

Comparative HRM: European views and perspectives

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Abstract The US originated notion of HRM has been widely accepted across the world – and also widely criticized. The underlying features of the European economy are different from those of the USA and it is argued that these have led to a different approach to HRM being developed in Europe. Differences in features such as more limited individualism, a greater role for the State, different patterns of consultation and patterns of ownership, are linked to these different practices and have led to more varied patterns of research and a more critical literature.

Keywords Critical HRM; Europe; HRM; paradigms; US.

Introduction

Human Resource Management (HRM) is an American concept: it came, and new ideas about it tend still to come, to researchers and practitioners in Europe from the United States of America. How relevant is it to the European context? What is distinctive about the European notion of HRM? Is there evidence of one model of HRM in Europe, or of many? And are approaches to HRM in Europe coalescing around a US model, or a distinctly European model, or are they staying embedded in their own national contexts so that there are as many models as there are countries?

This paper argues that HRM is seen differently in Europe and different approaches are often taken to research. The first part of the article, reprises, briefly, the US origin of the concept, explores some of the conceptual differences that can be found in the European context, and argues that these differences have led to a different research paradigm and a more critical approach to the subject of HRM in Europe. The second part of the article with, inevitably, considerable generalization describes some of the key things that are happening in HRM in Europe.

The US origins of theories of HRM

In its modern conception, our understanding of management in general, and human resource management in particular, has been heavily influenced by thinking in the United States of America. This is perhaps not surprising for a country that has been for decades the largest and most powerful economy in the world. The spread of American culture and American business practices has been widely heralded and, in HRM as elsewhere, there are signs of the hegemony of the US model. *Prima facie* evidence of the power of the US

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exemplar in HRM can be seen in the spread across continents of downsizing, contingent (flexible) working practices, and employer antagonism to trade unions.

Two seminal texts in 1984 launched a new approach to what had until then been the study of personnel management, 'partly a file clerk's job, partly a housekeeping job, partly a social worker's job and partly fire-fighting to head off union trouble...' (Drucker, 1989: 269). These texts, it was true, were based on previous teaching by the respective authors and built on extensive antecedents, but they popularized a whole new way of looking at the people within an organization – as 'human resources'. Fombrun *et al.*'s (1984) 'Michigan' model emphasized the link between human resource strategy and the business strategy of the firm: the business strategy should define and determine the types of employee, employee deployment and employee performance. Employees are a resource like any other: they 'are to be obtained cheaply, used sparingly and developed and exploited as fully as possible' (Sparrow and Hiltrop, 1994). The other text offered the 'Harvard' model (Beer *et al.*, 1984). This argued that employees are not a resource like any other – their understanding and commitment are crucial – whatever the corporate strategy is. Hence, the business strategy is bound in with, rather than leading, the HR strategy.

An undeclared assumption in these texts was that HRM was scientific (Brewster, 1999); the theories were universalistic in the same way that the laws of natural science were: 'relationships between the structural characteristics of work organizations and variables or organization context will be stable across societies' (Hickson *et al.*, 1974: 63). Kidger (1991) argued that businesses that grew in isolation from the (US dominated) world economy will find their approaches superseded by universally applicable techniques. The impact of globalization (incorporating cultures, institutions and organizational level practices) has also been called into evidence as a force for convergence (Geppert *et al.*, 2003). The argument is that US MNCs, and perhaps other mechanisms such as consultants and business schools, will disseminate 'best practice' across the globe (DiMaggio and Powell, 1983).

HRM in the US: core assumptions

There are, perhaps, two core assumptions underlying the classic models of HRM that have come to us from the USA (Brewster, 1995). The first assumption is that the employing organization has considerable latitude in regard to the management of personnel, including (*inter alia*) freedom to operate contingent pay policies and an absence of, or at least a minimal influence from, trade unions. In the context of the weakness of the trade union movement in the USA (where membership is currently probably less than one tenth of the working population, and its activities are predominantly site based), and the comparatively low levels of state subsidy, support and legislative control, this makes sense. It also fits comfortably with the notion that the state should not interfere in business, or do so as little as possible, and that it is the right of every individual to do the best for themselves without external interference (Guest, 1990). Such notions may be less common in Europe.

The second, closely connected, core assumption is that the subject of study is the way that employing organizations manage the human beings (human resources) they deploy. Attempts have been made to distinguish 'strategic HRM (SHRM)' from HRM generally, but it seems increasingly that definitions of HRM include, intrinsically or explicitly, the notion of a strategic approach to the subject. The assumption that underlies HRM is that its purpose is to improve the operation of the organization. The purpose of the study of HRM and, in particular SHRM (Fombrun *et al.*, 1984; Wright and Snell, 1991; Wright and McMahan, 1992), is seen as being about generating understanding in order to

improve the way that human resources are managed strategically within organizations, with the ultimate aim of improving organizational performance, as judged by its impact on the organization's declared corporate strategy (Huselid, 1995), the customer (Ulrich, 1989) or shareholders (Becker *et al.*, 1997; Huselid, 1995). Further, it is implicit that this objective will apply in all cases. Thus, the widely cited definition by Wright and McMahan states that SHRM is 'the pattern of planned human resource deployments and activities intended to enable a firm to achieve its goals' (1992: 298).

It has been argued elsewhere (Beaumont, 1991) that much of the US literature is prescriptive – discussing what should happen even though, perhaps, it doesn't happen that way in practice. The research that is done in the States, and the papers that the US or international journals are prepared to accept, come from a *universalist* paradigm (Brewster, 1999). The term paradigm is used here in Kuhn's (1970) sense as an 'accepted' model or theory, with the implication that other paradigms are often seen as not just different but wrong.

The universalist paradigm dominates much (although not, of course, all) of the research in the United States of America and, given the hegemony of US research, teaching and journals, is widely used in many other countries. It is essentially a *nomothetic social science* approach: evidence is gathered specifically to test generalizations of an abstract and law-like character. For people operating with this paradigm, social science, like natural sciences, should proceed deductively. Hypotheses should be formulated that can be answered 'yes' or 'no' (and hence can be used for prediction); collecting data to test those hypotheses and using recognized statistical tests to check for validity. Research is not deemed to be 'rigorous' unless it is drawn from existing literature and theory, focused around a tightly designed question and contains a structure of testing that can lead on to prediction. The research base is centred mostly on a small number of private sector 'leading edge' exemplars of 'good practice', often large, multinationals, and often from the manufacturing or even specifically the high-tech sector.

The value of this paradigm lies in the simplicity of focus, the coalescing of research around this shared objective and the clear relationship with the demands of industry. Good research based upon it tends to have a clear potential for theoretical development, it can lead to carefully drawn research questions, the research tends to be easily replicable and research methodologies are sophisticated, and there is a coherence of criteria for judging the research. Of course, in any particular case, inappropriate techniques or dubious lines of causality can negate much of the value of this form of research (see Gerhart, 1999, 2005). Even where the data and analysis are sound, however, a disadvantage of this paradigm, perhaps of the US research tradition in particular, is that the pressure to publish and the restricted nature of what is acceptable has led to much careful statistical analysis of small-scale, often narrow, questions whose relevance to wider theoretical and practical debates is sometimes hard to see. There are inevitably problems created by ignoring other potential focuses, the resultant narrowness of the research objectives, and the ignoring of other levels and other stakeholders in the outcomes of HRM (Brewster, 1995; Guest, 1990; Kochan, 1999; Legge, 2005; Pieper, 1990; Poole, 1990). This has been summed up, by an American commentator, in the notion of the 'drunkard's search' – looking for the missing key where visibility is good, rather than where the key was lost.

HRM in the European context

Whether the US-derived visions of HRM apply everywhere in the world is an important question for both theory and practice, since following US prescriptions in either area

may be detrimental if the theories are not transferable. Forster and Whipp (1995), for example, talk about the need for a contingent approach encompassing cultural, sectoral and regional differences. Similarly, other theorists have also argued for the need to cover both national differences and organizational contingencies, though they have used different terminologies: macroeconomic, micro-economic (Farmer and Richman, 1965; Gronhaug and Nordhaug, 1992); exogenous, endogenous (Schuler *et al.*, 1993); external, internal (Jackson and Schuler, 1995).

How the theory applies, in particular, to the European setting remains a conceptual and empirical challenge.

An initial problem is to define 'Europe'. The geographical boundaries of Europe have always been a little uncertain: how far east does the boundary lie? Although the focus here will be on the European Union states, plus Norway and Switzerland, the advent of the new central and eastern European states has meant that they have to be included as part of Europe.

Of course, 'Europe' is only one possible level of analysis. Within Europe, there are familiar regional cultural clusters: Ronen and Shenkar's (1985) Nordic, Germanic, Anglo and Latin European clusters for example (see also, e.g., Hofstede, 2001; House *et al.*, 2004). Regional clusters may be institutionally as much as culturally based (Hall and Soskice, 2001; Hollingsworth and Boyer, 1997; Maurice *et al.*, 1986; Whitley, 1999). These sorts of clusters of countries have also been found in studies of HRM in Europe (see, e.g., Due *et al.*, 1991; Ignjatovic and Sveltlic, 2003; Sparrow *et al.*, 1994; Tregaskis and Brewster, 2006) – see Table 1. Beyond the regional clusters, the individual countries in Europe remain clearly distinctive in how they manage their HRM (see, e.g., Brookes *et al.*, 2005; Lane, 1989; Luthans *et al.*, 1997; Ramirez, 2004; Thomson *et al.*, 2001; Tregaskis and Brewster, 2006).

Finally, of course, taking our focus down one more notch, we should also note, for completeness, that within any one of these countries there will be a diverse range of HRM models and practices in operation – differences between sectors, between organizations within a sector and even differences between the sites of one organization and, at the most micro level, even between the way that individual managers deal with their subordinates.

Discussing European approaches to HRM, therefore, involves substantial generalization. And, if we can see clear differences between the approaches at the European level to approaches in the USA, we must, nevertheless, remain aware of the substantial differences within North America, even within individual states in the USA; and the differences within Europe.

Despite the complexities, and the problems of generalization, it is clear that HRM operates in a different context in the USA from that in Europe (Brewster, 1999) – government support, the legal constraints, trade union influence, for example are all different – and the way HRM is conceptualized, researched and understood is also different. The effort to understand these differences is important.

HRM in Europe: different antecedents

What, then, might make one wary of the assumption that a subject area and theoretical approaches develop in the United States of America would apply in Europe and that the European conception of HRM would, at most, be the same, even if slightly adapted to different circumstances? Four antecedents might make us treat that assumption with caution (Brewster, 1999).

Table 1 *HR clusters in Europe*

<i>Due et al. (1991)</i>	<i>Filella (1991)</i>	<i>Sparrow et al. (1994)</i>	<i>Tregaskis and Brewster (2000)</i>	<i>Ignjatovic and Sveltic (2003)</i>	<i>Stavrou and Brewster (2005)</i>
Sweden Denmark Norway Finland Ireland UK	Sweden Denmark Norway		Sweden Denmark Belgium UK Finland	Sweden Denmark Norway Finland Switzerland Belgium Netherlands France Switzerland Belgium Netherlands UK	Sweden Finland UK Germany(W)
Germany Belgium Netherlands France Italy Greece Spain	UK Germany Denmark Switzerland France Italy Spain Portugal	UK Germany Italy France	Germany(W) Netherlands Switzerland Norway France Ireland Spain	Spain Czech Slovenia Italy Portugal Bulgaria Estonia Greece Cyprus Turkey Ireland	France Belgium Italy Spain Portugal Ireland

Source: Brewster (2005)

Less focus on individualism

Even if the subject is much discussed, there is a dearth of serious empirical data on national cultural differences (Hofstede, 2001; House, 2004; Schwartz, 1992, 1994; Schwartz and Sagiv, 1995; Spony, 2003; Trompenaars, 1993), but what we have indicates the unusual nature of the United States. It is, as one of the most popular commentators in this field wrote, 'quite untypical of the world as a whole' (Trompenaars, 1985). **US culture is significantly more individualistic and achievement-oriented than most other countries** (Hofstede, 2001; House, 2004). Indeed, it has been argued (Guest, 1990) that the assumption of business freedom and autonomy is peculiarly American (US) and is related to the American view of their country as a land of opportunity that rewards success. In HRM, this translates into a view that business owners should be as free as possible to run their businesses the way that they want and that individuals have to take individual responsibility for their situation. **This culture of individualism is clearly discernible in the thinking that underpins North American notions of reward systems, with their emphasis on individual performance-based rewards and the US 'hire-and-fire'**

mentality. In Europe, the situation is different, with a widespread feeling that businesses need to be controlled and to treat their employees in a socially responsible way.

The role of the state

Legislation has been seen as a significant reflector of national values (Hofstede, 2001) and it is no surprise therefore to find that the USA, which is characterized by high levels of individualism and comparatively low levels of uncertainty avoidance, has overall comparatively less legislative control over (or interference from, or support for) the employment relationship than is found in most of Europe. Pieper (1990), making this point, included the greater regulation of recruitment and dismissal, the formalization of educational certification, and the quasi-legal characteristics of the industrial relations framework in comparison to the United States. One could also include legislative requirements on pay, on hours of work, on forms of employment contract, rights to trade union representation, requirements to establish and operate consultation or co-determination arrangements - and a plethora of other legal requirements. These are all additional to those few areas, such as the legislation on equality or health and safety, which intrude on the employment relationship on both sides of the Atlantic. While some European states are committed to reducing legislative restrictions in this area, and countries remain very different (OECD, 2006), European employment is heavily regulated by legislation.

Moreover, Europe is unique in the world in having 27 of its countries at present (and perhaps more soon) committed to a supra-national level of legislation on a considerable range of aspects of the employer-employee relationship. The European Union, particularly through the Social Charter and its associated Social Action Programme is having an increasing legislative influence on HRM. While the rhetoric of governments reflects a clear intention to reduce the restrictions imposed by legislation at the national level, there is an equally clear trend to extend the influence of the supranational regulations. Recent developments include restrictions on the hours that individuals can work and a requirement for larger firms to set up Works Councils where employee representatives meet with senior managers on a regular basis to debate a series of subjects laid down in the legislation.

Pieper, a German authority, pointed out that 'the major difference between HRM in the US and in Western Europe is the degree to which [HRM] is influenced and determined by state regulations. Companies have a narrower scope of choice in regard to personnel management than in the US' (Pieper, 1990: 82). This remains an accurate assessment. Blanchard (1999) argued that employment protection has three main dimensions: the length of the notice period to be given to workers; the amount of severance pay to be paid according to the nature of the separation; and the nature and complexity of the legal process involved in laying off workers. Blanchard finds that the US is significantly different from Europe in general and Italy, Spain and Portugal in particular. There is, simply, less protection for workers in the USA.

A wider view of the legislative requirements on pay and conditions of work also shows marked differences. For example, the International Labour Organization reports that whereas in Europe legislative developments have ensured that average hours worked have fallen over the last two decades, in the USA they have risen. Thus, in the United States, almost 80 per cent of male workers and 65 per cent of working women now work more than 40 hours in a typical week. By contrast, in France the working week is by law limited to thirty-five hours with overtime limited to 130 hours a year (Boulin *et al.*, 2006). This policy even extends to making unpaid overtime by senior employees a penal

offence: in June 1999, a director of a defence company, Thompson Radars and Countermeasures, was fined after the government's jobs inspectorate had monitored executives, researchers and engineers and uncovered substantial unrecorded overtime. In the USA, such a case would be inconceivable.

Underpinning these legislative dimensions is a wider, normative, concept of what role the state should play in the economic arena (Albert, 1991). State involvement in HRM in Europe is not restricted to legislation. In broad terms, in Europe as compared to the USA, the State has a higher involvement in underlying social security provision, a more directly interventionist role in the economy, provides far more personnel and industrial relations services and is a more substantial employer in its own right by virtue of a more extensive government-owned sector. For example, most European countries have a substantial share of the 18–24 age group in higher education and in addition provide substantial support to employers through state-aided vocational training programmes. And in most European countries, much higher proportions of GDP are spent by the state on labour market programmes. This includes training, retraining and job transition support, job creation schemes and programmes to help younger people and the long-term unemployed get into the labour market. Substantial proportions of employment (up to 50 per cent in some countries) are in the public sector (OECD, 1995; Brewster, 1995).

Overall, governments in Europe, and the European Union itself, tend to have more of a controlling (through legislation) and supporting (through finance and institutions) role in HRM than is the case in the United States of America. The corollary is that employers are less autonomous *vis-à-vis* the State.

The role of trade unions and consultation

A third core feature of European states is the legislative status and influence accorded to trade unions. The definition, meaning and reliability of union membership figures vary between countries (Blanchflower and Freeman, 1990; Walsh, 1985). However, it is quite clear that, in general, the European countries are more heavily unionized than most other areas of the world. Trade union membership and influence varies considerably by country, of course, but it is always significant. Sweden has union membership of 85 per cent of the working population and the other Nordic countries also have union density figures of over two thirds, Belgium and Ireland have almost half the working population as trade union members, the UK and the Netherlands around one quarter.

A more important issue is trade union recognition, that is whether the employer deals with a trade union in a collective bargaining relationship that sets terms and conditions for all or most of the employees (Morley *et al.*, 1996). In this respect, Europe differs to a considerable degree from most other countries. In most European countries, there is legislation requiring employers over a certain size to recognize unions for consultative purposes. Morley *et al.* note that 'Europe has a tradition of collectivism and consensus building and trade unions have a social legitimacy in Europe on a much grander scale than in the US' (1996: 646). Collective bargaining coverage is considerably more widespread than union membership (see Table 2).

Closely related to the issue of trade union recognition is the European practice of employee involvement. Legislation in countries such as the Netherlands, Denmark and, most famously, Germany has for a long time required organizations to have two-tier management boards, with employees having the right to be represented on the more senior Supervisory Board. In all European Union countries, the law requires the establishment of employee representation committees in all organizations except

Table 2 *Union density and bargaining coverage, 2001*

Country	2001 union density (%)	2001 bargaining coverage (%)
Austria	39.8	98
France	9.1	90–5
Finland	79.0	90
Sweden	79.0	90
Belgium	69.2	90
Italy	35.4	90
Portugal	30.0	87
Netherlands	27.0	88
Denmark	87.5	83
Spain	15.0	81
Germany	29.7	67
UK	29.0	36
USA	13.5	15

Source: EIRO (2002)

the smallest. These arrangements give considerable (legally backed) power to the employee representatives and, unlike consultation in the USA, for example, they tend to supplement rather than supplant the union position (Brewster *et al.*, 2007). In relatively highly unionized countries, it is unsurprising that many of the representatives of the workforce are, in practice, trade union officials. In Germany, for instance, four-fifths of them are union representatives.

A central theme of HRM is the requirement to generate significant workforce commitment through developing channels of communication. However, in the Rhineland countries of Germany, the Netherlands, etc., it is noticeable that the provision of information to the workforce involves the use of the formal employee representation or trade union channels as well as the widespread use of individualized communication. And when upward communication is examined, the two most common means in Europe, by a considerable margin, are through immediate line management and through the trade union or works council channel (Morley *et al.*, 2000):

Patterns of ownership

Patterns of ownership also vary from one side of the Atlantic to the other. Public ownership has decreased to some extent in many European countries in recent years – although it has grown considerably in Norway, for example; but it is still far more widespread in European countries than it is in the United States. And private sector ownership may not mean the same thing. In many of the southern European countries particularly, ownership of even large companies remains in the hands of single families rather than of stock-market trading shareholders. On the other hand, in Germany, a tight network of a small number of substantial banks owns a substantial proportion of companies. Their interlocking shareholdings and close involvement in the management of these corporations mean less pressure to produce short-term profits and a positive disincentive to drive competitors out of the market place. The effect of these variations is that there is less pressure for management teams to take short-term views of investments and results.

HRM in Europe: a different concept

Given these contextual differences it is worth testing the assumption that HRM in Europe covers the same ground as the concept developed in the USA. There are four subsets of issues that need to be addressed in thinking about conceptualizing the study of HRM. It is argued below that these issues are seen differently in Europe from the way they are seen elsewhere. The issues are:

- the contested nature of the concept (what we are studying);
- the levels at which it can be applied (the range of our studies);
- the focus (what it aims to do); and hence
- the research paradigm.

The nature of HRM

HRM is a subject without an agreed definition. The confusion in the appropriate subject matter for HRM has been noted by many (Boxall, 1993; Dyer and Kochan, 1994; Legge, 2005). Despite the fact that identification of specific activities and policies is central to theoretical approaches to HRM (Weber and Kabst, 2004), there is no agreed list of what HRM covers. Some subjects seem to be included in most lists of the topics covered by HRM – resourcing, development, reward – but other topics may or may not be included. Thus, subjects like employee participation, trade union relationships, health and safety, equal opportunities, flexible working, career progression, work design and the countless combinations of HR practices, are included in some conceptions of HRM and ignored in others.

There is, perhaps, greater consistency in the US around what is included in the study of HRM and even around the notion of what constitutes ‘good’ HRM: a coalescing of views around the concept of ‘high performance work systems’. These have been characterized by the US Department of Labor (1993) as having certain clear characteristics: careful and extensive systems for recruitment, selection and training; formal systems for sharing information with the individuals who work in the organization; clear job design; local level participation procedures; monitoring of attitudes; performance appraisals; properly functioning grievance procedures; and promotion and compensation schemes that provide for the recognition and financial rewarding of high-performing members of the workforce. Alongside similar lists, which all differ to some degree, the Department of Labor list can be taken as an exemplar of the universalist paradigm: most US writers would be broadly in agreement with such a list.

In Europe, however, almost every item on the list is the source of debate. Thus, in much of southern Europe, recruitment and selection schemes rely heavily on the network of family and friends (the *cunha* in Portugal, for example). HRM experts in these countries would argue that this is a cheap and effective method of recruitment, and gives the organization an extra means of motivating and controlling employees. Interestingly, such systems are now increasingly being recognized by larger organizations in northern Europe as legitimate. Formal systems for sharing information with individuals at their workplaces are significantly different from sharing information at the strategic level with trade union representatives skilled in debating the organizational strategy – a common requirement across Europe. Clear job design (which can presumably be linked with the performance appraisal and incentive schemes for the individual job holder) can be inimical to the need for flexibility, teamwork and responsiveness to the pace of change seen as important by most European organizations. And so on through the list ...

Common to this debate is the assumption that HRM, and particularly SHRM, is concerned with the aims and actions of management within the organization. Perhaps in a country like the USA which has as an avowed aim of most politicians the objective of 'freeing business from outside interference', it makes sense to develop a vision of human resource management that takes as its scope the policies and practices of management. Europeans, however, find that the universalist paradigm ironically excludes much of the work of HR specialists and many of the issues which are vital for the organization – areas such as compliance, equal opportunities, trade union relationships and dealing with government, for example. They are often critical of the universalist model of HRM common in the USA (see, e.g., Brewster, 1999; Guest, 1990; Legge, 2005; Pieper, 1990). European authors have argued that 'rather than copy solutions which result from other cultural traditions, we should consider the state of mind that presided in the search for responses adapted to the culture' (Albert, 1989: 75, translation in Brewster and Bourniois, 1991).

HRM in the US typically focuses on the firm. In Europe, the nature of HRM is broader, providing better explanation of the potential differences in views about the topic and a better fit with the concerns of the specialists, by including national institutional and cultural issues such as the trade union movement, national legislation and labour markets as not just external influences but as part of the topic (Brewster and Bourniois, 1991; Brewster, 1995).

The level of HRM

A second key question concerns the levels of HRM. As Kochan *et al.* (1992) and Locke *et al.* (1995) have pointed out, cross-national comparisons can be made at various levels. We can use the analogy of a telescope (Brewster, 1995): with each turn of the screw, things that seemed similar are brought into sharper focus so that we can distinguish between, say, the forest and the fields, then with another turn between one tree and another, and then between one leaf and another. Each view is accurate; each blurs some objects and clarifies others; each helps us to see some similarities and some differences.

The universalist paradigm works with the organizational or, in some cases, the sub-organizational (e.g. business unit), level of analysis. Europeans are more likely to assume that HRM can apply at a variety of levels, i.e. that the scope is not restricted to the organizational or sub-organizational level. Thus, in Europe there are discussions of the strategic human resource management policies of the European Union or of particular governments or sectors. Debates about HRM policies between groups of EU member states are often lively. National governments have HRM policies (for example, reducing unemployment, encouraging flexible working practices) and indeed, some of the strategy literature has located the economic success of organizations, and economies, at the national level (see, for example, Porter, 1990; Sorge, 1991). Within a country, specific areas may have HRM policies and practices (raising training standards to attract inward investment, establishing local employment opportunities, etc.). All these levels, which might be seen as exogenous factors impinging upon HRM in the universalist paradigm, are seen in Europe as within the scope of HRM (Brewster, 1995).

It is difficult to discuss more than one level of analysis at a time. It is even more difficult to research more than one. Researchers and commentators often resolve this problem by simply ignoring it. Thus many of the seminal texts in our field draw their data from one level but are written as if the analysis applies at all levels: what Rose (1991) has called 'false universalism'. Many of these texts are produced in one country and base their work on a small number of by now well-known cases. For analysts and practitioners elsewhere,

and with interests in different sectors, countries and so on, many of these descriptions and prescriptions fail to meet their reality. Our task, therefore, is not necessarily to change what we write or believe, but to specify the level at which we can show it to be true.

The relevant level of analysis will depend upon the question being asked. The important point is not that any level is necessarily correct or more instructive than the others but that the level needs to be specified to make the analysis meaningful.

The focus of HRM

What is the focus of academic work in HRM? To put it bluntly, are we analysing the management of people as a contributor to finding more cost-effective ways it can be done in order to ensure that the top management's organizational objectives are met or are we critically analysing the way human resources are managed? How important is the 'so what' question? A strong stream of neo-Marxist theorizing (e.g. Friedman, 1997) has focused on managerial approaches to controlling potential dissidence. Thus, questions of 'fit' between the organization's corporate strategy and its HRM are open to challenge at both ends. While not always within the influence of this stream of writing, the willingness to challenge managerial objectives and actions remains relevant. In general terms, European researchers and writers have been more critical of the concept of HRM than the US experts.

The HRM/performance linked literature is a good example. Most of the critique of that literature from those writing in the universalist paradigm has been concerned with weaknesses in the empirical or statistical data (Cappelli and Newmark, 2001; Gerhart, 1999, 2005; Huselid and Becker, 1996). The critiques of the concept within Europe have tended to be more wide-ranging, examining the assumptions of universalism, of the inevitable 'goodness' of the link and the effects on those other than managers in the system (Guest, 1997; Guest *et al.*, 2003; Marchington and Grugulis, 2000; Paauwe and Boselie, 2005; Wood, 1999).

The research paradigm

The effect of the differences in the three issues noted so far is that, by contrast with the universalistic paradigm, many researchers in Europe operate within a contextual paradigm. The contextual paradigm is idiographic, searching for an overall understanding of what is contextually unique and why. It is focused on understanding what is different between and within HRM in various contexts and what the antecedents of those differences are. Among most researchers working in this paradigm, it is the explanations that matter - any link to firm performance, for example, is secondary. It is assumed that societies, governments or regions can have HRM policies and practices as well as firms. At the level of the organization (not firm - public sector and not-for-profit organizations are also included), the organization's objectives (and therefore its strategy) are not necessarily assumed to be 'good' either for the organization or for society. There are plenty of examples where this is clearly not the case. Nor, in this paradigm, is there any assumption that the interests of everyone in the organization will be the same or any expectation that an organization will have a strategy that people within the organization will support. Employees and the unions have a different perspective to the management team (Kochan *et al.*, 1986; Purcell and Ahlstrand, 1994; Storey, 1992). Even within the management team, there may be different interests and views (Hyman, 1987; Kochan *et al.*, 1986). These, and their impact on HRM, are issues for empirical study. As a contributor to explanation, this paradigm emphasizes external factors such as

ownership structures, labour markets, the role of the state and trade union organization as well as the actions of the management within an organization.

Methodologically, the research mechanisms used in Europe are more likely to be inductive. Theory is drawn from an accumulation of data collected or gathered in a less directed (or constrained) manner than would be the case under the universalist paradigm. Research traditions are different: **focused less upon testing and prediction and more upon the collection of evidence.** There is an assumption that if things are important they should be studied, even if testable prediction is not possible or the resultant data are complex and unclear. The policies and practices of the 'leading edge' companies (something of a value-laden term in itself) which are the focus of much HRM research and literature in the USA are of less interest to many European researchers than identifying the way labour markets work and what the more typical organizations are doing. Much more work in Europe, therefore, is based on **finding out and understanding what is happening;** hence there is a stronger tradition of detailed idiographic case studies and, conversely, of large-scale survey work, both of which lend themselves to analyses of the different stakeholders and the environmental complexity of organizations. Similarly, **HRM research in Europe is more often focused on the services sector or the public or not for profit sectors of employment than is the case for the US.**

Those in Europe operating in the contextual paradigm seem more likely to challenge the declared corporate strategy and approach to HRM laid down by senior management by asking whether these have deleterious consequences for individuals within the organization, for the long-term health of the organization and for the community and country within which the organization operates.

The practice of HRM in Europe

Clearly, the practice of HRM cannot be divorced from its institutional context or the way that the subject is conceived. The North American model may be a viable possibility for US organizations because of the context within which they operate. Whether it can – or should – be replicated in the European context is a matter of empirical evidence and opinion. Looking at Europe, we have to be more aware of the cultural, regional and sectoral differences and adopt a contingent (Forster and Whipp, 1995) or contextual (Brewster, 1999) approach.

Different models of HRM have been offered by European researchers (Thurley and Wardenius, 1990; Brewster and Bournois, 1991; Sparrow and Hiltrop, 1994). What they have in common is the need to adopt a multi-level view of the actors in the system and to see business strategy, HR strategy and HR practice located within an environment of national culture, national legislation, state involvement and trade union representation. These factors are seen as part of HRM and not merely as antecedents to it.

How does this play out in practice? It is not possible to cover all aspects of HRM within the scope of an article, but a few examples are given below.

The nature of work

One issue that is attracting increasing attention throughout the world is the issue of flexibility in labour patterns. This is an area bedevilled with terminological problems. This paper uses the term 'flexibility', adopting the terminology most commonly used in Europe. The European Commission prefers the term 'atypical working' and some trade unionists talk about 'vulnerable work'. Certain aspects of this subject are referred to as 'contingent working' in the United States of America. Arguably, all of these terms are to a degree inaccurate and certainly all the terms come with their own metaphorical

baggage. Whatever the terminology, the assumption has been made that, with the amount of employment legislation and the embeddedness of the trade unions in the EU, the European workforce is highly inflexible and that this is linked to high levels of unemployment in some European states (see European Commission, 1995).

The evidence shows that this is wrong. Our research, comparing organizations at national level across Europe (Brewster and Tregaskis, 2003; Tregaskis and Brewster, 2006) is consistent with the national labour market statistics (European Commission, various) in showing extensive and growing use of flexible working across Europe. Furthermore, some of these forms of flexibility (temporary employment and self-employment) are more widespread in Europe than in the US, and in others (part-time work) the US has about a median position on a ranking with the European countries (Standing, 1997).

Overall, organizations in Europe have tended to increase their use of contingent employment contracts over the last decade or so, although the pattern of use remains distinctive in each country (Tregaskis and Brewster, 2006).

Temporary and fixed-term contracts are underpinned by different legal and industrial relations frameworks across Europe. During the 1990s, temporary contracts were not highly regulated except in Germany, where there was a lower use of these contracts. The more liberal legislation elsewhere enabled a greater degree of commonality in organizational practice in terms of the adoption of temporary contracts. Equally, fixed-term contracts in, for example, the UK and Sweden are less favourable to the employer and as a result are used less by organizations in those countries. New common EU level requirements may change these country level differences.

Training and development

Education and training provision is to a considerable degree influenced by the educational and training infrastructure and the concomitant social and technical relationships that go with them and will have a significant effect on an organization's RHM and SHRM (Boxall, 1995; Mabey, 2004). Although human resource development practices vary considerably by country in Europe (Mabey, 2004; Tregaskis 1997), in world comparative terms the provision is extensive and of good quality. State support for post-education training is also high and gives these countries an advantage in country level competitive terms (Porter, 1990; Wever, 1995). Furthermore, while decentralization and devolvement mean that (as in the USA) many specialists are unable to say how much their organizations spent on training, employer expenditure is considerable and provides significant numbers of days training for all levels of employees (Brewster *et al.*, 2004). Furthermore, this training is evaluated systematically by most organizations. In terms of subject matter, people management and supervisory training was the highest priority in most of Europe.

The managerial role

Key to the concept of HRM is the notion of a strategic role for HR specialists and the responsibility of line managers for HRM.

On the first issue, it was pointed out some time ago that the rhetoric of the integration of the HR specialist function at the board level has outpaced the reality (Legge, 2005). That has not changed (Brewster *et al.*, 2004), although there have been some small increases in such integration in some countries, notably Germany. Of course, in a number of European countries – most clearly, but not exclusively, Germany and the Netherlands – HRM issues are brought into the strategic level discussions by the presence

of employee representatives on the board. In other cases, the presence of works councils with legal power, or pervasive unionism, means that in practice the interests of the employees feature in all major operational decisions.

The debate about the growing role of line managers in strategic (and indeed in operational) HRM is widespread in Europe. The notion of line management accepting greater responsibility for human resource management (HRM) within employing organizations is now received wisdom, but it is not unproblematic (Brewster and Larsen, 2000; Renwick, 2000). Line managers may not want this responsibility; they may not have the time to deal with it properly; they may not have the ability to handle HR issues effectively; nor the training for it; they are often ignorant about recent developments in thinking about HRM; they may not take a comprehensive organizational or longer term view of the topic; and they are poor at making policy in this area.

Overall, the trends are complex: there seems to be evidence of increased line management responsibility, but it is patchy and the situation appears not to have changed that much over the last decade and a half. Those countries that always had a lot of line manager involvement in HRM (such as Denmark) tend to stay at that end of the scale; those that have much less (such as the UK) tend to stay at the opposite end of the scale. European countries stay distinctive in the way that they manage their HRM.

Communication and consultation with employees

Some of the key questions in SHRM are about communication and consultation with the workforce. Employee representation, or 'voice', may take individual or collective forms. The collective forms include both union-centred and non-union mechanisms. The range and type of employee representation and involvement is a defining feature of different national business systems, as demonstrated in the extensive literature on the varieties of capitalism (Amable, 2003; Hall and Soskice, 2000; Whitley, 1999). Individually, effective communication, it could be argued, is at the heart of effective human resource management. Therefore, it might be expected to be increasingly common everywhere. There are, however, good reasons to suppose that cultural differences, in particular the influence of hierarchy (Hofstede, 2001; House *et al.*, 2004), will have an impact on the way that managers communicate to their workforce, so that the drive for greater efficiency, which might lead to convergence, will be counteracted to some degree by the national cultures. It is certainly going to be influenced by the institutional and legislative issues noted above.

There is now clear evidence that organizations across Europe are increasing the amount of communication and consultation in which they involve those employees (Brewster *et al.*, 2004). If there has been a tendency to associate the concept of HRM developed in the USA with the individualization of communication and a move away from, or even antagonism towards, the concept of communication and consultation which is collective, and particularly that which is trade union based, that is not occurring in Europe. The EU's Works Council Directive and the desire of organizations to use as many communications channels as possible has ensured that although there has been a growth in the use of individual channels of communication, the collective channels are still widely used amongst larger employers at least. In Europe, both individual and representational communication are growing (Morley *et al.*, 1996). There has been an increase in the use of direct verbal and direct written mechanisms, potentially reflecting the necessity to increase employee commitment in order to achieve organizational success. This increase, however, runs in parallel with the collective channels, thus supporting the argument that the two are not incompatible (Brewster *et al.*, 2007).

Conclusions

The evidence suggests that in Europe there is a tendency towards labour market deregulation; more extensive training and development of staff; increased flexibility; ever-greater line management influence; increasing individual communication and reducing trade union membership. As such, this is reflective of the findings of researchers on HRM in the USA. Comparison of policies and practices is made difficult by the fact that there is little large-scale evidence of HRM practices in the United States. There is a danger therefore of comparing what is happening in most organizations in Europe with more limited examples from the US.

It seems fairly clear, however, that many aspects of HRM practice are different. For example, those adopting a universalist viewpoint would see the increasing institutional and legislative influence of the European Union on employment contracts as an outside influence rather than part of HRM. The fact that employers in Europe are increasing communication through trade union influenced consultation structures and that it is employee representation that ensures that HR issues are included in strategic decision-making are difficult to explain without reference to the contextual paradigm. The European evidence suggests that managements, particularly perhaps in the Nordic countries, can see the unions, for example, as social partners with a positive role to play in human resource management. The successful integration of HRM with collective bargaining and more traditional approaches to industrial relations, dependent on employers co-operating with union representatives, and unions adopting a less adversarial approach, which has been called for by American critiques of the HRM concept (Kochan, 1999; Strauss, 1992), already exists in parts of Europe.

These empirical differences have important implications for practitioners. Even for those accepting that the focus of HRM should be on improving the performance of the firm, Gerhart has argued that 'it seems unlikely that one set of HRM practices will work equally well no matter what the context' (Gerhart, 2005; 178). Bloom and Milkovich (1999) point to the twin needs of understanding both the contextual differences surrounding an organization (at local, national and continental levels) and the strategic portfolios of the organization.

More generally, the representative data supports theoretical (Smith and Meiksins, 1995) and case study evidence (Ferner and Quintanilla, 2002), which indicated the complexity of these issues, the national embeddedness of HRM practices and the dynamic nature of evolving national business systems. Beyond the empirical evidence of difference, this paper has argued that, compared to the USA, the country of origin of HRM, there are conceptual differences in the way that HRM is viewed in Europe. The more critical approach to HRM found in much of the European literature adds an extra dimension to our knowledge of HRM. The study of HRM in general will only be enhanced by further debate between these researchers and those working from a universalist paradigm.

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