spender on most aspects of welfare provision (see Castles, 1985). An analogous response, and one which arguably explains our welfare story, would be appropriate to the question of whether Australia counts amongst the rich nations of the world. The answer is that we are rich both in terms of a comparison with the Australian past and with the contemporary reality of all but the most affluent of the world's nations, but that we have slipped badly from our pre-war status of being amongst the world's super-rich nations, this latter point emerging very clearly from what is, possibly, the only instance of comparative social sciences research of world stature by an Australian scholar (Clark, 1953).

The focus in this paper is on cross-national comparison, either of the purely cross-sectional type that involves a contrast of different nations at a single time-point or of processes of change, which necessarily involve simultaneous cross-national and cross-temporal analysis. One obvious reason for the emphasis on the experience of other nations is that cross-temporal comparison is the stuff of history and has not been neglected to anything like the same extent as cross-national comparison. No one doubts that one must know something of the Australian past to understand the Australian present, but the notion that one must know something of other countries to understand our own is much less frequently encountered.

Another reason is simply that, although historical analysis has made the idea of cross-temporal comparison rather familiar, it is cross-national comparison which is usually to the forefront in contemporary debate about the character of Australian society. When commentators argue that our economic growth rate is slow, that our manufacturing performance is weak or that our trade unions have unconscionable power, they are far more likely to mean that growth is slower, manufacturing performance is weaker and that trade unions have greater influence over government than in comparable nations than to be
offering a comparison with Australia's recent past. Implicitly, other nations serve as a benchmark for our own. In light of that benchmark, we locate various aspects or dimensions of our own experience - whether they are higher or lower, bigger or smaller, strong or weak, advanced or underdeveloped, and, as we shall see subsequently, and taking a more evaluative viewpoint, whether they are better or worse.

The word *implicitly* is very deliberately chosen here because, only too often, we make comparisons with other nations without much conscious awareness of what we are doing. That is because, instead of using explicitly comparative phraseology (country A is richer than countries B, C and D), we often make the assertion that a given country falls into a given classificatory category, whose derivation from comparison is unstated. When we say that Australia is rich, we are locating an aspect of its experience in a classificatory system consisting of, at a minimum, two kinds of economy, affluent and poor ones. In reality, such a classification and the concepts of which it is composed can only be derived from a criterion or criteria emerging from prior cross-national comparison. In other words, we can only describe a nation as rich because we have a conception of what it is to be a rich nation, and that, in turn, can only come from examining a number of nations and finding some criterion which distinguishes the more from the less affluent. Exactly the same applies to the classification of trade union power. We cannot meaningfully make assertions about the strength or otherwise of Australian trade unionism without some prior conception of the range of trade union influence in other comparable nations.

So, if classification and description in terms of categories is inherently comparative, why is it so important to adopt an approach which is *explicitly* comparative in orientation? The reason is that implicit comparison is rarely good comparison. Fundamentally, that is because unless we are aware of the scope of the comparison on which a given classification is based, we have no grounds for establishing the validity or otherwise of the conclusions that emerge from our analysis. Is Australia an advanced welfare state in expenditure terms? Most certainly, yes, if the comparison is between the industrialised countries and the vast majority of less developed nations, but, almost as emphatically, no, if the comparison is restricted to advanced capitalist economies. Only too frequently the descriptions offered us by both academic and journalistic commentators lack the comparative referents required for assessing the case being argued.

Equally frequently, such descriptions highlight one particularly dramatic comparison at the expense of all others, as when the Australian economy is compared, and found wanting in almost every respect, with its Japanese counterpart. Comparisons of this sort are always deeply suspect, because the choice of a single reference point by a commentator largely determines the character of the assessment to be made. They push us far too rapidly in the direction of conclusions that can only be properly substantiated by an examination of many cases and they do so frequently at the behest of commentators who are *parti pris* as to the proper interpretation of that reality.
The use of industrial relations practice in the United Kingdom in the late 1970s as a terrible warning to other nations is another flagrant example of this tendency.

A sensible comparative reference point for describing and classifying the Australian experience is a selection of nations including both other English-speaking nations, that might be assumed on *a priori* grounds to have much in common with Australia, and some wider contrast with other advanced, usually European, nations with fewer obvious cultural and historical affinities to Australia. However, there is no implication here that this focus of comparison is intrinsically better than any another or the only one appropriate for understanding all aspects of the Australian experience. The ideal comparative study is one in which all nations potentially relevant to the question in hand are compared and contrasted. But that is an ideal and usually the absence of sufficient space, data and knowledge force us to choose a somewhat more modest focus: in this case, sufficient cases to locate some of the more important aspects of what is distinctive and similar about the Australian experience as contrasted with other advanced democratic nations.

What we would insist on is that a self-consciously comparative stance is likely to be far less misleading than a description framed in categories the comparative basis of which are unstated or very partial. Description or classification of social, economic and political reality which makes no explicit reference to the comparative benchmarks it is using is analogous to a cartography which produces maps lacking any scales of distance. Equipped with such maps, we would be unable to tell whether the distance between London and Sydney was greater or smaller than the distance between Sydney and Melbourne. Without an explicitly comparative approach or with only a very partial one, we are likely to find it just as difficult to locate those features of the Australian experience that make it distinctive and those that we have in common with other nations.

This allusion to cartography is appropriate in another way. Large-scale maps are often useless when we wish to find our way around particular localities. The ordinariness metaphor points to the similarity of the Australian experience to that of other nations, whilst the exceptionalism metaphor points to our distinctiveness, but the truth is that in some areas we are similar and in others different and that similarity and difference can be conjoint in quite tightly circumscribed aspects of society. Patterns of interest group mediation are a case in point. Many features of Australian interest group arrangements, not least those pertaining to the industrial relations arena, are broadly similar to those of other Anglo-American societies, to the extent that Australia is usually lumped together with them into a 'pluralist' or 'liberal' category in most comparative studies (Lehmbruch, 1984; Crouch, 1985). But this wholly ignores the distinctive aspects of wage-setting arrangements in the Australian context, which, in virtue of their institutionalisation and statist character, fit most uneasily under such rubrics. Another area in which similarity to other nations and very marked differences is present is women's political influence. In respect of female legislative representation, Australia is very similar to other Anglo-American nations, with a far lower proportion of female
legislators than most European nations. In respect, of the development of women's policy machinery, however, Australia is wholly exceptional, and, arguably, in front of all other western nations (see Sawer, 1990 and 1991). The crucial point is that comparative analysis, no less than any other research strategy by which we seek to illuminate the Australian experience, has to be directed across the vast range of discrete topics that make up that experience. Broad generalisations are inadequate. Australia is similar and different from other nations in different ways depending on the subject we are examining and the only way we can find out which is by a detailed comparative analysis of any area in question.

Accounting for the Australian Experience

Apart from serving as a benchmark of description and classification, comparison offers us a logic by which we may account for features of the Australian experience. That logic rests on the fact that diverse nations are rarely either entirely different or entirely similar, and that grouping nations that are similar and contrasting those that are different often provides grounds for conclusions as to the factors influencing the outcomes that occur. What underlies such conclusions is a guiding assumption that like consequences stem from like causes and diverse consequences from diverse causes, so that when we discover two or more nations having some feature in common, we make, at least an initial, presumption that this similarity derives from some other shared characteristic. Using the comparative method to account for outcomes or events is a matter of locating patterns of similarity and difference across space (cross-national), time (cross-temporal) or both.

There are two possible strategies by which the comparatist may proceed (Przeworski & Teune, 1970). A 'most different' strategy is that which is utilised when we are seeking to understand patterns of similarity. If we can locate some particular feature which very diverse nations have in common, we are entitled to suggest that it is attributable to one of the few other attributes they share. Thus, if all or most nations, which have in common the fact that they spend x per cent or more of their national product on welfare, have more than y per cent of their population over the age of 65, we may conclude that the age structure of the population is a prime candidate accounting for the development of the welfare state (see Wilensky, 1975), and, clearly, the strength of that conclusion is reinforced, the greater their diversity in other respects. To the extent that the high welfare spenders exhibit major differences in cultural and historical development and economic, social and political structure, age structure becomes a more and more probable explanation. Similarly, if trade union politics manifest substantial variation within nations like Britain, Germany and the United States, but manifest striking convergences within the coal-mining and printing industries across these nations, it may be possible to locate factors specific to each of these industries responsible for shaping trade unions' response to the political environment in which they emerge (Marks, 1989). The mark of a study employing a 'most different' strategy is a conscious effort to increase potential
diversity in the group of nations under investigation, since each additional country with new characteristics added to the sample rules out further alternative explanations. This is not necessarily a matter of examining very large numbers of cases, as in the welfare state example, but is rather a matter of seeking to use unfamiliar contexts to test prior assumptions of distinctiveness.

A 'most similar' strategy is that which is utilised when we are seeking to understand patterns of diversity. If we can locate some particular feature in which otherwise very similar nations differ, we are entitled to suggest that it is attributable to one of the few other factors distinguishing them. Thus, if affluent, democratic capitalist states vary quite appreciably in the extent of their educational expenditure and that variation coincides with the ideological complexion of the political parties holding governmental office, we may argue that political ideology is a determinant of educational spending (see Castles, 1989a). In this case, our confidence in our conclusion is not a function of the diversity of the cases, but rather their similarity. To the extent that cases are properly matched - that is, they are entirely similar across a wide range of factors - that rules out many potential alternative explanations of patterns of diversity. Studies employing the 'most similar' strategy generally, but by no means invariably, tend to focus on fewer cases than those using a 'most different' one for the obvious reason that for each attribute on which nations are matched - how rich they are, whether they are democratic, etc - more and more are ruled out. Which attributes are matched is, of course, a matter of the question we are asking.

We have previously suggested that a sensible strategy of comparison is to compare and contrast Australia with a range of English-speaking and advanced European nations, which is not to say that the only strategy we advocate is the 'most similar' one. That depends on the purpose of the comparison. In some instances, we are locating this grouping of nations as one broadly similar to our own and seeking to account for remaining differences by factors which differentiate their experience in significant ways. Here, the strategy of comparison is the 'most similar' one. In other instances, we start from the assumption that the Australian experience is in some way unique, and look to other English-speaking and European nations to find factors common to all that may account for remaining similarities or to dissolve the apparent dissimilarities between Australia and other nations. Here, our strategy is 'most different', as, for instance, would be a comparison of wage outcomes which started out from the peculiarities of Australian wage-setting arrangements, but found them to be irrelevant to the trajectory of wage outcomes in Australia and other western advanced nations in the 1970s and 1980s (see Dowrick, 1991).

A reason for including English-speaking nations other than Australia stems from a belief that in many respects these countries are still more similar to us even than the economically advanced and democratic countries of Western Europe because they broadly share elements of a common culture, history, legal and political structure. Nevertheless, it is by no means invariably true that the English-speaking countries are better matched than some English-
speaking and some non-English speaking nations. That, too, depends on purpose and the question in mind. For instance, if we want to explain the factors conducive to the early emergence of democratic institutions, it may be more relevant to examine the commonalities of small countries with a strong independent rural sector, such as Australia, New Zealand and Denmark and to contrast them with other nations, including the United Kingdom, in which independent peasant proprietorship was weaker (see Therborn, 1977).

Comparisons and contrasts with other advanced democratic nations is most natural when our aim involves locating ways in which the Australian experience is novel and distinctive. In terms of that objective, much that emerges from comparisons with a wider range of nations at very diverse economic levels and with very different political systems is of rather limited value. We already know that Australia differs from the majority of the nations of the world in being relatively rich, democratic, literate, industrialised and so on and we already make the causal attribution that these characteristics are to a large degree interrelated. To say that Australia is more like Canada, the Netherlands and Sweden - to take three advanced nations at random - than it is like Colombia, Niger and Syria is simply to state what is already known and, hence, of little real interest. If asked, we would say that there is no point in comparing these latter countries because they are so different.

What is usually of greater interest is comparing ourselves to countries that we generally think of as being of the same order as ourselves. We may still start with an assumption of difference, as, for instance, the assumption that Australians are more egalitarian than most other peoples, but that makes it interesting if we find that Australian attitudes to state action designed to foster greater equality are by no means more positive than in other Western nations (Castles, 1989b). Alternatively, when we start from the assumption of basic similarity, nations in the same category serve to present a mirror to our own experience and permit the 'mental experiment' of reflecting that we too could be like that if circumstances were only a little different or our choices had been somewhat other than they were. But which circumstances and what choices?

Finding out involves a location of aspects of the Australian experience by the use of a 'most similar' strategy of comparison. Why is Australia's economic growth rate so slow compared to other affluent, Western nations? There are many rival explanations. Can low growth be attributed to the fact that countries that are already very affluent tend to grow slower than those which are less so? To find out, we contrast the growth performance of the richer and poorer of these nations and seek to establish whether there is, indeed, a convergent pattern, this clearly being an instance where we need to take into simultaneous account cross-national and cross-temporal comparisons. Can low growth be attributed to the choices made in some of these nations to utilise a large share of economic resources on welfare and egalitarian redistribution? To find out, we contrast the growth rates of the larger and smaller social spenders amongst the advanced nations (see Castles and Dowrick, 1990).
Comparison is one of the most important methods of seeking explanations in the social sciences, but, at least as employed in cross-national research, problems arise from either a lack of sufficient cases or from an inability to match cases well enough. The former difficulty tends to afflict studies based on a 'most different' strategy, for without enough cases it is impossible to rule out some possible sources of the similarity one is seeking to explain. The latter difficulty is an inherent part of the 'most similar' strategy. Ideally, that strategy would resemble the controlled experiment in which a single difference is introduced into otherwise identical specimens, leading to the inevitable conclusion that subsequent diversity is a consequence of that difference. But no group of nations is ever anything like that similar, so that there are always alternative sources of difference competing as the rival explanations of diversity (see Roberts, 1978, 294), as, in our previous example, prior levels of affluence and the size of welfare spending compete as rival ways for accounting for the diversity of economic growth rates in the advanced democratic nations.

Although these problems can never be wholly overcome, there are a variety of techniques for testing which of a series of differing accounts has the greatest degree of plausibility. Many of these techniques as used in the more sophisticated comparative literature are statistical in kind, providing an assessment of the probability of empirical regularities occurring by chance and providing objective criteria for deciding which of several competing accounts is the most likely to be appropriate. Using such techniques, it is possible to adjudicate the rival claims of affluence and the 'omnithy' state as determinants of low economic growth in favour of an account of the growth rate convergence of rich and poor nations (see Castles and Dowrick, 1990). Irrespective of whether testing is conducted by statistical or other means, the character of the exercise is identical insofar as it involves a process by which various hypotheses are matched up with evidence from a variety of nations to find that with the best fit. Such testing of hypotheses is the hallmark of comparative analysis which aspires to anything like a scientific status.

Finally, it should be mentioned that in what has been said so far the term 'explanation' has been used somewhat loosely at one or two points in the discussion of the logic of comparative analysis. An explanation consists of a set of reasons or a theory which makes sense of empirically observed regularities; that is, the similarities or differences revealed by comparison. The location of a convergent pattern of economic growth amongst advanced western states would clearly help us account for an important aspect of the Australian experience, but it would hardly be an explanation as such. For that we would need reasons: for instance, that nations find it easier to copy industrial techniques from other countries than to innovate them themselves or that preferences for leisure increase more than proportionately as income rises. So, in effect, the argument here is that comparison provides us with a logic by which we may isolate empirical generalisations which require theoretical examination. As the next section will make clear, that order of analysis is sometimes reversed: on occasions, we may start from theory and use it to identify critical cases, the further comparative investigation of which leads in turn to the redefinition of theory.
Exploring the Australian Experience

Although less frequently noted than its role in explanation and hypothesis testing, comparison is also a means of locating and exploring a phenomenon as yet insufficiently understood. This mode of analysis is, in effect, an extension of the task of identifying and describing features of national distinctiveness discussed in a previous section. The difference is that, whereas, earlier, distinctiveness was located along a single dimension - a country is exceptional in possessing this, that or the other feature to a greater or lesser extent than others - here we are talking of a nation being distinguished by its unusual placing in a two dimensional space constituted, on the one hand, by some fairly well established theoretical proposition or observed empirical regularity and, on the other, by an empirical instance which contradicts or seems to contradict it. Distinctiveness here is defined not in terms of the extremity of events, institutions or outcomes, but rather by the failure of a particular case or cases to conform with regularities which account for the behaviour of the vast majority of cases. Such failures create puzzles or paradoxes - sometimes described also as 'critical cases' and, in statistical parlance, as 'outliers' - which positively demand further exploration (Przeworski, 1987).

In some ways, it is easier to demonstrate dramatic instances of such puzzles or paradoxes in an Australian context than would be the case in respect of many of the other advanced Western nations. The reason is that Australia has not hitherto been in the mainstream of comparative social science research and generalisations concerning social, economic and political behaviour are frequently formulated without even a backwards glance at the Australian experience. No competent comparativist would offer such generalisations without seeking to demonstrate that they fitted at least the larger nations of the advanced world - the USA, Japan, the UK, Germany and France - and frequently there would also be at least some examination of the experiences of many of the smaller nations of Western Europe. However, few seem concerned, or even seem to realise, that they are leaving out of consideration a country which, unlike such frequently compared nations as, say, Sweden, Switzerland, Austria and the Netherlands, falls in the top half of the distribution of population size of the advanced democratic states. Australia is, in fact, the tenth most populated of the 24 nations of the OECD. An important reason for undertaking research which contextualises the Australian experience is a wish to locate important aspects of that experience which should be taken account of by anyone seeking to offer theoretical generalisations applicable to that entire 'most similar' grouping of nations.

So, what are some of the ways in which the Australian experience is paradoxical? Some examples have already been given: the coexistence of liberal forms of interest intermediation and institutionalised and regulated wage-setting arrangements, the emergence of highly developed women's policy machinery where female legislative influence is otherwise quite weak. The following additional examples offered here are merely illustrative and are drawn from my own recent work on the development of Australian public policy (Castles, 1985, 1988 and 1989c).
- Australia is a country with a population which, while not small, is in no way comparable to those of the major powers. Economic theory tells us that the smaller a country's population, the more it is likely to trade with the rest of the world, since it must rely on product specialisation and international trade to make up for the disadvantage of a small internal market (Dahl and Tufte, 1973, 113-116). So why, measured in terms of its export share, has Australia amongst the most closed economies in the OECD, following closely after the vastly larger American and Japanese economies?

- Australia is a country which, in virtue of its highly unusual system of conciliation and arbitration of industrial disputes and compulsory and centralised wage-fixing, may be regarded as possessing a highly institutionalised form of labour market regulation (see Phelps Brown, 1969). In Western Europe, such institutionalisation has been argued to be an important component of the success of neo-corporatist nations in weathering the economic crises of the 1970s (see Katzenstein, 1985). Yet Australia's economic performance in the 1970s was as bad as any in the OECD, being only one of two OECD nations which in the period 1974-79 were below the average in respect of economic growth, unemployment and inflation simultaneously.

- Australia is a country in which the strength of the labour movement, whether assessed in terms of union membership or electoral support has been traditionally strong. Indeed, we may note, as an aspect of Australian distinctiveness, that, taking the percentage electoral support since the turn of the century as a measure of labour movement strength, it is Australia and not Sweden which has had the world's most successful democratic socialist party. Theories suggesting that politics is an arena of institutionalised class conflict suggest that left strength should be translated into an impetus for welfare state development, but in Australia that has not been so. In 1986, of 20 OECD nations only Japan, Spain and the United States spent a smaller share of GDP on social expenditure and Australia's expenditure on pensions was lower than that of any other country (OECD, 1989).

- Australia's low level of welfare expenditure is the source of a further paradox. Much theorising in the area of social policy suggests that such expenditure is the chief means of egalitarian redistribution in advanced democratic states. Yet, although Australia's expenditure development has been weak, it has manifested higher degrees of income equality and income redistribution (Sawyer, 1976; Mitchell, 1990) than would be expected on such a basis.

In each of these examples, we have a puzzle or paradox because generalisations drawn from the comparative literature are contradicted by facets of the Australian experience. In each case also the solution is the same: we need to explore further the nature of that experience with a view either to a refinement of the way in which we describe and classify it or to a modification of the generalisations constituting the literature. Such
explorations raise fascinating problems for research. Referring back to our
examples, we can ask a variety of questions. Is economic openness something
that develops directly as a consequence of population size or is it a chosen
policy stance and, if the latter, why should Australia more than other small
nations have opted to shut out the influence of world markets? What are the
similarities and differences between the institutional form and outcomes of
labour market regulation through conciliation and arbitration in Australia and
through corporatist intermediation in countries such as Sweden, Germany and
the Netherlands, and why was the Australian variant more vulnerable to
economic crisis in the 1970s? How are we to visualise the impact of party
ideology on welfare state development in light of the failure of the normal
indicators of the strength of class conflict in politics to explain the Australian
experience? One possibility might be to turn from a theory of class politics to
one of party control of government (the ALP has not been successful in those
terms). Another might lie in an attempt to explore whether the Australian
labour movement possessed a different conception of welfare from
movements elsewhere. A different conception of welfare strategy might also
be the key to the surprising extent of redistribution of the Australian tax-
transfer system, a view by no means necessarily incompatible with the
Australian orthodoxy that means testing is both more economically efficient
and more egalitarian in its effects than more universal systems of welfare

The examples offered here and the new avenues of exploration they suggest
are only dramatic illustrations of a process at work in all research: each step in
the elaboration of theory leads to a need to describe and classify phenomena
in greater detail and with greater precision leading in turn to an impetus for
still more elaborated theory. All that we would argue here is that cross-
national comparison, and for Australians, at least, cross-national comparison
focusing on the distinctiveness of the Australian experience, provides an
extraordinarily fruitful way of promoting that research process in respect of
broader questions concerning the social, economic and political characteristics
of whole societies or nation-states.

Evaluating the Australian Experience

We have left what is, probably, the commonest and, in some ways, the most
important use of cross-national comparison to last, not least because it is
simultaneously the area of the greatest misuse of the comparative method. All
the time, in the councils of government, amongst their critics and by
commentators of all sorts, evidence concerning other countries is proffered as
a means of evaluating our own and, where that evaluation finds us wanting,
becomes an important stimulus for proposals for reform.

In quite recent times, this kind of evaluation has become more common in
Australia, particularly at the extremes of politics, where the symbols of Japan
and Sweden are frequently used by their adherents to sum up all that is good
about capitalism and democratic socialism respectively. We are also
beginning to encounter the phenomenon of major interests and governmental
agencies using serious comparative research as part of a reasoned case for
reform. One example was ACTU's 1987 report, *Australia Reconstructed*, which signaled the union movement's acceptance of a need for economic restructuring and a shift to competitive exporting along the lines of a model supposedly derived from the experience of Europe's small corporatist economies. Another was the Australian Manufacturing Council (AMC) report on the future of Australian manufacturing, which, amongst other things, pointed to the policy solutions of other similar countries, such as the restructuring of Canada's car industry through a trade-off between offering access to the domestic market for agreements permitting world-competitive production of a single model (AMC, 1989, C7), as potential remedies for our own difficulties.

The evaluative usage of comparison is unproblematic in principle, but is sometimes dangerous in practice. Cross-national comparison is clearly a valuable means of assessing the extent to which we achieve desired objectives. If we want to be richer than we are, it makes sense to compare ourselves with those that are more affluent and those that are poorer than we are. This is so for several reasons. First, the very fact that some nations are richer than we are suggests the potential conclusion that we could be richer than we are. Second, the range between the richest and the poorest nations of any group that we decide is somehow comparable to ourselves (i.e. 'most similar'), gives us an indication of the extent of the challenge we face in effecting desired reforms. Third, to the degree that our comparison produces an acceptable account for the nature of the problem - that is, reasons why some countries are richer than others - it provides us with a recipe for reform; that is, it suggests what we must do in order to become richer. Thus, there are very good reasons why evaluation and reform efforts should be informed by comparative analysis and why we should applaud when organisations such as the ACTU and AMC undertake serious cross-national research.

As soon as we compare performance against a measuring rod constituted by our objectives, descriptive statements of a more or less character are prone to take on a connotation of better or worse, with location of difference denoted in terms overtly indicating approval or disapproval such as leaders and laggards and winners and losers. Such terms are not dangerous so long as we always remember that they relate to performance in respect of some stipulated objective, which is not necessarily shared by all members of the community about which they are used. Difficulties do sometimes occur when these terms are taken to imply that failure to achieve desired objectives is a question of deficiencies that could be remedied by more intelligent policy-making. That may or may not be the case. Whether it is is a matter of what determines the outcomes of which we complain. If, for instance, the degree of industry spending on R & D is a function of the strength of the export manufacturing sector, it may make perfect sense to describe Australia as an R & D laggard, but very little to suggest that there is very much that can be done about it in the short-run (Castles, 1989d).

Fundamental difficulties in using comparison as a basis for evaluation only really arise when we give generalisations based on overseas experience an unwarranted and privileged status; that is, when we take the assertion of cross-
national evidence as incontestable proof. In reality, of course, our confidence in such generalisations should only be as strong as the evidence adduced, and establishing that is itself a matter for further comparative investigation. Harking back to our discussion of comparison as a means of accounting for the Australian experience, we may note that the criteria for scientific explanation and for evaluation with some real relevance to our problems are basically the same: that generalisations derived from comparative evidence are regarded as hypotheses to be tested and are only given credence when (a) such tests are undertaken, (b) such tests are properly designed and (c) such tests support continue to support the hypotheses.

Where comparison is being used for evaluative purposes, (b) is often the worst problem-area. Frequently, inappropriate choices are made as to the countries which are compared and those choices, in turn, lead on to misleading ways of accounting for the differences and similarities between nations. More than in any other respect, evaluation, leading on potentially to reform, requires a 'most similar' research design. The closer the match between cases, the less the chance that some unnoticed difference is the real reason for diverse national performance in the area which we are attempting to evaluate. On such a basis, we might be inclined to believe that it is more likely that we can emulate the lessons and avoid the pitfalls of countries such as Canada, New Zealand and the United Kingdom than of nations like Japan or Sweden. Japanese or Swedish outcomes may be preferred, but the far greater cultural and structural similarities between Australia and other Anglo-American nations are some sort of indication that what will work in one may well work in the others. That is why, despite ideals personified in the Swedish and Japanese success stories, there is a morbid fascination on both Left and Right with Thatcherism and Rogernomics. There, but for the grace of God, or with it, go we!

Close matching of cases inherently reduces the range of nations that may be meaningfully compared, but reducing it too far is just as dangerous as reducing it too little. When we are being invited to compare ourselves with just one or two other nations, those nations have quite often been picked to make a point. If Australia wants to be rich, she is frequently told she should copy the US and Japan. And what precisely is it about these countries that we should copy? In commentary emanating from the Right, of course, the answer is that it is their low levels of public expenditure that give individuals the incentive to work for the private gain and that lead to the maximisation of aggregate national wealth! But that answer presupposes, first, that the only thing Japan and the US have in common is low public expenditure, second, that all rich nations have low public expenditure and, third, that all countries with low public expenditure are rich. None of these things are true, the final presumption being disproved by the very fact that it is Australia, a low public expenditure country, that is being advised that the road to economic redemption lies in copying the similar practices of the US and Japan.

So, although some considerable attention to matching cases is required when we set out to use comparison for evaluation and reform, it is crucial not to make the comparison too limited to exclude spurious generalisations. What is
required in all cross-national comparison, whether it is merely descriptive or seeks to account for, explore or evaluate the experience of our own or other countries is a balance between the similarity that makes the experience of other nations relevant to our own and the differences that serve to weed out unwarranted generalisations.

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Chapter 1


2 Teaching Comparative Labour Relations: A Global Perspective

Nigel Haworth

Newly Industrialising Countries (NICs) and dependent Less Developed Countries (LDCs) do not figure large in the analytical traditions underpinning orthodox labour relations theory. Practical and theoretical considerations have permitted a situation in which theorisation of labour relations has appeared to take place predominantly within paradigms and locations established within the developed market economies. Practically, this effect has been a product of the impetus and resource base devoted to labour relations thinking, both primarily located on the transatlantic axis. Theoretically, the conjunctural victory of the systems model and its associations with the industrialism thesis reinforces the effect. The appropriation of theoretical terrain by 'labour relations theory', that well-defined focus on job regulation and collective bargaining, further reinforces a broadly eurocentric narrowness. Of course, critical perspectives exist within this universe, but, generally, they too accept the geographical limitations of the model criticised, if not the paradigm.

Theorisation of labour relations appearing to exist only in the developed market economies is simply that - an appearance. A vast array of labour relations literature now exists on the NICs and the LDCs, but it is either unknown or ignored by many labour relations specialists. Three sorts of contingent arguments are often used to explain this intellectual omission. Firstly, its practical relevance to the developed market economies (DMEs) is questioned; secondly, its origins in paradigms and traditions alien to the dominant intellectual traditions in the DME labour relations analysis is cited as reason for exclusion; thirdly, simple ignorance of the sort which asserts that one can only deal with one country's bargaining system, or perhaps at most with the comparative base offered in the DMEs. The tradition of teaching a national system course complemented by a DME-based comparative course simply reproduces the effect within the next generation of labour relations scholars.

This exclusionary approach can be challenged both theoretically and empirically. The need for such a challenge is seen practically in the day-to-day analytical requirements of labour relations practice. For example, many labour relations specialists in the DMEs now teach students from the NICs and the LDCs, yet face the difficulty of relating Flanders on Fawley to
Nigerian oil extraction, or Clegg on the UK to political bargaining in Mexico. Similarly, the international firm now demands specialist inputs into the bargaining circumstances faced far beyond the confines of the DMEs.

A broader analytical brush may also contribute to the development of greater theoretical insights into labour relations. Supporters of the dominant systems paradigm may well find support for their analytical perspective in the experience of bargaining development in non-DMEs. Certainly, this was what was expected by the founding charter of the industrialism tradition (Kerr et. al. 1962). Equally, however, critics of the systems approach may well find important qualifications of its universality and application by broadening their base of analysis into the NICs and the LDCs. In any event, the nature of the internationalised economy requires the labour relations specialist in the DME to broaden horizons beyond the immediacy of advanced capitalist structures.

The Dilemmas of Eurocentrism

There is little point in rehearsing the arguments which underpin the dominant systems paradigm in labour relations analysis. Their universality reveals their paradigmatic qualities, as shown by a perusal of any standard text or theoretical contribution. The interesting feature of the dominance of this paradigm lies in the attempts to refine it over time, particularly in response to criticism. For example, the debate between Clegg and Hyman about definitions of labour relations (Hyman 1978, Clegg 1978) is conducted within a framework defined by the systems model, and concerns more the elasticity of the systems analysis than the counterposition of one meta-theory against another.

This black hole effect, in which intellectual effort is sucked ever closer to the heart of a particular systems model, results not so much from the rigour of the labour relations orthodoxy as from the power of its supporting model - the industrialism thesis and its concomitant Parsonian rationale. The roots of a critique of the labour relations paradigm must be lodged firmly in the loam of the industrialism thesis.

Of the many themes constituting the industrialism thesis, three stand out in relation to eurocentric analysis in labour relations theory: convergence, superiority and universality. Convergence posed the problematic of history in terms of the inevitability of market system dominance globally as development models increasingly approximated to the models of society and production found in the most advanced DMEs. Explicitly stated in Kerr et.

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1 The problems posed by the adoption of the systems/institutional pluralist model within the DME labour relations analysis are well rehearsed and require little reconsideration here (for example, Fox 1973, Goldthorpe 1977, Hyman and Fryer 1975, Hyman 1978, Hyman 1980, Marsden 1982). Such critiques, though sharing much in common with the more general critiques of the industrialism thesis, remain trapped within a DME perspective.
al. (1962), and developed in greater technical detail in Dunlop (1958), labour relations systems were to be a central aspect of the convergence process. The invincibility of the market system established its superiority over alternative models of society, and established a strong normative impetus towards the international adoption of an institutional collective bargaining model in national labour relations systems. Many international aid agencies promoted the process of system adaptation in line with this normative push. Hence, the universality of the job regulation or collective bargaining model was sought in both policy and analysis.

Amongst the many criticisms of the industrialism thesis and its riders, two stand out. The first is the ahistoricity of the argument; the second, its uncritical eurocentrism or promotion of metropolitan precedence. Ahistoricity was found in the understanding of industrialisation. It was argued that patterns of industrialisation, and consequent social and political orders, were not reducible to one unilinear process of capitalist industrialisation; furthermore, empirical outcomes of industrialisation and development were seen to contradict the thesis that DME status awaited all development models eventually. The existence of underdevelopment as a consequence of the actions of DME-dominated accumulation, and the alternatives offered by socialist accumulation models, seemed to deny the logic of the industrialism thesis.

The eurocentrism of the model was challenged in terms of both prescription and fact. Normatively, the assumed priority of eurocentric social and economic relations was thought to be flawed and to be the product of a sophisticated 'colonial' mentality. In this sense, it was argued that the ending of formal colonial power after the Second World War was to be replaced by an ideological control system in which development strategy was to be directed from the metropolis by specialist aid and economic institutions. The factual criticism took on two dimensions. The first counterposed indigenous or alternative models of development against the normative push of the industrialism model; the second noted the practical inapplicability of the eurocentric model and highlighted the distortions which resulted from the effects of the application of inappropriate models of change, whilst also highlighting the manner in which such models were 'corrupted' by indigenous alternatives.

In the light of the above, labour relations theorising in the DMEs takes on a particular historical character. It adopted as its dominant analytical approach a systems model rooted firmly in the industrialism thesis, and in a classically dialectical way, came to 'overdetermine' that thesis by its constant renewal and development of central tenets. It became uncompromisingly eurocentric in orientation, strongly ahistorical analytically as it adopted the fact-gathering/ordering model, firmly prescriptive in its practical advice beyond the confines of the established institutional pluralist systems of the DMEs. Unlike other disciplines enmeshed in the logic of industrialisation model, labour relations as a new, 'synthetic' and dependent discipline, located its
analytical autonomy on the shifting sands of a potentially flawed meta-theory, and, in the manner of all converts, has consistently and vigorously defended that autonomy on the same flawed basis.

These points merit further exploration. The essential eurocentrism of the institutional pluralist model provides a clear explanation for the geographical lacunae in metropolitan labour relations analysis. Omission is not the result of individual ignorance, or constraints on time and effort, or other contingent factors but the effect of a priori theoretical injunctions that establish the priority of metropolitan models and a consequent legitimisation of 'exclusionary' analysis. The intellectual black hole is created and promoted. The ahistoricity of the model complements eurocentric method. The challenge to the model posed by inconvenient historical developments is marginalised by the descriptive method so common in labour relations. Where 'facts' become impossibly inconsistent with the model, contingency permits the 'exceptionist' alternative to carry the explanatory responsibility. If, of course, the NICs and the LDCs were fully integrated into labour relations analysis, exceptionism would become the norm, and the analytical edifice currently at the heart of labour relations theory might fall in favour of an alternative meta-theory or a more eclectic theoretical approach.

The prescriptive outcomes of the model are transparent in any number of contexts. Even in the DMEs, prescription highlights the failure of bargaining systems such as that in France to reform towards an institutionalist framework. It may be argued that the Auroux reforms of 1982-83 are an attempt to apply the logic of the industrialism thesis against the French tradition of political bargaining. Debate around Spain, Italy, Portugal and other European countries with politicised bargaining structures often follows the same prescriptive line. In the wider context, from the early contributions of academics, such as Alexander (1962), Yesufu (1962) and Payne (1965), to the later offerings, such Turner et. al. (1980), the tradition of institutionalised job regulation has been promoted as the logical necessity for labour relations in the development process. The impacts of the International Labour Organisation (ILO) and its regional offices, and of the international trade union movement, are also an important feature of prescription. In the face of this prescriptive onslaught, the resilience of indigenous bargaining practices is evidence of the effects of dependent development which structurally preclude simple convergence in bargaining systems.

The Victory of Exceptionism

Study of the NICs and the LDCs allows the labour relations orthodoxy to be challenged in two key ways. The first allows the variety of alternative models of bargaining to be found in the non-DMEs to be counterposed to the standard institutionalist model. The second focuses on the explanatory models available to explain a 'new-found' richness in bargaining systems. Here, we focus initially on the alternative models of bargaining and then return to their explanatory consequences.
Rather than a country-by-country analysis, it is easier and analytically more useful to look at the pluralism of bargaining practices in the NICs and the LDCs in terms of existing analyses of their structure. Not all of these analyses are unique to the LDCs and the NICs, but their application to these specific circumstances is identifiable apart from their general application. Broadly, labour relations analysis in the NIC/LDC literature has produced five main themes relevant to alternative bargaining models. First, there has been debate over the exporting of pluralist institutional models. Second, there has been emphasis on political bargaining models, which is related to the corporatism debate. Third, New International Division of Labour (NIDL) models have emerged, including the new international labour studies model and a particular literature on the gender effects of the NIDL. Fourth, the colonial inheritance/transformation model has been discussed, including debate over the labour aristocracy. Fifth, there are the socialist transfer and indigenous socialist models.

(a) The Export of Institutional Pluralism

The export of institutional pluralism has been touched on above. Intellectually, it was a dominant theme in the training of NIC/LDC labour relations practitioners; it was a model taken by aid agencies and international capital into the non-DMEs; it was an analysis counterposed in numerous academic texts to the 'failures' or 'weaknesses' of NIC/LDC bargaining systems. Its hegemony in the DMEs guaranteed its status in the creation of an ideological structure of dependency. A text illustrating this tradition well is Alexander (1962). A product of the Inter-Universities Project which coordinated the Industrialism Project, this text classically establishes the priority of institutional pluralist structures and processes by counterposing their problem-solving and stable forms against the instability and asserted inadequacy of Latin American politicised bargaining. The normative, prescriptive content of the analysis is explicit; in the countries chosen, industrialisation, as a post Second World War phenomenon, is 'modernising' erstwhile backward economies. These economies are also, therefore, needing to confront the inadequacy of their social institutions, generally at the level of the political process, specifically at the level of labour relations. The achievement of successful stable industrialisation requires the concomitant achievement of adequate social institutions; consequently, institutional pluralism will out, or economic and political backwardness will prevail.

The critique of this view functions at two levels. Firstly, is the proposed model feasible? Secondly, should it be adopted? The response to the former question depends on positions struck around the perennial debate between convergents and modernisers on the one hand, and dependency theorists on the other. The balance of analysis is still indeterminate. Clearly, the majority of LDCs have not achieved successful industrialisation and exist in identifiable dependent relationships with the DMEs and associated institutions. Yet the growth of the NICs has qualified the certainty with which dependency analysis was presented in the 1960s. Warren (1980) captures this dimension of uncertainty in his explicitly marxist challenge to dependency theory. Recent events in the Eastern Bloc have reinforced the convergence model, and
offered the option of arguing that it is not so much a question of if convergence will occur, as a question as to the time-scale in which market-driven systems will come to dominate.

The response to the second question is, perhaps surprisingly, not dependent upon the response to the first. Many NIC/LDC governments have attempted to stabilise bargaining practices in line with some aspects of the institutional pluralist practice, despite contradictions which ensue. In this sense, the modernisation argument has won a qualified policy victory. Yet the qualifications are great. Bargaining formalisation has been promoted to undermine the politicised bargaining agendas which challenge development programmes; to provide frameworks within which international investment may comfortably take place; to allow governments to appear liberal democratic in orientation and escape international opprobrium; to incorporate a centrist union movement into an accommodation and consequently undermine more militant alternatives.

However, such formalisation is often open to question. Its scope is often limited, especially in economies with a primacy of small-scale production units or artisanal production. Legislation is often formally enacted, but not supported by enforcement procedures. Exclusion of the state or foreign firms from the scope of the law is sometimes permitted. States of Emergency and other 'temporary' measures are used to by-pass legislation. The recipients of largesse - the unions - sometimes fail to cooperate with the modernisation agenda and continue in their 'backward' beliefs. Management may act in overt and covert ways to undermine legislation, sometimes with the connivance of government.

Can we identify a trend towards formalisation of bargaining in line with the convergence prediction? Evidence of such a trend might support a gradualist interpretation of the industrialism thesis. Firm analytical ground underlays the assertion of clear bargaining trends within the LDCs and NICs, though whether in line with the convergence notion remains to be seen. The internationalisation of management and government bargaining strategies consequent on the slump of the 1970s has reached deep into both the Eastern Bloc and the Third World. Supply-side models of deregulation and price flexibility are arguably more prevalent in the latter area than in the DMEs, if only because the desperate plight of debt-laden economies has caused World Bank and International Monetary Fund prescriptions for reform to be enacted with great severity. Thus, superficially, economic crisis has appeared to validate the logic of convergence.

Yet, detailed study suggests that this is not the case. Whereas in the DMEs rationalised bargaining structures have been introduced with relatively little opposition from the workforce and with a degree of success in terms of increased productivity and performance, this is not the general case in the LDCs. In Chile, for example, the supply-side model has been reasonably successful, has introduced a degree of bargaining formalisation in line with the convergence model, yet has achieved little reduction in the century-old politicisation of the bargaining process. In Peru, on the other hand, the same
model has failed disastrously and bargaining continues to be highly politicised and, more importantly, the numbers of people excluded from the benefits of the 'modernised' society appears to be growing.

We may conclude that supporting evidence for the convergence thesis in general is still doubtful. Furthermore, although institutional pluralist practices are in place in many LDCs and NICs, their nature may be qualitatively different from those found in the DMEs.

(b) Political Bargaining Models

Political bargaining models dominate non-DME labour relations analysis and provide the major evidence of institutional pluralist exceptionism. Such models have much in common with the analyses of Lorwin (1966), Kendall (1975), Lange et al. (1983) and others offered in relation to France, and offer alternative axis for comparative work across the DME/non-DME axis. Two examples capture the qualities of this approach: Payne (1965) on Peru, Angell (1972) on Chile.

James Payne's analysis of Peruvian labour relations is a classic pioneering text which unites an understanding of political bargaining with a modernising policy outlook. He traces the weak development of both the labour relations system and the union movement in Peru up to the 1950s, and argues this combination of factors established unions in a client role with political parties which offered protection to the unions and, in return, used the unions as electoral and political agents in the struggles around state power. Payne concludes his argument with a plea for the formalisation of the bargaining structure by the legislative enactment of a Chilean-style labour code. Ignoring this last prescriptive element, which may have been a practical suggestion in the early 1960s but was not taken up, Payne captured analytically the central thrust of most LDC bargaining structures - the politicisation of bargaining as a necessity within the power structures of dependent societies.

Angell applies a similar argument to Chile, but in the qualitatively different context of the 1924-31 Labour Code. Unlike the Peruvian case, in which the bargaining structure was virtually wholly unpatrolled by legislation, social upheaval in the 1920s gave Chile a highly-structured and legalistic bargaining system, with similar stabilising and formalising effects as those observed in New Zealand after 1894. Angell argues that, despite the existence of a formal bargaining system, the political realities of a dependent economy required the union movement to seek political party patronage in order that the power relations within the bargaining system should not be skewed fatally against the unions. Thus, highly technical bargaining procedures, equivalent to anything to be found in Europe in terms of sophistication and complexity, were conducted in intimate relationship with political agendas proposed by parties.

The contrast between Payne and Angell is important for, when taken together, they suggest that formalisation of bargaining processes in LDCs and NICs of itself guarantees little movement away from 'backward' politicisation of
labour relations. Indeed, the evidence they provide of the resilience of the political bargaining process stands to raise serious questions about the feasibility of the convergence model of functional labour relations.

However, the basic political bargaining model extends into LDC and NIC versions of the corporatism, populism and bureaucratic authoritarianism analyses. In turn, these models of political bargaining integrate LDC/NIC political analysis into the DME debate about corporatism. In the DMEs, corporatist models have been associated with the substantial qualification of the liberal democratic pluralist political order, and a consequent 'distortion' of the bargaining system in which channels of political leverage integrate the parties in the bargaining process into government decision-making on a privileged basis. Similarly, the origins of the corporatist model in the Third World are laid in the search for an embracing accommodation binding social constituencies into development models which embrace a structure of vertical linkages into government and a complementary system of quid-pro-quo. Within this model, illustrated most usually by the experiences of Argentina from the mid-1940s and Brazil from the mid-1930s, labour movements were fostered in return for their political adherence to the corporatist model. A form of rigidified political bargaining, corporatist labour relations were by definition highly politicised and involved a fusion between the instrumental demands of the bargaining parties and wider political agendas.

Rigidity and politicisation laid the grounds for a further development of the corporatist model into what has been called 'bureaucratic authoritarianism', wherein centralised, authoritarian and often unelected power requires the formal subordination of the bargaining process to central government agendas. In practice, bureaucratic authoritarian regimes - Brazil post-1964, for example - enjoyed a high degree of support from the employer party, and it was the union movement which suffered the greatest pressure towards conformation. The rationale for the model rests in the belief that a national development strategy requires central direction, that all sectors must subordinate their sectoral desires to the national good (which, incidentally, is under this model often to be seen as synonymous with the definition of national interest provided by the military), and that strong measures are needed to direct politicised bargaining in an appropriate direction.

Though the models of political bargaining discussed above are drawn mainly from Latin America, the phenomenon is widespread across the LDCs and the NICs. Bargaining in most of the one party states of Africa follows a pattern akin to that described above (see, for example, Peace 1979; Waterman 1983; Jeffries 1978). Similarly, numerous Asian states encompass political bargaining, and may have experienced the extremes of bureaucratic authoritarianism.

Political bargaining systems in the LDCs give rise to analytical concerns which vary from those which predominate in the institutional pluralist systems. In particular, the political mobilisation of the bargaining parties takes central stage, in stark contrast to the procedural focus in, say, the UK. Thus, labour relations analysis cannot proceed without a clear sense of the
political identities in the system, without a clear view of the meaning of militant action and popular mobilisation, without a clear view of the wider, extra-workplace constituencies involved in the labour relations process, or without a clear understanding of the political economy of a nation and region (see De Shazo 1983). By its nature, an experience of political bargaining allows the student to cut through many of the definitional problems which dog DME-based labour relations analysis, and gives credence to the analytical framework for the study of labour relations offered by, for example, Cox (1971).

(c) The New International Division of Labour (NIDL) Model

A third LDC/NIC-derived framework for the study of labour relations is provided by the New International Division of Labour (NIDL) model, pioneered by Frobel et. al. (1980), and since subject to considerable debate (for example, Jenkins 1984, Elson 1986). Although the model offers insights into new conditions found in the manufacturing sectors sprouting up around the LDCs, as off-shore assembly and processing is seen to offer substantial cost and flexibility advantages, the main insights into labour relations derive from the New International Labour Studies (NILS) (see, for example, Cohen 1980, Munck 1989, Southall 1988) and the studies of gender in the international market place which have arisen in tandem with NIDL analysis (for example, Elson and Pearson 1980).

The NILS approach argues that the internationalisation of production at the centre of the NIDL has produced a similarly global market for labour and, implicitly, the generalisation of managerial and state strategies to deal with labour's demands. Thus, students of labour relations not only have to be aware of the international dimensions of labour relations practice; they must also adopt an international perspective in their intellectual formation. In practice, this argument has produced a growing 'internationalist' literature on labour relations which is rooted broadly in a radical analysis of the political economy of international capitalism. As such, it finds itself aligned with both NIDL and dependency-type interpretations of LDC/NIC development. Furthermore, such analysis has contributed to the development of an international labour movement politics extending far beyond the limited activities of the international trade secretariats and other international union bodies.

An important element of the NIDL/NILS tradition is its focus on gender issues. In numerous works, the effects of globalisation upon the social, labour market and domestic circumstances of women have highlighted the changing international subordination of women to capitalist accumulation (see, for example, Elson and Pearson 1980). This focus lends itself to a broadening of the context in which labour relations might be considered into the growing terrain denoted in the 'social movements' literature. Although an expressly political concept, social movements are increasingly seen to be the dominant actors in political change in LDCs and, consequently, engage with 'politicised' union movements.
(d) The Colonial Inheritance/Transformation Model

A fourth context dominates much of the African and Asian discussions of labour relations system formation. The experience of colonialism and independence has provided a substantial literature on the development of bargaining structures within colonial and newly-independent societies.

Whilst focusing primarily on the social/political nature of bargaining systems, analyses of colonial rule also integrate labour market policies (Arrighi 1970a), the role of the state (Cohen 1974), the impact of Multinational Corporations (MNCs) (Arrighi 1970b), and the absorption of colonial economies into the world market (Kilby 1969, Amsden 1971) into an embracing analysis. The main themes emerging from these analyses are the forced nature of wage labour creation, the consequent politicisation of both wage labour and subsistence/semi-market orientated agricultural production, the integration of organised labour into independence movements, the asserted and often queried creation and maintenance of a labour aristocracy and the attempted use of political control by the independent state to direct union activities towards unitary development goals. Woven through this argument is the impact of foreign practices imported into the bargaining system by colonial governments, international trade union bodies, and MNCs.

Particularly interesting in this literature is the discussion of appropriate bargaining systems for development. In the convergence literature, it was argued that as economies 'modernised', so would bargaining practices. To the extent that some degree of formality has entered bargaining practice, convergence arguments might appear to be correct. Yet, universally, unions have remained politically affiliated and active, riven by conflicts between the International Confederation of Free Trade Unions (ICFTU) and the World Federation of Trade Unions (WFTU), and as a result of direct, often brutal, intervention by government. We must choose between arguments which suggest the 'backwardness' of system formation as the explanation of this continuing politicisation, or alternative interpretations which argue that politicised bargaining is a direct product of the colonial-to-independent status transfer, and is the organic form of LDC bargaining. The intensity and resilience of politicisation seems to support the latter argument.

(e) The Socialist and Indigenous Socialist Models

A final context for labour relations analysis revolves around the development of indigenous socialist and cooperative models of production and the import of existing models from elsewhere. The contrast between Cuba and Tanzania illustrates one dimension of this context. The former adopted a classically Bolshevik model of centralised control, whilst the latter sought to create its own indigenous form of socialist model, Ujamaa. A further dimension is offered by the cases of Algeria, Peru, Chile, Malta, amongst many others, which have adopted something akin to the Yugoslavian models of worker self-determination, often in the ideological context of a 'Third Way', neither communist nor capitalist (Bayat 1989).
In the former case - Bolshevism versus indigenous development of a socialist model - the bargaining parties in labour relations became functions of the state's political process, subsumed under a unitary development strategy. Escape from this unitary straitjacket has to involve a political struggle against the dominant political order, in which the union movement particularly plays an important mobilising role. Outcomes of such challenges will tend to remain similarly political. For example, moves in the People's Republic of China in 1989 designed to 'free' unions from state intervention in no way decrease the political role and nature of Chinese unions. They simply create new locations in which political struggle will continue.

The worker self-determination model, though irretrievably political in nature, is somewhat different from the Bolshevik model. Often charged with the creation of a radical unitarism in which management and workforce are bound together in a profit-sharing or capital-sharing arrangement, it is also often counterposed to traditional union-management oppositions, with an associated agenda for the marginalisation and/or abolition of autonomous union organisations. Reforms of this type therefore become the site of multiple clashes between government, traditional owners of capital, unions, political activists and the institutions of worker control. Of course, by its very nature, a move towards worker self-determination as the basis for production greatly transcends the parameters permitted to bargaining by the institutional pluralist model.

(f) An Assessment

The above brief foray into the non-DME analyses of labour relations precipitates analysis somewhat abruptly back into a classical opposition within labour relations analysis. This is between two competing meta-theories - pluralism and political economy - wherein it may be argued that the majority of approaches and insights into labour relations outside the DMEs are revealed by a political economy approach to the detriment of the pluralist model. This assertion requires some further justification.

Firstly, a contingent feature of much LDC/NIC analysis promotes political economy approaches. On the whole, institutional pluralists have not undertaken much analytical work in non DMEs and radical thinkers, usually linked to dependency and anti-imperialist traditions, have been more active. Furthermore, the experience of dependency has prompted the majority of indigenous commentators to adopt a radical approach in their analyses.

Notwithstanding this contingency, the chief reason for political economy vanquishing the institutional pluralist approach rests in the analytical power of political economy models when faced by the LDC circumstances. The profoundly intimate association of economic development, state policy, management strategy and workforce organisation found in the development process requires general explanation, and cannot be teased apart in the manner of pluralist analysis of DME social processes. Put another way, the conceptualisation of labour relations as a sub-system of the whole, operating in terms of institutions and processes enjoying a degree of autonomy from the
conditioning effect of other sub-systems, is difficult to sustain in any traditional pluralist sense. Politicisation of bargaining as the norm in LDCs and NICs not only supports the argument that exceptionism is the characteristic of the institutionalist models of the DMEs; it establishes the priority of political economy approaches to bargaining across much of the world.

**Bringing the NICs and LDCs into Comparative Labour Relations Theory**

If traditional labour relations thinking has been overly eurocentric and too beholden to the institutional pluralist framework, the question of alternative theory is vital. Here, the development of taxonomies of labour relations systems emerges as an interesting and useful area for exploration. Many pluralist models offer little texture in their understanding of different bargaining systems. We are offered a simple juxtaposition of the positively-promoted systems model, and the exceptionism of politicised, backward models; these latter models, of course, then being broadly ignored. Once asserted, this simple model opens up the opportunity for the descriptive approach to the operation of a bargaining system beloved by the orthodox tradition, because potentially difficult theoretical considerations have been dealt with a priori by the categorisation of a system as pluralist.

This simplistic model is unacceptable in the contemporary 'global' economy. It has always been intellectually unacceptable to those wedded to a political economy perspective, but even then, many observers critical of the systems approach have chosen not to extend their criticism to a formulation of an international taxonomy of bargaining systems.

A number of international taxonomies may be constructed, but here only two are presented as a stimulus to discussion. The first focuses on description and may be construed as an informed pluralist taxonomy of labour relations systems. The second focuses on processes of system formation within international accumulation and therefore coincides more clearly with a political economy perspective.

**(a) Advancing Pluralist Taxonomies**

By way of beginning the development of alternative taxonomies, we should recognise that the pluralist model is capable of providing a global framework in which the majority of national bargaining contexts might be fitted. Such a framework is presented in Table 1.
<table>
<thead>
<tr>
<th>Title</th>
<th>Location</th>
<th>Key Features</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advanced Institutional</td>
<td>DME</td>
<td>Institutional Accommodation, Economism, Mixed Economies, Corporatism then Neo-Liberalism, Industrialised Generally</td>
<td>UK, USA, West Germany, Sweden</td>
</tr>
<tr>
<td>Advanced Politicised</td>
<td>DME</td>
<td>Politicised Accommodation, Mixed Economies, Corporatism then Neo-Liberalism, Industrialised Later or Partially</td>
<td>France, Italy, Spain</td>
</tr>
<tr>
<td>Advanced Socialist</td>
<td>N/A</td>
<td>Centralised Political Power, Planned Economy in Transition, Partially Industrialised, Constrained Political Bargaining</td>
<td>USSR, Eastern Bloc</td>
</tr>
<tr>
<td>Transitional NICs</td>
<td>NICs</td>
<td>Recent Industrial Expansion (Post-WW2), Growth-based, Corporatist/Bureaucratic Authoritarian and/or then Neo-Liberal, Limited Accommodation, Politicised</td>
<td>South Korea, Taiwan, Singapore</td>
</tr>
<tr>
<td>Dependent LDCs</td>
<td>LDCs</td>
<td>Dependent, Stalled Industrialisation, Import Substitution then Neo-Liberalism, Politicised</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Four Forms of Accommodation:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>(i) voluntarist/undeveloped</td>
<td>Peru, Chile, 1924-73</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(ii) Labour Code</td>
<td>Ghana, Kenya, Nigeria</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(iii) inherited/reformed colonial</td>
<td>New Zealand</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(iv) Settler Economies</td>
<td></td>
</tr>
<tr>
<td>Socialist Bolshevik</td>
<td>LDCs</td>
<td>Centralised State Planned Economy, Dependent, Politicised, Constrained Institutions</td>
<td>Cuba, North Vietnam, Ethiopia</td>
</tr>
</tbody>
</table>
The structure of this taxonomy is self-evident. A number of bargaining models and contexts may be identified internationally. The features which define one form from another are:

- the scope of industrialisation;
- the manner of integration into the international economy;
- the structure of political/social accommodations;
- the nature of the state;
- the nature of the bargaining institutions.

Each of these features is readily identifiable as either a central or contextual/environmental aspect of a pluralist analysis.

However, the taxonomy is a clumsy, rough-hewn tool for analysis. It is descriptive and ad-hoc, and stands simply as an arbitrary construct divorced from any explanatory coherence. It manifests all the dilemmas associated with 'relativist' perspectives in the social sciences (Keat and Urry 1978). Alternative frameworks are possible which are better rooted in explanation and applicability.

(b) An Alternative Political Economy Taxonomy

Cox has provided one approach to the analytical integration of different national and international bargaining processes within a comparative labour relations framework (Cox 1971). His focus is the variety of class relationships engendered within capitalist societies at different levels of development and international integration. However, the analysis tends towards the general and abstract and is not easily reducible to empirical application. An effective political economy analysis requires an analytical axis which moves from abstraction to empirical process, and this may be best provided in the debate about accumulation processes, control of the workplace, workforce and the production process. If we recast the object of labour relations analysis somewhat in line with Hyman's model (Hyman 1975), and conclude that the nature of labour relations systems is defined by
the matrix of measures and relationships marking the struggle over control of the labour process, then a global taxonomy of labour relations may be constructed within a political economy framework. Such an approach is attempted in Table 2.

Unlike the first pluralist taxonomy, which is an essentially static description of bargaining contexts, the second should be considered in terms of processes. The defining process is the political economy of industrialisation, in which the routes chosen and the stages reached become the crucial variables. Here, industrialisation is taken to be not a narrow process of industrial growth, but a broader process of social and economic transformation in which capitalist production relations come to dominate and define all social relations.

**Table 2: A Taxonomy of Labour Relations Derived from Political Economy**

<table>
<thead>
<tr>
<th>System</th>
<th>State</th>
<th>Industrial -isation</th>
<th>Control Mechanism</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accommodation</td>
<td>Liberal</td>
<td>Mature</td>
<td>Political, Accommodation, Corporatism, Economism, Formalised Consent, Juridical Power</td>
<td>UK, USA, Sweden</td>
</tr>
<tr>
<td></td>
<td>Democratic</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Partial Accommodation</td>
<td>Liberal</td>
<td>Mature/Dominant</td>
<td>Unstable Political, Accommodation, Authoritarian Corporatism, Politicalised Bargaining, Unstable Formalised Consent, Juridical Power</td>
<td>France, Italy, Spain</td>
</tr>
<tr>
<td></td>
<td>Democratic</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Market Integrated</td>
<td>Constrained</td>
<td>Partial/Unbalanced</td>
<td>Central Authority, Constrained Political Accommodation, Constrained Bargaining, Imposed Consent, Juridical and Market Sanctions</td>
<td>Taiwan, Singapore, Hong Kong</td>
</tr>
<tr>
<td></td>
<td>Democracy, Centralisation Authoritarianism, Bureaucratic Authoritarianism</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Partial Integration</td>
<td>As Above</td>
<td>Partial/Unbalanced/Limited</td>
<td>As above with: Reinforced Market Constraints, Dualism, Coercive Practices</td>
<td>Most LDCs</td>
</tr>
<tr>
<td>Separatist</td>
<td>Socialist, Democratic Centralist</td>
<td>Unbalanced/Partial</td>
<td>Centralised Power, Constrained Bargaining, Constrained Consent, Coercive Practices</td>
<td>Socialist Bloc</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Conditioned by this fundamental process are the nature of political systems and their accommodations, the structuring of political consent, and, consequently, the nature of bargaining accommodations and bargaining consent. As the industrialisation experience is transformed by the interplay of forces in the world market, so shall be transformed the associated accommodations, and so shall particular bargaining systems tend to be transformed.

The second political economy approach raises the vexed questions of causality and independent versus dependent variables in social analysis. Although these issues cannot be addressed in detail here, suffice it to say that the political economy approach proposes a dialectical interplay of industrialisation and social formation and, consequently, denies unilinear causal explanation. In part, this response also deals with the issue of independent and dependent variables, though not adequately. In terms of the broad processes discussed above, there is a strong argument to be made that the motor force of change underpinning social formation is the contradictory process of international industrialisation and world market integration. The political economy approach is predicated upon a belief in that argument.

Implications for Teaching Comparative Labour Relations

A number of implications for the teaching of comparative labour relations emerge from the previous argument. The most obvious issue concerns the theoretical context in which comparative material is couched. It is no longer acceptable either to adopt the eurocentrist logic of the Anglo-Saxon model, or to adopt an arbitrary empiricist analysis, based on description and contingency. Unfortunately, the specification of an alternative universal framework not only requires major re-thinking of traditional industrial relations analysis, but also requires a vast amount of empirical material previously ignored or compartmentalised elsewhere to be considered.

The theoretical solution may well be found in the study of capitalist accumulation's political economy. Writ large in the study of the broad structure and dynamic of accumulation, and writ small in the fertile arena of labour process analysis, this political economy is already the source of much that is innovative in the study of comparative labour relations (for a good example, see Humphrey 1982).

The dilemma of empirical coverage is much less easy to resolve. The spate of publications in labour relations in the last two decades has already driven many labour relations teachers to adopt a pragmatic approach to what they can hope to read, research and teach. It has been this pragmatism, rather than a commitment to eurocentrism, which has allowed the contemporary structure of most comparative teaching to emerge. A dualism has emerged in teaching between the examination of the domestic national system of industrial relations and comparative studies of DMEs. Most industrial relations departments in the advanced capitalist economies operate on this basis, and most firmly marginalise the remainder of the world.
A number of challenges to this pragmatic division of labour have emerged in recent years. The first emerges from the practical needs of capital and its adoption of the Human Resource Management (HRM) approach. Globalisation has required management to understand bargaining and labour market practices in non-advanced economies and, consequently, HRM courses increasingly move away from a eurocentric focus. Secondly, globalisation has impinged on academic thinking as witnessed by the debates around the New International Division of Labour. The contemporary reorganisation of Europe may be expected to promote this liberalisation of analysis. Unfortunately, the former challenge is generally intellectually weak and prone to produce desperately 'culturalist' analyses, usually because it cannot conceive of a political economy framework. The latter is still too new to have had an impact.

A half-way house solution to eurocentrism in teaching has been to construct a portfolio of courses which maintain traditional course divisions, yet provide more comprehensive coverage for students. Thus, a national system paper might be complemented by papers in advanced systems, underdeveloped systems, socialist systems and so on. A further solution has been to locate 'serious' labour relations in one department, which deals with the national and advanced issues, whilst other departments (usually political studies, sociology, anthropology, for example) deal with the underdeveloped or alternative models.

None of these solutions is satisfactory, although the half-way house model is at least moving in the right direction. To provide a better solution, we need to overcome the pragmatism noted above and create in labour relations teachers a desire to move beyond the DMEs and their associated analytical models. Clearly, this means that current students of labour relations need to be taught in different ways. An alternative teaching model, used over a decade or more, is presented in Table 3.2

<table>
<thead>
<tr>
<th>Topic</th>
<th>Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrialisation:</td>
<td>Explanations of industrialisation; UK industrialisation; late advanced industrialisation; colonial models and import substitution; the NICs; socialist alternatives.</td>
</tr>
<tr>
<td>The State:</td>
<td>The state and economic models; the voluntarist state (UK); intervention and labour codes; the state and political bargaining; the colonial state and independence; the socialist state.</td>
</tr>
</tbody>
</table>

2 This is the outline of a course in Comparative Labour Relations to be run in the University of Auckland in 1992, and is in part based on a course at the University of Strathclyde between 1978 and 1987.
<table>
<thead>
<tr>
<th>Topic</th>
<th>Content</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employers:</td>
<td>Theories of class formation in advanced, colonial, underdeveloped and socialist societies; employers and voluntarism; employers and intervention/labour codes; employers and political bargaining; the employer and clientelism in colonial economies; employer and management functions under socialism; employers and restructuring.</td>
</tr>
<tr>
<td>Unions and Social Movements:</td>
<td>Theories of unionism; unions and collective bargaining; unions and political bargaining; colonialism, unions and independence; unions and social movements; labour organisation under socialism; unions and restructuring.</td>
</tr>
<tr>
<td>Bargaining:</td>
<td>Models of collective bargaining - voluntarist, political bargaining, labour code, state controlled under colonialism and independence, socialist; levels of bargaining; content of bargaining; formal versus informal bargaining structures.</td>
</tr>
<tr>
<td>Workplace and Labour Process:</td>
<td>Technology, the labour process and workplace; advanced economy models (core-periphery etc); third world labour aristocracy models; marginality and petty commodity production; NICs and the NIDL debate; workplace, indigenous culture and bargaining; labour supply models and issues.</td>
</tr>
<tr>
<td>Democratisation:</td>
<td>Concepts of participation and workers' control; participation in DMEs; industrial participation and anti-colonialism; participation and radical reform models; workers' control and socialist transformation.</td>
</tr>
<tr>
<td>Globalisation:</td>
<td>Analyses of multinational capital; historical phasing of capital's internationalisation; modes of regional incorporation into international accumulation; role of the state in internationalisation process; implications for labour relations - labour markets, labour relations practices, labour solidarity.</td>
</tr>
<tr>
<td>Crisis:</td>
<td>The nature of international economic crisis; the abandonment of Keynesianism and the supply-side revolution; the restructuring process and regional implications; the international debt crisis; contrasting models of labour relations reform within restructuring.</td>
</tr>
</tbody>
</table>
The success of this course is dependent on the integrity of the theoretical links between topics and the appropriate choice of examples to illustrate the argument. It is predicated upon a knowledge of literatures which is very broad and, therefore, by definition, not comprehensive. At the same time, a careful reading programme focused on maintaining the course's integrity should permit a newcomer to this type of course enough coverage to make the course viable and educationally exciting.

Countries outside the DMEs and the Eastern Bloc, which integrate into this course well, include Algeria, Nigeria, Kenya, Tanzania and South Africa; Brazil, Argentina, Mexico, Bolivia, Chile and Peru; Jamaica and Cuba; India (though the scope of the issues raised is so great as to seem insuperable), Hong Kong, Singapore, Indonesia, China, Vietnam and Malaysia. These are, of course, preferences based on a particular experience. For example, the Middle East offers interesting alternatives for the innovative.

Conclusions

There can be little doubt that comparative labour relations needs to be taught differently from the normal offering in most DME tertiary institutions. For this change to be achieved, the academics teaching comparative courses will have to rethink their analytical frameworks, buckle down to a wider, often quite alien literature, and move outside the DMEs. In return, they will find a richness of debate and research potential more than adequately rewarding the effort involved in refocusing their teaching. As they say in New Zealand - way to go!

References

Chapter 2


Jenkins, R. (1984) 'Divisions over the the International Division of Labour', Capital and Class, No. 22.


3 An International Survey of Courses in Comparative Industrial Relations

Roy J. Adams

Although there has been some professional discussion about conceptual and methodological issues in comparative industrial relations (for example, Blanpain, 1987b; Peterson, 1986; Kassalow, 1968), pedagogy has been almost entirely ignored. As a result, those of us who toil regularly in this area have had to rely almost entirely on informal communications in order to gather information about the development and teaching of the subject.

Over the years, I collected several course outlines and had numerous conversations about teaching comparative and, in the fall of 1989, I put together a paper (Adams, 1989) based on my experience and distributed it to over 100 colleagues around the world for comments. I also asked that those who teach comparative industrial relations courses send me a copy of their most recent outline. This paper is based primarily on the 40 or so responses I received to my request for comments on the previous paper and on 32 syllabi of courses taught between 1987-1990. Reference is also made to other course outlines that I have been collecting since 1970, as well as to numerous informal discussions I have had with colleagues over the years. The 32 outlines include 27 that were clearly for comparative industrial relations courses, four that were for combined human resources management and industrial relations, and one for a course on comparative labour law and industrial relations. Syllabi were received from colleagues in the following countries: United States, United Kingdom, Australia, New Zealand, Italy, Canada, South Africa, Switzerland, France and Nigeria, although they were solicited from individuals in a much larger group of countries.

Where are Comparative Industrial Relations Courses Taught?

Comparative industrial relations courses are taught in the same countries where industrial relations has developed as an independent discipline (Adams, 1988). They are most common in English speaking countries. I have been able to establish with certainty that comparative courses are taught in the US, Canada, the UK, Australia, New Zealand, South Africa, Nigeria, Hong Kong and Israel, but also in non-English speaking France, Switzerland and Italy.
(although the Italian course focuses more on human resources than on traditional industrial relations and it is co-taught by an American professor). It is not unlikely that such courses are also taught in India, the Philippines, Eire, Belgium and the Netherlands. I would be surprised to find the subject taught in West Germany, Scandinavia, the Iberian countries and Japan. To date, I have been unable to identify any courses being taught in South America, although Hector Lucena of the University of Carabobo in Venezuela does devote part of an introductory course to international (primarily regional) comparisons. There may be a few additional countries in English speaking Africa where such courses are taught (eg. Zimbabwe, Kenya, Ghana), but I would be very surprised to find one in the French speaking areas. Industrial relations as a discipline has hardly taken root in the Islamic world and thus one would not expect to find even a basic introductory course, let alone one devoted to comparative issues, in most of North Africa and the Middle East.

Since my closest contacts are with scholars at industrial relations centres and business schools, it is not surprising that practically all of the course outlines that I have collected are taught in one or the other of those faculties. With that said, there does appear to be a pattern. Comparative industrial relations courses appear where industrial relations is relatively well established as a distinct area of research and teaching. That standard is met in all of the industrial relations schools or institutes which exist in English speaking countries. Industrial relations as a separate focus is also well established in business schools in Canada, UK, Australia and New Zealand, but somewhat less so in the US where human resource management and organisational behaviour manifest themselves as alternatives to industrial relations to a much greater extent than is the case in the other countries, where all three are typically seen to be complementary subjects.

Whereas a distinct trend away from industrial relations (and presumably comparative industrial relations) has been reported for the US (Begin, 1987), no such trend may be seen in the other countries, or if there is one, it is much weaker. I received a few letters from the US noting that comparative courses were no longer offered although they had been taught in the past (Berkeley, Temple), but I received no such letter from the other countries. Instead, I received letters from Canada and New Zealand reporting that new comparative courses were being developed. I also received several letters from the US (Northeastern, Western Carolina, California State Polytechnic) reporting the development of new comparative industrial relations courses.

One US respondent to my survey suggested several propositions about comparative industrial relations courses. First, it was suggested that they are more popular in English speaking countries outside the United States than within it. Of the 27 outlines that I received for pure comparative industrial relations courses taught in the past three years, eight were taught in the US, 17 in other English speaking countries and two in French speaking countries. Obviously no firm conclusions may be reached from a non-representative sample. Nevertheless, one may note with interest that about 30 per cent of
courses in my sample were US based, a distribution that is probably not much different from the distribution of degree programs in which such courses might be offered. Second, it was suggested that comparative industrial relations courses are more popular in separate industrial relations schools than in business schools. In my sample, 10 pure comparative industrial relations courses were offered by industrial relations schools or independent departments, 15 by business schools and two by economics departments, while the rest were unclassifiable. Such courses are very common in business schools outside the US, whatever the case in the United States.

Third, it was suggested that comparative industrial relations courses are more common at the undergraduate than graduate level. Unfortunately, the information included on many of the course outlines that I received does not indicate whether the students are undergraduates or graduates. However, for those that are classifiable, six universities offer only graduate courses and four only undergraduate courses. In a recent report on 36 post-graduate programs in industrial relations and human resources management (of which four were Canadian, one Australian and the remainder American), Hoyt Wheeler found that 45 per cent offered courses in international and comparative labour (Wheeler, 1988). These observations are consistent with my general knowledge of the situation. They do not seem to support the proposition.

Finally, it was suggested that comparative courses are offered less frequently today than they were 30 years ago. Since there are no data on the incidence of such courses 30 years ago, no direct quantitative comparison may be made. However, my experience suggests that whatever the situation in the US, the proposition is almost certainly untrue for other English speaking (and non-English speaking for that matter) countries. Interest in comparative industrial relations has grown substantially in Britain since that country entered the European Common Market. It has also increased in Australia and Canada as industrial relations as a field has matured. Nor am I convinced that its incidence has fallen off in the US. Although I received a few reports of comparative courses being dropped, as noted above, I also received other reports indicating that new courses were being developed. Comparative industrial relations courses are frequently offered as part of IR/HRM programs, as noted above, and those programs have expanded substantially in the US in the past 30 years (Begin, 1987). Krislov and Mead (1987) recently reported an increase in the number of courses concerned with 'international aspects of work' in non-degree industrial relations programs.

Course Objectives and Content

When offered as part of the coursework required for degrees in industrial relations or general business, there are four major objectives which comparative industrial relations courses attempt to meet. First, they seek to provide an understanding of industrial relations arrangements in several countries. The countries which appear most often on comparative industrial relations course outlines are Great Britain, Sweden, West Germany, France,
Japan and the US. Almost entirely ignored are the Arab countries, the Caribbean and the South Pacific. Selected examples are often chosen from Asia (eg. India), Africa (eg. Kenya, Nigeria) and South America (eg. Argentina, Brazil) to illustrate general features of industrial relations in the Third World. The People's Republic of China, the USSR, Hungary and Poland were often used as representatives of the Second World pattern until now, but that may well soon change with the dramatic events of 1989/90 in Eastern Europe.

During the 1960s and 1970s, Yugoslavia frequently appeared on course outlines as the prime example of workers' self-management. However, as Yugoslavia entered a period of economic and political difficulties in the 1980s, it began to look less like a 'model industrial relations system' and thus began to disappear from many courses (on model industrial relations systems, see Windmuller, 1963; and Kassalow, 1983).

A second objective of comparative industrial relations courses is to explore contemporary issues of importance to several countries. Among the issues most commonly discussed are tripartism (also known as neo-corporatism or social concertation) and workers' participation in enterprise decisions. Issues which have been getting more attention in recent years are technological change, industrial restructuring, flexibility and 'Japanisation'. Guest workers and incomes policies (as specific examples of tripartism) have been addressed less often recently, and the impact of enhanced trade in North America and Europe has begun to make an appearance. The so called New International Division of Labour (see, for example, Southall, 1988) has provided a new framework for organising course material on the Third World.

Labour market issues, such as unemployment and inflation, are not often considered as part of comparative industrial relations courses, except as they impact labour-management relations. Nor is much attention paid to employment equity or occupational health and safety, although those issues are frequently the subject of industrial relations research and frequently appear on national course outlines. Job satisfaction and the quality of working life were issues more frequently addressed in the 1970s, although worker involvement via such techniques as multi-skilling and the team approach to production are often discussed today. The difference is that in the 1970s the worker's well-being was the focus, whereas the focus today is on product quality.

During the later 1960s and the decade of the 1970s, the arguments put forth in Industrialism and Industrial Man (Kerr et. al., 1964) were universally mandatory subjects for students of comparative industrial relations. At that time many developing countries in Asia and Africa were fast achieving their independence from colonial powers and the focus of Kerr et. al. volume on the problems of labour in the course of economic development seemed to be particularly appropriate. Today, however, when the primary focus of comparative industrial relations has shifted away from the developing countries, the issues raised in Industrialism and Industrial Man no longer seem quite so urgent and the full text is rarely assigned. Nevertheless, the
central proposition of the book, known as the 'convergence hypothesis', continues to be discussed in comparative industrial relations classes. It also continues to stimulate research and debate particularly among sociologists (see Form, 1979).

In line with the general shift in the US away from labour relations and collective bargaining towards human resources management, comparative courses with an HRM focus are beginning to appear. My survey turned up four such courses, of which three were taught in the US and the fourth was offered in Italy jointly by an Italian and an American. Those who teach comparative HRM generally use the multinational firm as their prism and review research with regard to the recruitment, selection, appraisal, development and compensation primarily of expatriate managers. A recent textbook on the subject was co-authored by an Australian and an American (Dowling and Schuler, 1990). One very interesting recent book systematically compares three countries (Great Britain, West Germany and France) on several HRM dimensions including work organisation, training, management development, management style, reward structure, job design and the impact of new technologies on HRM (Lane, 1989).

A third objective of many comparative industrial relations courses, closely related to the discussion of contemporary issues, is to provide students with knowledge of industrial relations patterns that transcend national boundaries. The difference is that in the first case one reviews the development of contemporary issues and sees how they are being played out in several countries, while in the latter case, one is less concerned about contemporary developments than about the general nature of the phenomenon under consideration. In other words, the aim is to make generalisations about trade union structure, ideology, policy, growth and decline; about employer organisations and managerial behaviour; about government policies towards labour and management; and about collective bargaining and industrial conflict. These are issues addressed in practically all comparative industrial relations courses.

A fourth objective, considered by several teachers of comparative courses as the most essential one, is to place the home country in context by contrasting its institutions and practices to those in other countries. It is widely believed by comparativists that only through comparative study may one's own system be fully understood. There is concern by several American professors that this principle is not widely appreciated in the US.

My survey also turned up some courses that have unique or specific objectives different from the four noted above. For example, Joe Krislov at the University of Kentucky is sometimes asked to teach comparative industrial relations courses in conjunction with area studies programs and he develops the curriculum to match the objectives of the program. Hoyt Wheeler teaches a comparative course as part of a professional program designed to prepare managers for positions in multinational companies and the curriculum is developed with that objective in mind.
Finally, there is one aim of such courses that is not often voiced, but is real nevertheless. It has to do not with the students but with the teachers. The objective is to compel experts in comparative industrial relations to keep their skills honed to a fine edge. Teaching a course is so important to keeping current that some professors in my sample have a provision in their employment contract that they must be permitted to teach the subject on a regular basis, even if the number of students who elect to enrol falls to low levels.

Course Organization

Twenty or thirty years ago, it was not uncommon to find basic courses with titles like Labour Economics and Labour Relations. However, as industrial relations has become more established as a field distinct from economics, such courses began to disappear to be replaced by more purely labour relations or industrial relations courses. The same thing apparently has happened in the comparative area. Very few courses in my sample concern themselves with traditional labour market issues. Most utilize some version of the industrial relations systems framework to organize the course. None of the respondents to my survey utilize the marxist political economy framework. Marxist analysis has not achieved dominance in industrial relations schools or business schools, although marxist concepts and theory certainly have influenced industrial relations research and teaching, especially outside the US. Thus, labour process theory is regularly considered in comparative courses, especially in the section on employer behaviour.

It is a bit surprising that so few respondents to my survey utilized the human resources management framework. No doubt, that is due in part to the fact that I specifically requested outlines for courses on industrial relations rather than HRM. Nevertheless, as noted above, four of the course outlines which I received specifically focussed, at least in part, on comparative human resources management. Along with the recent appearance of a textbook on comparative HRM, this may suggest a trend. Only in the US, however, is there any indication of a movement away from comparative industrial relations to comparative HRM.

One of the most difficult choices that a teacher of comparative industrial relations has is whether to organize the course on a country-by-country basis or on a subject basis. Comparative specialists, such as Ron Bean and Michael Poole, have a strong preference for the subject approach. They believe that the proper focus of research and teaching in comparative industrial relations should be the search for enduring generalizations rather than the rote learning of exotic minutiae (Bean, 1985; Poole, 1986). I certainly agree, but operationalizing the standard is not an easy task. When I have organized courses on a subject-by-subject basis (seeking generalizations with regard to union, employer and state behaviour), my students have had a very difficult time because of their lack of knowledge of basic facts about the several nations to which reference was being made. Ideally, one would review in some depth the economic, political, social and industrial relations
characteristics of several countries before discussing the possibility of multinational continuities. Typically, however, there is not sufficient time to implement this strategy, so one must fashion a compromise.

John Windmuller at Cornell University utilized a scheme for several years in which he alternated between countries and issues on successive weeks, and others in my survey use a variant to this scheme. Jack Fiorito at Iowa attempts to pair countries with industrial relations systems concepts in a deliberate fashion. For example, he pairs 'unions' with 'South Africa' because 'South Africa provides dramatic contemporary variation among unions...' (personal letter, dated 13 November 1989). I have used a number of methods. One of the most successful is to require groups of students to assemble basic information about a country other than Canada according to a standard outline and to make a class presentation based on their research. The students making the presentation learn the non-home country system fairly well and thus have at least two points of comparison (Canada, for which a basic industrial relations course is a prerequisite, and the presentation country) when generalizations are discussed later in the course. Several countries are covered early in the course and the remainder of the available time is devoted to a multinational consideration of key issues, such as union growth or industrial conflict.

No method of course organisation seems to be ideal. In fact, several teachers switch methods periodically. For example, John Windmuller very recently decided to utilize a format whereby he focused on a small number of countries but discussed them in much greater depth than usual. I switched from the format described above to one similar to that used by Fiorito. Since comparative industrial relations courses are usually elective rather than required courses, teachers of comparative often have a good deal of curricular flexibility.

In a typical course in my sample students are required to read one or two books and additional selected articles. There are most commonly two exams and a term paper. The term paper is most often on any topic approved by the professor. In a few cases the specific topics are dictated by the teacher. A few courses required students to write book reports, either in lieu of or in addition to term papers.

The most widely used textbook in my sample is Ron Bean's *Comparative Industrial Relations*, closely followed by Bamber and Lansbury's *International and Comparative Industrial Relations*. In fact, the most common pattern is to use these two books together. Bean does a good job of reviewing research and developing generalizations on unions, employers, the state, collective bargaining, industrial conflict, workers' participation and the impact of the multinational firm on industrial relations. Bamber and Lansbury provide an introduction to the general characteristics of the industrial relations systems in the major industrialized market countries. Other books either required or strongly recommended by more than one professor are Poole (1986), Clegg (1976), Windmuller et. al. (1987), Juris et. al. (1985), Dunlop (1958) and Blanpain (1987a).
Conclusions

On the basis of the work I have done during the past few years, I am convinced that comparative industrial relations is on a sound footing. It is a subject which, on a worldwide basis, has expanded during the past 20 years and is likely to continue to expand during the next 20 years. It may face a challenge from comparative human resource management, but that challenge is not likely to be significant outside of the United States where human resources and labour relations co-exist quite well. With the demise of centralised state planning and control in Eastern Europe, it is probable that the theoretical framework of industrial relations and therefore of comparative industrial relations, will make headway in that part of the world (Hethy, 1989).

References


4 An Australian Survey of Subjects in Comparative Industrial Relations

Lyndal Jenkins

This chapter reviews existing comparative subjects taught in the field of industrial relations and related areas, both in terms of their curricula and more generally with respect to their status within courses. It draws upon information being collected as part of the Review of Industrial Relations Teaching in Higher Education conducted by the Australian Centre for Industrial Relations Research and Teaching (ACIRRT). The first section of the chapter defines the subjects surveyed and the second identifies where industrial relations subjects are offered in Australian universities. Consequent sections consider the issues associated with teaching comparative industrial relations subjects. The subjects included in this review have been identified by reading subject descriptions in handbooks printed by tertiary institutions. This population has been supplemented by preliminary data collected through the Review of Industrial Relations Teaching and through the direct collection of sixteen full course handouts prepared for students in 1990. Thus, the population of comparative subjects is not exhaustive and is specific to the 1990 academic year. The data, therefore, should be used only as a guide to trends and issues, and the conclusions drawn from this sample must be regarded as preliminary.

1 Throughout this chapter, and in line with the terminology used in the Review of Industrial Relations Teaching in Higher Education, 'subject' refers to a discrete unit of study, which usually part of a larger 'program', which is a sequence of subjects which together constitute what is commonly called a 'major' or 'minor'. A 'course' refers to an accredited award or qualification, such as a degree or diploma.

Chapter 4

What is a Comparative Industrial Relations Subject?

In selecting subjects to be included within this survey, two preliminary questions had to be addressed. First, what constitutes an industrial relations subject? To a large extent, the subjects reviewed in this paper lie within the boundaries of what has traditionally been defined as industrial relations. They are subjects 'primarily concerned with examining work and work relations', usually being titled as industrial relations subjects. In addition, where possible, a selection of subjects offered within the disciplines of politics, economics, history, law and sociology have also been included, especially where these subjects have concentrated on the area of work and work relations.

The second preliminary question was: what is a comparative industrial relations subject? The answer here was to give 'comparative' a broad meaning, partly with the objective of encompassing a wide diversity of subjects and courses, but also because what is regarded as 'comparative industrial relations' varies greatly from institution to institution. Thus, there is a variety of comparative subjects surveyed here, ranging from the obviously comparative to the rather more ambiguous. The more obvious inclusions are subjects which have specific comparative aims and are usually organised on a thematic basis. They are concerned with examining industrial relations institutions, issues or processes in countries other than Australia in order either to increase understanding of these phenomenon as they exist in Australia or to pursue more abstract, theoretical goals. The more ambiguous inclusions are subjects which do not synthesise the study of industrial relations aspects across countries with the purpose of comparing and contrasting experiences. Rather, these subjects are organised on a country-by-country basis and have the objective of making students aware of the institutions and developments which exist in other countries, rather than pursuing an explicitly comparative purpose. To classify the subjects more systematically, there are four types of subjects reviewed in this paper:

(a) subjects which are solely devoted to industrial relations utilising a comparative perspective (these will be referred to as 'principal' comparative industrial relations subjects);

(b) industrial relations subjects with some comparative components;

(c) comparative subjects with some industrial relations component;

(d) subjects examining a single country other than Australia, with some industrial relations component.

The distinction between the first two categories is the emphasis given to the comparative objective and/or comparative content within subjects. Subjects with clear comparative objectives, titles and significant overseas content constitute the first category. Subjects in the second category usually concentrate on Australia and seek to develop an understanding of either Australian industrial relations generally or a single industrial relations
phenomena observed in Australia, or they approach industrial relations from a particular disciplinary perspective. The third category includes comparative subjects within disciplines such as law, economics, sociology and politics, with some industrial relations component; this component may be small or it may be a substantial part of the subject. The final category of subjects, focusing on a single country other than Australia, obviously includes subjects which are not comparative in the true sense of the word. These subjects have been included within the review for two reasons. First, they may be of general interest to those specialising in the study of particular countries. Second, because they may represent an emergent trend in the international study of industrial relations.

This categorisation of subjects involves a degree of arbitrariness when individual subjects are allocated to categories. In some cases it was difficult to determine the category of a subject due to the brevity of descriptions included within handbooks and lack of information. Moreover, there is some variation in objective and Australian content between subjects within these categories. Nonetheless, the categorisation is useful and necessary for this analysis.

Where is Comparative Industrial Relations Taught?

A list of the comparative industrial relations subjects reviewed is set out in Appendix 4.1. There were 72 separate subjects identified as on offer in 1990. Universities in every state and territory, with the exception of the Northern Territory, taught comparative subjects of at least one of the four types identified above. However, the distribution between states was far from even. In some states, there were few comparative industrial relations subjects on offer. This was the case for the Australian Capital Territory, Tasmania and South Australia, where there are fewer universities in operation. There are also fewer industrial relations programs on offer by universities in these regions and thus less likelihood of a comparative industrial relations subject being offered. All three universities in the state of Western Australia, however, offered more than one comparative industrial relations subject within full industrial relations programs, which indicates that size is not the determining factor. Rather, the provision of comparative industrial relations subjects seems to depend more on the depth of industrial relations teaching within an institution. In the other states, including New South Wales, Queensland and Victoria, a number of institutions offer comparative industrial relations subjects as part of industrial relations and related programs of study.

Appendix 4.1 also categorises subjects on offer according to the four types identified above. Of the 72 subjects reviewed, 28 (or a little over a third of the total) were principal subjects in comparative industrial relations (Type A); 30 subjects were comparative industrial relations subjects with some comparative component (Type B); nine subjects were included to represent comparative subjects with an industrial relations component (Type C); and five subjects examining a single country other than Australia (Type D) were noted. These proportions should not be read as representative of the
proportion of subjects available in the total population of comparative and industrial relations subjects on offer. As the main focus of this survey was to identify principal (or Type A) comparative industrial relations subjects, less attention was given to identifying subjects from other categories.

Type A: Principal Subjects in Comparative Industrial Relations

This section, the most substantial of the chapter, will discuss the 28 subjects identified as Type A (or principal comparative industrial relations) subjects; these subjects are listed in Appendix 4.2. The subjects will first be located within their regions, institutions and programs of study. The objectives, organisation and content of the subjects will then be examined in turn. Finally, teaching methods and materials will be briefly surveyed.

(a) The Subjects in Context

Type A subjects were offered by institutions in New South Wales, Victoria, Queensland and Western Australia through a range of academic departments including, industrial relations departments and schools, economics departments and management departments and schools. However, generally these subjects are offered by departments and schools which teach a program of study (either a major or minor) in industrial relations.

Fifteen of the 28 Type A subjects were offered at undergraduate level. Approximately half of these subjects were optional electives, and the other half were compulsory to a program of study. The typical program of study for undergraduate subjects was industrial relations, with fewer subjects being offered in combined personnel management/industrial relations programs and human resource management programs. The undergraduate courses where these subjects were offered included degrees in commerce, economics, business and arts.

Some departments offered more than one principal comparative industrial relations subject in 1990. This was the case for all the Western Australian universities; Phillip Institute of Technology in Victoria; Griffith and Queensland University of Technology (Brisbane CAE) in Queensland; and the Universities of Sydney, New South Wales, and Western Sydney - Nepean in New South Wales. With the exception of those in Queensland universities, all these departments offered Type A subjects at both undergraduate and graduate/postgraduate levels. These departments were mainly industrial relations departments or schools offering full undergraduate and graduate/postgraduate programs in industrial relations.

Principal comparative industrial relations subjects were also offered only at either graduate or postgraduate level by some departments and schools. In most cases these departments and schools did not offer a program of study in industrial relations at undergraduate level, only at graduate or postgraduate level. Graduate schools of management tended to offer these Type A subjects
even where these constituted a part of only a small industrial relations program of study, most usually within Masters of Business Administration. Thirteen graduate/postgraduate principal industrial relations subjects were identified in all. The majority of these were offered as optional electives rather than compulsory subjects.

(b) Subject Objectives

There were four main types of objectives referred to in descriptions and handouts of principal comparative industrial relations subjects on offer in 1990. Most often, subjects had more than one of the following objectives.

(i) To review industrial relations institutions and developments in selected overseas countries.

This objective was rarely the only objective of subjects surveyed here, as all subjects involved explicit comparative study. However, most subjects acknowledged a need to develop a basic understanding of institutional and contextual factors influencing industrial relations in other countries. This objective was most characteristic of subjects with a national systems approach to comparative study.

(ii) To examine particular industrial relations themes and policies across countries.

Some subjects where more concerned with examining particular policies or themes across countries. In only one or two instances, however, were whole subjects structured around a set of these issues. This was the case with the Comparative Industrial Relations subject offered by the Department of Economics at the University of Melbourne. The organising themes for this subject included trade unions, employer associations, the role of the state, industrial relations in the public sector, processes of industrial relations, industrial conflict, industrial democracy and industrial relations in Japan. This organisation was used even though the subject retained a mainly institutional perspective.

The overwhelming majority of Type A subjects achieved a compromise between the first two objectives. They did this by examining particular themes or issues within subjects which were predominantly organised on a country-by-country basis. Common themes and issues are detailed below.

(iii) To compare and contrast the operation of industrial relations in other countries with that of Australia.

The majority of principal comparative industrial relations subjects were also concerned with using comparative study to improve student understanding of Australian industrial relations. That is, they used comparative study to 'put

3 Subjects which concentrated on one theme, for example industrial democracy, are review in a later section.
the home country in context'. The methods by which this objective was achieved ranged from including Australia as one of the countries in the national systems under review or the inclusion of separate topics considering lessons for Australia, through to specific comparisons with Australia in each topic of the subject. In some cases a comparison with Australia was used in reverse, in order to increase understanding of a particular theme, issue or aspect of industrial relations in another country.

(iv) To develop other objectives.

A range of other objectives were set for principal comparative industrial relations subjects. Some of these objectives related to the particular student audience so that, for example, a comparative subject taught by a management school examined different management approaches to industrial relations. The objectives of other subjects were clearly to develop theory and method in industrial relations study through a comparative perspective. For example, the subject offered at the University of Wollongong had as one of its aims, 'to assist students in expanding their analytical skills through use of the comparative method.'

(c) Subject Organisation

The objectives set for particular subjects influence the organisation and content of the subject. As Adams has shown in Chapter 3, there are two basic choices to be made in organising a subject in comparative industrial relations: on the one hand, industrial relations practices and procedures of each country can be examined on a country-by-country basis or, on the other hand, a thematic approach examines particular issues across countries. The first approach provides more opportunity to develop a national context to the industrial relations phenomena observed, while the second encourages more generalising and theorising about industrial relations phenomena. Most of the subjects identified in this review combined these approaches.

The standard method of organisation among these subjects was to proceed with a country-by-country examination of industrial relations systems, drawing out the main issues or themes for comparison as each country was being examined. Such an approach was usually accompanied by an introductory discussion of comparative theory and methodology. The discussion of each national system usually proceeded by examining the historical development and national context (especially economic) of industrial relations; the actors and institutions, including trade unions and employer associations and the state; and the processes of industrial relations, including current developments.

A number of themes and issues were given special consideration and were commonly linked with segments on particular countries. For example, where a subject examined Swedish industrial relations, centralised wage determination, industry policy and strategic unionism were often compared with Australia, especially in the context of debate over the ACTU/TDC's Australia Reconstructed. In examining industrial relations in the United
States, common themes were enterprise collective bargaining and the non-union sector. Industrial democracy was given special attention in discussions of West German industrial relations and the role of the state was a favourite theme in examining British industrial relations. There was a slight variation to this standard approach in some subjects where one or two phenomena where examined as separate topics either before or after the national systems discussion. These phenomena ranged from patterns of industrial conflict to the operation of multinational corporations and other international organisations. In a few other subjects, issues such as women and trade unions or public sector industrial relations were examined. In the main, the range of issues given specific comparative attention were related to current policy issues in Australia. As well as the above, these issues included union structure, enterprise bargaining, industrial democracy and technological change.

This limited range of topics and approaches is indicative of a traditional adherence to the institutional/systems view of the subject matter of industrial relations - a preoccupation noted by Adams in his international survey of teaching in comparative industrial relations (see Chapter 3). Adams also notes the recent development of subjects with a comparative human resource management perspective, but Australian developments in this area cannot be assessed here because data on comparative human resource management subjects were not gathered.

However, one emerging trend in the teaching of comparative industrial relations in Australia which suggests the adoption of an alternative theoretical framework is the development of subjects which use a 'model approach' to the selection and organisation of material. These 'models' depend more upon a political economy perspective than the traditional Dunlop systems framework, resulting in countries being grouped according to type of economy, level of economic development and the role of capital and labour in the accumulation process. For example, the Comparative Industrial Relations subject taught by the Department of Economics at the University of Wollongong is organised to examine OECD countries, then South East Asian and Socialist European countries, before examining particular case studies of the role of the state, management, the labour process and labour movements (see Chapter 7). The Comparative Industrial Relations subject at Griffith University examines the 'Anglo-American' and 'ASEAN' models (see Chapter 6). At the University of Western Australia, the Department of Industrial Relations offers two Comparative Labour Relations subjects. One follows the more traditional country-by-country approach, while the other considers countries such as the Philippines, Singapore and Malaysia in terms of the social structure of accumulation, the role of transnational capital, the state, forms of worker resistance and particular characteristics of the labour market of these countries.

(d) Subject Content and Countries Studied

There seems to have been a change over recent years in the choice of countries studied in Type A subjects in Australia. Anecdotal evidence and
Adams' international survey reported in Chapter 3 suggest that previously most subjects were devoted to the Western industrial economies, and a significant proportion of subjects surveyed here (approximately 40 per cent) continued to focus on the industrial relations of these countries. However, the majority of subjects actually range beyond this to include some reference to newly industrialised and developing economies. A standard pattern is to add one or two newly industrialised economies to an examination of the established industrialised countries.

Despite this trend, only a very small percentage of subjects are wholly or mainly concerned with the industrial relations of newly industrialised and developing economies. In fact, only two such subjects have been identified here, both offered by the University of Western Australia. Also, only two subjects were identified which examine industrial relations within socialist economies; the subject offered at the University of Wollongong and another subject offered by the Victoria University of Technology (Footscray Institute of Technology). The overwhelming majority of subjects add one or more newly industrialised or developing countries to a traditional set of Western industrialised economies.

There are various ways in which countries chosen for comparative study may be categorised: by type of economy, by the extent of economic development and by geographic location. The principal distinction in the first of these is between capitalist and socialist; with respect to the second, the categories used include industrialised economies, newly industrialised economies and developing economies; while the last can include countries grouped as ASEAN, Pacific Rim, Western European and so on. Obviously there is overlap between the typologies and some divisions are arbitrary, which makes it difficult to determine which factor, if any, decides why single countries are included within subjects. However, it would seem that more countries are now being included within Type A subjects because of their geographic location in the Asia/Pacific region; that is, because of their close proximity to Australia. Some of the countries in this region (for example Hong Kong, Singapore, Taiwan and South Korea) are also achieving attention because of their newly industrialised status.

Among the industrialised economies category, the most favoured countries for comparison are Britain, the United States, Sweden and Japan. These countries are followed closely by West Germany and Canada. Lower down the reference scale are countries such as France, Italy and, in one or two cases, New Zealand. The place of Australia in this schema varied. The majority of subjects identified were at least mindful of Australia. Most subjects made reference to Australian industrial relations through an examination of particular issues, while many sought to draw lessons for Australia from the experiences of other countries. In three subjects, Australia was considered as a national system in its own right.

In the newly industrialised category, Singapore is examined most often, followed by South Korea and then Hong Kong. It is more common for subjects to expand beyond industrialised countries to examine a newly
industrialised economy than a developing economy. Among developing economies, Malaysia is most popular (often grouped with Singapore) followed by Thailand, the Philippines, and then Papua New Guinea. African and Latin American countries are studied in the Industrial Relations 2 subject offered by Phillips Institute of Technology, although this appears to be the only subject where these countries are included. China is also considered in a couple of subjects with an Asia/Pacific focus, although it is also a socialist economy. Other socialist countries included for comparison are Poland, the USSR and Hungary. Where subjects are offered which include newly industrialised and/or developing and/or socialist economies, some reference (sometimes in the form of additional topics) is usually made to the distinctive social, political and economic context of these countries. The most advanced form of this occurs in the subjects adopting the 'model approach' noted earlier.

The choice of countries studied appears to be very much related to the specific objectives of the subject in question. Where subjects have the objective of undertaking comparative study to improve understanding of Australia or to draw lessons for Australia, industrialised and then newly industrialised economies are most important. As noted above, this is the case with the majority of Type A subjects offered in 1990, especially at undergraduate level. Where a broader political economy or international thematic perspective is adopted, developing and socialist economies are more frequently examined.

The number of countries studied in particular subjects can vary greatly. The standard is to examine six to eight countries, on a country-by-country basis. There were some subjects which examined more than this number. These latter subjects were more thematic in nature and often grouped a number of countries together within models.

(e) Teaching Methods and Materials

It was not unusual in principal comparative subjects for no set text to be prescribed, especially where the subject was mainly concerned with examining themes across countries, countries in the Asia/Pacific region or newly industrialised, developing and socialist economies. Where a text was set, the most common was Bamber & Lansbury (1987), while Bean (1985) was the next most recommended text. Bamber and Lansbury was most often prescribed at undergraduate level and in subjects organised on a country-by-country basis, while Bean was most recommended in subjects with specific thematic aims. However, many subjects utilised both texts, reflecting the mix of national and thematic concerns.

Tutorials and seminar presentations formed an important part in this sample of subjects, generally making up half of the average three to four hours per week of class contact. Tutorial presentations of topics also constituted an important part of the assessment process, as did tutorial papers, accounting for between 25 per cent and 50 per cent of marks. Exams accounted for 50 per cent or less of total assessment in all subjects except one (at 80 per cent).
There was some variety in the staffing arrangements and teaching methods employed in these comparative industrial relations subjects. A team of specialists taught some subjects, with teaching usually being divided by country. It would seem that films and videos were not commonly used in teaching. One interesting innovation was introduced into the subject taught by the University of Wollongong, where students were required to undertake a group project resulting in formal presentation of a policy submission 'for changing (or not changing) an element or aspect of industrial relations in Australia, based on the team's research of the particular aspect in Australian and overseas, with particular focus on one country'.

**Type B: Industrial Relations Subjects with Some Comparative Component**

Of the 72 comparative industrial relations subjects surveyed in total, 30 were classified as Type B. These broke up into three main sub-groups. First, there were 14 subjects which could be described as industrial relations subjects with some comparative component; these subjects retained their mainly Australian focus. Secondly, there were 13 subjects concerned with a single industrial relations theme which had some comparative component. Third, there were three industrial relations subjects taught from a particular disciplinary perspective, which again contained some comparative component.

(i) **Subjects mainly concerned with Australian industrial relations.**

Typically, these subjects consisted of a general survey of industrial relations practices or issues in Australia as the largest part of the course, along with a smaller comparative component to assist understanding of these phenomenon. Examples of such subjects are *Industrial Relations Issues* offered by the University of Canberra, *Contemporary Issues in Industrial Relations* offered by Charles Sturt University - Mitchell, and *Industrial Relations B* offered by the Tasmanian State Institute of Technology (soon to become the University of Tasmania). Countries most commonly included for comparison were the Western industrialised economies.

Subjects in this sub-group also tended to be general introductions to Australian industrial relations at undergraduate level or graduate diploma level. They were generally not offered within an extensive industrial relations program, but rather by departments or schools offering management programs.

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(ii) *Subjects concerned with a single industrial relations theme.*

It is not unusual for specialist industrial relations subjects on a particular theme or issue to involve a comparative component. For example, subjects were offered at both undergraduate and graduate level examining industrial democracy and industrial conflict which drew on overseas comparisons. These subjects were offered as electives within both industrial relations programs and management programs. The countries studied within these subjects were, in the main, Western industrialised economies. Another example came from the South Australian College of Advanced Education (to become part of the University of Adelaide in 1991), which offered the subjects *Trade Unions: An International Comparison* and *Trade Unions and the Third World* within a specialised Labour Studies program at Associate Diploma level. La Trobe University also offered a comparative trade union politics subject at undergraduate level.

(iii) *Subjects taught from a particular disciplinary perspective in industrial relations.*

Only three of these subjects were identified in this sub-group: two in the area of comparative labour law and one examining comparative industrial sociology. One of the law subjects adopted an institutional framework, being primarily concerned with examining the Australian legal system in comparison to systems in countries such as the United States, Great Britain, Japan and in Western Europe. The other was concerned with particular aspects and problems in Australia and considered international law, as well as sociological approaches to the law.

*Comparative Industrial Sociology*, offered by the University of Western Australia, examines the 'social, political, and economic transformation that has accompanied the process of industrialization in the West, in the third world and in existing socialist societies'. It is organised around various themes including the global economy, class and the labour process. The subject is offered in the industrial relations program at undergraduate level jointly by the Department of Industrial Relations and the Department of Anthropology.

**Type C: Comparative Subjects with Some Industrial Relations Component**

There are many other subjects offered by disciplines such as law, economics, management, sociology and politics which are broadly concerned with 'work and work relations' rather than just industrial relations, and which have a comparative component or perspective. Thirteen of these subjects were reviewed and the following characteristics noted.

In law, subjects with a comparative component were most often identified in the area of occupational health and safety law. These types of subjects where found at universities, such as the University of New South Wales and Monash
University, among a range of other specialist subjects offered by law schools in undergraduate and postgraduate programs.

In the area of politics, subjects such as the Labour and Socialist Politics and Australian Labour: Politics and Culture offered by the Department of Government at the University of Sydney may be representative of subjects offered by other institutions. These subjects most often had a specific thematic aim and formed part of larger undergraduate teaching programs. These comparative subjects concentrated on Western and European democracies.

By far the most common comparative subjects concerned with work and work relations were those offered within sociology. Many industrial sociology subjects are standard, undergraduate, introductory sociology subjects. The themes of the historical development of work, the organisation of work and future alternatives for work in industrial societies were common areas for examination in these subjects. Subjects such as the Advanced Industrial Societies subject offered at the University of New South Wales involved a comparative examination of gender, race and ethnicity in the workplace and in the area of unpaid work. Technology and the labour process is also a major theme. One notable characteristic of the comparative sociology subjects was their attention to the international division of labour and to countries beyond the Western industrialised economies.

Economics subjects with a comparative component were most often comparative in the examination of policy areas, such as wage determination and the operation of incomes policies.

Type D: Subjects Examining a Single Country Other than Australia, with Some Industrial Relations Component

At a couple of universities, subjects are offered which examine the industrial relations of a particular country other than Australia. For example, the Asian and International Studies Division of Griffith University offers a subject called Industrial Relations in Japan. At the University of New South Wales, the School of Industrial Relations and Organisational Behaviour offers a subject which examines Japanese Employment and Productivity. Amongst other topics, both of these subjects examine the transferability of industrial relations practices or institutions to Australia.

We also found a handful of subjects offered within disciplines such as sociology and law which examine topics related to industrial relations in countries such as Japan and Korea. These subjects are interesting because they provide further evidence, albeit of a more specialised nature, of the trend towards examining countries in the Asia/Pacific region.
Conclusions

The teaching of comparative industrial relations subjects is widespread in Australia. This survey divided these subjects into four main types, but most attention was devoted to Type A (principal comparative industrial relations subjects). There are some institutions and states in Australia where principal comparative industrial relations subjects are not offered, but these institutions and areas tend to be those which do not offer full programs of study in industrial relations. Where a full program of study in industrial relations is offered at either undergraduate or graduate level, it generally includes a comparative industrial relations subject and in most cases it is a Type A subject. Comparative industrial relations subjects are usually offered as optional electives within these programs, although the practice at undergraduate level is more mixed, with some institutions making these subjects compulsory for all students completing an industrial relations major.

There are some remarkable similarities between comparative industrial relations subjects offered by economics, industrial relations, business and management schools and departments. These subjects usually follow a country-by-country format, comparing particular themes across countries and with Australia. They also focus on Western industrialised economies and adopt an institutional/systems framework.

However, while Western industrialised economies tend to prevail in most comparative industrial relations subjects, a significant trend can be observed towards the inclusion of newly industrialised countries and countries from the Asia/Pacific region. This trend is not inconsistent with the Australian focus of much comparative industrial relations teaching in Australia, and it is certainly consistent with the policy orientation of much of this teaching.

Two approaches are apparent in the way Asia/Pacific and newly industrialised economies are being encompassed within comparative industrial relations subjects. The first is characterised by a simple addition of one or more of these types of countries to an examination of industrialised economies and Australia. This approach, which is by far the more common, tends to leave the traditional subject matter and theoretical framework of industrial relations unchallenged, despite the contradictions it might produce.

The second approach to increasing the range of countries studied is represented by a 'model approach', which more systematically compares the new countries with the Western industrialised economies according to their respective stages of economic development and other characteristics. As several other chapters in this monograph show, the 'model approach' tends to challenge the traditional subject matter and theoretical base of industrial relations. It tends to be characterised by a political economy perspective which goes beyond institutions and legal frameworks to examine issues such as the labour process, class and power. In this way, the 'model approach' is similar in perspective to comparative subjects offered in the disciplines of
sociology and anthropology. While it is not widespread, the 'model approach' to teaching comparative industrial relations perhaps points towards a future direction in teaching.

References


## Appendix 4.1: Institutions Offering Comparative Subjects in Industrial Relations, By State, 1990

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In developing a course on comparative industrial relations, as with courses on any subject, there is an inevitable compromise between two demands. On the one hand, there are intellectual and pedagogic ideals. Academics would be vocationally misplaced if they did not have strong ideas about the content and method of the subjects they teach. Many of the chapters in this monograph spell out the value of comparative study, its intellectual challenges and educational advantages. On the other hand, there are the more pragmatic requirements of the educational institution and the student body in question. The comparative course is usually just one component of a larger program of studies. Its place in that program will influence the objectives of the comparative course and it will determine the knowledge and capacities of the students. Even the number of teaching hours and weeks are very real factors which mould the structure and character of a course by imposing a necessity for selectivity in the issues addressed.

The University of Sydney provides just one example of how this compromise is met. Here, the undergraduate course in comparative industrial relations falls in the second semester of a six-semester program and, given the peculiar administrative arrangements at this institution, it is compulsory for all students studying industrial relations. This means that students beginning the comparative course have been exposed to just one semester of industrial relations, which mostly comprises an introduction to Australian institutions. Being in their first year, many students are also new to the rigours of university study in general. These circumstances have led me to advocate a particular approach to teaching comparative industrial relations - an approach which limits the range of countries to a small number of developed nations, which combines detailed description of these countries with genuinely comparative analysis, and which emphasises the themes of comparative method and the use of comparative study to better understand Australian industrial relations.

In discussing these three features of the course at the University of Sydney, I am obviously presenting an idiosyncratic approach derived from my personal experiences. However, I think this approach also has wider applicability and may be of interest to teachers of comparative courses in other institutions.
A Limited Range of Countries

The countries studied in this thirteen-week course are usually USA, Britain, Sweden, West Germany and Japan, along with regular references to Australia. There are several rationales for this narrow range, all of which are related to the limited knowledge and experience of the students. First, I feel that it is best to work slowly through a small number of countries rather than rush through a large number. This is especially important in a comparative course where a major theme is the interrelationship between industrial relations institutions and broader social, economic and historical forces. Given the broad knowledge of each country demanded by such an approach, students easily (and justifiably) become mesmerised by a passing parade of facts, figures and anagrams.

Second, it is best to confine attention to the developed nations because they are more familiar to students. Each of these nations have mixed capitalist economies, well developed industrial relations institutions, stable and reasonably democratic political systems. Some familiarity with these basic similarities reduces the time required to grasp the many 'facts' involved and allows attention to be focused on identifying and explaining the differences between the countries. In this way, the course seeks to exploit the logic of the 'most similar' research strategy, discussed by Castles in Chapter 1.

Third, these countries are most commonly referred to in industrial relations policy debates. It is, after all, through policy debates that most students will have encountered comparative issues and, if they are to become involved in comparative questions as graduates, the students will most likely do this in the context of researching and advocating particular policy stances. The long-running arbitration versus bargaining debate, the controversies raised by the ACTU's *Australia Reconstructed*, the constant references to the virtues of Japanese styles of management, the often acrimonious exchanges about the industrial relations effects of privatisation and commercialisation of the public sector, and the disagreements over the advantages and disadvantages of incomes policies are just a few examples of recent policy debates which involve the countries studied during the course.

Finally, a relatively small number of countries presents few disadvantages if the main theme running through course is the development of comparative method. In this way, the countries chosen can be used simply as examples of a more general approach rather than as important entities in themselves and the value of the course depends less on the countries chosen than on the comparative method developed. Effective teaching of the general approach should also enable students to apply it to any other countries confronted after the students have completed the course.
Chapter 5

A Combination of Single-Country Description with Comparative Analysis

It is commonplace for comparative scholars to lament the persistence in the field of edited books containing detailed, side-by-side descriptions of industrial relations in a series of different countries. The problem is that little genuinely comparative analysis is conducted (Bean, 1985, Preface; Poole, 1986, 6-8). The same problem can also occur in comparative teaching, with courses examining a series of countries without explicitly dwelling on the similarities or differences between them and without exploring possible explanations for these observed similarities or differences. There seems little point in a course on comparative industrial relations if no comparisons are made!

However, despite the validity of this point, comparative analysis requires a knowledge of what is being compared. Students can not and should not be expected to describe or explain comparative phenomena if they have no basic understanding of the industrial relations institutions, the history, the cultural or economic features of the countries in question.

Given these competing demands, it is best to combine the two types of study. I have found it most useful to follow a pattern of single-country description followed by comparative analysis which exploits that descriptive knowledge. I usually begin with the historical development of industrial relations in the USA, followed by exploration of 'American exceptionalism' and comparisons between the USA and Australia. Then comes Britain, followed by comparisons between Britain and the USA and between Britain and Australia. Then Sweden, followed by comparisons between Sweden and Britain and so on. This combination can also be advanced by exploiting different classroom situations. Formal lectures, for example, may be used to present the more structured descriptive detail, while tutorials or seminars can attempt in a less structured atmosphere to stimulate lateral thinking and discussion about particular comparative problems or possible explanations of comparative phenomena.

The Themes of the Course

Despite the intellectual satisfaction often gained from examining foreign situations or exploring exotic ideas, this is not sufficient by itself to justify comparative study. George Strauss put the point nicely:

One reason [for comparative study] might be that, like other foreign curiosities (Arabian harems, New Guinea sing-songs, or moonlit Venetian canals), industrial relations elsewhere is quaint, even charming... But voyeurism is hardly enough to justify a field of study. (Strauss, 1986)
Rather, comparative courses need a clear theme to provide explicit purpose and to integrate the often diverse material presented. I attempt to follow two themes, which concern the development of comparative method and the use of comparative study to better understand Australian industrial relations.

(a) Comparative Method

I believe it is vital to focus students' attention onto matters of method. They must be encouraged to think about what it is they are doing when they compare industrial relations in different countries. There are good academic reasons for such a focus, since international comparisons represent a level of analysis which almost inevitably raises theoretical issues and often provide a means for developing better theory (for example, Shalev, 1980). But there are also very practical reasons for focusing on method. The complexity of comparative analysis and the many pitfalls awaiting unsuspecting exponents mean that those unaware of method are more likely to commit the sins of superficiality we so often associate with politicians and media commentators. As already mentioned, an emphasis on method also provides a basis from which students can independently explore a broader range of countries and situations which are not necessarily covered in the course they undertook.

There are a number of scholarly accounts of comparative method in the social sciences (for example, Przeworski & Teune, 1970). However, none of these is specifically directed at industrial relations and most are aimed at scholars undertaking comparative research, especially quantitative research, rather than students requiring an introduction to the subject. Consequently, the 'comparative method' I present is reduced to five 'principles'. These principles are hardly profound or original, but they are useful rules of thumb that can be used to inform better comparative analysis.

(1) **Like must be compared with like.** In other words, when undertaking descriptive comparisons, the subject being compared must be carefully defined and the problems caused by differences of language, culture, terminology and data collection must be avoided.

(2) **Industrial relations comprises a complex set of parties, processes and relationships in which no single part can be understood in isolation from the other parts.** For example, the nature of unionism in a country cannot be understood without reference to that country's employers and state agencies, while the character of employers cannot be explained without looking at unions and the state.

(3) **Industrial relations cannot be separated from the broader society of which it is a part.** Explanations of industrial relations structures and processes must include elements of the broader society, such as the economy, politics, culture, geography and demographics of a country.

(4) **History is vital.** The present cannot be understood without reference to the past.
(5) *Beware implicit value judgments.* Comparisons all too readily involve judgements about 'better than' or 'worse than'. Such judgments are perfectly legitimate, but they must be made consciously and explicitly by identifying the evaluative criteria being used.

These principles bear repetition throughout the course and inform both single-country and comparative topics. They also encourage a critical assessment of the way comparative analysis is used in policy debates. The exchanges between the ACTU/TDC (1987), the Confederation of Australian Industry (1986) and the Business Council of Australia (1986) over the usefulness of the Swedish model provide good material here: What methods did these groups use in analysing the Swedish system? Did they observe the principles of good comparative method? Did a failure to observe these principles result in a jaundiced picture of the Swedish system and its potential as a model for Australia? This type of critical assessment of policy debates is, in fact, one area which will be developed in future courses because it has so far not been exploited to its full potential.

(b) Using Comparative Study to Better Understand Australia

Given the place of comparative industrial relations in the undergraduate program at the University of Sydney, the course is used to reinforce and extend students' understanding of Australian industrial relations. By drawing on his experience in political science, Frank Castles has already shown in Chapter 1 how this objective can be achieved: comparative study helps to describe and classify, explain, explore and evaluate the Australian experience. This same approach can be applied to industrial relations. Certainly, there are limitations in the industrial relations literature which impede the range of comparisons that can be made, but there are still many, many insights to be gained. Besides, highlighting gaps in the literature is itself a useful process.

Three examples from the University of Sydney course demonstrate the approach. The first concerns the non-union sector in US and Japanese industrial relations. Both these countries display a significant dualism between unionised and non-union companies and industries; non-unionism in Japan is confined mainly to small companies, while it extends to many large companies in the USA. A small but useful literature has emerged on the different patterns of industrial relations in each sector (for example, Chalmers, 1989; Koike, 1983; Kochan et al., 1986, Chapter 3; Garbarino, 1984; Foulkes, 1981). In most cases, non-union companies and industries in both countries are not covered by collective agreements and, within the limits imposed by legislation, management has a free hand to unilaterally determine wages, employment conditions, recruitment and dismissal procedures, the allocation of labour within the company and so on. These overseas studies raise questions rarely posed about Australia: what types of companies and industries are non-union in Australia? What are the consequences of non-union status for workers and management in these companies? How are wages determined in such situations? And recruitment and dismissal procedures etc? How important is company size in determining patterns of industrial relations in Australian firms? The answers to such questions are not
easy to find, given the lack of Australian research, but such questions allow us
to use comparisons to gain a better descriptive knowledge of Australian
industrial relations. We begin to better understand the role of a centralised
industrial relations system, the importance of 'common rule' awards, and some
of the implications of any move towards a system of enterprise-based
collective bargaining in Australia.

A second example arises from a comparison between the structure of the
union movements in Australia and Britain. Investigation reveals that the two
union movements are more similar than they are different. Both display a
complex union structure which is characterised by considerable occupational
identification, multi-unionism at workplace level, large numbers of small
unions with small numbers of very big unions, generally weak union finances
and so on (for example, Hyman, 1983). Apart from serving to reinforce and
clarify the picture of Australian unions developed in their earlier studies, this
comparison raises an interesting dilemma for students. The standard
explanation offered by Australian scholars for the peculiar structure of our
union movement focuses on the impact of the arbitration system: by
protecting small unions and 'freezing' the pre-existing structure, the arbitration
system has prevented unions from evolving towards a modern and supposedly
more appropriate type of structure (Howard, 1977; Ford & Isaac, 1971, 100;
Rimmer, 1981). The comparison with Britain challenges this widely accepted
explanation. It suggests that forces apart from the arbitration system must be
examined in order to explain the structure of the union movement. It also
serves to question the effectiveness of legislative amendments or adjustments
to the arbitration system as instruments for reforming union structure.

The third example concerns international comparisons of strike statistics.
Empirical studies in this area help to illustrate the peculiarities of Australian
strikes, especially their high frequency and relatively short duration (Creigh,
1986; Beggs & Chapman, 1985). These characteristics would seem
unremarkable without international comparison. Furthermore, reviews of the
literature suggest several different explanations of why different countries
have different patterns of strikes. Bean (1985, Chapter 6), for example,
categorises these explanations as institutional, infrastructural, organisational
and political, and economic. Do these theories help to explain Australia's
peculiar pattern of strikes, especially as the conventional explanations tend to
be of the institutional breed, focusing on the effect of the arbitration system on
the frequency and duration of Australian strikes (for example, Dabscheck &

Thus, comparative study expands students' descriptive knowledge of
Australian industrial relations by examining our institutions from a different
angle and forcing them to explore what is peculiar or unusual about our
institutions from an international perspective. Comparative study also forces
students to challenge conventional explanations by asking new questions
about Australia. It matters not that the answers to these new questions are
often unavailable because they have not been subject to scholarly
investigation. What is more important is that students are encouraged to think
laterally and develop critical analysis.
Conclusions

The undergraduate course in comparative industrial relations at the University of Sydney provides one example of the compromise between pedagogic ideals and pragmatic constraints. The account of this course presented here is designed to show that the advantages of comparative study can be achieved - perhaps are best achieved in the circumstances - by examining a relatively small number of countries in addition to Australia. The most important ingredients in the course are a combination of single-country description with comparative analysis of issues and a strong focus on specific themes. In this case, the themes pursued are those of understanding comparative method and using comparative method to better understand Australian industrial relations.

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6 Teaching Comparative Industrial Relations: The Merits of Models

Craig R. Littler

Teaching comparative industrial relations, or comparative management, is a difficult process, fraught with problems of miscommunication and misunderstanding. In addition, there is the particular problem of developing within the students an adequate knowledge base for discussion to proceed.

In terms of structuring a course, one basic issue is whether it should be organized thematically (weaving in and out of different countries/economies) or geographically. In my view, the latter is a failure to teach or think comparatively; rather it represents a tendency towards juxtaposed descriptions - a trot across the institutional map of many lands. However, a thematic organization, whilst intellectually satisfying, creates teaching difficulties because it presupposes a level of knowledge by the students which is usually lacking.

This paper considers the means of structuring a comparative course, the problems encountered and the reactions of students. In particular, the paper advocates the use of models of labour relations whereby the model acts as an ideal type - an hypothesized set of causal linkages and actor strategies - which enables comparisons to proceed and differences to be explained. The issue of industrial relations models is used to elucidate the development of industrial relations theory. The paper is organized in terms of three fundamental questions: Why compare? What to compare? How to compare?

Why Compare?

Why bother with comparative industrial relations at all? Why should students be interested in the subject area? There are two basic reasons for comparative industrial relations. The first is policy-oriented: comparison is orientated to learning from the experiences, institutions and perspectives of others. The second is theory-oriented: the problems of experimentation in the social sciences means that there must be a reliance on comparative methods, what Mills called the 'method of difference', which by careful comparison permits the elimination of spurious causes or spurious effects.
The theory orientation to comparisons need not involve an acceptance of quasi-experimental methodology. The focus may be on theory-building leading to statistical or other analysis at a different level of generalization. For example, trade unions are located in economic and social structures which involve different principles, such that the roles and functions of unions are very different in, say, competitive capitalism, corporate capitalism, developing economies or under state planning. Given this, it becomes important to make the comparative effort so that theories of trade union formation, and trade union functions are not confined to one type of political economy. These broader notions of trade union formation can then be utilized in explaining the particular experiences of one society (for example, see Littler, 1983).

What to Compare?

There are two questions involved here: What should be the unit of comparison? And what should be the range of comparison? Let me deal with each question in turn.

(a) The Unit of Comparison

This issue is usually ignored in industrial relations. One striking difference between teaching a course on comparative industrial relations and comparative management is that the former allows the nation-state to function as a unit of comparison. This unit of comparison does not seem to work in relation to comparative management in the same way. Why not? Because the flows of influence in relation to management are so much greater and faster. The institutions of multi-national corporations, international consultants across all management fields, government sponsored innovations (for example, Just-in-Time and Quality Management) permit the rapid diffusion of management patterns. In general, capital mobility accelerates the pace at which technology (including 'software' technology) engulfs entire industries and spreads across national boundaries. Consequently, it makes much less sense to talk about national management models. Even when teaching about the Japanese management model, it is necessary to make clear to the students that we are not talking about Japan as such.

This argument has implications for industrial relations; namely, employment patterns and labour markets are, at present, much more embedded in the society, institutional patterns, and culture of a specific nation-state. At present, this provides us with a convenient and commonsensical unit of analysis. But this will not last. Arguments through the 1960s and 1970s (less so in the 1980s) concerning world systems and an international division of labour need to be taken more seriously. Certainly in considering industrial relations in developing economies, it makes no sense to ignore such perspectives (see, for example, Chapter 2).
(b) The Range of Comparison

If we put to one side the issues concerning the unit of comparison and take the nation-state for granted, then there are still differing views concerning the range of comparison. In general, there is a choice between comprehensiveness versus limited range comparisons down to two country comparisons. Comprehensiveness is clearly desirable, but it is impractical: there are the obvious constraints of time and student understanding, plus the less-considered constraints of availability of literature. For example, in compiling a bibliography on Asian industrial relations (Littler, 1991), it is noticeable that there are several gaps; in particular, a marked lack of literature on South Korea, Thailand and Taiwan. Associated with this point, lecturers themselves cannot be expected to be the geographical version of polymaths - any such attempt quickly reduces course content to trite simplicities.

If then we accept the necessity of limited comparisons, what are they to be? It is important to appreciate that the axes of comparison can shape the conclusions: a comparison of the industrial relations institutions of Australia with Japan highlights certain features; a comparison with Ireland throws a spotlight onto very different processes and trends. In general, the industrial relations practices in Australia have been examined in terms of an Anglo-American model (sometimes implicitly); Britain or the USA have been the preferred countries of comparison. Less commonly, Australia has been examined in connection with a limited range of European countries. However, there are serious problems with this teaching strategy in industrial relations. The relevant comparisons should be determined not by unexamined notions of an Anglo-American model that includes Australia, nor the fashions of travel, but by a consideration of relevant comparisons in terms of economic scale, world position (core versus periphery) and industrial structure. On this basis, the relevant comparisons for Australia are the semi-peripheral, 'settler' economies of New Zealand, Canada and Argentina, not the massive, dominant core economies of the USA or Japan. However, we are all guilty of this type of error (myself included) and there is the underlying question of the objectives of comparative industrial relations. Many of us want to teach students about the institutions and practices of their immediate economic and geographical neighbours. Increasingly Australia is part of, and locked into, the Pacific Basin economy and yet much of our teaching still reveals a colonial legacy mentality.

How to Compare?

There are three broad sets of variables which need to be considered in connection with any industrial relations system:

(a) modes of state regulation/involvement;
(b) patterns of ownership and control;
(c) forms of unionism and articulation of interests.
In combination, (a), (b) and (c) give rise to different sets of actor strategies which cumulatively structure industrial relations over time. The basic task here is to construct models of industrial relations by isolating out the principles of a limited range of economic and social structures plus the hypothesized causal linkages. The trick is to pre-figure the range of systemic isomorphism. This is a process which involves uncertainty, selection and idealization.

For example, can we talk about an Anglo-American model of labour relations? What about American 'exceptionalism' (Davis, 1980)? In some senses there are significant commonalities between the Anglo-American countries: adversarial collective bargaining, relatively autonomous unions arising from rank and file mobilization, an acceptance of pluralism, and unions operating within a market system which emphasizes the separation of the political and the economic. However, are the differences more important than the similarities? What weight do we give to the fragmentation of the working class in the USA (ethnic consciousness versus class consciousness), the lack of a labour party, and the differences in legal frameworks? There is no simple answer to these questions: the acid test is whether the causal weight (in terms of scope and intensity) of the common set of factors is greater than the weight of the factors we refer to as American 'exceptionalism'. My own view is that it does make sense to talk about an Anglo-American model: the differences are important, but they exist at the level of structures, not the basic type. It is possible to isolate out common social and political features which constitute a significant set of interlinkages at a general level of abstraction.

There are many ways to construct a model and many of them do not get us very far. For example, we could construct a colonial legacy model (a notion which is often implicit in the literature). However, if we defined such a model as the abstract commonalities of the industrial relations systems of those countries which were once the colonies of Britain, it rapidly becomes clear that though there have been patterns of influence, the differences outweigh the similarities. Countries like Malaysia and the former African colonies do not easily group with Australia and New Zealand. Apart from the obvious cultural and social differences, the timing and extent of industrialization and urbanization are radically different.

Why bother with models of industrial relations at all? What is the utility of such models? Why not adhere to general theories which can be used across all economies? One answer to these questions is that there are no general theories in industrial relations. Indeed, this issue goes to the heart of much industrial relations writing. In a neglected paper, Kassalow (1983) argued for an historical-comparative view of industrial relations models. It is possible to build on and adapt his work in order to gain some critical insights. This argument is developed below.

The basic argument is that the focus of industrial relations writing at any one point is derived from specific policy issues. This focus leads to a specific industrial relations theoretical concentration which, in turn, leads to the identification of 'models'. Such models are idealizations of the industrial
relations practices of specific countries (for example, 'Japanese industrial relations') which legitimates various labour relations 'reforms' in other countries. Further, industrial relations theory can be identified in terms of a set of models, or paradigm shifts, which are non-cumulative. Part of the argument is set out in Table 1 below.

**Table 1: Paradigm Shifts in Industrial Relations Theory**

<table>
<thead>
<tr>
<th>Dates</th>
<th>Country Used as Model</th>
<th>Theoretical Focus</th>
<th>Policy Problematic</th>
</tr>
</thead>
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<tr>
<td>1870s to end of 19th C</td>
<td>U.K.</td>
<td>Nature of trade unionism</td>
<td>Problematic of the institutionalization of trade unions</td>
</tr>
<tr>
<td>End of 19th C to WW 1</td>
<td>Germany</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1918 - 40s</td>
<td>No clear model</td>
<td>--</td>
<td>WW 1 destroyed Germany as a model, while 1926 destroyed the U.K. as a model. Unions weak in most developed countries.</td>
</tr>
<tr>
<td>1945 - 1960s 1960s</td>
<td>USA Sweden</td>
<td>Systems theory</td>
<td>Problematic of legislative frameworks and restructuring post-1945</td>
</tr>
<tr>
<td>1970s 1980s</td>
<td>Germany Japan</td>
<td>Employment relationship</td>
<td>Problematic of workplace industrial relations and worker commitment</td>
</tr>
</tbody>
</table>

What Table 1 indicates is a series of non-cumulative industrial relations models which constitute idealized views of the practices of certain countries derived from a specific policy nexus or problematic. The perceived policy answer (whether British pluralism and laissez faire or Japanese enterprise unionism and enterprise bargaining) helps to shape the orientation and perspectives of industrial relations writing: the process is interactive. However, this has consequences: it forecloses the development of systematic comparative research. This is indicated in Figure 1 below.
What is desirable as a method of research and theory-building is the opposite process, namely systematic comparative research leading to the development of industrial relations theory leading to soundly-based policy prescriptions. We are all sufficient realists to appreciate that this is a rationalist's dream. Nevertheless, students need to appreciate the best processes of theory-building and the limitations of existing ideas. In my experience over many years of comparative teaching, the use of models has proved its worth. The method has the following advantages:

(a) students are taught to focus on the abstract essentials and the learning load is reduced, with the result that students do not get lost in a welter of institutional and legal detail;
(b) comparisons between exemplifications within each model are facilitated;
(c) comparisons between models are facilitated.

In general, comparative industrial relations is an excellent terrain in which we can attempt to teach students how to think theoretically; how to ask theoretical questions and to construct their own models of practice and process.

Conclusions

I have considered the issue of comparative industrial relations in terms of three questions: Why compare? What to compare? And how to compare? With respect to why compare, it has been argued that comparative labour relations, as a subject, has been utilized as a policy box (How to learn from the Germans? How to learn from the Japanese?). Nevertheless, the subject area has enormous potential in terms of theory-building. Both objectives are important in terms of the future of comparative studies. For our students, they can learn both the limits of ethnocentricity and how to think theoretically.

In connection with the what to compare question, there are no simple answers. In part, it depends on objectives and the objectives pull in different directions: policy orientations suggest study of the large, successful economies of Japan and Germany; theory-building suggests more concentrated efforts in terms of comparable economies such as Canada and New Zealand; reductions in ethnocentricity suggest more focus on the Asian economies, especially as these are our major trade partners (see Garnaut, 1989). Theory-building
suggests more extensive comparisons, whilst 'teachability' indicates more limited comparisons. Underlying these issues is the question of the continued relevance of the nation-state as the unit of comparison.

In connection with how to compare, it has been argued that the theoretical legacy of industrial relations has impeded the construction of general concepts. Instead, concepts, whether from the Webbs, Dunlop or Kochan, are policy-derived, history-bound and culture-bound. Consequently, the processes of comparison themselves can be used to generate more general concepts, particularly by means of model-building. Moreover, this method yields excellent results in terms of student learning.

One final word: we should not be sanguine about the future of comparative industrial relations as a subject. Human Resource Management, an increasingly dominant orientation, has a dynamic towards the micro-level and away from systematic comparative studies. If we wish to continue to teach comparative industrial relations, then we need to argue the case.

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7 Industrial Relations in ASEAN and Other Capitalist Countries

Melanie Beresford and Diana Kelly

The theory and policies of industrial relations both stand to benefit significantly from rigorous comparative analysis, but because there are so many lessons to be learned many approaches to comparative analysis are also possible (Bean, 1985; Shalev, 1981). This is particularly true of analysis involving areas such as those outside the traditional industrialised capitalist countries of the Organisation for Economic Co-operation and Development (OECD). For many, the basis for analysis of this grouping compared with others lies in the convergence/divergence debate (Lash & Urry, 1985). The limitation of such a debate for comparative industrial relations is that it locks analysts into one or the other, and in doing so places undue constraints on our understanding. In this paper, we seek to demonstrate that comparative analysis of industrial relations in the countries of the Association of South East Asian Nations (ASEAN) can be undertaken to identify similarities and differences within the nation-states in this grouping, and between ASEAN, OECD and other groupings. This is achieved through recognising the employment relationship as the 'core industrial relation' (Keenoy, 1985), and then examining the ways in which the parties seek to regulate the employment relationship. This is achieved by use of a hierarchy of explanatory levels including, firstly, the mode of production; secondly, the labour process, which is the concrete expression of the employment relationship at a given stage of capitalist development; and, thirdly, the distinguishing cultural and historical features.

Levels of Explanation in Comparative Analysis

The basis of all comparative studies in industrial relations is the single unifying concept of the employment relationship. Essentially, what we try to achieve is an understanding by students of how the employment relationship works in different types of economic systems and under different historical conditions. What is universally true about the employment relationship is that it is a power relationship, but the distribution of power and its mode of operation vary between modes of production and cultural systems. Faced with a plethora of industrial relations systems (in the institutional/cultural sense) how are we to make sense of them? One approach, such as that taken
by Siddique (1989) and Sharma (1985), is to surrender to the overwhelmingly apparent differences and find a unique explanation for each 'unique' industrial relations system. This comes very close to the approach which Kahn-Freund somewhat xenophobically identified as 'foreign industrial relations' (Kahn-Freund, cited in Schregle, 1981). The other approach, which we follow, is to attempt to abstract what is essential to understanding the distribution and operation of power in the employment relationship from each case.

The process of abstraction involves a number different levels of explanatory priority. At the most basic level, the concept of mode of production provides an explanation of the distribution and operation of power that is capable of distinguishing between broad 'systems', such as capitalism, socialism and feudalism (Kalecki, 1976). Clearly, however, the degree of abstraction which is involved in the mode of production does not capture the reality of industrial relations in any particular country. There are notable differences, such as the class structure and the level of development, between ASEAN countries, taken as a bloc, and the major OECD countries.

The single most important mechanism through which the level of development affects the employment relationship is the labour process. This is because capitalist development, especially capitalist industrial development, effects changes on the labour process by increasing the social and technical division of labour and transforming both the type of technology people are working with and the concomitant ability of workers to exercise control over the pace and intensity of work. In ASEAN countries, as in other less developed areas of Africa and Latin America, there is an extremely broad range of technologies and labour processes, from traditional agriculture and artisan crafts to the most sophisticated industrial production processes. As will be shown below, the range of labour processes and uneven patterns of technological development have led to a variety of patterns of industrial relations, some of which parallel those in OECD-type economies, and others which are dissimilar.

A third explanatory level of these different patterns is needed since there are many aspects of the employment relationship which are still not captured by recourse to abstract analysis of either mode of production or the labour process. These are the historical and cultural developments within ASEAN countries, some of which may justify treating ASEAN as a bloc, and some which signify important differences among ASEAN countries such that wholesale generalisation could lead to serious mistakes. Many of these differences can be attributed to the place of the 'leading industry' in the country (Hoffman, 1958); that is, the industry branch or sector which has the greatest effect on industrialisation during a given stage of its economic development (Limqueco et al, 1989).

In the following sections we briefly describe the comparative industrial relations course as it was taught at the University of Wollongong in 1990. Then, taking the three levels of explanatory priority as the basis for analysis, we discuss the transformation in the structure of capital accumulation in ASEAN since 1960, with its implications for the role and tactics of capital,
the state and workers in their respective attempts to control the employment relationship. In the process we seek to develop an understanding of industrial relations in ASEAN, and yet, at the same time, we emphasise and demonstrate the comparability of ASEAN countries with those in other groupings.

Comparative Industrial Relations: A Third Year Subject

A general objective of the course is to explore the ways in which economic imperatives will determine the employment relationship. In this respect, we take the underlying assumption that ASEAN is part of the capitalist system, not some separate economic system. There are unique features due to the historical conjunctions, but the dominant mode of production is the same as Australia or other OECD countries. The ASEAN countries are capitalist economies, even if they are less developed and facing different pressures to those which countries like Australia faced at similar stages of development. Thus, we examine not only what is unique about ASEAN, but also what are the similarities in the employment relationship and in the ways the industrial relations parties seek to control this relationship in ASEAN compared with other capitalist and socialist countries studied in the course.

We can do this not only because ASEAN countries have eminently comparable features to OECD countries which derive from the fundamental sameness in the economic systems. We can also compare OECD, ASEAN and state socialist countries because one of the strengths of a rigorously applied comparative analysis is that the employment relationship can be studied as a relation in any mode of production or stage of economic development. Without this 'core' relation, comparative analysis would be a limited tool indeed. In all industrial relations there are universal conditions, which include the employment relationship, at the core, and a state which seeks to maintain and advance the dominant mode of production. In capitalist countries employers seek to expand their control over production, distribution or exchange, and employee organisations attempt to advance the interests of some or all workers. The nature of the labour process, management strategies and tactics, and the structure of the labour market all flow from this commonality of issues.

What we have said above emphasises what we see to be central aspects of a comparative industrial relations course. Our teaching is based on two defined needs in this type of course. The first is that students should have a strong understanding not simply of the industrial relations 'system' itself, but that system should be seen to be embedded in the context of each country's political economy. There is a danger when teaching comparative industrial relations of examining trade unions, for example, without taking into account the contexts in which these trade unions have developed. Similarly, there has been a tendency to examine the role of the state only insofar as it pertains to industrial relations legislation, despite the fact that many other legislative and regulatory activities of the state will impinge on the nature of industrial relations. It is perhaps a consequence of trying too hard to give industrial relations definable disciplinary boundaries as a means of justifying our
existence that we exclude significant forces at work on and in the arena of industrial relations that may not be immediately identifiable as 'industrial relations' (Kalecki, 1976).

The second need in a comparative industrial relations course, which has received closer attention, arises from the danger of comparative industrial relations not being comparative at all, but simply 'foreign industrial relations'. In our course, and paying lip-service to the age of acronyms, we used the blander term IRIOC - Industrial Relations In Other Countries - to cover that part of the course which seeks just to develop students' understanding of industrial relations in particular countries.

IRIOC is covered in the first half of the session, which begins with an introductory section on the nature and differences between IRIOC and comparative industrial relations. The goal of IRIOC analysis is to assist students in developing a basic knowledge of industrial relations within the framework of the economic, social and political contexts of each country being studied. Content also includes a small amount of illustrative comparison between ASEAN countries and between 'East' and 'West' on larger issues of political and industrial rights, and the role of the state.

The second half of session concentrates on expanding knowledge of specific aspects of countries or sub-systems, emphasising the ways in which comparative industrial relations can illuminate understanding of industrial relations concepts and policies. The employment relationship for women, for example, can be compared between ASEAN, state socialist and OECD countries, where in each case there are clear similarities and differences. Recognition of both the similarities and differences highlights students' understanding of both the gender issues, and the ways in which the employment relationship is controlled and administered in different countries.

Since our brief in this paper is to describe and assess our teaching of industrial relations in ASEAN, we will now focus on this aspect.

Given the political economy framework described above, it follows that our analysis of economic development in ASEAN flows from ways of analysing developments in the capitalist economy in general, together with a theory about the role of the state in capitalist societies. What is important in introducing students to ASEAN industrial relations, then, is that the systems and their determinants are comparable with other systems. From this assumption of comparability, comes the first step in understanding industrial relations within each of the ASEAN countries. Students can develop their capacity to use comparative analysis if, first, they have an understanding of the mode of production and the way this is affected in each country by the internationalisation of capital. By examining the responses and policy adjustments of developmentalist states in ASEAN, the impact of the changing pace and level of development can be measured. As well, the effect that the introduction of different production processes have on the labour process offers more understanding of the nature and determinants of the employment relationship. Since there are obvious differences between each of the ASEAN countries, these are analysed through an understanding of the ownership, role
and contribution to national productivity of the leading industries. We discuss
these in the course of our examination of the role of the state and the diverse
forms of resistance by labour. As in almost all industrial relations analysis,
however, the latter can only be explored and analysed once an understanding
of the economic context in which government officials and private employers
have to operate, is attained.

Just as there are fundamental similarities in the employment relationship
throughout the capitalist world, so there can be fundamental similarities
among these countries in the ways in which employers, the state and trade
unions will attempt to control and regulate the employment relationship,
directly and indirectly. It is important to explore the indirect aspects of
control over the employment relationship, since events or policies which
affect labour market participation or the right to protest against governments,
for example, can determine the nature and pattern of industrial relations
without being directly aimed at industrial relations. The Green Revolution in
agriculture, for example, has yielded an influx of peasants into the cities
which has had immense effects on the urban labour markets. Another
example of this point is the Internal Security Act in Malaysia, which was
implemented as an anti-communist device, but which also destroyed the links
between trade unions and politics. Similarly, the racially discriminating laws
in Malaysia, which are used as a means of restructuring the labour market,
have the equally intended effect of constraining industrial relations processes.
The advantage of a political economy approach is precisely that, because it
begins from power relations in the capitalist mode of production, it can
explain the employment relationship in terms of such apparently unrelated
historical and cultural phenomena.

Thus, the Southeast Asian countries have particular contextual features which
differentiate them from those of OECD countries, but these are consequences
of the stages of development or the conditions under which development is
taking place rather than differences in the fundamentals of the system. There
are clearly important differences, however, between ASEAN countries, taken
as a bloc, and the OECD countries which are not covered by discussion at the
'mode of production' level. Not only is the class structure of the so-called
'Third World' countries often very different from that in the West, large
numbers of peasant farmers being one obvious difference, but the different
levels of development also have a fundamental impact on the employment
relationship.

For example, the international economic environment has been increasingly
competitive and interlinked in recent decades and this has had significant
effects on the policies of nations and multinational companies, especially
since globalisation affects both bargaining power and the ability of ASEAN
countries to find export markets. OECD countries are affected by the same
processes but, because of their underdevelopment, ASEAN countries are
placed under extra pressure to reduce costs of production, including labour
costs, in order to remain competitive. Similarly, the pace and nature of
technological change in the late twentieth century, when the ASEAN
countries began to industrialise rapidly, have meant that the Less Developed
Countries (LDCs) have a further disadvantage. They are commencing their development a long way behind the technological frontier and are therefore likely to remain dependent upon technology imports from the advanced countries for some time. This leads many of them to go to extreme lengths to acquire foreign investment and its attendant technological transfer (Limqueco et al., 1989). The need to compete with other LDCs to attract foreign investors clearly has ramifications for industrial relations policies and practices, as does the wide spectrum of techniques which prevails behind the technological frontier.

Capital, Economic Development and the Labour Process in ASEAN

The global economy has altered fundamentally since the 1960s with the expansion of Transnational Corporations (TNCs) and the rise of new centres of capital accumulation such as Japan, South Korea and Taiwan. The ASEAN countries, as 'second-tier NICs' (Limqueco et al., 1989), have responded to these international developments in a variety of ways, reflecting their different historical contexts and the characteristics of their states. A dynamic framework needs to be used, therefore, as the basis for identifying the similarities and the differences between particular ASEAN countries and between ASEAN, OECD and state socialist countries.

From a very low level, the rate of industrialisation has been rapid in Southeast Asia since 1960. While none of the ASEAN countries received the massive injections of US aid supplied to Japan, South Korea and Taiwan in the postwar period, they have nevertheless benefited indirectly from the growth of the East Asian economies and the rapid rise in foreign trade and investment flows that these generated. American expenditure in the region related to the Vietnam War provided a further external stimulus to economic growth in countries like Thailand and the Philippines during the 1960s, while Indonesia and Malaysia gained from the oil price increases of the 1970s. With the exception of Singapore, the ASEAN countries are all rich in human and natural resources. Domestic policies pursued by the post-colonial regimes have been inspired by strong developmentalist ideologies, the goal of industrialisation remaining uppermost in the plans of each regime, ranging from ultra-nationalist to fawning pro-American, from military dictatorship to the relative liberal democracy of some countries today.

This combination of expanding regional and global economy plus the determination of individual states to pursue policies geared towards industrial (rather than resource-based or service sector) development brought a dramatic change in the structure of ASEAN economies in the 25 years after 1960, as illustrated by the figures presented in Table 1. In just 30 years the percentage of the labour force in agriculture has dropped to the extent that in Malaysia and the Philippines it is well under 50 per cent, while Indonesia is rapidly approaching that figure (World Bank, 1989). A major spin-off from the rapid growth of industrial output has been the expansion of employment in the service sector (Herrin, 1972), which adds to the changing composition of the labour force and has important consequences for industrial relations.
Table 1: Changes in the Economic Structure of Five ASEAN Countries

<table>
<thead>
<tr>
<th>Country</th>
<th>Industry as a Percentage of GDP</th>
<th>Manufactures as a Percentage of Exports</th>
<th>Percentage of Labour Force Engaged in Industry</th>
</tr>
</thead>
<tbody>
<tr>
<td>Singapore</td>
<td>18</td>
<td>37</td>
<td>26</td>
</tr>
<tr>
<td>Malaysia</td>
<td>18</td>
<td>*36</td>
<td>6</td>
</tr>
<tr>
<td>Thailand</td>
<td>19</td>
<td>30</td>
<td>2</td>
</tr>
<tr>
<td>Philippines</td>
<td>28</td>
<td>32</td>
<td>4</td>
</tr>
<tr>
<td>Indonesia</td>
<td>14</td>
<td>36</td>
<td>0</td>
</tr>
</tbody>
</table>

*Note: * 1981


Industrial relations in ASEAN does not take place in some kind of more 'primitive' setting than in the OECD countries. The days when wage labourers were referred to by the pejorative term 'coolies' are long past and instead the very rapid industrialisation of the last three decades in all the ASEAN countries has created a permanent and increasingly sophisticated workforce (Limqueco et al., 1989). The common characterisation of industrial development as consisting of labour-intensive, low-technology production processes introduced by essentially migratory TNCs seeking cheap labour, is only partly correct. There is, in fact, considerable deepening of capital structure taking place, causing the ASEAN economies increasingly to take on the industrial characteristics of the West.

One indicator we use to illustrate this rapid deepening of the industrial structure is the 'Hoffman Index' (Hoffman, 1958). Hoffman showed, in his study of European, North American and Japanese industrialisation, that each country passed through an initial stage in which consumer goods industries played the role of 'leading industry' (usually food processing and textiles). In the early stages of industrialisation, the ratio of these consumer goods outputs to capital goods was around 5:1. Later on, as demand for capital goods expanded and technological change speeded up, capital goods production increased its overall weight in the economy, eventually reducing the above ratio to around 1:1. Measurements which have been done for some of the ASEAN economies show that, while the ratio stood at about 5:1 in 1960, the index for the early 1980s was around 2.5:1 for Thailand and 1.5:1 for Malaysia (Limqueco et al., 1989). In Singapore, capital goods account for more than half of manufacturing output (McFarlane, 1988).

This does not, of course, indicate that ASEAN countries have already reached Western levels of industrial development, nor that uniform labour and technology endowments have emerged. While the rate of change has been spectacular, the impact on employment and production has been very mixed within ASEAN. Excepting Singapore, the relatively low level of
industrialisation and lack of industrialised agriculture mean that there is wide spectrum of techniques in use. Some labour processes that are common in ASEAN, such as plantation labour and the widespread artisan techniques in manufacturing, exist only in pockets in the West. They co-exist with labour processes which imitate the most sophisticated Western ones: the strongly developmentalist nature of the regimes, has caused them to build steelworks, petrochemical plants and nuclear power reactors. In between there is a vast array of old and new technologies and industrial relations which may parallel those in similar industries in OECD countries.

In the garments industry, for example, there are many common features such as low pay, predominance of females, widespread undercutting of legal pay minima and regulation of conditions, quiescent unions and low levels of unionism, and a large reserve army of unemployed workers waiting in the wings (in the case of the Philippines read 'peasants', in the case of of the OECD read 'cheap Asian garment workers' who are increasingly illegal immigrants). Moreover, some industrial labour processes in ASEAN have to be seen as extensions of those in the West. In the electronics industry, for example, the establishment of enterprises using cheap Asian labour is actually part of the US or Japanese employment relationship itself, while the complete dependence of the Asian workers on the viability of the 'mother-industry' in the West has implications for their own industrial relations.

Much of the capital goods sector in ASEAN exists on borrowed technology and few, if any, industries are at the leading edge of technology. But the Hoffman Index does indicate a significant and rapid change in the industrial structure towards greater diversification and complexity, growing technological sophistication and increasing levels of skill among the industrial workforce. Moreover, shortages of skilled labour are now one of the key bottlenecks facing manufacturers in these countries. This hardly fits the image - widespread in the New International Division of Labour (NIDL) literature - of a dispensable labour force of young females who can be discarded and replaced from the inexhaustible reserve army of unemployed ex-peasants. To be sure, such sectors exist and are still important, especially in the garments and electronics sectors of Malaysia and the Philippines, but increasingly among the worries expressed by employers are factors like the low level of education among Thai workers, the lack of trade schools in the Philippines, or the difficulty in holding skilled workers in what is essentially a sellers market. These developments clearly have significant implications for the employment relationship and show the importance of using a dynamic framework of analysis.

However, there are further aspects of the employment relationship which are not captured by the abstract models of the capitalist economy. We need, therefore, to introduce the third level of explanatory priority which brings in specific historical and cultural development of the countries being studied. Some of these justify treating ASEAN as a bloc, especially if the focus of analysis is on the global economic system, but mostly they do not.
The historical and cultural factors which ASEAN countries have in common include a powerful history of regional and international maritime trading; a polyglot ethnicity which is distinctively Southeast Asian, being neither Indian nor Chinese, although carrying strong cultural influences from the Indian sub-continent; Malay as the lingua franca, except Thailand and Singapore; European and North American colonialism, except Thailand, which nevertheless experienced strong British and other Western influences; Japanese occupation and/or alliance during World War II, followed soon after by political independence; and finally, a substantial ethnic Chinese community which dominates in the business sector of each country.

There are, however, many historical and cultural factors which the ASEAN countries do not share, and many of these immediately influence the employment relationship. Malaysia and Singapore, for example, inherited their legal and political system from the British, the Philippines from America, Indonesia largely from the Dutch, while the Thai have developed their own blend of monarchy and bureaucracy. There is no common religion, but rather five major ones, if Confucianism is counted as a religion which is dubious. Singapore is urban and industrialised, in contrast to the others which have large rural hinterlands and politically important peasant populations. Malaysia and Indonesia are oil exporters, while Thailand and the Philippines are net importers, and Singapore is a major exporting refiner. Thailand and Indonesia have close relations with Japan, due to wartime alliances with local politicians. The other countries suffered at the hands of the Japanese and, while this has not, in the long run, affected acceptance of Japanese investment, it has led to a more circumspect attitude to the Japanese way of doing things. Indonesia, Thailand and the Philippines have all experienced long periods of military/civilian dictatorships, while the others have had elected civilian governments, albeit highly authoritarian in style. The regimes have varied in outlook from highly nationalistic, concentrating on import substitution, nationalisation of foreign companies and establishment of a large public sector (such as Indonesia under Sukarno), to moderately, but never wholly, laissez-faire and pro-Western (for example, Singapore), with a great variety in-between. A great many of these variations derive from the actions of colonial and post-colonial states and, for these reasons, we find it essential that the students have a clear idea of the contemporary role of the state in ASEAN.
The Role of the State

In each country, the economic and political role of the state rests on the historical development of a political culture, which reflects the legacy of colonialism, the nature of the struggle for independence and the way this culture interacts with economic development. The task of the state in advancing the well-being of capital is thus influenced not only by the stage of development, but also by historical factors which are peculiar to each society. In Malaysia, for example, two elements in the political culture are pervasive and have a crucial bearing on the industrial relations context. These are ethnic relations and anti-communism. Both have their origins in the economic and political structure created by British colonialism. The Malayan Emergency (1948-60) resulted from an attempt to protect capital by destroying a communist threat which was, prior to 1948, largely expressed in political trade unionism (the General Labour Unions) (Stenson, 1970; Morgan, 1977). The extension of this struggle into the realm of guerilla warfare and the repressive legislation which followed in the wake of the Emergency, although directed at controlling the wider Malaysian society, have had the crucial impact of keeping the predominantly Chinese working class without effective trade union representation for most of the post-independence period (O’Brien, 1988). The question of ethnicity is not merely one of managing a so-called 'plural' society, but of managing it in the interests of capital.

Another example of state action with a strong bearing on the employment relationship is the Green Revolution, in which technological advances, with their need for higher levels of investment, have forced farmers from their lands or required off-farm employment (Islam, 1984; Ofreneo, 1980). The new urban populace have been in the main a displaced population, separated from traditional family support by government programmes promoting Green Revolution, such as Indonesia's BIMAS and the Philippines' MASAGANA 99. They may also live within societies which have been ethnically restructured through government policies, such as Malaysia's New Economic Policy. Such economic development policies have affected the nature of the employment relationship as these countries attempt rapid industrialisation in a manner which aims to make cheap and docile workforces available, not just for TNCs, but also for enterprises which are developed as a consequence of locally funded capital or state ventures. The intervention of the state in industrial relations in ASEAN is thus not simply limited to legislation specific to the control and administration of labour relations at the enterprise level, but it is one which covers many facets of economic and social life. This, of course, is not limited to ASEAN, as the great range of non-labour laws which affect the employment relationship in any country attests.

There are, however, tensions and contradictions in state policy caused by conflicts of interest between different fractions of capital. An example is provided by Malaysia, where government policies of rural poverty alleviation and consolidation of Malay land ownership, have helped to slow the flow of rural-urban migration, leading to labour shortages in the industrial sector (Hing Ai Yun, 1985). Ethnically-based policies can thus be dysfunctional to the interests of TNCs and local capitalists seeking cheap, docile labour and,
we believe, contribute significantly to the repressive legalism of Malaysian state involvement in the industrial relations processes in order to offset this impact. In the Philippines, almost by contrast, promotion of the Green Revolution combined with the inability or unwillingness of the state to challenge the power of landlords has been a major contributor to rural poverty and the flow of migrants to cities and overseas. Together with other policies aimed at achieving wage reductions, pursued in the hope of attracting foreign investment, this immiseration has destroyed the market for numbers of firms producing for domestic consumption and created a fetter to further industrial development.

Not one of these aspects, (rural/urban migration, the attempts to industrialise through ensuring the availability of a low cost workforce for local, state and international capital, and the prevailing, rather specific legislative provisions to meet these needs) is unique to ASEAN, although debates about them abound in much analysis of ASEAN. Nor are they the same in all ASEAN countries. In Thailand, industrialisation has occurred through policies which reflect the greater role of the military in the state, whereas the kinds of close links between the state and capital to be found in the Philippines have been more heavily influenced by the colonial structures. The emphasis has varied in different ASEAN countries, according to their historical background, but these broad themes provide a useful basis for analysis, which does not elide the specific features of industrial relations in each country.

**Forms of Worker Resistance**

One of the clearest things which emerges from a study of the employment relationship in ASEAN, using the political economy approach that we have adopted, is that not only is there an enormous variety of trade unionism, but much resistance does not take place within the 'normal' industrial relations institutions at all. Probably the most outstanding example is that of the mass hysteria that broke out in certain electronics factories in Penang in the 1970s. This is an industry in which workers have been banned from joining the relatively militant Electrical Industry Workers' Union, by the device of creating a legal definition of the electrical industry which excluded electronics. A study of the causes of the outbreaks cited working conditions (such as monotony, poor layout of work-place, exposure to toxins, supervision methods, lack of privacy for Muslim women) and pointed to the lack of alternative outlets for the expression of grievances (Limqueco et. al., 1989). Such outbreaks have also occurred in Singapore and Japan, but rather than seeing this as uniquely Asian, we encourage students to seek examples of non-institutionalised expressions of protest by workers in other systems; alcoholism in the Soviet Union, and sabotage and petty theft in Australia are two examples that come to mind.

Within the institutional industrial relations structures we can also see a variety of responses, not only in the attempts by the state to mould the trade unions into a pliable model, but also in the frequent refusal by workers to join 'the system'. Some house unions in the Philippines, for example, do not follow the
usual Western pattern, but often represent an attempt by workers to escape the large labour federations, their corrupt officials and pressure to embrace close relations with the state (Limqueco et al, 1989). This leads to a proliferation of smaller unions. Such proliferation exacerbates the existing weakness of the labour movement and is, moreover, often encouraged by employers. None of these characteristics seems unique to ASEAN. The capacity for corruption of officials, close relations of leaders of big unions with state officials, politicisation, fragmentation, and the low or variable levels of union membership are all features of the capitalist employment relationship in the late twentieth century.

Politicisation of unions is another feature which is common in Thailand, where several of the larger unions are dominated by factions of the army or police (Wehnhorner, 1983), and in the Philippines, where the Trade Union Congress of the Philippines was for many years an instrument of government policy, while the Kilusang Mayo Uno (May First Movement) has strong connections to the Communist Party of the Philippines. It is also a feature of much international cooperation which takes place between the Asian trade unions and organisations like the International Confederation of Free Trade Unions, the World Federation of Trade Unions, Friedrich Ebert Stiftung and AAFLI (the Asian offshoot of the US-based AFL-CIO). These organisations not only attempt to mould the Asian unions in their own image (something which exposes an important political characteristic of unions in the West), but through their provision of finance often end up weakening the unions by corrupting local officials. An alternative model of international cooperation, which does not interfere in local trade union development, can be seen in examples like the Malaysian Airlines System's dispute of 1978-9. Overseas unions undertook supportive action which so threatened to undermine the state's authority in industrial relations matters that the Malaysian government now requires official approval for all international contacts with Malaysian unions (Lent, 1984). Where financial handouts have resulted in unions moving closer to the pliable model of state policy, action taken at the grassroots level, even where not successful, can help maintain the independence of workers' organisations. Discussion of cases like these which expose the ambiguities involved in different forms of organisation, not only illuminates industrial relations in ASEAN, but can assist the students in understanding the modus operandi of unions in the opposite situations to those found in the OECD countries.

Conclusions

The brief we were given for this chapter was to show why we considered ASEAN industrial relations important and what have been the main themes and methods by which we teach it. We make ASEAN industrial relations a central topic of the comparative industrial relations course for several reasons. These are that, first, ASEAN countries are in the region nearest to Australia. The current and future importance of these countries to the Australian economy argues for much greater effort to expand and enhance understanding of ASEAN for itself and for a clearer picture of the nature of industrial
relations in countries which are both trade competitors and partners of Australia. The haste with which Australian universities are rushing to teach students from ASEAN countries attests to the growing wealth and economic significance of these countries. Further, as we have shown, industrial relations in ASEAN are not unique, and so can be taught in company with that of other, more developed countries. While industrial relations in ASEAN countries are clearly complex enough to warrant a full course of their own, the aim of a rigorous comparative industrial relations course is not simply to expand students' knowledge, but also their capacity to research and analyse, making use of comparative method. By teaching ASEAN industrial relations along with other groupings, we can introduce them to systems with which they are unfamiliar, yet which have direct relevance to an understanding of their own economy and industrial relations.

As we have also shown, there are important themes and issues which can be drawn from an exploration and analysis of industrial relations in ASEAN - themes and issues which are central to understanding the nature of industrial relations in this region, as well as to comparative industrial relations in general. These relate to the imperatives of international and local capital, the levels and pace of economic development in relation to developed capitalist and socialist economies, and the range of strategies and tactics employed by governments, employers and employees in meeting economic demands.

The method of teaching ASEAN industrial relations, as with other groupings, is by use of a political economy framework. The underpinning analytic device, the concept of power in the employment relationship, allows for a basic understanding of constraints and opportunities for the parties in their attempts to control the employment relationship in the ASEAN countries. The key link between the specific histories and cultures of the ASEAN countries, on the one hand, and the abstract model of the capitalist mode of production, on the other, is the way in which different labour processes are adopted and incorporated. In the three levels of explanation employed, the labour process is the simplest and most comprehensive expression of the employment relation. It is this framework which, by viewing the employment relationship at different levels of abstraction across an array of contexts, enables the students to expand their understanding of a variety of systems and issues in a comparative way.

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8 Teaching the Industrial Relations of the East Asian NICs

Chris Leggett

An immediate question arises when introducing a comparative dimension to the study and teaching of industrial relations; that is, what shall be the criteria on which to base the selection of national industrial relations systems for a particular syllabus or program? Concentrating on the phenomena of indigenous industrial relations may be justified as pragmatic. However, even here, insight may be gained from selected comparisons with other countries (Bamber and Lansbury, 1987, 9). Many national systems have borrowed or had imposed upon them the institutions of another country, especially those with a colonial legacy. In the 1960s, with the breakup of the European colonial empires, comparative studies focussed on the emerging independent nations. In this genre were the studies of Meynaud and Salah-Bey (1963), Roberts (1964) and Davis (1966), who each employed a combination of geographical and colonial legacy criteria to analyse the development of trade unionism in Africa. A little earlier, Dunlop (1958) had premised his claim to have raised the level of generality with his *Industrial Relations Systems* upon the need to be more theoretical with the expanding data on the then newly developing countries.

More recently, Bamber and Lansbury (1987) have used culture as a criterion (among others) for the selection of comparative studies of national industrial relations by distinguishing English-speaking countries from Continental European countries, and these in turn from Japan, in an edited text of international and comparative readings. Their approach is qualitatively different from that of Bean (1985), whose text for the most part offers cross-national comparisons within a number of mainstream areas. Comparative attention to areas or themes, but usually country by country, has been the approach of the annual *Bulletin of Comparative Labour Relations* and from time to time by publications of the International Labour Organisation (ILO) and its institutes, in particular the *International Labour Review* and *Labour and Society*. The advantage of the country by country approach is that it provides students with, for the time being, up to date material on each of different countries, but leaves the comparative analysis using supplied criteria largely to them. The advantage of the area or theme approach is that it furthers the development of a genuinely comparative paradigm by bringing the country phenomena to the issues rather than vice versa. In the latter vein, Poole (1986), who, although he attaches significance to cultural differences,
eschews descriptive categories and methods by emphasizing that explanations of diversity in industrial relations are to be sought in their environmental contexts, such that industrial relations phenomena are conceptualized as intervening and not independent variables.

The comparative industrial relations scholarship of Bean and Poole responds to the concerns expressed by Shalev (1980) that theoretical contributions in the field had been ignored because of their unsystematic formulation. On the other hand, Shalev felt that Dunlop had made a correct strategic choice in adopting a comparative approach to acquire theoretical wisdom and suggested that Dore's study of Japanese exceptionalism (Dore, 1973) provided a valuable theoretical model for scholars by integrating diverse description and analysis with the theoretical issue of convergence raised by Kerr et. al. (1960) and by conducting a two country case study. From this it might be deduced that theoretical insight ought to be a criterion for selecting countries for inclusion in comparative syllabuses.

A search of the index for 'International & Comparative Industrial Relations' articles in the British Journal of Industrial Relations from 1963 to 1981 (Dunn, 1984) suggests a range of criteria for selecting comparative research and syllabus material in addition or complementary to those identified above, although in most cases the articles and reviews listed are not explicitly comparative. Apart from national and continent-wide studies, distinctions suggested by authors' titles accord with the following, some dichotomous, criteria: type of economy (planned socialist versus market capitalist); labour process (capitalist versus socialist); political and/or economic union (EEC and ASEAN); international labour affiliation (ICFTU versus WFTU); development level (Third World, underdeveloped, developing, industrialized, newly industrialized and advanced industrialized); culture (collectivist versus individualist); levels of conflict (strike proneness); industrial democracy (qualities of worker participation); trade unionism (pluralist versus incorporated); occupational segregation (ethnic and sexual); dependence on multinational companies (transnational capital and the state and labour). By no means exhaustive, the above list gives some indication of how rich and varied are the materials from which syllabuses might be developed.

An enduring theme from the above list, and one of particular relevance to this paper, has been that of industrial relations and economic development. That the imperatives for development and the requirements from labour, and to a lesser extent from employers, are identified by governments introduces another criterion for selection for comparative study. The International Institute for Labour Studies has sponsored research into the interaction of industrial relations and the political process in developing countries (International Labour Organisation, 1981) and in so doing acknowledged the relevance of the political dimension and public policy in comparative analyses. Others, such as Levine (1980), who have examined the strategies of labour and management to changes in the world economy in both NICs and earlier industrialized countries, have been obliged to incorporate the role of the state - in effect government strategies - to make their analyses complete. As Kassalow (1978, 12) has put it with respect to trade unions in developing
countries: 'The central force of economic development in most new countries is the State [and] the State becomes the natural countervailing and regulating force against foreign investors and not the workers' movement'. With this not entirely accurate observation (the state has not often regulated 'against' foreign investors in industrializing countries) in mind, this article will now turn to the rationale for including the Newly Industrialized Countries (NICs) of East Asia in the teaching of comparative industrial relations; first in general, and then in Australia in particular.

Why the NICs of East Asia?

Kerr et. al. (1960) accounted for diversity among national industrial relations systems by the different political orientations of their industrializing elites - nationalist leaders and colonial administrators being two particularly timely examples of the elites - and by the stage reached on the road to an ultimate destiny of pluralist industrialism. Leaving aside its ethnocentrism and tendency to technological determinism, this particular convergence theory does not adequately explain the phenomenon of contemporary industrial Japan or the apparent diversity of industrial systems among the NICs of East Asia, namely Singapore, Hong Kong, South Korea and Taiwan, or the 'gang of four' as they are sometimes waggishly called in the region. From his British Factory - Japanese Factory study, Dore (1973) has sought to show that Japan's employment relations represent a projection of other industrializing countries' futures and is an example of 'late development'. Subsequently, Dore (1979) has attributed the different-from-Japan features of the East Asian NICs to their being 'late, late developers'.

The opportunities for theory development provided by studies of the NICs of the Asian/Pacific region have not been confined to the convergence debate. Deyo (1989) selected the four East Asian NICs - which he compares with the Latin American countries of Argentina, Brazil and Mexico - to explain the political subordination of labour movements. The central argument of Deyo's thesis 'is that neither the generalized weakness of East Asian labor nor the varied impact on labor of cultural, economic, and political factors can be adequately understood without consideration of the economic and social structural context within which these variables operate' (Deyo, 1989, 7). An earlier study by the same author (Deyo, 1981) resulted in a structuralist analysis of trade union subordination in Singapore which examined the relationship between 'authoritarian corporatist controls' over organized labour and economic development dependent on foreign investment in export-oriented manufacturing. By focussing on the relationship between economic structure and weak labour movements, Deyo claims to have redressed the imbalance resulting from the selection in other studies of political, cultural
and economic explanations for the role of labour in the East Asian NICs as well as to have provided an explanatory framework for the differences among them.

The case presented here for the inclusion of the East Asian NICs in industrial relations syllabuses is that scholarly attention to their industrial relations systems has both contributed to the theoretical development of the discipline and provided insights into the labour process, studies of which have been largely confined to the historical experiences of earlier industrializers. If it can be conjectured that Japan was the precursor of the East Asian NICs, might it not now be conjectured that Singapore, Hong Kong, South Korea and Taiwan are themselves the precursors for even later developers - in the Asian/Pacific region, for Thailand, Malaysia and Indonesia? Not least, what might be conjectured about the implications of East Asian developments for Australia and New Zealand as policy makers in these two countries strive to reorient (literally) their societies and economies? The power of the state in the East Asian NICs, not excluding the 'positive non-intervention' government of Hong Kong, it can be shown, has been harnessed to assure the compliance of labour, with the requirements of investors, foreign and indigenous. Singapore offers the least complicated model of this aspect of the labour process (Wilkinson and Leggett, 1985).

It is appropriate to note here that, in spite of the shared phenomenon of rapid and 'late, late' economic development of its NICs, culturally and politically the region defined as 'East Asia' is not homogenous. The populations of Hong Kong, Taiwan and, substantially, Singapore are overseas Chinese and together with South Koreans share a Confucian heritage. Except for Singapore, whose government, ever mindful of the tentative circumstances of the city-state's birth, has resolutely sought to foster a national identity, the political integrity of the NICs is under challenge - from China and North Korea. Of the capitalist countries, Japan and Thailand apart, the political elites are from and represent ethnic Malays, although overseas Chinese may contribute to the economies in which they are a minority more than proportionately to their numbers, especially in Malaysia which, like Thailand, is fast achieving NIC status.

East Asian NICs, it may be concluded, have been construed variously for the purposes of comparative industrial relations research and, by extension, teaching. Of primacy have been temporal explanations of the phenomenon of East Asian industrialization - The Pacific Century (BBC World Service, 1983) - justified by their contribution to theory development, and these have subsumed economic, strategic (political), and socio-cultural dimensions. Although not specific to industrial relations, but nevertheless pertinent to a regional understanding, is a study of the cultural source of overseas Chinese business dynamism in East Asia which links societal values to economic activity (Redding, 1990). Other recent studies have addressed specific industrial relations issues and offered lessons for others to follow (as was done so prolifically with Japan a decade or so earlier), an example being of
technological change and pay structures with case studies from among other places, Singapore, South Korea and Indonesia (International Labour Office, 1988).

Relevance to Australians of the East Asian NICs

In making a case for including the East Asian NICs in Australian industrial relations syllabuses, whether explicitly or implicitly comparative, advocacy has to be directed at more than one class of potential beneficiary. An academic audience is likely to be inclined to evaluate its contribution to the discipline while public policy-makers, corporate managers and trade unionists might be expected to seek a pragmatic justification. The relationship between the academician and the pragmatist is not unproblematic, as has been shown by a recent article which addresses the issue of American business school professors' intransigence towards company executives' who complain that business scholarship has been 'irrelevant and deliberately recondite' (Oviatt and Miller, 1989). Increasingly, at least in the English-speaking world, the disciplines of 'industrial relations' and 'personnel management' are being displaced by a generic 'human resource management' to give a more strategic management cast to faculty curricula and, within the orthodox industrial relations discipline, the introduction by Kochan et. al. (1984) of a strategic decision making model as an analytical tool reflects an intellectual recognition of the increasing influence of the management perspective.

In the Australian context, academics have acknowledged the influence of the management perspective, particularly in its 'New Right' manifestation, which 'is one environmental factor which personnel managers cannot ignore' (Plowman, 1988, 44). As in the United Kingdom, Australian business and management and related faculties in the universities have perceptibly shifted their curricula and staff structures to meet the criteria for the corporate funding of research and training. The search for funding has also prompted strong competition with North American and British universities for foreign students, particularly for master of business administration (MBA) degree students from East Asia, for whom comparative syllabuses in labour-management relations are often more relevant than those based on the phenomena of the host country.

For those doctrinally committed to free enterprise, the East Asian NICs offer a mixed bag of industrial relations strategies. Equally successful, as measured by sustained economic growth, Singapore and Hong Kong, on the face of it, represent contrasting models. Labour subordination in the former has been achieved by a high degree of labour market regulation, the central pillars of which have been trade union incorporation and national wage controls. Hong Kong, on the other hand, is characterized by minimal government intervention and a trade union movement whose energies are dissipated by political alignments and fragmentation. Rather than as examples for emulation, the justification for Australian businessmen's understanding industrial relations in the East Asian NICs is the ability to weigh the labour factor in making decisions to invest in the region. However, it has to be acknowledged that in
so far as Australia competes for foreign investment with the NICs, the extent to which potential foreign investors are influenced by labour cost predictability, itself a part function of the industrial relations system, understanding the bases of competitive advantages is important.

Trade unions in the East Asian NICs have been suppressed by the political elite (South Korea and Taiwan), ignored by employers (Hong Kong), or incorporated into a national scheme of things (Singapore). Of the four countries, trade unions in Singapore come closest to the Australian pattern. This is because of their association through the National Trades Union Congress (NTUC) with the governing political party, the Peoples' Action Party (PAP) in a 'symbiotic' relationship, but this amounts to something more resilient and embracing than the Australian 'Accord'. Nevertheless, objectives are similar: the maintenance of a favourable investment climate; the accommodation to technological change; economic growth; checking employer exploitation. However, trade unionism in Singapore since 1982 has been defined in law as an agency for productivity improvement and labour-management cooperation. Dependence on state provision of dispute settlement through judicial arbitration and conciliation (originally modelled on that of Western Australia) has declined and the locus of the employment relationship, in emulation of the Japanese, partly returned to the enterprise. The national imposition of the common rule has had to give way to company performance-related pay and conditions, a relocation reinforced by the restructuring of trade unions along industry and enterprise lines (Leggett, 1988). During the transformations that Singapore's trade unions have made to meet government-determined imperatives, they have had to face and deal with declines in membership. Many of the issues which have concerned Singapore's NTUC have been similar to those discussed at the 1989 Congress of the Australian Confederation of Trade Unions (ACTU): membership decline; union restructuring; efficiency restructuring; wages and productivity; the 'Accord' (Davis, 1990). The locus of control has become an issue too with the publication of a contentious report for the Business Council of Australia on enterprise bargaining (Industrial Relations Study Commission, 1989).

A significant dimension for all Australians who have an interest, academic or pragmatic, in East Asian industrial relations is the cultural dimension. Here, the difference between Australian institutions and those of the NICs of East Asia is that the latter's participants share a Confucian heritage. Analyses have sometimes attributed East Asian industriousness and economic successes to a Confucian work ethic analogous to the Protestant ethic (Weber, 1930), a largely untested hypothesis until the study by Redding cited above, but also of interest are the different political regimes' cultural justification for requiring non-confrontational modes of employment relationship. Ethnocentrism is a problem for academicians producing cross-cultural syllabuses, as it is for businessmen and trade union officials for whom cross-cultural contact is a part of the job. This problem will be returned to below.
The attention of this part of the paper has been directed towards what is of interest to Australian parties from East Asian industrial relations. However, the intellectual trade has not been all one way. A recent report by Lansbury and Zappala (1990a), commissioned by the Korean Labor Institute, is concerned with the relevance of the Australian experience to South Korea. This was then developed as a comparative study of interest to Australian academics (Lansbury and Zappala, 1990b). Garnaut (1989) too has directed Australians’ attention to Northeast Asia.

Themes and Issues: The East Asian NICs

The choice of a particular country or pre-selected category of countries for a comparative study in an industrial relations syllabus - in this case of the East Asian NICs, either with Australia and/or with each other - demands an integrating theme. Bean (1985, 7) concludes that 'the aim of comparative analysis is to promote wider understanding of, and foster new insights into industrial relations, either by showing what is unique about any one set of national arrangements or, equally well, reducing what might appear to be acutely specific and distinctive national characteristics by demonstrating their recurrence elsewhere'. It is suggested that the hypothesis by Deyo (1989) - that the political subordination of labour movements in the East Asian NICs can be explained by economic and structural variables - offers one integrating theme which both enables external comparisons and permits a distinction of the unique features of each NIC.

Taken cross-nationally and emphasizing structural variables in line with the integrating theme, the following themes and issues might also be explored:

**Historical contexts.** The historical circumstances of the initiatives to industrialize had immediate, short term and longer term implications for labour especially and industrial relations as a whole in the East Asian NICs. Common and unique experiences have affected the strategies adopted by the governments and the responses to these strategies from labour and employers. Of particular significance are the colonial legacies, political struggles for control and related external influences, the origins and sources of trade unionism, sources of entrepreneurship, employment patterns and labour supply.

**Socio-cultural contexts.** Rapid industrialization has displaced or incorporated traditional values and attitudes. Industrialization by Chinese, family-oriented entrepreneurs in Hong Kong contrasts with the dependence of multinational companies (MNCs) in Singapore. While employment relations are predominantly paternalist in the East Asian NICs, paternalism takes different forms; in the case of South Korea, for example, being a hybrid between the Chinese and Japanese forms (Redding, 1984). Labour migration, permanent and temporary, has altered the composition of labour forces and their characteristics have changed attitudes to existing industrial relations institutions, including trade unionism.
Political contexts. Legislation has been variously used by the ruling elites in the East Asian NICs to determine the roles of the other parties to achieve desired peaceful industrial relations climates. A question arises as to what extent industrial peace can be attributed to the benefits of economic growth and an assumed Confucian preference for harmonious relations or to the use of repressive political controls by the respective governments. In relation to the control of labour in the East Asian NICs, Deyo (1989, 107) distinguishes two types of control 'repressive' and 'corporatist', the distinction being one of the relative predominance of prescriptive and prescriptive regulation. In addition to types of controls, he suggests the dimensions of their severity, level and effectiveness as a comparative typology for defining the characteristics of labour regimes.

Industrialization and restructuring. Economic restructuring to accommodate new technologies, sustain competitiveness in export-oriented manufacturing and the growing service sectors has required concomitant changes in employment relationships. This has been most prescriptive in Singapore where the government has relied upon its extensive corporatist powers to effect change (Leggett et. al., 1983). In Hong Kong, weak labour unions and a non-interventionist government have facilitated entrepreneurs' responses to changing international product markets (Leggett and Levin, 1990). In contrast to Hong Kong and Singapore, South Korea has experienced industrial conflict, particularly in capital-intensive heavy industry, but also in electronics as a result of relocation by MNCs. Attention to technological change as an elite-determined imperative for labour force compliance in the East Asian NICs, it would seem, justifies further development along comparative lines.

The state and the labour process. Bray and Littler (1988, 576) have noted the failure of the labour process literature to incorporate the state into its analyses. In the East Asian NICs, both the extent of state intervention in the management of workers at the company level and the role of the state in the general socialization of the workforce varies. To facilitate economic restructuring, the Singapore government with the aid of the trade unions has sought to socially engineer the workforce to comply with the increasingly specific productivity requirements of employers. At the national level it has anticipated changing skill requirements and guaranteed a labour force attractive to high technology, capital intensive MNCs. The study of the effects of East Asian NIC state intervention on occupations, occupational opportunities and levels of skill and displacement within the framework of the labour process debate constitutes a theme which might be developed for inclusion in comparative syllabuses.

Institutional frameworks. It is acknowledge here that a purely institutional focus reveals little of the causation of the qualities of industrial relations in the East Asian NICs. Nevertheless, the forms of the institutions, whether incorporated, residual or latent may serve to legitimate government and/or employer power in the determination of wages and conditions, the handling of disputes and the roles of the parties' participation in defining employment relations. Collective bargaining,
trade unionism, conciliation and arbitration have been highly bureaucractized in Singapore and employers' associations required to embrace tripartitism. In contrast, these institutions in Hong Kong appear embryonic, although political uncertainty and opportunity following events in China have seen a revival of independent trade unionism. An official preference for joint consultation and the preservation or extension of management prerogatives is common to all the East Asian NICs and associated with the transition to high technology economies. For thematic development, the institutions are more fruitfully treated as intervening variables.

**Employer strategies.** However categorized, employers in the East Asian NICs apply human resource strategies that are invariably paternalist. In Hong Kong, current and former British trading houses, or *hongs*, and MNC electronics firms and the Civil Service are characterized by bureaucratic paternalism. Shanghai-owned textile companies in Hong Kong are something of a halfway house between the *hongs* and MNCs and the patriarchal Chinese family businesses of both Hong Kong and Taiwan. The once government-backed South Korean *chaebols* practice patrimonial labour management overtly more autocratic than that of the Japanese large corporations. Public sector employers - civil services, disciplined services, statutory boards and government-owned companies - also warrant categorization, particularly because they are sometimes required to be exemplary employers for the private sector. Analyses of employer types and their strategies have been somewhat confined to organizational behaviour and strategic management texts and syllabuses, but some authors, for example, Deyo (1989), England and Rear (1981) and England (1989), have included them in explanatory frameworks of industrial relations.

**Trade union incorporation.** The conventional treatment of trade unions under the headings of structure, government and membership characteristics in industrial relations syllabuses has relevance for Singapore, Taiwan and South Korea only within the context of their incorporation within elite-controlled structures. Paradoxically, in Hong Kong it is the exclusion of trade unions from public policy which ensures labour compliance. Incorporation brings its own problems for the elite. Singapore's trade unions have periodically suffered membership crises as new constraints on their bargaining capacity reduced their credibility to workers. Their restructuring along industry and enterprise lines imposed on them by NTUC leaders, in spite of resistance, also led to a membership decline. Cadre-controlled trade unions, as Singapore's have become, lack the vitality which the government requires from the 'labour movement' to mobilize workers towards the productivity orientation projected for labour. South Korea and Hong Kong have suffered declines in union membership in the 1980s, and in South Korea and Taiwan state-controlled unions have had to be reinvigorated in order to contribute to the effectiveness of the regimes' economic strategies after having earlier been repressed. As a theme for development in syllabuses, trade union incorporation has to address a number of questions for which there are not obvious answers.
Why has resistance to incorporation taken different forms and, apparently, been stronger in South Korea than in the other East Asian NICs? Why has a labour movement not emerged in the less repressive political climate of Hong Kong? Does Singapore’s trade unionism, the most socially and politically engineered of the four NICs, presage the future of trade unionism elsewhere?

Other themes. Depending on the purposes of the particular industrial relations program certain issues not confined to the East Asian context might suggest themselves for treatment. The following are possible examples: substantive issues (wages, conditions, health and safety and the quality of work life); conflict (nature, levels and forms of resolution); inequality, gender, race and employment; labour standards; the role of labour legislation; freedom of association. These examples reflect the concerns of the International Labour Organisation as indicated by its conventions.

Teaching Comparative Industrial Relations: The East Asian NICs

There are some difficulties which have to be overcome when developing the above outlined themes and issues in a teaching program. One concerns source materials. Because English is the language of academic research in Singapore and Hong Kong, published articles and books on these countries’ industrial relations are readily available for use by English or English medium teachers. For Taiwan and South Korea there is much less literature accessible, although this will be partly remedied by two anticipated Australian edited readings on Asian/Pacific industrial relations (Deery and Mitchell, forthcoming; Frenkel, forthcoming) and an American edited encyclopaedia of the region’s labour organizations (Scoville, forthcoming). Further, both indigenous and foreign authors are sometimes constrained to ensure that their analyses are consistent with ruling elites’ official representations of national industrial relations phenomena and this inhibits them from publishing insights which might be construed as criticism. Instead there is a tendency to undertake narrow empirical studies which are not contentious and not explicitly related to a theoretical issue, or if they are, are conveniently self-confirming. On the other hand, external observations are sometimes coloured by the ideological orientation of their authors and these too can result in omissions and distortions. An example of the former, though not narrowly empirical, is a recent presentation of Singapore’s industrial relations as a ‘system’ (Ananataraman, 1990), and of the latter, the treatment of union restructuring in Singapore by Blum and Patarapanich (1987). Of course, antithetical, as opposed to one side only, representations are not necessarily a problem in developing comparative industrial relations programs; indeed, they are the stuff of imaginative and worthwhile courses.

Another, and related, difficulty arises from the ethnocentrism of the discipline’s dominant Western frames of reference and from the choice of analytical tools which are applied to the study of industrial relations in East...
Asian NICs. In particular, systems models tend to define the boundaries between environments, actors and mechanisms derived from their creators' analyses of North American and British industrial relations so that they ill-fit the East Asian phenomena. For example, the persistent representation of industrial relations in Singapore as tripartite - the three 'actors' separately considered - takes little account of the multinational corporate influence in formally tripartite institutions or the domination of the trade unions by Members of Parliament (including government ministers) from the ruling PAP. Industrial relations emerged as an academic discipline in the Western industrialized nations largely to explain the phenomena of trade unions and collective bargaining. It has been essentially reformist in nature and as such evolved the analytical tools best suited to the phenomena to be reformed. Bean (1985, 15) particularizes this problem for comparative studies as one of 'ensuring concept-equivalence across societies [where] nominally identical practices or institutions may perform varying functions, or have a very different significance'.

A human resource problem for the development of comparative industrial relations syllabuses is the need to find teachers and researchers familiar with the national characteristics of the countries to be compared. As already noted, indigenous researchers are subject to political and cultural constraints and foreign observers bring their own biases. Further, it is a rarity for an academician to have in-depth familiarity with more than two countries, one being her/his own. This partly accounts for the predominance of edited readings of country studies in the literature. For the most part indigenous industrial relations academics of the four East Asian NICs have assimilated the paradigms of the 'schools' in Europe (mainly Britain), North America or Australasia where they have completed their postgraduate studies and then applied these, sometimes critically, to their own countries. More often, they have participated in comparative research programs initiated by their former mentors. Increasingly, it can be expected that industrial relations specialists in the East Asian NICs will become homegrown as the local universities and institutes bring their faculties into line with their country's industrialized status. Singapore labour economists, for example, now address a wider audience than their own nationals and, although it remains their prime focus, do not confine themselves to local phenomena.

Conclusion

Two related trends which have a close bearing on the prospects for the study of the industrial relations of the NICs of East Asia are discernible. One is to do with the perception of geo-political realities; the other concerns developments in the discipline of industrial relations. Both justify a certain optimism for the future of East Asian comparative industrial relations in Australia.

The first trend is in Australian public policies. Wide interest in things Asian has been only a recent phenomenon in Australia, a delay lamented by some. Addressing a Commonwealth Press Union Conference in Hong Kong
recently, Australia's ambassador to China, Dr Fitzgerald, said: 'The breathtaking absence of Asia from the general education and training of the populace creates a monumental impediment to the leadership's recent attempts to involve Australia more intimately with Asia, (South China Morning Post, 17 October 1990). Assuming Dr Fitzgerald's sentiment to be one shared by Australian policy-makers, one might expect the emergence of an educational environment favourable to the development at tertiary and post-experience levels of business and management programs on East Asia which include the employment relationship, if not industrial relations specifically.

The second trend is within the discipline of industrial relations. The international community of industrial relations academics has for some time extended its foci to East Asia, mostly attracted by the industrialization phenomena of Japan, but increasingly by the rapid economic development of the NICs of East Asia. This extension of interest has been made possible partly by the advent of wider theoretical perspectives in the 1950s and 1960s. Subsequently, academic researchers, some cited in earlier sections of this paper, have addressed comparative industrial relations as a discipline in itself and contributed to the emergence of a paradigm, with attention given to methodology and theoretical enhancement.

Both trends are necessary conditions for the teaching of the comparative industrial relations of the NICs of East Asia. Sufficiency rests with the quality of the second.

References


England, J. (1989) Industrial Relations and Law in Hong Kong, Hong Kong, Oxford University Press.


Appendix 8.1: A Selected Bibliography

Hong Kong

This is a concise and updated version of England and Rear (1981). It serves as a standard textbook in Hong Kong and is organized according to Dunlop's *Industrial Relations System*. Its framework and employment practices chapters are particularly informative.

This earlier edition of England (1989) covers the legal aspects in greater detail than does the last.

This comprehensive set of 25 readings, including two on the Asian region, covers the institutions, the societal input, technological change, public sector and white-collar unionism, and an assessment of the prospects for trade unions in Hong Kong by H. A. Turner.

The nine readings in this publication are distinguished by the editors' extensive introduction and by company and industry specific studies. Keith Thurley offers some broader perspectives.

Based on a report by the authors for the International Labour Office, this book discusses the distinctive characteristics of labour-management relations and employment conditions in Hong Kong. The areas covered are well supported by tables of statistical data.

Subtitled *A Study of the Labour Movement, Labour Market and Labour Relations in Hong Kong*, this publication is a composite of seven external and one Hong Kong academic's investigations of the weakness of trade unionism in an industrialized economy. It anticipated 'a more participative and equitable capitalism' in Hong Kong but subsequent developments leave this an open question.
Singapore

Written for managers and students this is the only textbook on Singapore's industrial relations. Heavily endnoted, it contains a wealth of facts, but the application of a theoretical framework is a little confusing. Its author is at pains to justify the corporatist mode of Singapore's industrial relations, claiming that 'the pluralist dream of a cooperative union-management relationship will remain largely a vision.'

This article both highlights the achievements and and the problems of state-dominated development, especially in relation to economic restructuring begun around 1979 and the economic crisis of 1985. Wages policy is given particular attention.

Deyo uses a case study of Singapore's industrialization to support a thesis that there is a close relationship between authoritarian corporatism and market-oriented industrialization dependent on foreign investment in NICs. The emphasis is on the depoliticization and incorporation of Singapore's labour organizations. Deyo correctly predicts the Singapore Government's adoption of a more 'popular' authoritarianism to overcome the demoralizing effects of rapid industrialization.

This article is concerned with the only significant industrial action taken by a trade union in Singapore since 1977. The pilots' work-to-rule tested the authority of the Government over organized labour and revealed how effective were its corporatist institutions for restoring control.

Restructuring trade unions along enterprise lines in emulation of Japan was one of a number of measures adopted to upgrade Singapore's economy in the 1980s. This article places the promotion of enterprise unions in the context of trade union incorporation and looks at the consequences of the Government's redefinition of trade unionism.

Chapter 8

This paper examines the participation of the parties to technological change in the light of the Singapore Government's policy of upgrading the economy to one based on high level technology. Procedural and substantive issues arising are discussed.


Pang and Cheng, in this paper, classify the development and transition of Singapore's industrial relations into four phases. Beginning with the colonial period they link the phases to the course of political and constitutional developments. The paper offers an excellent non-doctrinaire introduction for students of Singapore's industrial relations.


This article offers a concise account of the Singapore Government's policies for the transition of employment relations from Taylorist to Mayoist prescriptions in the early 1980s. Its assessment of the Government's social engineering approach offended the authorities and in consequence its expatriate authors were 'advised' not to renew their employment contracts with the National University of Singapore.

Comparative


This edited collection of papers will include the four East Asian NICs as well as Japan, Malaysia, Thailand and the Philippines. With an emphasis on the regulatory role of labour legislation, each country paper will offer an analysis of industrial relations practices and the substantive results of their application. It is being produced with Australian students of comparative industrial relations in mind.


Deyo's study of the political marginality of labour in the four East Asian NICs argues that cultural, political and economic explanations are insufficient and that the economic and social structural context within which the variables operate need to be considered for a fuller understanding. The variables and the structural contexts are dealt with cross-nationally with the NICs examined under each. This is not a country by country study, but rather a study of the effects on labour of export-oriented industrialization and the circumstances in which labour is subordinated, often preemptively, by the political elites.
Frenkel, S. (ed) (forthcoming) *Trade Unions in Asia/Pacific*, Sydney. Frenkel's edited collection of separately authored Asia/Pacific country papers will emphasize the changing nature of trade unionism not just in the East Asian NICs, but also the other East Asian countries, including China and Japan, and in the Pacific countries of Australia, New Zealand and Fiji. Comparative indicators will be identified throughout the collection and a comparative analysis across countries be made in a concluding chapter.


Redding, S. G. (1990) *The Spirit of Chinese Capitalism*, Berlin, Walter de Gruyter. This is a comparative management study of the overseas Chinese in Hong Kong, Singapore, Taiwan and Indonesia presented as an economic culture. Its value for industrial relations specialists is in that it analyses in depth the characteristics of the prevalent employer type, the Chinese family business, in East Asia.

Scoville, J. G. (ed.) (forthcoming) *Labor Organizations in Asia and the Pacific*, Westport, Maryland, Greenwood Press. Many years under production, this comprehensive directory promises to be a valuable historical reference on trade unions in Asia and the Pacific, including those of the four East Asian NICs.
ACIRRT

The Australian Centre for Industrial Relations Research and Teaching (ACIRRT) at the University of Sydney was established as a Key Centre of Teaching and Research in 1989 through a grant from the Commonwealth Department of Employment, Education and Training. The Centre is closely linked with the University's Department of Industrial Relations, which has a long and distinguished history of teaching and research in this area.

ACIRRT's main brief is to improve the quality of industrial relations teaching and research in Australia. This goal will be pursued through a range of activities including a national review of industrial relations teaching, conferences and seminars, research projects conducted by members of ACIRRT and scholars from other institutions, secondments of staff, and publications.

ACIRRT publications fall into three categories: Working Papers; Monographs published solely by ACIRRT or jointly with other organisations; and books published in the Studies in Australian Industrial Relations series by Longman Cheshire.

Manuscripts to be submitted for publication in any of the three ACIRRT series or any other correspondence about publications should be forwarded to the Director of Publications, ACIRRT, University of Sydney, New South Wales, Australia 2006.