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Research and Working Paper Series No. 175 February, 1981 A THEORY OF EMPLOYER ATTITUDES AND BEHAVIOUR TOWARDS TRADE UNIONS IN WESTERN EUROPE AND NORTH AMERICA

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A Theory of Employer Attitudes and Behaviour

Towards Trade Unions In

Western Europe and North America

by

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Paper presented to an International Conference on Management Under Differring Value Systems, Toronto, York University, October 17, 1980. Anyone familiar with modern industrial relations systems cannot help but notice that the behavior of employers in North America and Europe is quite different. In Europe employers generally accept trade unions as legitimate and necessary institutions in democratic society. Rarely do they overtly attempt to dissuade employees from becoming union members. European employers have formed industrial associations and national federations which are recognized by society, government and organized labour as the authoritative representatives of industry in regard to social and labour management affairs. Through either formal or informal mechanisms employer organizations commonly seek to reach national consensus with labour and government over major issues of common concern.

The North American situation is quite different. Employers typically pursue independent and uncoordinated objectives in the social and labour arena. Although there are many national employers' organizations (e.g., The Chambers of Commerce, The Canadian Manufacturers' Association, The U.S. Business Roundtable, and the Canadian Business Council on National Issues) there are none with the membership density or authoratative stature in regard to social and labour issues comparable to their European counterparts. By and large North American employers grudgingly tolerate unions because they are a fact of life rather than because of any formal recognition that unions have a positive social role to play. Many North American employers hold that unions are unnecessary where management "does right willingly." It is quite common for employers to attempt to avoid unionization. It is taken for granted that non-union employers will continually attempt to discourage employees from becoming union members and establishing collective bargaining. Because they have overtly hostile attitudes towards unions and because their organizations are weak employers rarely join with unions and governments to reach national concensus over critical issues. Instead labour and management typically lobby hard for their own preferred policies which are often considered unacceptable and detrimental to the other side.

These observed differences might lead the casual observer to conclude that the basic attitudes or value systems of European and North American employers are fundamentally divergent. The thesis of this paper is that the basic attitudes and values of employers on both sides of the Atlantic are essentially the same. The variance in observed behaviour is the result, not of underlying attitudes, but rather of critical historical events and resultant differences in industrial relations systems.

### Early Response of Employers to Unions

The commonality of employer attitudes in regard to trade unions is indicated by their initial reaction to the emergence of the labour movement. Everywhere the first response of employers was to destroy or contain the unions. In both Europe and North America one may find examples of some combination of the following tactics being put to use against union organization:

- Victimization: the dismissal of workers suspected of union sentiments.
- Yellow dog contracts: requiring workers to sign individual contracts stating that they were not trade unionists and would not become trade unionists.

- 3. Company or yellow unions: encouraging pacific employee organizations designed to reduce the attraction of "free" unions.
- 4. Blacklists: the distribution of the names of workers suspected to be union organizers and the subsequent refusal of employers to hire people on the list.
- 5. Refusal to negotiate with worker representatives.
- 6. The use of strikebreakers, lockouts and strike insurance to counteract strikes, the primary basis of union power.

To the continental employer, according to Landes, "a union was a conspiracy against public order and morals; a strike an act of ingratitude; the effort of labour to raise wages the indiscipline of an impatient son. All of this was evil. And there is no negotiating with evil."<sup>1</sup>

In Germany typical practices of early employers were "the blacklisting of strikers and the supplying of strikebreakers, the operation of employment offices, propaganda on behalf of the employer viewpoint during labor disputes, and the promotion of legislation favorable to the employer." Employers also encouraged the development of "yellow" or company unions which by World War I had a large membership.<sup>2</sup>

Common devices used in France were "Blacklists, firing of unionists, lockouts, agents provacateurs, and spies." Company unions were also prominent in the first decade of the twentieth century.<sup>3</sup>

In Britain an employers' association in the engineering industry agreed, in the 1850's, to the following rules:

- No member would employ a trade unionist

- No member would "receive" a "deputation of workman or unions".
- All members would require each of their employees to sign a document stating that the employee "was not and would not become a union member."<sup>4</sup>

Students of Swedish labour often claim that most employers were not intent on destroying unions. Nevertheless, as a result of a strike in 1899 employers at Sundsvall declared that they "would not hire a single union man, and that every man who hoped to keep his job must sign a non-union contract."<sup>5</sup> Until the 1930's Swedish employers made very frequent use of lockouts to keep unions weak.

All of the tactics noted above were in common use in the U.S. and Canada. In the infamous "Mohawk Valley Formula" employers consciously combined the entire range of anti-union tactics to fight the surge of unionism.<sup>6</sup>

If scholars had addressed the questions of employer attitudes and behavior towards trade unions in 1880 they would not have found much difference between Europe and North America. At about that point in time, however, the industrial relations systems began to evolve in different directions.

## The European Pattern

From about 1880 European unions expanded their base of membership from skilled to unskilled and the mainstream embraced a philosophy which called for the uplift of the entire class of working people. The capitalist system was condemned as inherently exploitative and the long term objective became the replacement of capitalism with socialism. In several countries links were established between unions and labour or socialist parties.

Despite employer opposition union membership, strikes and the support for labour/socialist political parties all grew substantially. (See tables 1, 2, 3). In response to increasing union membership strength, militancy and political power governments began to pursue a more conciliatory policy towards labour. Laws forbidding union organization as conspiracies in restraint of trade were repealed. Strikes were made legal. Instead of backing employers in disputes governments began to act as mediators attempting to bring labour and management together. Labour's grievances became major political issues.

#### Table 1

Union Membership 1890 - 1920 (000's)

	1890	1900	1910	1920/21
France	404	492	977	2,000
Germany	278	680	2,017	7,568
G.B.	1,100	1,200	1,662	6,418
Belgium		45	118	800
Denmark		77	102	279
Sweden		44	85	280
Netherlands			59	467.

Source: Kendall, Walter (1975), The Labour Movement in Europe, London: Allen Lane. Some of the figures are rough estimates.

### Table 2

# Electoral Support of Socialist and Communist Parties 1900 - 1920

Socialist	Communist
4,807,000	МА
6,529,000	NA
12,853,000	620,000
	4,807,000 6,529,000

Source: Kendall, 1975. Combined total votes from France, Germany, Italy, Britain, Belgium, Netherlands and Denmark.

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# Table 3

# Number of Industrial Disputes (5-year averages)

Year	Number
1896-1900	2504
1901 <b></b> 5	3545
1906-10	6148
1911–15	5102
1916-20	5034

Source: Kendall, 1975. Combined total from France, Germany, Italy, Britain and Belgium.

In such an environment employers began to realize that the tactics of overt beligerance were likely to be counterproductive. Instead of containing unions, active opposition was more likely to produce increased government intervention. Moreover, given the political objectives of labour\_employers had good reason to fear for the survival of the capitalist system itself. The idealistic political strategy of labour in Europe produced a threat not merely to individual employers but rather to employers as a class. Given the nature of this threat employers began to unite for, in the words of one contemporary observer, "sheer self-preservation."<sup>7</sup>

As a result of either direct government intervention or the threat of government intervention employer associations expanded in size and scope and recognized unions as the legitimate representatives of the working class. Several examples may be cited. During the 1890's labor political power increased in Sweden. The Swedish Employers' Federation was founded in 1902 as the direct consequence of a national three day strike. In 1906 the unions were recognized broadly by the association as the spokesmen of the working class and as the bargaining agents for workers generally.

In Germany, after the removal of the anti-socialist laws in 1890, union membership and support for the socialist party grew rapidly. German employers began to associate more thoroughly in response and the German Employers' Federation was founded in 1913. At the end of World War I a socialist government rose to power. Pressure was applied to employers to recognize the trade unions as the bargaining agents for labour and that was done in 1918. Although many employers considered it to be an effront to their "personal

liberty" collective bargaining spread.<sup>8</sup> The Employers' Federation expanded from 61 associations representing 500 enterprises in 1913 to 200 associations representing 100,000 enterprises in 1920.<sup>9</sup>

In Britain the Engineering Employers' Federation was founded in 1896. The 1915 to 1920 period was one of considerable worker military, increasing radicalization of labour organizations, and growth in the support for the Labour Party. In response to these forces the government applied pressure on employers to associate more extensively and to recognize and negotiate with the unions. Collective bargaining expanded dramatically. Membership in the Federation increased from 816 firms employing about 200,000 manual workers in 1910 to 2,440 companies employing about 700,000 workers in 1920.<sup>10</sup>

French employers began to organize in the 1890's "in response to the growth of unions, the increase in strikes, and fears of increasing intervention by the State."<sup>11</sup> In 1899 the socialist Alexandre Millerand became a cabinet minister and issued decrees regulating wages, working conditions and hours, and creating a network of Regional Labour Councils. The formation of the Metalworking Employers' Association was the direct result.<sup>12</sup> In the troubled period following World War I the General Confederation of French Production came into existence. Collective bargaining expanded but fell into disuse as the result of a depression in the early 1920's. The Confederation was able to attract only a minority of individualistic french employers into membership until the late 1930's when the Popular Front Government led by Socialist Leon Blum came to power. There were massive sit down strikes. The Blum government pressured the employers to recognize and

negotiate with the unions. As a result of the Matignon Accord the employers federation expanded greatly and took on new functions.<sup>13</sup>

A similar developmental pattern occurred in other countries: The political power of labour increased, government responded by applying pressure on business to recognize and negotiate with unions, employer associations expanded in number, size and scope and established on-going relationships with the unions.

The achievement of national recognition meant that unions acquired a moral legitimacy which they had not previously enjoyed. It soon became socially and politically unacceptable for European employers to interfere with the right of association or to refuse to negotiate with unions. Recognition meant that unions became the bargaining agents not merely for their own members but rather for the entire class of relevant workers. But for the unions there was a price to pay. By accepting recognition and by entering into regular patterns of interaction with employers they gave up, in practice if not in theory, the credibility of their goal of revolutionary societal transformation.

In return for union recognition employers received de facto acceptance of the legitimacy of capitalist enterprize. France and Italy were exceptions. In those countries the mainstream of the labour movements clung to their radical objectives. Because they have done so, the efforts of government to bring about stable labour-management relations have been less than successful. Employers continue to complain that they cannot deal matter-of-factly with organizations whose avowed public goal is the destruction of capitalism.<sup>14</sup>

To European employers generally recognition did not mean that they were prepared to fully share the power to manage. For the most part employers, through their associations, insisted that negotiations should take place on an area or industry rather than on a plant by plant basis. Some of the older craft unions opposed this bargaining structure but the wider-based unions generally approved it. By agreeing to multi-employer bargaining over basic terms and conditions of employment employers intended to maintain control over most managerial decisions. They continued to vigorously oppose any union presence in the enterprize. In some countries the associations compelled the unions to explicitly recognize management's right to manage. For example, in the December Compromise of 1906 the Swedish unions accepted the right of employers "to hire and dismiss workers, direct and allot work and employ any workers they chose."<sup>15</sup> In 1898 the Engineering Employers' Federation in Britain required unions to sign an agreement containing the following statement:

"The Federated Employers, while disavowing any intention of interfering with the proper functions of trade unions, will admit no interference with the management of the business..."

Twenty-four years later a new agreement stated:

"The Employers have the right to manage their establishments and the trade unions have the right to exercise their functions."<sup>16</sup>

Despite such statements British employers were not very successful in excluding union representatives from the enterprize. During World War I and again in the World War II and post war era strong shop stewards movements emerged. These informal organizations which were often separate from the union establishment did place serious constraints on managerial prerogatives. They often hindered the implementation of new techniques and insisted that long established customs and practices be respected. Their demands were supported by the use or threat of "wildcat," "unconstitutional" or "unofficial" strikes. It is no coincidence that British employers have been more prone to fight unionization on a plant by plant basis than other European employers.

In several countries where management was more successful in excluding unions from the enterprize the void in worker representation at the shop level was politically unacceptable. Works councils, established either through legislation or collective bargaining, were the usual compromise. To employers the councils were more acceptable than shop floor unions because they were composed of company employees rather than outsiders. In most cases the councils were provided with a productionist rather than a consumptionist mandate. They were also forbidden to negotiate collective agreements - a function which the unions insisted that they exclusively retain. Nor were the councils permitted to strike. Employers did not willingly accept the councils. In many cases they fought vigorously against them. However, by holding out for no employee representation they achieved a compromise which was more acceptable than the alternative of union organization in the plant. From an employer's perspective the strategy was quite successful. For several decades the councils were to have very little influence on the power to manage.<sup>17</sup>

With the establishment of multi-employer bargaining several countries

passed extention of agreements legislation. These provisions allowed negotiated terms to be extended to employers who were not party to the negotiations. They protected associated employers from low wage competition and provided the unions with a means of providing more universal benefits. Since non-associated employers could be compelled to implement terms over which they had no control extension provisions encouraged the growth of employer associations. In North America where extension provisions are all but non-existant most employer associations consist of small and weak firms. In Europe, however, large employers who may influence association policy are more highly associated than are small firms.<sup>18</sup>

After World War II new social issues came to the fore: reconstruction, inflation, wage and price controls, unemployment, active manpower planning, the quality of worklife, and new demands for workers participation in management. Labour, management and the state all had strong interests in these issues and each party had organizations though which their interests could be pursued. Either formally or informally national decision-making in regard to employment related issues became tripartite.

Regardless of their level of membership density trade union federations came to be regarded by the state and by society as the national voice of the working class. The National Employers' Federations filled the same role in regard to the interests of capital. A tradition was established of seeking concensus. Society came to expect labour and management to take the public interest into account in their dealings with each other and with the state. It also came to expect the state to seriously attempt to reach consensus

before proceeding with legislation. Collective bargaining in the broadest sense of the term became a multi-level process. National labour and social standards were often produced by agreements between some combination of the three principal actors.

National negotiations were accompanied by union-association bargaining at the industry level over wage and benefit movements. Any breakdown in these high level bargaining processes could produce much immediate public discomfort. Conflict could also exacerbate inflation and recession. Thus, the public held the parties accountable for their actions and bargaining rounds were widely discussed by society. Social recognition meant the acceptance of social responsibilities. Wage and benefit bargaining became more technical and less power based.

To effectively participate in these processes employers' associations expanded staff, took on new functions and acquired new members. Today the associations are dominant institutions in European Industrial Relations Systems. In several countries association membership density exceeds that of the unions. It has been estimated that between 60 and 90% of employers belong to associations engaged in labour relations activities.<sup>19</sup> This unity is not, however, a negation of individualism. Strong employer associations are a mechanism designed to defend the ability of managers to make decision as they see fit.

# The North American Pattern

North American developments were quite different and as a result employers developed a distinctive strategy. In 1880's the mainstream of the

labor movement decided to limit itself to craft organization and emphasized economic action against employers over political action. Socialism was firmly rejected. Nor was there to be any alliance with a political party. As a result there was no serious political threat to capitalism. Employers did not have to seek public and union acceptance of capitalist enterprise. It was granted freely. Union leaders continually reaffirmed their acceptance of the capitalist system. Trade unionism did represent a challenge to management's power to manage but it was manifest as a threat to specific employers in specific industries at specific times and places rather than as a general threat to employers as a class.

One might intuitively expect that employers would be more receptive to unions which pledged allegiance to the system but quite the contrary occurred. The moderation of the labor movement led employers to believe that the unions could be destroyed or at least contained.

Where unions were able to compel companies to recognize and negotiate with them as a result of their market power they were also able to compel employers to sign collective agreements which over time became elaborated and made serious inroads into the rights of management. For example, unions imposed seniority provisions regarding layoffs and promotions, manning schedules and crew sizes, job descriptions and classifications, restrictions on the implementation of new technology or restrictions on the manpower consequences of technological change. There were mandatory union membership provisions and requirements that companies must use union labour. There were restrictions and requirements regarding training and overtime and the subcontracting of work. The ability of management to impose discipline was constrained by grievance procedures and by the threat of strikes.

To protect against such incursions companies often required unions to sign collective agreements which contained "managements rights" clauses similar to the general provisions noted above in regard to Sweden and Britain. Moreover union leaders often went on record stating that it was not their intention to usurp the role or responsibility of management. Nevertheless when workers experienced job-related problems because of management decisions unions sought to restrict those decisions. Mine worker unions negotiated the price of the product; clothing worker unions participated in the establishment of production standards; construction and printing unions specified who the employer would hire and the level of skill to be attained by workers. As one observer noted "at some time or place unions have negotiated on subjects embracing every area of management."<sup>20</sup>

Despite the strength of unions in organized companies the employer strategy of plant by plant opposition had considerable success. By the 1930's less than 15% of the relevant labour force in Canada and the U.S. was unionized.<sup>21</sup> In that decade, however, union militancy increased and unions began to expand into the mass production industries. By broadening their base of membership unions became a more considerable political factor. On the other hand the political and social influence of business was at a low level because of the collapse of the economy in 1929. Government policy shifted to support for labour. By that point an embryonic collective bargaining system had taken shape. Modest attempts had been made by the Wilson Administration after World War I and by the Roosevelt Administration in the early 1930's to encourage labour and management to reach a national accomodation. But the will to achieve such an accomodation was not strong on either side. By the 1930's unions had a vested interest in the existing system. For the most part they thought of themselves as representatives of their own members and sought to represent all employees in their separate jurisdictions. They did not vigorously seek general recognition from employers as the societal representatives of the entire working class. Instead they sought legislation which would allow them to extend decentralized collective bargaining to new sectors of the economy. The Wagner Act, passed in 1935, reflected these concerns. A Labour Relations Board was established which had the power to determine employee units appropriate for collective bargaining. To become the bargaining agent for employees in each such unit unions had to convince a majority to vote in favor of unionization and collective bargaining. Most of the weapons used by employers to oppose unionization - the blacklist, the yellow-dog contract, discharge for union activity, spies, company unions and other "threats of reprisal or promises of benefit" - were made illegal. At first the Labour Relations Board forbade employers to make any statements regarding unionization since negative statements from employers would almost certainly have an intimidating effect on employees. However, employers argued that this policy infringed their "right of free speech." As the result of a court case they quickly recovered their right to resist union organization provided that they did not engage in blatantly coercive behaviour. The Taft-Hartley Act of 1947 enbedded the right in law and public policy. Soon after

the American initiative an almost identical policy was adopted throughout Canada.

#### THE CONTRASTS

In both Europe and North America governments have pursued policies designed to expand union recognition and orderly collective bargaining. However, the policies chosen created quite different expectations of employer behavior. In Europe governments said to employers: "You must recognize the unions as the bargaining agents for workers generally. You must take the initiative and work out an appropriate accomodation." In effect North American governments said to employers: "You do not have to recognize unions; you do not have to reach an acceptable accomodation with organized labour. You may continue to fight unionization; you may attempt to convince employees not to join unions, not to establish collective bargaining. Your only social and legal responsibility is to refrain from overt coercion. If you are unsuccessful in your attempts to convince employees to remain non-union then you must bargain 'in good faith' with the agent they choose to represent them."

This approach provided employers with an ethical mandate to continue with their beligerant behaviour towards unions. Today North American employers fight strongly against unionization in part because of this ethical mandate and in part because of the success achieved by North American unions in limiting employer discretion. In the overwhelming preponderence of union organizing cases employers attempt to persuade their employees to reject unionization. Typically employers argue that unions are outsiders who are

more concerned with collecting dues and accumulating power than in the interests of employees. They argue that unions cause strikes and that strikes mean lost wages and perhaps lost jobs. They claim that unions cannot be counted on to bring about job improvements and that present benefits might even be lost. In short where employers do not outrightly infringe the law implicit threats replace explicit threats.

This behaviour is generally tolerated by North American societies because unlike Europe trade unions have never been widely accepted as an idealistic force for democracy. At its core union philosophy in North America is pragmatic and while pragmatism may have provided the union movement with strength in the difficult formative period it has also become a long term source of weakness. In practice "business" unionization appears to the public to be self-interested and self-serving and thus the notion of unions as instruments of democracy seems incongruous. Most North Americans would probably subscribe to the proposition that unions are unnecessary where management "does right willingly." It is common for unionization to be considered the consequence of management failure.<sup>22</sup>

Because of the prevalence of these attitudes government did not prevail upon employers to recognize unions as the general representatives of working class interests. Moreover because unions have never posed a credible threat to employers as a class employers have seen no reason to unite for their defense. These attitudes also explain the widespread indifference in North America to the absense of collective representation in many parts of the economy.

Given this milieu it is also understandable why employers see no advantage in cooperating with unions in search of consensus solutions to national problems. To do so might suggest that unions have a legitimate claim to be recognized as the societal spokesmen for workers generally. Were this perception to become widely accepted it might be increasingly difficult for non-union employers to maintain active opposition to unions and for employers generally to defend their present domain of discretion against further incursions by labour, by the state or by both.

The situation in the U.S. and Canada is not precisely the same. Since the 1960's a unified labour movement in Canada has supported the socially idealistic New Democratic Party. Moreover, many well-known Canadian trade unionists are publicly avowed socialists. In Canada socialism has fewer negative connotations than in the U.S. In short the Canadian labour movement may be considered more apparently idealistic than the U.S. labour movement.

In the mid-1970's the CLC made a bid for national recognition as the representative of working class interests. It published a "Manifesto" in which it agreed to cooperate with employers and government in the public interest. In return it wanted real power. No concrete change in formal decision-making mechanisms resulted from the gesture. Moreover, many unionists opposed the move believing that Congress would be coopted by government and business. Nevertheless since the mid 1970's there has been more consultation between labour, government and business organizations than during previous periods. Moreover, the CLC has concluded agreements with business organizations concerning the appropriate direction of policy in

regard to a few public issues. Whether these developments are an indication of fundamental changes to come or merely abberations around the norm is yet to be seen.

## The Theory

Many of the observations reported in this essay are well known. In the past, however, the "facts" have usually been assessed from a worker or union perspective. Employer behaviour has typically been accepted as a given rather than as a phenomenon to be explained. However, the variation in the behaviour of European and North American employers requires explanation in its own right. The theory developed in this essay is summarized in schematic form below

> Employer Attitudes Towards Unions (C)

Labour Philosophy and Strategy (V)

Government Action (V) ---> Employer behaviour (V) ---> IR System (V) towards unions attributes

V = Variable C = Constant

The theory holds that the attitudes of employers towards trade unions in both Europe and North America are fundamentally the same. Employers place a very high value on the power to manage free from restriction and unions are a prime threat to that objective. Stemming from this value orientation the initial behaviour of employers towards unions in both Europe and North America was essentially the same. In defense of their power to manage employers sought to either destroy or contain the emerging unions. Today employer behaviour towards unions varies considerably. In Europe employers recognize unions as the legitimate representatives of the working class; in North America they do not. In Europe employers have formed strong organizations to deal with social and labour matters; in North America they have not. In Europe employers frequently interact with labour and the state in search of consensus solutions to pressing national issues; in North America they do not.

The theory suggests that these differences are primarily the result of government action. In Europe governments demanded that employers recognize unions as the legitimate representatives of workers generally or face state intervention toward that end. North American governments never made such demands on employers.

Union behaviour has had both a direct influence on employers and an indirect influence through the medium of the state. In Europe the mainstream of the labour movement, faced with intransigent employers, rejected the capitalist system and organized broadly to achieve social change through political action. This strategy influenced both the government action and the change in employer behaviour noted above.

North American unions, faced with similar employer intransigence, adopted a very different strategy. Pragmatic craft unionism, accepting of capitalism, became the mainstream.<sup>23</sup> Pressure for comprehensive recognition was neither exerted nor granted. Moreover, the embracing of pragmatism, although it

resulted in strength and survival in specific enterprize and industrial situations, produced political and social weakness. The philosophy of "more, more, more" appeared to lack an idealistic base and thus was incapable of arousing widespread social and political support. Employer belligerence came to be accepted as a reasonable stance towards union self-centredness.

This variation in employer behaviour has had major consequences for the operation of present day industrial relations systems. Individualistic belligerence in North America contributes significantly to the high level of overt conflict and to the restriction of the extent of employee participation in management by right. However, employers caught in the web of strong unions in spite of their belligerence have seen their rights to manage dissipated to a greater extent than their European counterparts. In Europe collective acceptance of unions has produced a low level of industrial conflict and wide spread establishment of employee participation mechanisms. Most employees work in establishments where some form of participative structure has been established. Until recently, however, employers through their associations have been able to restrict the depth of participation. While recognizing the legitimacy of collective employee representation at the national level and at the industrial level and at the peak level within corporate hierarchies they have been able to maintain a great deal of control over managerial functions. In short, workers' participation in enterprise management in Europe is extensive but shallow; in North America it is restricted but relatively deep. This pattern has, however, been changing in recent years and workers in Europe have, through political means, been acquiring more influence on managerial

decisions.<sup>24</sup>

The theory presented here is very general. Admittedly Europe and North America are not invariant entities. Thus Britain in many ways stands between continental Europe and North America on several of the factors discussed. In turn Canada stands between Britain and the United States. France and Italy are exceptional because of the continuing ideological militancy of their unions. The general theory requires refinement to take account of such variations. Nevertheless, we believe that the dominant patterns and relationships have been identified.

#### Notes

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- 16. Wigham, 1973.
- 17. Sturmthal, Adolf (1964), Workers' Councils, Cambridge: Harvard University Press.
- 18. Structure, Scope and Activities of National Central Employer Organisations (1970), London: International Organisation of Employers. This observation is contrary to the argument put forth by Ingham that centralization of power and authority in employers' associations is related positively to the level of industrial concentration. See, Ingham, G. K. (1974), Strikes and Industrial Conflict, London: Macmillan and Jackson, Peter and Keith Sisson (1976), Employers' Confederations in Sweden and the U. K. and the Significance of Industrial Infrastructure. In: British Journal of Industrial Relations, Vol. XIV, No. 3.
- 19. Structure, Scope and Activities of National Central Employer Organisations, 1970.
- 20. Chamberlain, Neil (1948), The Union Challenge to Management Control, New York: Harper & Row.
- 21. Derber, Milton (1970), The American Idea of Industrial Democracy, Urbana: University of Illinois Press.
- 22. The AFL-CIO has supported numerous legislative initiatives in the general interest of workers. Nenvertheless, in the public mind these statements and activities are eclipsed by the self-serving image which emerges from decentralized collective bargaining.
- 23. The explanation for this union strategy, generally held in North America, is that the union movement had no real choice because conditions unique to America precluded the success of the more idealistic, communitarian approach dominant in Europe. The validity of this explanation is not directly relevant to the argument of this paper. Our purpose is to demonstrate the effects of the choice irregardless of the reasons for it. See Perlman, Selig (1970), The Theory of the Labor Movement, N. Y.: Augustus Kelley and Galenson, Walter (1961) Why the American Labor Movement is not Socialist. In: American Review, Winter.
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