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Comparative Perspectives in Employment Relations Research

Industrielle Beziehungen

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Carola Frege*

Comparative Perspectives in Employment Relations Research**

Abstract —This article discusses the historical trajectories of employment research in the U.S. and Germany. Both countries exemplify very different research traditions, which have their origins in the 19th and early 20th century and are shaped not only by the field of inquiry (different national employment institutions and practices), but also by different social scientific traditions and political philosophies, for example the different interpretation of what constitutes industrial democracy or employees' rights at work. I conclude that current research still differs across countries and that we would do well to endorse this plurality rather than assuming an inevitable convergence to US research styles.

Industrielle Beziehungen in vergleichender Perspektive

Zusammenfassung —Dieser Beitrag untersucht die geschichtliche Entwicklung der 'Industriellen Beziehungen' Forschung in den USA und Deutschland. Wir finden unterschiedliche Forschungstraditionen in beiden Ländern, die bis in das 19. und das beginnende 20. Jahrhundert zurückführen. Diese Traditionen basieren nicht nur auf den unterschiedlichen nationalen Entwicklungen der Arbeitsmarktsinstitutionen, sondern auch auf unterschiedlichen Wissenschaftstraditionen und politischen Ideologien. Hier ist z.B. das differente amerikanische und deutsche Verständnis von industrieller Demokratie und Mitbestimmungsrechten von Bedeutung. Der Beitrag zeigt, dass die gegenwärtige IB Forschung weiterhin nationale Merkmale aufweist und wir von keiner vollständigen 'Amerikanisierung' reden können. Ich argumentiere zudem, dass die wissenschaftliche und sozialpolitische Relevanz unseres Forschungsgebietes keine Konvergenz, sondern gerade eine Intensivierung dieser pluralistischen Ansätze voraussetzt, um der wachsenden Komplexität der globalen Arbeitsbedingungen gerecht zu werden.

Key words: **comparative industrial relations, Germany, USA, history of science** (JEL: B10, J01, J40, J51, J53, J65, J80, J83)

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Introduction

The industrial revolution and its social consequences in Europe and the U.S. during the 19th and early 20th century increasingly drew scholars from a variety of emerging social sciences to engage in the analysis of the mechanics of capitalism. Of particular relevance was the “social question”, respectively the “labour problem” (poverty and social unrest related to the industrialization) (Katznelson 1996). At the same time, the U.S. and Britain (and subsequently other Anglophone regions) – where the labour problem was particularly severe – saw a new academic field emerging: the study of employment, industrial or labour relations. Though originally established by institutional economists in the U.S. it soon became to be seen as an interdisciplinary field incorporating labour economists, as well as social psychologists, personnel management scholars, industrial sociologists, and labour lawyers as well as political scientists working on a broad variety of labour issues. This development did not occur in the rest of the world, in particular not in continental Europe, where employment relations (ER) research was conducted by multiple disciplines, mainly by sociologists, political scientists and lawyers.

I will argue in this article that these different institutional developments came about not by chance but can be traced back to different research traditions across these countries, exemplified in different preferences regarding methods, paradigms and theories. This article starts by describing the different historical trajectories of ER research in the U.S. and Germany as core examples of Anglophone and continental European research traditions. Classifying national traditions is surely problematic as research is never homogeneous and there are always alternative lines of research in every national setting. Hence, I will not attempt to provide a comprehensive coverage of the field in each country but a simplified outline of its main, comparatively distinctive features.

I show that research traditions are shaped by the field of inquiry (thus national employment practices in our case) but also by nationally specific scientific traditions and political philosophies. In contrast to the common belief of the growing universalism or homogenization of social sciences I find that research practices in ER continue to significantly differ across countries. They are deeply embedded in national-specific path dependencies. The article finishes with some thoughts on its potential implications for the future of ER research. Rather than betting on the long term convergence to US research styles we should embrace different national research traditions and advocate a more pluralistic understanding of employment and work. Only the latter will allow a more realistic response to the complex global challenges employment relations are facing today.

United States of America

The first ER course in the U.S. was created at the University of Wisconsin in 1920. Other universities such as University of Pennsylvania (Wharton Business School 1921) and Princeton (1922) and Harvard (1923) followed. In the same year the National Association of Employment Managers changed its name to the IRAA (Industrial Relations Association of America), which was a forerunner of the current professional

association, IRRA/LEERA (Labor and Employment Relations Association), created in 1947. After World War II ER became increasingly institutionalized as an independent field of study in various U.S. universities.

Historically ER as an academic field was founded in the U.S. by institutional or political economists, such as Richard Ely, Henry Carter Adams and John Commons (the founder of the Wisconsin School), who were heavily influenced by the German historical school of economics and felt increasingly alienated in their economics departments which began to turn towards neoclassical paradigms at the beginning of the 20th century (Hodgson 2001). One can argue that the ‘new political economy’ or institutional economics arose in reaction to the ascendance of the laissez-faire perspective within economics. The institutional economists found in ER a niche to pursue pragmatic, behaviourist, public-policy oriented research which took institutional constraints in the labour market into account (Jacoby 1990; Kaufman 2004). Ideally, this perspective focused on the rules and norms underpinning economic activity, viewing institutions of work and employment as embedded within, and largely inseparable from, broader social, economic, and political institutions (Godard 1994: 1).

Note that these early theorists were not radical progressives however, but liberals and conservatives at the same time. They were liberals in their desire for reforming some of the social processes operating in the U.S. society and conservatives in their desire to preserve the contours of their capitalist system and the parameters of wealth and power therein (DeBrizzi 1983: 8). As Commons would have put it, they wanted to preserve capitalism by making it good. According to Kaufman (2004: 2) ER arose as a relatively pragmatic, socially progressive reform movement, thus “occupying a position in the progressive centre to moderate left on issues of politics and economics, and spanning a diverse and not entirely consistent range of opinion with liberal business leaders on the more conservative side of the field and moderate socialists on the more radical side”.

It comes as no surprise then that when the IRAA was established in 1920 the top positions were taken over by pro-management conservatives. Their publication ‘Personnel’ became dominated by the conservatives and adopted a strident anti-communist tone that spilled over into more general anti-labour sentiments (in particular against militant workers) but continued to remain agnostic on the question of collective bargaining (Kimmel 2000: 197).

Moreover, the pioneers of the field in the Anglophone world, Commons in the U.S. and the Webbs in Britain, were heavily engaged in the world of public policy (Hyman 2001). ER was developed as an explicit policy-oriented field of research, devoted to problem-solving (Kaufman 2004: 117; 2008). In other words, their aim was to solve the labour problem without threatening capitalism. ER sought major change in the legal rights, management, and conditions of labour in industry, but at the same time was conservative and non-Marxist in that it sought to reform the existing social order rather than replace it with a new one. In fact, Marxists were antagonistic to the new field of ER since it sought to save through reform what they hoped to replace by revolution (Kaufman 1993: 5; 2008).

At the same time, Human Resource (HR) practitioners (formerly personnel management) and managerial scholars became also interested in the wider field of work and employment (Kaufman 1993: 19). Already in 1910s there was increasing interest in the scientific engineering of human capital, as symbolized in the work by Frederick W. Taylor (*Principles of Scientific Management* 1911). According to Kimmel (2000: 5), by the end of World War I, however, academic researchers and practitioners in HR split in two camps, the ‘reformists’ and ‘managerialists’. The reformists adopted liberal values and continued to support progressive ideas of capitalist reforms and saw a role for personnel managers to mediate between workers and employers interests. “They defined their professional task as the regulation of labour relations in the public interest and the oversight of collective dealings between employers and employees” (Kimmel 2000: 6). These scholars and practitioners would borrow from the theory and methods of the institutional labour economists. They were part of a wider progressive group of policy makers and scholars from different disciplines who came to the joint conviction that modern industries would need reform such as for example an employment department, which would promote employee welfare (Commons 1919: 167).

The managerialists, on the other side of the spectrum, embraced, according to Kimmel (*ibid.*), scientific expertise and objectivity as the defining features of their profession and assumed a harmony between employers and employees. Their task was to discover the source of problems in ‘sick’ companies where workplace relations were not harmonious and then to cure them. They used scientific techniques for ‘adjusting’ workers to industry, drawing in particular on industrial and social psychology. The idea was to improve workplace relations by a special profession, which would apply in particular the new science of psychology to the ‘human factor’ in industry.

Over time, the more reform-oriented HR members found themselves increasingly marginalized within the management profession (Shenhav 2002: 187). The triumph of managerialists meant a sharp split between psychological approaches and political and economic approaches to the study of ER. Managerialists favored psychological approaches, which were seen as more objective: Industrial psychology (later on ‘organizational behaviour’) became very popular during World War I and thereafter and was increasingly regarded as the solution to the labour problem (Shenhav 2002: 183; Godard 2013). This shift of the new profession of personnel management away from reform and toward ‘science’ also entailed a move away from a broad treatment of work and employment as involving economic and political (thus macro), as well as psychological and social (micro) factors, towards a narrow treatment of ER/HR as a fundamentally psychological (individual) concern (Kimmel 2000: 311). This approach gained dominance during the 1930s and 40s. In 1922 business leaders even founded their own rival organization to promote the field of employment/personnel management. The American Management Association (AMA), as it was named, campaigned vigorously for the open shop and against organized labour. Thus, increasingly in the early 20th century the rising academic field of management excluded concerns with labour from their industry and personnel studies and pushed those reformist scholars interested to the evolving field of study of IR (Shenhav 2002: 187). This divide between macro and micro approaches remained a characteristic feature of the field over

the following decades. As a consequence, institutional economists interested in ER and reformist HR scholars shared in the beginning a common interest in pragmatic research leading to solutions of the labour problem. However, over time disagreements arose in particular over trade unions and collective bargaining (as one possible regulatory solution) and the two factions eventually split but learnt to co-exist and to divide the problem of work and employment between them, with personnel types handling the 'human element' and ER experts handling the material and collective aspects of labour relations (Kimmel 2000: 312). These developments partly explain why we find two sorts of HR scholars in the U.S. today: the HR scholars in the ER field acting under the umbrella of LERA and the HR and organizational behaviour (OB) scholars, who belong to the Academy of Management. According to Godard (2013) OB is however increasingly taking over HR research not just within the Academy of Management but also increasingly within the ER field. There are only very few ER-oriented HR scholars left.

Finally, it comes to no surprise that from early on the broad field of ER was perceived as an interdisciplinary study rather than a distinctive discipline (Kaufman 1993: 12; 2010). Yet, interdisciplinarity was in reality pretty narrowly defined. The leading assumption was that the field should investigate a broad terrain by combining economics as well as psychology. However, this did not include disciplines such as political science, sociology or history and their different methodologies and paradigms. Labour economics and social psychology (in the tradition of the Hawthorne experiments) were clearly the leading disciplines in the field of ER.

After World War II the split between the two economic and psychological groups became larger and the field became increasingly dominated by labour economists and other institutionally oriented scholars interested in collective bargaining (Jacoby 2003; Kaufman 2010). Thus, the quasi-stable co-existence of HR and ER started to disintegrate in the 1970s/80s when the New Deal system of collective labour relations began to break down. Labour economists have since then increasingly dominated the LERA activities and research programs as well as publications (Kaufman 1993: 193). It is no surprise that the past academic presidents of LERA were all labour economists.

As mainstream economics developed during the 1970s toward a sharply focused analytical discipline with a strong methodological consensus centering on model-building and on the statistical-empirical verification of largely mathematical theoretical hypotheses (Solow 1997) this had unsurprisingly also an impact on labour economics and ended up marginalizing the institutionalists. Thus, labour economics developed from an original institutional focus towards increasingly neo-classical (rational choice) paradigms (Boyer/Smith 2001; Jacoby 1990). Strauss and Feuille (1978: 535) argue that "if collective bargaining represents employment relations central core, then labour economics has largely divorced itself from that core". Labour economists are currently mostly interested in micro level studies such as skill-wage differentials, labour contracts or training (e.g. the leading Cambridge School in U.S. labour economics). Thus, institutionalism has lost its theoretical link to labour economics (Jacoby 2003). This development has surely been supported by the declining importance of institutions in the U.S. labour market such as unions or bargaining. These days it is extremely difficult in the U.S. to hire young institutional labour economists.

In sum, it comes as no surprise that labour economics has dominated much of U.S. ER research from its very beginning. Not only were and still are most authors in leading ER journals labour economists but research methods, theories and paradigms of most publications also continue to be shaped by economic paradigms (Frege 2007). As outlined above, this does not deny the existence of a large contingent of U.S. labour scholars who use non-economic, multi-disciplinary theories and methodologies, but compared to other countries labour economics clearly has been dominant. Currently, we are observing the beginning of a second turn in the ER field in the U.S. as well as in other Anglophone countries with the rise of psychology and OB (see also Godard 2013). In my own, very US-biased department we have hired a large amount of OB scholars in the last few years but only one (non institutional, Chicago trained) labour economist.

Overall, mainstream research has been characterized by empirical, quantitative, deductive research with multi-variate statistics, mid-range hypotheses and focused on the micro-level (individual or groups of employees) (Frege 2007; Mitchell 2001; Whitfield/Strauss 2000). Moreover, most ER theories are borrowed from economics or psychology and produce rational choice hypotheses or behaviouristic, social-psychological approaches (Cappelli 1985: 98; Godard 1994). There is also evidence that research published in U.S. ER journals, has increasingly focused on HR/OB rather than ER issues (Frege 2007). Finally, with regard to the underlying research paradigms it is commonly suggested that mainstream U.S. research has generally interpreted ER as a labour market outcome and has been driven by a paradigm of contractual *laissez-faire*, which was traditionally defined as free collective bargaining and is now increasingly perceived as an individualistic contractual system (Finkin 2002; Finkin et al. 2011).

Germany

In Germany employment studies have a long tradition going back to Karl Marx and Max Weber, Lujo Brentano and Goetz Briefs. During the 20th century the field became dominated by law and political science but most prominently by sociology with the first university institute specializing in industrial sociology in 1928 at the Technical University Berlin (Keller 1996; Müller-Jentsch 2001). Despite the fact that the relationship between capital and labour and the emergence of interest institutions were discussed in German social sciences from the mid 19th century, ER was however not established as an independent academic discipline (Keller 1996: 199). There is no IR department in any German (or continental European) university.¹

Research on work and employment issues remained the subject of various social science disciplines. A few indicators should suffice to support this observation. First, although there have been increasing attempts in recent years to establish an ER discipline in Germany (e.g. the establishment of the journal “*Industrielle Beziehungen*” in 1994) the academic community directly associated with ER remains small. The Ger-

¹ A typical example is the IAAEU Institute in Trier, which is divided into a labour economics and a labour law unit. An exception used to be the WZB Berlin, which had a long-standing research unit on ER which is now closed.

man section of the IIRA (GIRA, established in 1970) counted only 80 members in 1995 and 163 in 2013.

Moreover, a quick overview of “Industrielle Beziehungen” between 1994 and 2013 revealed that published research has been conducted by researchers with a wide array of specializations: industrial sociologists, labour lawyers, political scientists, business administration scholars, and economists. Rarely does anyone call himself an ER scholar. Industrial sociologists are in the clear majority.

Note that there is hardly any cross-disciplinary communication between the disciplines. Business administration or law scholars for example are rarely cited in the industrial sociology literature and vice-versa (Muller 1999: 468). The field is really multi- rather than inter-disciplinary.

Industrial sociology has made the most significant contribution to the German study of ER (Keller 1996). Its central focus are core ER issues such as bargaining policies, working time, technical change and rationalization, and their impact on work organization and social structure, but not labour market issues (Baethge/Overbeck 1986; Kern/Schumann 1984; Schumann et al. 1994). From its very beginning industrial sociology included a much larger field of topics compared to industrial sociology in Anglophone countries. German industrial sociology was closely connected to social philosophy and general sociology and in fact regarded as its major sub-discipline (Schmidt et al. 1982; Müller-Jentsch 2001: 222). It positioned itself within the broader societal context of industrialization, and focused in particular on the role of organized labour.

Max Weber initiated the first systematic sociological research on German industry under the patronage of the ‘Verein für Socialpolitik’ in the late 19th century. This famous association, founded in 1872 by academics of the German historical school, intended to establish social fairness between capital and labour (Müller-Jentsch 2001: 223). Goetz Briefs developed the field of ‘Betriebssoziologie’ (sociology of the firm), later subsumed under ‘Industriesoziologie’ (industrial sociology), which became a major approach of research during the 1920s and 30s (Müller-Jentsch 2001: 222). Another major research project of the ‘Verein’ was launched in the first decade of the 20th century on the selection and adjustment of workers in different segments of German industry (1910-15). According to Müller-Jentsch (2001: 224) this was the beginning of systematic industrial research in Germany. The core question was how humans are shaped by modern industry and which job prospects (and indirectly life chances) do big enterprises offer them. Weber wrote a long introduction to the research project and outlined various questions to be addressed: social and geographical origins of the workforce; the principles of their selection; the physical and psychological conditions of the work process; job performance; preconditions and prospects of careers; how workers adjust to factory life; their family situation and leisure time (Müller-Jentsch 2001: 224). Methodology was based on interviews and participant observation in selected companies.

Müller-Jentsch (2001) argues that industrial sociology at that time was heavily shaped by the notion of workers exploitation and this was advanced not just by Marxists but also by liberal scholars. Lujo Brentano, for example, was an early liberal

economist and antipode of Marx and Engels but argued that “trade unions play a constitutional role in capitalist economies since they empower employees to behave like sellers of commodities. Only the unions enable workers to adjust their supply according to market conditions” (ibid: 225).

After World War II sociology was gradually (re)established as an academic discipline (Müller-Jentsch 2001: 229) with a main focus on industrial sociology (Maurer 2004: 7). In the early years after the war sociologists were primarily concerned with whether the political democracy introduced by the Allies would stabilize in Germany. There was a common conviction that democracy is not only about institutions but that it also needs a cultural basis in society. According to von Friedeburg (1997: 26) the fear was that class conflicts either become too strong that they endanger the democratization process, or that they become too weak and endanger the reform potential of the labour movement. The belief was that only self-conscious workers could be a counterweight to the restorative forces in postwar Germany. As a consequence many sociologists focused on exploring worker consciousness and beliefs, traditional ER topics.

The first explicit project after World War II was conducted by industrial sociologists in the late 70s at the Institute for Social Research in Frankfurt (Bergmann et al. 1979). It entailed a large empirical study on German unions from a sociological perspective (Müller-Jentsch 1982: 408). In the same year ER was first introduced as an official topic at the German sociological congress (Berliner Soziologentag 1979). It is also symptomatic that the first German textbook on ER was written by a prominent industrial sociologist, Walther Müller-Jentsch (1986), and called “Sociology of Industrial Relations”.

To conclude, Germany’s core ER research has traditionally been dominated by industrial sociologists and this is still the case today (e.g. SOFI Goettingen). Research focuses on ER rather than HR issues, is more theoretical or essayistic than empirical and if empirical generally favours qualitative, inductive research (Frege 2007; Hetzler 1995). The focus is on the firm level. The dominant paradigm is to interpret ER as a socio-political process, thus as being shaped by economic as well as political forces, and the emphasis has been on corporatist social partnership approaches rather than collective bargaining (Hyman 1995: 39). Last but not least one should note the slightly separate tradition of ‘Personalmanagement’ (now in many cases anglophiled as ‘Human Resources’) as a subunit in management studies (e.g. *Zeitschrift für Personalforschung*). It took Germany, however, a long time to embrace an U.S. definition and study of human resources.

Research variations and their national embeddedness

The brief overview has revealed different national developments in both countries. In the U.S. labour economics was, from early days, the leading discipline in ER research, initially with a strong institutional, policy orientation which was subsequently taken over by a more neo-classical approach to labour markets. Germany has a long intellectual (Marxist and liberal) tradition on researching work and employment issues, which has been traditionally dominated by industrial sociologists. Whereas the field has not

established institutional independence in Germany but remains multi-disciplinary, ER became an independent academic field in the US.

At the same time it comes to no surprise that both countries reveal variations in their research practices, thus methodologies, theories and research paradigms. These variations have been shown to be long-standing national academic profiles. Such diversity of research styles — which can be found in other social sciences too (e.g. Fourcade-Gourinchas 2001 for economics) — certainly undermines simplistic assumptions of a universal, linear evolution of social sciences and challenges recent claims that globalization evokes a convergence of scientific research to a universal, if not U.S.-led model. Thus, at this stage there is evidence of a continuing national embeddedness of ER research despite the growing internationalization of academia (e.g. international conferences, cross-national research collaborations) and despite the increasing globalization of employment practices throughout the industrialized world (e.g. supranational employment regulations in the E.U.). A related question is then what this means for the future of ER which will be discussed at the end. For now, we want to discuss how then can we explain the ongoing diversity and persistence of national research traditions? The article turns to explore longstanding roots of national research profiles in specific structural, institutional and political constellations, within which social scientists have tried to develop discursive understandings of their ER systems. I argue that a theory may gain acceptance in the field not simply because it provides the most ‘adequate’ explanation for a phenomenon, but, rather, because the explanation it offers is in a form that is particularly attractive to a specific national culture or a particular group of scholars who are leading in the field.

Note that explaining research variations is an ambitious enterprise: No single factor can explain the variations across different research traditions. The inquiry ideally requires a complex set of multiple factors. Thus, one would ideally need a comparative history of ER institutions and its ideas across countries, a history of knowledge production, a history of the relations between ER and related disciplines, a history of influential academics in the field, and a social history (students and their background). We would also need a theory to interconnect historical, structural and cognitive determinants and the actions of the scientific community (Weingart 1976). However, as Fourcade-Gourinchas (2001: 398) argues, we do not have yet a satisfactory encompassing theory of knowledge formation that would allow us to account simultaneously for the social structures and institutions of knowledge production and for the latter’s intrinsic, substantive ideational nature. And we have no theoretical framework to analyse cross-cultural variations between social science disciplines. The remaining part of this article introduces therefore three preliminary approaches, which highlight the embeddedness of ER research in its national-specific context. These are heuristic tools rather than a tight theoretical framework, exploring interrelations between variables rather than determining causalities.

The first explanation provides a substantive approach and focuses on how the subject field of academic inquiry, national ER practices, can shape research patterns. The second approach highlights the institutional embeddedness of ER research in national scientific traditions. The third and final approach discusses the relationship

between national political ideologies and traditions, in particular the conception of political and industrial democracy, and ER research.

ER practices

This approach provides a contextual explanation of cross-country research variations by linking 'external' ER practices to 'internal' research styles. It is assumed that in particular research topics, author affiliations and academic paradigms will mirror the development and practice of ER institutions in a specific country. This position is essentially functionalist since it assumes an independent scientific space organized around specific self-referential understandings of the subject field (ER practices). Academic disciplines develop essentially as structural reactions to changes in their external environment (Wagner 1990: 478). This assumption is widely acknowledged among social scientists today and is in stark contrast to the original positivist position arguing that scientific inquiry is independent of the phenomenon observed (Delanty 1997). Moreover, because ER is a problem-oriented field of study it is even more likely to be shaped by the real world of ER, which obviously differs across countries. As Dunlop states, "different interests of academic experts seem largely a reflection of their type of ER system" (1958: 329). Also Hyman (2001) concludes that different national ER systems provoke different research topics: for example an emphasis of Anglophone research on collective bargaining and in Germany on social partnership and codetermination. Thus, the traditional lack of academic interest in social partnership in the U.S. can be explained by the traditional absence of a proactive state and of workplace democracy in U.S. employment relations, whereas their dominance in German research mirrors their continuing relevance for the German employment regime.

In a similar vein, scholars have highlighted that research follows changing policy questions (Strauss/Feuille 1978). In particular, Capelli (1985) argues that shifts in research topics easily occur as a reaction to shifts in government, union or employer policies. For example, the increasing interest in HR issues in the U.S. can be understood as a reaction to the increasing number of non-union workplaces and anti-union employer and/or state strategies. Moreover, should ER regulations and practices increasingly converge in a globalizing world one would expect a simultaneous convergence of research patterns across countries. So far, however, this has not yet happened.

Undoubtedly this approach helps to explain research shifts over time in a particular country (e.g. the decline of ER and the increase of HR/OB topics in the U.S.) but also cross-country research variations. Moreover, this approach provides an explanation of why different professions get interested in ER topics. For example, the more legalistic and corporatist ER systems in Europe attract more legal scholars, political scientists and sociologists, whereas labour economists are primarily attracted in Anglophone countries where market forces play a larger and more accepted role in determining ER. The substantive approach is not a sufficient explanation, however, and for example is not helpful in exploring the different institutional development of the field of study.

Scientific traditions

A second approach is historical and embraces the embeddedness of ER research within national social science traditions. It is now widely recognized that social sciences and their disciplines are social constructs, embedded in specific historical contexts and shaped by national cultures and philosophies (Levine 1995: 100). They are not just the outcome of a universal, automatic progress of science, nor are they natural, pre-determined categories, but vary across countries. In Ross' words (1991: 1), "the content and borders of the disciplines that resulted in the beginning of the 20th century were as much the product of national cultures, local circumstances and accidental opportunities as intellectual logic". In particular, the development of social sciences were closely connected to the rise of modern universities and were shaped by national epistemological traditions.

University structures

It is during the late 19th century in particular that universities were resurrected as primary knowledge-producing institutions and that the idea of a research-oriented university became predominant in Europe and the U.S. (Wittrock 1993: 305). This development was closely related to the rise of the modern nation-state and the new economic capitalist order. Universities therefore came to be key institutions both for knowledge production, in particular technological progress and for strengthening a sense of national and cultural identity (ibid.: 321). As we will see, however, below they developed in different ways in different countries. Major questions, debated in all countries, were for example between the pros and cons of a liberal versus vocational education and pure versus applied research.

The national-specific structures of universities are useful in explaining the institutional differences within ER research, thus its institutionalization as a field of study in the Anglophone world but not in continental Europe.

The close relationship between knowledge structures and research practices has been widely accepted in the literature. Already Merton (1968: 521) observed that research patterns are influenced by specific forms of knowledge organization. Fourcade-Gourinchas (2001: 400) points out that "scientific discourses [research patterns] are inevitably driven by broader, nationally constituted, cultural frameworks embodied in specific institutions of knowledge production". And Ringer (1992: 26) convincingly proposes that intellectual communities such as academic disciplines cannot be adequately discussed without reference to the history of educational systems in each country, which are heavily dependent on the specific relationship between state and society.

Applied to our context, this trajectory links the existence or absence of the institutionalization of ER to the national university structures. Arguably, the development of the German university structure of professorial chairs enabled a broader research agenda for the individual professors but hindered the institutionalization of interdisciplinary fields. In contrast, the more formal departmental structure as developed in the U.S. in the early 20th century, which was later also introduced to British universities, narrowed the individual's research area but facilitated the creation of institutionalized inter-disciplinary fields.

In other words, the strict classification of disciplines in U.S. universities, which became more dominant than in Europe (Wagner 1990: 236), made it more difficult for individual scholars to integrate ER topics into their own discipline, but on the other hand created the opportunity to establish specific inter-disciplinary programs. U.S. social science disciplines tend to follow a strict methodological and theoretical canon and are more likely to discriminate against alternative views. In Ross' (1991: 10) words, "the importance of disciplines and disciplinary professions to stabilize academic positions in the U.S. system lead frequently to an ontological purification of disciplinary discourses by excluding outside factors to strengthen disciplinary identification whereas in Europe disciplines were less inhibited to use theoretical concepts from other disciplines". The fact that in the U.S. ER centres were first created by institutional economists, who felt increasingly left out of their own discipline, substantiates this point.

In Germany, the Humboldtian reforms in the second part of the 19th century supported an organizational structure around chairs, which traditionally allowed a slightly less rigid definition of the disciplines. Individual professors were more able to follow their own interests independent of the mainstream. Thus, a sociology or law professor interested in labour had it easier to follow this research topic even if it did not fit completely with disciplinary boundaries. There was therefore less need to establish inter-disciplinary forums. An additional reason was that interdisciplinary, specialized or vocational fields had less chances to get accepted because of the traditional German emphasis on general, pure knowledge creation, which was fostered by Humboldt.

Epistemological traditions

In addition to the university structures epistemological traditions also shaped the development and patterns of scientific disciplines in each country. These traditions help explain, for example, why a German and a U.S. sociologist working on similar labour issues may use different research tools, in particular different methodologies, despite their shared profession. And why a U.S. economist and a U.S. sociologist may have something in common despite their different professions. In other words, it may provide an explanation as to why the U.S. is generally leaning towards quantitative empirical research whereas German research is traditionally characterized by qualitative research; or why U.S. ER research tends to produce intermediate, middle-range theories whereas Germany is biased towards more abstract, general social science theories (Bulmer 1991).

Modern philosophies of knowledge developed during the 18th and 19th century and influenced the countries' conception of knowledge creation. In short, the idealist philosophy and humanistic university reforms during the 19th century in Germany were strongly oriented towards science for its own sake ('pure science') rather than to be an instrument for larger societal purposes (e.g. improving social conditions) as became the norm in particular in the U.S.. There was an emphasis on holistic thinking in broad historical cultural categories and being informed by a philosophy, which rejected narrow-minded specialization, which provided a challenge to mechanistic and compositional thinking prevalent in Europe at that time. As a consequence, when

social sciences (including the academic treatment of work and employment) were slowly established at the end of the 19th century they became mostly concerned with elaborating a coherent theoretical framework for societal analysis based on philosophical foundations (Wittrock et al. 1991: 41). Social sciences were originally interpreted as historical sciences embedded in the humanities. This shaped the tendency of the social sciences towards descriptive, historical, qualitative and theoretical research as we can still observe today, for example in the case of ER research. Efforts at empirical research were very fragmented and policy-oriented research could hardly develop in the shadow of formal theorizing (Wittrock *ibid.*). This may have induced the strong presence of hermeneutic and Marxist epistemological approaches and heuristic methodologies in German social sciences. Thus, one can argue that these traditions may have facilitated a more political and critical awareness of social conditions and problems. Social science was understood as a tool to explore the genesis of modern society and it fostered the importance of academic freedom and supported the pursuit of pure knowledge rather than of instrumental, pragmatic research.

The U.S. developed a scientific, pragmatic approach to the sciences, in particular social sciences, which were seen as a tool to improve the social conditions of their modern society. It favoured a more scientific, detached approach to social questions, which was modelled upon natural sciences (Bulmer 1991: 152). This ultimately induced a bias towards an empiricist ideology with a focus on quantitative scientific methods in the U.S. (Ross 1991). In sum, these national knowledge systems, which originated in the 19th century, shape the different ways social sciences and therefore ER research have been organized and practiced across countries.

Political traditions

Yet, the cross-national variation of subject fields as well as the scientific traditions are a necessary but not a sufficient explanation for research variation. What it cannot explain is that similar research topics can be researched in very different ways. The fact that the U.S. traditionally has a strong interest in HR policy and work performance whereas German academics are more interested in the labour process – both approaches look at the workplace – indicates the existence of different paradigms and aims of research. German social scientists have traditionally been more concerned about the labour process and its outcomes for workers as a social class than their mainstream U.S. counterparts who are more interested in individual work attitudes and workplace efficiency. These variations cannot be sufficiently explained on the basis of different subject fields or scientific traditions.

A third and final factor therefore is the political and ideological embeddedness of the research field. The assumption is that political traditions have a certain independence of their subject matter and of their academic institutionalization and can shape research patterns of various sciences in different ways. In particular in a policy oriented field like ER research paradigms, aims and also theories are likely to be influenced by political ideas and – as I will argue – specific ideas on democracy.

I focus on the national political discourse on work and democracy, which originates in the 19th century in both countries. Arguably the philosophical traditions of idealism in Germany or of liberalism and positivism in the U.S., shaped the political

understanding and subsequent writings on the state, democracy and the economy during the 19th century. In particular, the relationship between political and industrial democracy crucially influenced the development of different research paradigms in ER. The two countries developed during the 19th century rather different political traditions on the relationship between state, society and economy, which shaped two different streams of interpretations of industrial democracy: an Anglophone and a German (continental European) stream. U.S. developed a free collective bargaining approach (and eventually voluntary, employer-led direct participation schemes) whereas Germany developed a legalistic, state-oriented approach (co-determination). Both constitutional traditions are based on two distinct concepts of industrial democracy, which I call “*contractual*” and “*communal*”.

In essence, the U.S. regarded the capitalist enterprise as a ‘*private affair*’ (firm as private property) and the economy as an assembly of free individuals joining in contractual relationships. Private contracts rule. Industrial democracy focuses on free bargaining between employers and employees. Moreover, the law privileges individual rather than collective employment rights.

In Germany, the main understanding was to perceive the firm as a *quasi-public affair*, as a social community, a state within the state, a constitutional monarchy, where workers would receive certain democratic rights and the monarch/owner would not have absolute power as in a constitutional monarchy. “The employment relationship is not seen as one of free subordination but of democratization”. This was the declaration of the famous Weimar labour law scholar, Hugo Sinzheimer (Finkin 2002: 621). One could also say that the U.S. focused on ‘private contracts’ whereas Germany focused on a ‘social contract’ within the firm, to adopt Rousseau’s phrase.

The distinction between a private and public view of the firm has a clear reminiscence to the mechanic and organic state theories and to civil and common law traditions. The role of the entrepreneur is seen differently in both traditions. In the Anglophone common law tradition the enterprise is the property of the entrepreneur with workers relegated to contractual claims, at best, on the surplus from production (Deakin 2005: 12). The continental or in our case German entrepreneurs, however, are seen as members of the enterprise community and ideally share duties and privileges that this position entails.

One can conclude therefore that democracy in the U.S. has been mainly conceptualized at a political level and developed a much smaller place in economic life, which is dominated by the principles of market forces, and where democracy is focused to certain individual rights and a minimum of collective rights (e.g. free labour contracts and collective bargaining). In other words, the individual has only very limited democratic rights at work, the main right being to be in a free contractual relationship and therefore to be able to leave the contract. The focus of Anglophone labour law on individual rights has therefore a long tradition. Today this is emphasized even more in the continuing decline of collective labour law and the dominance of identity-based employee rights (which partly substitute collective rights). In contrast, in Germany, due to its 19th century history, industrial democracy has been much more linked to the development of political democracy and has legally restrained managerial discretion.

The focus of labour law remains on collective rights and sometimes misses out on individual employment rights (e.g. anti-discrimination rights).

In sum, this approach highlights the importance of linking national research patterns to the historically embedded political discourses on democracy and work. The different state philosophies as they developed in Germany and the U.S. during the 19th century shaped the perception of the capitalist firm and subsequently the conception of free markets and industrial democracy. Surely these perceptions can change over time and there are free market advocates in Germany as well as U.S. scholars favouring socially responsible capitalist firms – yet the main legal interpretation and public opinion in both countries² are still shaped by these old standing state philosophies.

Applied to the context of ER the different intellectual traditions of political and industrial democracy help to explain certain cross-national research differences. For example, the fact that German scholars traditionally work on topics related to worker participation may not just be due to their labour institutions promoting democracy at work ('subject field'), but also because of a long-standing intellectual tradition in German social sciences to interpret industrial democracy as an important adjunct to political democracy and hence as a value itself. This also explains the interest of German political scientists and lawyers in ER research. In contrast, industrial democracy in the U.S. has not generally been seen as a precondition or attribute of political democracy and has been traditionally perceived as individual rights, property rights on one side and no forced labour on the other side. Recent discussions on employee voice (Budd et al. 2010; Freeman/Rogers 1999) exemplify this individualistic conception of industrial democracy (also Godard/Frege 2013).

Conclusion

This article has offered a brief description of the historical development of ER as a field of research in Germany and the U.S., representing trends in the Anglophone world as well as in continental Europe. It suggested that social sciences, such as the ER field, do not necessarily develop in similar ways across countries but continue to be embedded in broader national-specific cultures. There is no reason to assume that these varying research styles are deviations from a standard or delays in reaching that standard. On the contrary, the persistence of national intellectual profiles over time undermines assumptions of an universal, linear evolution of the social sciences and instead highlights their national historical embeddedness.

I explored the significance of national employment institutions and practices in shaping research outcomes. The article also reminded us to conceptualize ER research as a social scientific field of study, which is inevitably embedded in long-standing national traditions of scientific knowledge production, such as university structures and philosophical traditions of knowledge creation. Finally, I outlined the political perception of ER in each country, for example to what extent the workplace is seen as part of the wider political democracy and how these political ideologies shape the research agenda.

² An excellent example is FOX news for the U.S.

To conclude, ER research has developed differently in both countries. Looking at U.S. and German publications in ER there is no evidence of a significant convergence of research styles. Sustained divergence is the result so far.

However, this does not mean that research patterns should be seen as historically deterministic. They are potentially open for change. Such shifts and developments are mainly driven by significant institutional changes. For example, changes in national university structures (e.g. state and/or private university funding, benchmark exercises such as the *REF* in Britain or the *Exzellenzinitiative* in Germany) can lead to a stronger emphasis on international journal rather than book publications and this will favour more empirical, U.S. driven research methodologies.

Also note that in both countries ER related research, departments and student numbers have severely declined (Frege 2007; Godard 2013). As examples in the U.S. most notably the elimination of the renowned IR center at Wisconsin and in Germany the disappearance of the IR unit at the WZB in Berlin come to mind. Other formerly independent ER departments have been absorbed by management departments/business schools.³ This has also significantly reduced the number of new hires and PhD students interested in ER and has increased management driven research paradigms and methods.

Moreover, the diminishing importance of ‘old school’ institutional labour economics in the U.S. and other Anglophone countries might lead to a stronger inclusion of other disciplines.⁴ So far, however, the Anglophone field has merely opened up to its second traditional discipline, psychology. This is also a result of the above-mentioned incorporation of ER into business schools. As Godard (2013) has forcefully argued, we are currently witnessing a second paradigm shift in the U.S., thus a significant psychologization of ER research. Most new recruits in U.S. or U.K. management or ER departments are not economists, but OB scholars focusing on psychological research. This has sadly not led to any greater methodological variety. In contrary, psychology in the U.S. stands for an even stronger empirical and large quantitative data driven, hypothesis-testing methodology than institutional economics ever was. Note, that OB scholars mainly publish in management journals.

At the same time both countries experience the decline of the political and social importance of employment institutions. Employment issues are much less a public policy concern than in the past. New social conflicts (such as immigration, integration) now dominate the public and scientific discourse and although these are labour issues ER scholars have not yet managed to make a significant mark on these new topics.

What does this mean for the future? I would argue that rediscovering the importance of its original public policy relevance, on both sides of the Atlantic⁵, and the

³ Cornell, Illinois, Penn State and Rutgers are among the few exceptions.

⁴ The most prominent US journal, *ILRR*, focused in the past heavily on labour economics, but has recently changed its editorial board and now explicitly invites submissions of other disciplines and methodologies – though 4 out of 7 editors are still economists.

⁵ Interestingly, the *ILRR* now promotes special ‘public policy review’ articles, which is an excellent idea to reinvigorate the field’s impact on public policy debates.

inclusion of socially relevant topics are in fact closely interconnected with the need for more comparative research and a closer dialogue between national research traditions. This article has shown that abolishing national research patterns and converging to an universally homogenous (U.S.) approach is highly unlikely in the near future. What we need to endorse instead is a culture of mutual learning and the open embracement of different research methods, paradigms and theories across countries – in order to ensure the long-term viability of our discipline.

Ulrich Beck (2006) has recently asked for a ‘cosmopolitan turn’ in social and political theory: “to make research more attentive to global interconnections and less limited to the presumptions of nation-states” (2013: 279). I would argue that such a paradigm shift is long overdue in our field. Clearly, as labour and employment issues become increasingly global and interconnected we need to advocate the joint use of quantitative and qualitative methods as well as theoretical analyses, and we need to advance a larger variety of economic, psychological, sociological and political theories. A ‘cosmopolitan’ turn would therefore not mean the take-over of one particular research tradition but the mutually beneficial co-existence of different paradigms and methods across countries.

Alas, this is not easily done in practice and I am afraid that it has become more difficult than in the past. Just two mundane examples: publications in non-English journals, which were once applauded as a sign for the internationality of faculty members, are now strongly discouraged and ignored in U.S. (and U.K.) universities. Similarly, in Germany many ER publications are in German and remain qualitative.⁶ Moreover, U.S. departments hardly ever hire faculty without an American PhD (the same is now true the management department at the LSE⁷). It is paradoxical – on one hand ER topics become more global than ever but national research customs remain the same. Yet, for the sake of the survival of our field an increasing joint effort seems more needed than ever to render our research more pluralistic, diverse and relevant to address the future global challenges of the 21st century.

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⁶ As an example the longstanding, renowned institute for industrial sociology in Germany, SOFI (Göttingen) published in the first half year of 2013 4 monographs (in German) and 23 articles (out of which 3 are in English). None of them seem to use quantitative or econometric analyses.

⁷ Our currently advertised lectureship has only US PhDs on its shortlist.

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