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Union Administrative Practices: A Comparative Analysis

Abstract
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Keywords
union, administration, analysis, efficiency, Canada, United Kingdom, international, United States, human resources, personnel practices, strategic planning

Disciplines
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Union Administrative Practices: A Comparative Analysis

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In response to growing challenges, many labor organizations are reevaluating themselves in an effort to become more efficient and effective. Their efforts, however, are limited by their frames of reference. Seldom do unions compare practices across labor movements. To expand these frames of reference we compare union administrative practices in three countries: Canada, the United Kingdom, and the United States. Two specific areas of union administration are examined — human resource/personnel practices and strategic planning. Results from these countries are presented and analyzed to identify and explain similarities and differences.

I. Introduction

Because of increasing challenges and obstacles, labor organizations are being forced to reinvent themselves. In an effort to become more efficient and effective, unions have begun to more carefully evaluate their goals and their strategies for achieving these goals.

The reform movement at the AFL-CIO, begun in 1995, illustrates this top-to-bottom reexamination. Beyond launching initiatives in organizing, collective bargaining, and political action, the AFL-CIO’s new leadership, led by John Sweeney, has made significant changes in the federation’s structure and administration. Among these reforms have been the revamping of an antiquated personnel operation, an inadequate accounting system, and an inefficient mail room (Galvin, 1996). A multi-year strategic planning process called Committee 2000 has also been initiated.

Paralleling this phenomenon has been a renewed interest in union administration among academic researchers that is beginning to match, in scope and intensity, the interest of earlier scholars (Strauss, 1977). Over the last ten years unions in the
U.K., U.S., and Canada have been the focus of much of this work. In the U.K., books on trade union officers have recently been published by Watson (1988) and Kelly and Heery (1994). In addition, Willman et al. (1993) published a book on union financial practices. In the U.S., Dunlop's 1990 book on the "management" of unions was followed by the Industrial Relations Research Association's volume, *The State of Unions* (Strauss et al., 1991) which devoted a chapter to union administration and other chapters to related issues. Other significant works have examined strategic planning efforts (Stratton and Brown, 1988; Weil, 1994) and the utilization of human resources in American unions (Clark, 1992; Clark and Gray, 1992). Canadian unions have also been the subject of studies on strategic planning (Reshef and Stratton, 1990) and on human resource policies and practices (Clark et al., 1996).

Although unions in the U.K., U.S., and Canada share a common language, have many historical connections, are relatively close geographically, and increasingly deal with many of the same employers, little recent research on union administration in these three labor movements has been comparative in nature. This is somewhat curious as British, U.S., and Canadian labor movements all have been going through intense periods of self-examination and self-reflection to gird themselves for the many immediate and future challenges they face. U.S. union leaders, for instance, have regularly met to discuss administrative practices and to learn how to make their organizations more effective. Few attempts have been made, however, to look abroad for innovative ideas and alternate approaches to common administrative concerns.

One explanation for this reluctance to look beyond the somewhat common experiences within one's own labor movement may be the belief that the histories, structures, cultures, and legal frameworks are so different that the experiences of unions in one country are not applicable elsewhere. A fundamental, often-cited difference among the American, British, and Canadian labor movements centers on the respective movements' philosophy of unionism. Mainstream American unions have generally employed an economic or bread-and-butter focus known as "business unionism" (Kochan and Wever, 1991; Kumar, 1993). In contrast, British, and many Canadian, unions have placed greater emphasis on broader social and political goals and strategies, an approach known as social unionism (Kumar, 1993).

While any comparative analysis must be sensitive to the differences between unions operating in dissimilar environments and employing different philosophies and strategies, these very differences make a comparison of administrative practices useful. Unions in the same country, in the same labor movement, and with similar histories, usually have similar operating paradigms. The differences in practices based on these paradigms are often marginal and insignificant. Examining the practices of unions in different environments and considering alternate paradigms may potentially expand the options and alternatives available to labor organizations.

We compare union administrative practices across three labor movements by using data collected through surveys of unions in the U.K., U.S., and Canada on two specific union administration issues: human resource/personnel administration and
strategic planning. Results from the three countries are presented and compared to highlight and explain the differences.

II. Unions As Organizations

Unions began as small, local, self-sufficient, democratic organizations created and led by worker-leaders and governed by direct member participation. Over time, as their environment changed, unions evolved into increasingly large, complex, regional, and eventually national and international, organizations. These circumstances necessitated some basic changes in the structure, governance, and administration of labor organizations. Included in the administrative challenges unions faced was their new status as employer and their need to engage in long-term strategic planning.

As unions grew in size, many elected leaders became full-time union employees. Eventually, as their problems became more complex, they hired staff members with special skills in law, economics, public relations, occupational safety and health, and data processing. The union was an employer, staffed by employees, and its elected leaders were managers. While the raison d’etre of unions remained to challenge employers’ rights to make unilateral decisions regarding their employees, leaders were placed in the unfamiliar position of directing work and hiring, disciplining, and discharging workers. As managers they shared the traditional concerns of an employer — productivity, efficiency, and quality.

As in any organization, personnel policies and practices play an important role. The relationship between employer/unions and their employees has become an even more critical concern in recent years as unions have expanded their member services. This expansion has led to an increase in the number of full-time union officials and specialists on the payrolls of American, British, and Canadian unions (Clark, 1992; Kelly and Heery, 1994; Statistics Canada, 1993).

The changing environment in which unions operate has also caused an increasing number of unions to take a more systematic, long-range view in developing strategic approaches to their problems. In their earliest days, unions were largely reactive organizations that existed to challenge and question employers’ actions or inactions. As labor and product markets expanded, technology evolved, and government regulation increased, their environment became increasingly complex. Unions were forced to look much further into the future when making strategic decisions, a process requiring planning skills that many union leaders had not acquired.

While some unions have pursued strategic planning thoughtfully and systematically, other unions have not. A 1993 study by Reshef and Stratton-Devine indicated that only 24.4 percent of unions in Canada and the U.S. engaged in long-range strategic planning. There is also little evidence that this is a common activity among British unions.

The Reshef and Stratton-Devine study provides useful insight into planning activities by surveying unions about the issues included in their strategic discussions.
Of the fourteen issues mentioned, member education, budgeting, and political action were the three most often cited. Other issues included in these planning exercises were organizing, bargaining agenda and structure, labor-management cooperation, and affiliations and mergers.

III. Data Collection

In 1990 a questionnaire was sent to 110 U.S.-based national and international unions. Forty-eight completed questionnaires were returned for a 44 percent response rate. In 1993 questionnaires adapted from this instrument were sent to the 297 national and international unions listed in The Directory of Labour Organizations in Canada, 1992–1993 and to 86 national unions listed in the 1992 Trades Union Congress (TUC) Directory and the British Trade Union Directory (Maksymiv et al., 1990). The response rate for the Canadian survey was 20 percent with 60 unions returning completed questionnaires. Of the 86 British unions surveyed, 61 completed the questionnaires, a 71 percent response rate.

Each version of the questionnaire included identical sections on personnel and strategic planning practices. The personnel section asked whether the union had written policies in equal opportunity/affirmative action, discipline and discharge, hiring, performance appraisal, promotion, salary review, and training for their headquarters professional staff. Unions were also asked more detailed questions about qualifications for staff appointments and whether the union employed a personnel or human resource director.

The strategic planning section included items asking whether the union employed a formal strategic planning process, whether the union had a systematic process for evaluating the results of this planning process, and whether outside consultants were utilized in these planning activities.

Additional questions in each version of the instrument involved membership levels, membership trends, and the sectors in which members were employed.

IV. Results and Analysis

Personnel Policies. The data indicate that formal, written personnel policies are the exception, rather than the rule, in all three countries (Table 1). Only in the U.S. and the U.K., where 54 and 56 percent of the respondents had established a formal discipline and discharge policy, were the staff of a majority of unions covered by even one of the personnel policies examined. While the results were somewhat mixed, Canadian unions employed formal policies slightly more often than U.S. unions. Formal personnel policies were even less common in British unions.

As Table 2 suggests, U.S. unions are twice as likely as Canadian unions to employ a personnel/human resource director (44 percent to 22 percent) and are substantially more likely to do so in comparison with British unions (34 percent). Despite
Table 1
Percent of Respondent Unions with Written Personnel Policies for Headquarters Staff/Specialists

<table>
<thead>
<tr>
<th>Policy</th>
<th>Canada (n=60)</th>
<th>U.K. (n=61)</th>
<th>U.S. (n=48)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equal Opportunity/Affirmative Action</td>
<td>32</td>
<td>44</td>
<td>46</td>
</tr>
<tr>
<td>Discipline and Discharge</td>
<td>42</td>
<td>56</td>
<td>54</td>
</tr>
<tr>
<td>Hiring</td>
<td>40</td>
<td>28</td>
<td>44</td>
</tr>
<tr>
<td>Performance Appraisal</td>
<td>37</td>
<td>10</td>
<td>34</td>
</tr>
<tr>
<td>Promotion</td>
<td>35</td>
<td>23</td>
<td>32</td>
</tr>
<tr>
<td>Salary Review</td>
<td>40</td>
<td>49</td>
<td>37</td>
</tr>
<tr>
<td>Training</td>
<td>35</td>
<td>23</td>
<td>29</td>
</tr>
</tbody>
</table>

Table 2
Union Policies and Practices

<table>
<thead>
<tr>
<th>Policy</th>
<th>Canada (n=60)</th>
<th>U.K. (n=61)</th>
<th>U.S. (n=48)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of unions that</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employ Personnel Directors</td>
<td>22</td>
<td>34</td>
<td>44</td>
</tr>
<tr>
<td>Require Specific Qualifications for Staff</td>
<td>74</td>
<td>38</td>
<td>72</td>
</tr>
<tr>
<td>Vary Qualifications by Function</td>
<td>57</td>
<td>43</td>
<td>75</td>
</tr>
<tr>
<td>Restrictions on Appointment to Staff</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Must Be Current Union Member</td>
<td>51</td>
<td>76</td>
<td>38</td>
</tr>
<tr>
<td>Must Have Been Elected to Office</td>
<td>16</td>
<td>24</td>
<td>2</td>
</tr>
<tr>
<td>Must Have Been Employed by Another Union</td>
<td>7</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
being more common in the U.S., such a practice is still employed by a minority of unions in each of the countries examined.

The hiring practices of U.S. unions are somewhat more consistent with typical human resource practices employed in business, government, and other nonprofit organizations than are the policies of British and Canadian unions (Table 2). Seventy-two percent of U.S. unions require specific qualifications for appointment to staff positions, and 75 percent indicated that these qualifications vary by job function. U.S. unions placed fewer union-related, as opposed to skill-related, restrictions on staff employment.

There are at least three explanations why unions do not consistently establish formal human resource policies for their professional employees. First, the political nature of unions usually extends to the relationship between union leaders and union staff (Stamm, 1969; Shostak, 1995). The formalization of the employee-employer relationship might make union employees less accessible as political assets and less vulnerable to political pressure, a change which union leaders would likely resist. Second, the absence of formal policies tends to increase the operational control that the organization has over its employees. Unions, as organizations, undoubtedly value this flexibility. Third, this phenomenon may also reflect the lack of administrative experience of many union leaders (Dunlop, 1990; Shostak, 1995).

The differences between countries may be a function of several different factors. Analysis of the data by union size suggests that larger unions tend to implement formal personnel policies and practices more often than do smaller unions. As Table 3 indicates, formal policies were more common in unions with 50,000 or more members in all three countries, with the difference more pronounced in the U.K. and Canada. The greater resources available to large unions appears to result in more systematic personnel policies and practices. This relationship is consistent with research showing that formal policies are more prevalent in large than in small firms (Peirce, 1987; Callus et al., 1992).

In this study, the number and proportion of large unions (50,000 or more members) in the U.S. sample was significantly greater than in the U.K. and Canada samples. Size might, therefore, explain why formal personnel policies were more common, overall, in U.S. unions than in British unions. It would not, however, explain why the Canadian unions in the sample, which were overwhelmingly small in size, employed formal policies at a rate similar to American unions and greater than their British counterparts.

A second explanation of why unions in the U.S. appear to establish formal, systematic personnel practices to a greater degree than British unions may be that much of the U.S. labor movement has traditionally practiced business unionism while the unions in the U.K. have a tradition of social unionism. This might partly explain the tendency of U.S. unions to adopt more business-like administrative practices. Also, U.S. employers, in both the private and public sectors, tend to employ more formalized business practices than do their British counterparts. Unions in the U.S. may
Table 3  
*Percentage of Responding Unions with Written Personnel Policies*  
(by size of membership)

<table>
<thead>
<tr>
<th></th>
<th>Canada &gt;50,000 (n=7)</th>
<th>Canada &lt;50,000 (n=53)</th>
<th>U.K. &gt;50,000 (n=14)</th>
<th>U.K. &lt;50,000 (n=47)</th>
<th>U.S. &gt;50,000 (n=27)</th>
<th>U.S. &lt;50,000 (n=21)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affirmative Action</td>
<td>86</td>
<td>25</td>
<td>86</td>
<td>32</td>
<td>52</td>
<td>33</td>
</tr>
<tr>
<td>Discipline/Discharge</td>
<td>71</td>
<td>38</td>
<td>86</td>
<td>47</td>
<td>44</td>
<td>62</td>
</tr>
<tr>
<td>Hiring</td>
<td>86</td>
<td>35</td>
<td>64</td>
<td>17</td>
<td>48</td>
<td>33</td>
</tr>
<tr>
<td>Performance Appraisal</td>
<td>57</td>
<td>35</td>
<td>14</td>
<td>8</td>
<td>26</td>
<td>43</td>
</tr>
<tr>
<td>Promotion</td>
<td>71</td>
<td>31</td>
<td>50</td>
<td>15</td>
<td>26</td>
<td>38</td>
</tr>
<tr>
<td>Salary Review</td>
<td>43</td>
<td>41</td>
<td>40</td>
<td>33</td>
<td>37</td>
<td>79</td>
</tr>
<tr>
<td>Training</td>
<td>71</td>
<td>31</td>
<td>50</td>
<td>15</td>
<td>30</td>
<td>24</td>
</tr>
</tbody>
</table>

emulate, consciously or unconsciously, the employers with which they regularly deal.  
Again, this rationale does not seem to apply to Canadian unions which tend to fall  
closer to British than American unions on the social unionism-business unionism  
continuum.

A third explanation for the greater presence of formalized practices in U.S. and  
Canadian unions is the greater prevalence of staff unions (unions representing union  
staff employees) in those countries. Where staff unions have been established, more  
formal personnel policies usually are found in collective bargaining agreements.  
Even in unions with unorganized staffs, bargaining units in other unions may act as a  
catalyst for more formalized personnel practices (Clark, 1989).

A final factor that may account for some of the differences in personnel policies  
and practices across the three labor movements are differences in employment laws.  
While a comprehensive comparison of the legal system's effects on employment in  
the U.K., U.S., and Canada is beyond the purview here, one example of how different  
practices might impact the establishment of personnel policies is unfair dismissal.

Formal discipline and discharge policies for professional staff are far more common  
in American and British unions than they are in Canadian unions. For American  
unions this may be related to the absence of any meaningful unfair dismissal protection  
under the law (Wheeler and Nolan, 1992). And, although there is such a law in  
the U.K., the prevalence of formal personnel policies in British unions may be a function  
of the ineffectiveness of this legislation in protecting British workers (Mackie, 1992).  
The fact that unfair dismissal policies are less common in Canadian unions
might be explained by Canadian unjust dismissal legislation which is considered to
be responsive to the employment rights of workers (Adams and Adell, 1992).

The differences in hiring practices are consistent with the greater tendency of
U.S. unions to hire professional staff from outside their ranks. Two possible explana-
tions for this practice are the heavier emphasis on staff training and union education
in the U.K. and Canada which makes it easier to promote from within and the greater
prevalence of university labor studies degree programs in the U.S. which prepare
labor-oriented young people for appointment to union staff positions (Gray, 1976).

**Strategic Planning.** As shown in Table 4, the results involving strategic planning
practices suggest some variance among unions in the three countries. Canadian
unions engage in most of these practices to a greater degree and more systematically
than do U.S. or U.K. unions. Canadian unions were more likely to have a formal
organization chart and an annual budget. Fifty-eight percent of Canadian unions
reported having a formal strategic planning process compared to 40 percent of the
U.S. unions and 36 percent of the British unions. In addition, more Canadian unions
(56 percent) reported having established a process for evaluating the outcomes of the
strategic planning process than did unions in the U.S. (20 percent) or the U.K. (16
percent). Finally, 64 percent of Canadian unions employed outside consultants in
their strategic planning process compared to 42 percent of U.S. unions and 55 percent
of British unions.

Among the possible explanations for the greater level of strategic planning
activity in Canadian unions is that the Canadian Labour Congress (CLC), as well as
the provincial Federations of Labour, have been active in planning activities. This
activity may have had a “trickle-down” effect on affiliated unions since the CLC and
provincial federation’s strategic planning efforts would simultaneously lend credibil-
ity to such activities and help to develop planning expertise and experience.

**Table 4**

<table>
<thead>
<tr>
<th>Percent of unions having:</th>
<th>Canada (n=60)</th>
<th>U.K. (n=61)</th>
<th>U.S. (n=48)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Formal Organizational Chart</td>
<td>59</td>
<td>53</td>
<td>49</td>
</tr>
<tr>
<td>An Annual Budget</td>
<td>74</td>
<td>56</td>
<td>66</td>
</tr>
<tr>
<td>A Formal Strategic Planning Process</td>
<td>58</td>
<td>36</td>
<td>40</td>
</tr>
<tr>
<td>An Evaluation Process for Activities</td>
<td>56</td>
<td>16</td>
<td>20</td>
</tr>
<tr>
<td>A Committee for the Future</td>
<td>50</td>
<td>61</td>
<td>58</td>
</tr>
<tr>
<td>Outside Consultants</td>
<td>64</td>
<td>55</td>
<td>42</td>
</tr>
</tbody>
</table>
The AFL-CIO has also taken steps in the direction of strategic planning, most notably with the establishment of the Committee on the Evolution of Work in 1982 and the publication of the Committee’s 1985 report. The current AFL-CIO leadership team listed the establishment of an office of strategic planning in its campaign platform. Upon assuming the federation’s presidency John Sweeney put in motion a strategic planning process called Committee 2000.

V. Conclusions and Future Research

This examination of personnel/human resource practices and strategic planning activities in the U.K., U.S., and Canada yields somewhat mixed results. Overall, there are major differences in the administrative practices employed by unions in these countries. U.S. and Canadian unions appear to have more formalized, systematic personnel/human resource practices and policies than do unions in the U.K., while Canadian unions appear to be more active in strategic planning activities than the unions in the other two countries.

Although administrative practices differ, there are reasons to believe that unions in the U.K., U.S., and Canada will move toward more formal and systematic practices in the years ahead. The challenges facing each of these labor movements may compel their member unions to maximize the efficiency of their organizations. In the U.S., the lead has been taken by the Sweeney administration at the AFL-CIO. Prior to his election as AFL-CIO president, Sweeney was president of the Service Employees International Union (SEIU). While at the SEIU Sweeney made a concerted effort to improve the union’s administrative practices by such actions as creating a full-time position of Administrative Director, appointing a Human Resource Director, developing an elaborate organizational chart, stepping up recruiting from outside the membership ranks, and establishing a strategic planning and budget process. When he assumed office at the AFL-CIO, Sweeney brought with him the SEIU’s Administrative Director to serve in a similar position at the federation.

Another reason to suggest that unions in the U.K., U.S., and Canada will move toward more efficient and effective administrative practices is the trend toward union mergers in each of these labor movements. Many of these mergers have resulted in significantly larger organizations — the type of organizations that tend to employ formal personnel policies and practices. The proposed merger of the United Steelworkers (USWA), United Auto Workers (UAW), and Machinists (IAM) is an example of this trend in the U.S. The merger, if finalized, would result in a union of two million members, the largest in the American labor movement.

The U.K. labor movement is also experiencing mergers. Examples include the 1991 merger of the Society of Graphical and Allied Trades (SOGAT) and the National Graphical Association (NGA) to form the Graphical Paper and Media Union (GPMU) and the 1993 merger of the Confederation of Health Services Employees (COHSE), the National Union of Public Employees (NUPE), and the National and Local Government Officers’ Association (NALGO) to form UNISON.5
As our results suggest, membership size appears to be closely related to the formalization of personnel/human resource practices. The merger trend toward larger unions in each of these countries will likely lead to the establishment of more formal, systematic policies in this area.

One final factor suggesting that unions in the U.K., U.S., and Canada may, in the future, move toward more similar administrative practices is the convergence of philosophical approaches to unionism among the three labor movements. Evidence suggests that the American labor movement may be moving from the business unionism end of the philosophical continuum towards social unionism. Most notably, the reforms being undertaken at the AFL-CIO, with the support of most major American unions, appear to be guided by this broader vision of unionism. Similarly, British and Canadian unions appear to be gradually taking steps away from social unionism and adopting policies more associated with business unionism (Willman et al., 1993).

Despite the possibility of convergence, our study suggests that presently a considerable variance exists in the administrative practices and policies of unions in these countries. This variance provides an opportunity for further comparative study aimed at critically examining the range of practices in these areas. If the different models presented by unions in the U.K., U.S., and Canada are to serve as realistic policy options, more needs to be known about these practices. In the area of personnel/human resource practices, additional information is needed about the unionization of professional union staff and how professional staff unions influence the establishment of formal personnel policies. More also needs to be known about the hiring and utilization of professional union staff and how those practices and policies affect staff morale, commitment, and satisfaction, as well as employee productivity, performance, and turnover.

Regarding strategic planning, more detailed information on the formulation and implementation of planning activities and outcomes is needed. Detailed case studies of strategic planning programs and their outcomes in unions across the U.K., U.S., and Canada would provide valuable insights. Efforts should also be made to compare and contrast the practices and experiences of unions in these countries. In addition, such research should be expanded to include labor organizations beyond the U.K., U.S., and Canada.

As unions respond to challenges that threaten their viability, they will be more likely to examine their administrative practices and more enthusiastically consider the experience of unions in other countries. Comparative research on the administrative practices of unions, like comparative work on membership recruitment strategies, bargaining structures, and public policy on employment issues, could potentially have important results.

The impact of the type of comparative work suggested is clearly related to, and to a degree depends on, two factors. One factor is the willingness of unions to examine, or allow others to examine, their administrative practices. A second factor is the degree to which unions are willing to share the findings of such research. A recognition of the importance of such practices to the viability of a labor organization facing
great challenges should be enough to get unions to spotlight their administrative practices.

Cross-national labor groups could play a major role in facilitating the gathering and distribution of information about such practices. Groups like the International Labor Organization (ILO), the International Confederation of Free Trade Unions (ICFTU), and industry groups like the International Metalworkers Federation (IMF) currently collect and share information about wage and benefit patterns, safety and health concerns, and worker participation programs. These groups might consider focusing at least part of their efforts in the future on internal administrative practices.

NOTES

1 The most far-reaching of these exercises in the U.S. has been led by the AFL-CIO's Committee on the Evolution of Work which published its original report in 1985. This was followed by strategic planning programs in numerous U.S. unions including the United Steel Workers, the Bakery, Confectionery, and Tobacco Workers, the Air Line Pilots Association, the National Association of Letter Carriers, and the Communications Workers.

2 For many years the elected secretaries and treasurers of national and international unions in the U.S. have met under the auspices of the AFL-CIO to discuss administrative concerns of mutual interest. More recently, top non-elected union administrators (executive assistants to national officers, department directors, etc.) have formed a group called the National Union Administrators Group which meets periodically.

3 Anecdotal evidence suggests that unions have sometimes placed union-related restrictions, as opposed to skill-related restrictions, on staff employment which limits hiring to the most qualified member or elected officer, making it difficult for the union to hire better-qualified individuals in such technical fields as research, education, and public relations.

4 Most collective bargaining agreements have some type of just-cause clause that protects employees from unfair or arbitrary discipline or discharge. The vast majority of nonunion workers are not covered by such clauses and have little protection under law, although there has been some growth on the limits placed on the employment-at-will doctrine by the courts in recent years (Wheeler and Nolan, 1992).

5 This trend is also evident in other industrialized countries, most notably Australia where the total number of unions fell from 299 to 142 during a period of consolidation that ran from 1989 to 1995 (Hall and Harley, 1995).

6 Weil has made a good start in this direction in his 1994 book; however, more in-depth, detailed case studies are needed.
REFERENCES


