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Organizational Work-Life Initiatives: Context Matters. France Compared to the UK and the US

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Abstract

Why are organizational work-life initiatives endorsed in some countries such as the US or the UK, while they generate little interest in France and other non Anglo-Saxon environments? In a qualitative theory-building approach, this article assesses the gap in workplace practices adoption among the US, the UK and France and analyzes in-depth interviews with 44 HR officers, employee representatives, unions and work-life service providers in France. Five main factors explain the adoption of organizational work-life initiatives in France and potentially other countries: (1) Employers versus State's legitimacy in the nonwork sphere of life (2) industrial relations and unions' stance towards work-life practices (3) the complexity of the legal framework (4) the awareness of work-life issues within HR departments and (5) the framing of work-life as a business or a social issue. With reference to prior research, a model is built to account for the influence of the national context on employees' expectations and employers' leeway at the macro level, and for strategic choices made by employers at the meso level.

Keywords: France, Global work-life strategy, International work-life, Multinational enterprises, Work-family

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Résumé

Pourquoi les pratiques d'harmonisation travail - hors-travail (work-life initiatives) sont-elles développées chez les employeurs américains et britanniques, alors qu'elles suscitent peu d'intérêt en France et dans d'autres pays non Anglo-Saxons ? Dans une approche qualitative, d'élaboration de théorie, cet article évalue le différentiel d'adoption des pratiques par les employeurs aux Etats-Unis, au Royaume-Uni et en France, puis analyse des entretiens semi-structurés approfondis avec 44 responsables RH, représentants des salariés, syndicalistes et prestataires de services liés au hors-travail, en France. Cinq principaux facteurs expliquent le degré d'adoption des pratiques d'harmonisation travail - hors-travail en France et potentiellement dans d'autres pays : (1) la légitimité des employeurs par rapport à l'Etat, dans le domaine du hors-travail (2) les relations industrielles et la position des syndicats sur ces pratiques (3) la complexité du cadre législatif (4) la connaissance qu'ont les responsables RH de l'enjeu et des pratiques d'harmonisation et (5) l'interprétation sociale ou économique qui

est faite de ces pratiques. En s'appuyant sur les travaux antérieurs, cet article propose un modèle qui rend compte de l'influence du contexte national sur les attentes des salariés et sur la marge de manœuvre des employeurs, au niveau macro, ainsi que sur les choix stratégiques opérés par les employeurs, au niveau méso.

Mots clés : France, Multinationales, Politique RH de conciliation/harmonisation, Travail – hors-travail, Work-life

Introduction

Why are Human Resources practices readily adopted in some countries, and disregarded in others? This article focuses on organizational work-life initiatives, understood as formal policies and informal arrangements allowing employees to manage their roles, responsibilities and interests in their life as whole persons, engaged in work and nonwork domains. Nonwork notably encompasses the family, the community, friendships, personal development and life-long training projects, political, associative, spiritual and sports activities, and leisure (Thévenet, 2001). Work-life initiatives at the workplace typically include flexible working options such as flexible hours, telework, part-time, term-time, job-sharing and time banks, as well as childcare and eldercare facilities, information or financial support pertaining to the nonwork sphere of life, and various on-site services. The most advanced practices emphasize supervisor training and attempts to change the organizational functioning and mindset.

Organizational initiatives originated in Anglo-Saxon countries in the late 1970s. Can they be implemented in other countries, and how? What factors must be taken into account to anticipate the way they may be perceived in other countries? Despite a vigorous stream of research on work-life issues, international studies are still scarce. Some areas such as work-family conflict are being investigated at the global level (Poelmans, Allen, Spector,

O'Driscoll, Cooper & Sanchez, 2003), but research on the determinants of the adoption of organizational work-life initiatives has mostly been conducted in and on English-speaking countries. As stated by Bardoel and de Cieri (2006), research on work-life as a concern for HRM in a global context has still to be developed. In the recent years, the European Foundation for the Improvement of Living and Working Conditions (EFILWC) initiated an increasing body of comparative research, notably the Establishment Survey on Working Time and Work-Life Balance (2004-2005). Yet, with the notable exceptions of Evans (2001) and den Dulk (2005), current knowledge on the adoption of organizational work-life practices is restrained to a single-country context, mostly the United States. A limited set of factors have been found to impact the level and nature of the practices adopted: (1) Company size (Bond, Galinsky, Kim & Brownfield, 2005; den Dulk, 2005; Evans, 2001; Goodstein, 1994; Ingram & Simons, 1995; Tremblay, 2004), (2) industry (Goodstein, 1994; Ingram & Simons, 1995; Tremblay, 2004; Wood, de Menezes & Lasasosa, 2003), (3) geographical region (Friedman, 2001; Morgan & Milliken, 1992) (4) proportion of women in executive, management and professional positions (Bond & Galinsky, 1998; Ingram & Simons, 1995), (5) proportion of qualified workers or knowledge workers (Bond & Galinsky, 1998; Evans, 2001; Konrad & Mangel, 2000; Guérin, Saint-Onge, Haines, Trottier & Simard, 1997; Osterman, 1995) and (6) need to foster a high level of commitment (Budd et Mumford, 2006; Evans, 2001; Osterman, 1995). Other determinants that are found in some studies but not others are public-sector and unionization (Dex & Scheibl 1999; Evans, 2001; Guérin & al. 1997; Ingram & Simons, 1995; Wood & al., 2003; Woodland, Simmonds, Thornby, Fitzgerald & McGee, 2003). Table 1 summarizes these findings.

=== Insert Table 1 about here ===

Only two of these sixteen studies are comparative; they include a limited number of countries. Both underline that the institutional environment does influence the adoption of HR practices and call for additional international research. Furthermore, the convergence/divergence debate in HRM has made clear that comparative perspective is crucial to analyze the determinants of any HR practices adoption (Brewster, 1999), and work-life researchers have stressed the need for a multi-level approach focusing on both workplace initiatives and national contexts (Lambert & Kossek, 2005).

Therefore, this article sets out to analyze the way the national context shapes the adoption and nature of work-life practices in a given country. The starting point is a comparison of work-life practices adoption among French, British and American employers. The scarcity of work-life employer initiatives in France, compared with the US and the UK, is exposed and explained. France is an ideal polar case compared with Anglo-Saxon countries: international classifications consistently oppose French Welfare State to a more liberal Anglo-Saxon model (Anxo & O'Reilly, 2000; Esping-Andersen, 1990; Letablier, 1995). Typically, the French socialist laws setting the regular duration of the workweek to 35 hours for employees in organizations of more than twenty employees, in 1998 and 2000, have sparked a heated debate on the role of public policy in regulating employment (Estevao & Sa, 2007). The US has been a pioneer country for work-life practices for the last forty years. The UK is a very interesting partner for comparison because the UK shares a liberal perspective with the US but has to comply with European regulations, although it has long stayed out of the social chapter. Including the UK helps design a framework that includes different shades of grey. While this research compares three countries, it is not limited to these countries. Exploring why global work-life strategies cannot be transferred to France as such is paramount to understanding the necessary adjustments in any non Anglo-Saxon environment.

Work-life balance is a major issue in France and in Europe. The 2000 European Union's Lisbon Strategy is to become "the world's most dynamic and competitive economy" by 2010. To accomplish this and strengthen the European social model, higher employment levels are needed. Specific targets were established: 70% of the whole population, 60% of women and 50% of seniors in the workforce by 2010. In the context of an aging workforce and of growing needs for care, that women still mostly assume, great efforts are required in the fields of gender equality, distribution of time over the life course and quality of life (EFILWC, 2003). Therefore, work-life balance is more than ever on the agenda of social policy makers.

Work-life balance is also an endless quest for citizens in Europe. More than in the US, an enjoyable work-life balance and the ability to take time off from work contribute to social status (Guillen, 2006). The need for work-life balance is particularly salient in France and the UK because of the high fertility rates: 1,9 and 1,8 children per woman, while the average in Europe is 1,4 (Institut National de la Statistique et des Etudes Economiques, 2007). These rates compare with the US one of just under 2 children per woman (Nyce, 2007). In France, although the 35 hour week has been said to fulfil the need for work-life balance, this is not the case for most employees. These laws were designed to fight unemployment, not to enhance the quality of life (Fagnani & Letablier, 2004; Buffier-Morel, 2007). While the 35 hour week improves work-life balance for exempt employees who often work 50 to 60 hours a week but get more vacation time (Alis & Dumas, 2005), it means more employer-driven flexibility for unqualified workers: longer days at work with free time in the middle of the day, useless for family or personal purposes (Méda & Orain, 2002). Employers can and do require overtime hours, in line with the controversial motto of the current government "Work more to earn more". Hence, it is no wonder that work-life balance remains a high concern and priority in recent surveys in France (Alis & Dumas, 2005).

In this context, how can we explain the weak prevalence of organizational work-life initiatives in France, even in subsidiaries of Anglo-Saxon multinationals? Surveys conducted at the national level in the US (Bond & al., 2005), the UK (Hayward, Fong & Thornton, 2007) and France (Carré, Dauplait, de Cleat, Lefevre, Noël, Pailhé, Papadopoulos, Quaglia, Ragazzi, Razafindratsia, Solaz & Vichneskaia, 2005) point to a gap in the adoption of organizational work-life initiatives in France, as illustrated in Figure 1. The surveys were focused on similar initiatives and conducted on reasonably similar samples of large organizations (2673 worksites of more than 20 employees in France, 1092 employers of more than 50 employees in the US and 1462 employers of more than 5 employees in the UK).

=== Insert Figure 1 about here ===

As many as 70% of American and 67% of British employers state that flexible hours are available for employees, compared with only 36% of French employers. The same pattern prevails for home working on a regular basis: 35% of American and 26% of British employers compared with 10% of French employers. The gap in practices adoption is also observed for part-times (although the French survey asks about employee-chosen part-times as opposed to employer-driven part-times) and on-site daycare centers. It is very enlightening to note that job shares, compressed workweeks, resources and referrals related to early childhood and seminars on personal matters are so scarce in France that the survey has not even asked these about them. Yet, there is no public policy or provision available as a substitute, as is the case for vacation and parental leaves. Triangulation with other data sources such as the previously cited EFILWC Establishment Survey and an analysis of all corporate websites and official reports of companies composing similar stock exchange indexes in the three countries confirms the much lesser level of practices adoption in France (Ollier-Malaterre, 2008). Intent to demonstrate best practices is also weak: the Great Place to

Work Institute in France indicates that only 52 organizations have applied to appear in their 2005 ranking. Most of them are the French subsidiaries of foreign multinationals.

Methods

Because of the scarce knowledge on organizational work-life practices adoption in France, this research takes a qualitative and inductive stance, with a theory-building objective. The starting point was the data, but previous research was used to shape the theoretical "skeleton" of the exploration (Kelle, 1997).

In-depth semi-structured interviews were conducted with 44 people in 2005-2006, lasting an average of 75 minutes. To obtain the interviews, a personalized request was sent by email with follow-up as necessary. Further contacts were asked to the first interviewees and selected according to the sampling strategy, with an overall acceptance rate of 84%. The aim was to collect different viewpoints inside organizations, to avoid a one-sided perspective: HR and diversity officers, employee representatives from the unions and the works councils, non-unionized employees, a nurse and an on-site daycare director. Union officers from national union federations as well as service providers were included to gain a broader understanding at the national level. The distribution of the sample is illustrated in table 2. Out of these 44 persons, 29 are women, 15 are men. All are French, except one American citizen.

==== Insert Table 2 about here ====

The 44 interviewees belong to 16 different organizations (not counting the service providers). Based on the above-mentioned literature on the determinants of adoption, the organizations were sampled so that they would be contrasted in terms of size, industry, nationality (subsidiaries from American multinational enterprises were included in a control perspective) and location of interviewee's workplace. The intent was to include more large

organizations because institutional theory has shown them to be more vulnerable to external pressures (DiMaggio & Powell, 1983). The distribution of organizations' sample is illustrated in table 3.

=== Insert Table 3 about here ===

The interview guide was structured around the salience of the work-life issue for the company, the initiatives adopted or investigated, the actors prone to support or oppose them, and the environmental factors likely to influence the company's decisions. All interviews were tape-recorded and fully transcribed, except for five which were transcribed with the help of notes and memory right after the interview. Contextual data was also collected through corporate brochures, web sites and service providers' documentation.

The content analysis followed Miles and Huberman's methodology (1994). An interview memo was written right away in observance of Eisenhardt's "24 hours rule" (1989, 547). The transcripts were then carefully read sentence per sentence to produce a "first-level coding", with the emerging categories being documented in a diary. Intra-coder reliability was checked by re-coding a sub-sample of interviews after a month. A "pattern coding" analysis was then conducted using: (1) an horizontal analysis of each interview to track consistent patterns within the interviews and links between categories and (2) a vertical analysis of each category, to analyse it and determine its relative salience within the corpus of interviews.

Results

Five main factors emerge from the content analysis. Combined together, they explain the lesser adoption of organizational work-life initiatives in France. They correspond to the most salient categories in the coding scheme.

Three of them pertain to the national socio-institutional environment and two to the organizational level. The three macro factors are: (1) Employer/State legitimacy in the nonwork sphere of life (2) industrial relations and unions' stance towards work-life practices and (3) the complexity of the legal framework. The two meso factors are: (4) the awareness on work-life practices among HR departments and (5) the framing of work-life as a business or a social issue. This section details the main themes of each factor and illustrates them with selected verbatim (the original verbatim in French are available upon request).

(1) Employers/State legitimacy in the nonwork sphere of life. When it comes to support in the nonwork sphere of life, two main questions may differentiate countries. First, is family considered a private matter that individuals must take on by themselves or do people have a "sense of entitlement for support" (Lewis & Smithson, 2001)? Second, who is this support expected from: the State, the employer, or the community and family (Esping-Andersen, 1990)? In the UK and the US, the family is perceived as a private matter (Kamerman & Kahn, 1997). The community and the family are the preferred support providers, while employers are also very active (Glass & Fujimoto, 1995). In France, however, the State issues regulations pertaining to family life. Public provisions for early childhood are extensive compared with other western countries (subsidized daycare centers and family daycare before the age of three, public school after that). Employers/State legitimacy is the most salient category in the interviews. Employers are not perceived as legitimate to address issues pertaining to the nonwork sphere of life, and they are less legitimate than the Welfare State. Several themes are highlighted in table 4.

=== Insert Table 4 about here ===

How can these perceptions of the State as the most legitimate source of support, including in the family domain, be explained in light of the UK and US comparison? In the US, the unions have observed a low sense of entitlement for support outside of work (Gerstel & Clawson, 2000). One should be self-reliant and there is even a stigma attached with governmental support (Bailyn, 1992). American researchers have focused on individual aspects of work-life rather than contextual factors, as the predominance of role theory shows (Kossek & Friede, 2006). This is not quite so in the UK. For a long time, social policies have not considered the family as an appropriate field of action (Daly & Rake, 2003), because the still persistent breadwinner model entailed a separation of the professional and personal spheres of life (Lewis, 1992). But more recently, the Labour government played a major role in promoting work-life initiatives among employers. In the context of the transition from welfare to workfare, the 1998 National Childcare Strategy and the 1999 National Strategy for Carers prepared the ground for the 2000 Work-Life Balance campaign with a budget of over 1.5 million pounds. State intervention in the family is much more evident in France, where the State has long been collecting statistical data on family topics such as fertility, daycare and women's paid work (de Singly & Schultheis, 1991). Towards the end of the 19th century, Durkheim already underlined the growing intervention of the State into families (Lallement, 1993). In France, the State is perceived as bearing a responsibility towards children because they are future citizens and must be socially integrated (Daly & Rake, 2003).

On the matter of employers' versus State's legitimacy, Tocqueville, as early as 1840, noticed the mistrust of American citizens towards their government (Segal, 2005), which Googins sees as rooted in "the original tenets of the founding fathers that a nation governs best which governs least" (1994, 202). It is so engraved in the American Constitution and the Bill of Rights that even the experience of welfare capitalism and the New Deal could not foster a new social contract (ibid.). The State's legitimacy is greater in the UK, but employer

initiatives are favoured over public provisions. In France however, the ideas of the French Revolution of equality and solidarity are still vivid, implying that only the State, through its elected representatives, can act towards common good (Lamont, 1995). All bodies preventing a direct relationship between the citizen and the State are subject to mistrust (ibid.). The rise of the Welfare State in the last decades of the 19th century as well as a very negative image of paternalism also contribute to the better legitimacy of the State in France (de Bry, 1980).

Religious backgrounds probably explain a crucial difference between countries imprinted by the ideas of the Reform on the one part, and France, that is mostly catholic, on the other (d'Iribarne, 2002). In Reform countries, wealth and virtue are perceived as compatible, and morality obeys to similar laws in the professional and private spheres. Hence organizations are seen as moral communities as well as businesses, and "ethical actors" (ibid.). In France however, morality and economic interest are seen as divergent. An image of private employers as "cold monsters deprived of honor (...) and clearly on the side of interest" (d'Iribarne, 2002, 34) undermines their legitimacy beyond the strict professional sphere. This explains the partial rejection of American and British codes of conduct and whistle blowing policies. Thus, employer support for life outside of work, other than through the collection of taxes, may generate fears on the part of employees (Barel & Frémeaux, 2005).

(2) Industrial relations and unions' stance towards work-life practices. Two characteristics of industrial relations have been identified as fostering the adoption of work-life practices. The first is a collaborative climate between the unions, the employers and the government (Guillen, 1994), and the second one is active pressures from the unions (Drago & Fazioli, 2003). British and American unions gradually became interested in work-life (Dones & Firestein, 2002; Morris & Pillinger, 2006). How does this differ in France? Industrial relations

are the second most salient factor in the analysis, with several themes summarized in table 5 and further explained below.

==== Insert Table 5 about here ====

The works councils were created in 1945 by an anti-paternalistic law that made management transfer their social works budgets to an employee-elected body, in organizations with more than fifty employees. Employees are therefore represented by the works councils and the unions' representatives. Management tends to not engage in work-life because they consider it to be a family issue, hence the responsibility of works councils who have their own budget. Yet, most works councils focus on subsidized trips and summer camps, or coupons for leisure and early childhood, rather than flexible working arrangements or flexible career systems. As for the unions, despite interesting experiments by local union representatives, most of them are suspicious of flexible working practices. The national agreement signed on telework in November 2005 is typical of a their defensive stance: it focuses on protecting workers from increased employer requirements and intrusion in the private sphere of life and barely mentions any benefit for the employee or the employer.

Prior research converges with this analysis. Certainly, the climate can not be described as collaborative in any of the three countries (Anxo & O'Reilly, 2000; Edwards, Hall, Hyman, Marginson, Sisson, Waddington, & Winchester, 1992; Slomp, 1995). But Slomp too has observed that the nationally- and industry-centralized structure of the unions slows initiatives down in France. And Silvera (2006) explains that most French unions see flexible working as an attempt from employers to further improve productivity at the expense of workers.

(3) The complexity of the legal framework. The legal framework, including the tax system, has been shown to have contradictory effects on HR practices adoption. On the one

hand, coercive pressures (DiMaggio & Powell, 1983) such as compliance with the law and tax incentives increase the level of practices adoption. A generous platform of rights also enhances employees' sense of entitlement (EFILWC, 2003). On the other hand, the complexity and inflexibility of a legal framework can discourage HR officers from launching initiatives (Gooderham, Nordhaug & Ringdal, 1999).

In this sample, both encouraging and dissuasive effects are mentioned but the latter predominates. Tax incentives for on-site daycare centers and services for employees, as voted by the *Conférence de la Famille* in 2003 and the Borloo Act in 2005 encourage organizations to adopt work-life practices. Governmental pressure on public and recently privatized large companies is also strong. But the refraining aspect of the heavy legislation is the one mentioned by most interviewees, as illustrated in table 6.

=== Insert Table 6 about here ===

This concurs with Gooderham and his colleagues (1999) who argue that French HR officers are experts, kept busy by operational constraints such as compliance with a stratified legislation and the necessity to monitor on-going relationships with the unions, the works councils and official authorities as the Inspection du travail. Their counterparts in the UK tend to adopt more "collaborative" practices because they act as facilitators focused on training, communication, and alignment of HR strategy with the global business strategy.

(4) Awareness of work-life practices within HR departments: a good number of issues compete for managers' attention when they scan their environment (Milliken, Dutton & Beyer, 1990). HR officers act as "gate keepers" for the company, in the sense that they are the ones capable of identifying a new issue, gathering knowledge and finally "selling" it to top management (Dutton & Ashford, 1993). As far as HRM practices are concerned, France has

been termed a "cultural island", distinct from the "Anglo-American business culture" (Sparrow, Schuler & Jackson, 1994, 279). It is therefore possible that HR tend to have a less systematic knowledge gathering process. This is confirmed in the interviews, as shown in table 7.

=== Insert Table 7 about here ===

(5) Framing of work-life as a business or a social issue: once they have scanned their environment and identified a salient issue, HR officers "make sense" of it. They investigate four main questions (Milliken & al., 1990): do work-life practices have a business impact; are they for women or all employees; is it the company's responsibility to act in this area; and can they be linked with other current HR issues? Several themes underlining the social rather than economic framing of these practices in France are illustrated in table 8.

=== Insert Table 8 about here ===

A more vivid Marxist tradition in France may explain the social interpretation (Gooderham & al., 1999), as may also the tendency of French people to differentiate between the "logic of honor" and inferior business interests (d'Iribarne, 2002). However, the framing of work-life as a social issue reduces the adoption of work-life initiatives. In the US, they have reached a momentum when they have been considered as a global competitive issue, fully integrated with other HR policies as well as transversal issues such as gender and diversity, rather than just a child care issue (Friedman & Galinsky, 1992). Indeed, the business language fosters practice adoption (Friedman & Kossek, 2002; Lee, MacDermid, Williams, Buck & Leiba-O'Sullivan, 2002), even though some researchers call for a recasting of work-life as a corporate social responsibility issue (Pitt-Catsouphes & Googins, 2005). In the UK, too, the business case has been articulated by governmental publications such as *Work-Life Balance*,

Changing patterns in a changing world (Department for Education and Employment, 2000).

Also, resistances arise when an issue is seen as a women's problem (Kraut, 1990).

Discussion

As measured by national studies and observed from a qualitative perspective, French organizations adopt less work-life practices than their British and American counterparts.

This can be explained by:

(1) At the macro level: a weaker legitimacy of French employers in the nonwork domain, compared with the Welfare State in France, and with British and American employers; uncooperative industrial relations that curb dialogue and initiatives, all the more than work-life is a low priority for most unions; and a complex legal framework which dissuades HR officers from engaging in new practices.

(2) At the meso level: weaker awareness and expertise on work-life practices; and an interpretation of the practices as benefits for the employees or a social issue in connection with diversity, equal opportunities and corporate social responsibility.

The results of the analysis underline two major considerations, which may seem antagonist at first. The first one is the weight of the socio-institutional environment in which organizations evolve, at the macro level. As institutional theories have shown (DiMaggio & Powell, 1983), the macro environment shapes employers' actions through coercive pressures (legislation, cultural expectations), mimetic pressures (successful organizations and competitors) and normative pressures (professional standards). The second consideration is that each company makes strategic choices, through an on-going interpretation or "sense making" process of its environment (Daft & Weick, 1984). To adapt to change in the environment and institutional pressures, each company decides whether or not to adopt

specific HR practices, such as work-life practices. The decision process of a given company follows three analytical steps which in reality may overlap: (1) scanning, (2) interpretation, and (3) learning (Milliken & al., 1990). Two of them were illustrated in this research.

While these two perspectives do rely on different epistemological positions, their combination has proved extremely heuristic (Milliken & al., 1990; den Dulk, 2005). Therefore, a two-level perspective, macro and meso, may be embraced in an attempt to build an explanatory model. This model explains the level of adoption of organizational work-life initiatives in a country, based on France, and is illustrated by Figure 2.

==== Insert Figure 2 about here =====

Although this article has described the five factors separately, there are of course numerous interactions between them. The most important is that macro factors influence meso factors. For instance, HR knowledge of work-life practices is weak because they do not systematically gather information or attend practitioners conferences on this topic (meso level), but also because the focus on the State as preferred support provider undermines employees' requests, political debate on employers' contribution to work-life and the development of specialized service providers (macro level). This interaction is visualized by an arrow in Figure 2. A feedback effect from meso to macro may be observed in countries where work-life initiatives are well developed: adoption by leading employers may raise expectations among employees of other organizations, modify the perception of employers' role towards life outside of work and open a market for service providers. This is not the case, yet, in France.

Interactions are also found inside each level. At the macro level, the strong legitimacy of the State explains the abundance of regulations, while it is nurtured by uncooperative industrial relations. At the meso level, the social interpretation of work-life initiatives is due

to the antagonist employee-employer relationship (macro influence) and to lack of information on the initiatives and how they can benefit the employer (meso influence).

This model emphasizes a contextualist approach of HRM, considering the embeddedness of HR practices in their context (Brewster, 1999). From an epistemological standpoint, it subscribes to the multi-level thinking known as "effet sociétal" (Maurice, Sellier & Silvestre, 1982): the intrinsic coherence created and nurtured by interactions between the macro, meso and micro levels in each country. This approach is particularly relevant in a field where social policies at the macro level, corporate practices at the meso level and individual needs and expectations at the micro level are closely interlinked (Bardoel & de Cieri, 2006).

This article makes several contributions in the field of international work-life research. It provides rich information about the French context and the stance of various interlocutors (HR officers, unions, works councils, service providers) towards work-life practices. There is very little research on organizational work-life practices in France, except for the surge of interest for the 35 hours law, and the depth of the information gathered adds value both for researchers and practitioners.

Moreover, this research is in no way specific to France, the UK and the US: it can be generalized and used as a theoretical tool to conduct research in other countries. Apart from Poelmans and Sahibzada's multilevel framework (2004), which was of prime interest for this research but has not yet been empirically validated, there is not much research combining a comparative perspective and a multi-level approach. This article clarifies the most salient factors determining organizational work-life practices adoption in a given country. To HR practitioners, the model provides a deeper understanding of why a given practice is welcomed or not in a given country, and why it is efficient or not. A particular attention needs to be directed towards the macro environment of organizations which shapes employees and

union's expectations as well as HR officer's leeway. This can hopefully contribute to achieve a more relevant endorsement of HR global strategies within multinational enterprises.

Limits of this research pertain to data collection and methodology. First, the sample used to test the model is predominantly French and this choice limits the validity of the comparative analysis. Secondly, the content analysis was performed by a single coder. To address this, rigorous tracking methods were adopted such as a category diary with explicit categories definitions and memos detailing changes in the coding scheme. Lastly, the qualitative methodology does not allow for a validation of the propositions at a large scale. The contribution of this paper is to build a theoretical framework which can be further validated. This methodology makes sense given the scarcity of previous comparative research and the complexity of the research question raised in this paper, involving two levels of analysis and three countries (Miles & Huberman, 1994). Furthermore, it is very valuable in a context of an existing research which relies almost exclusively on quantitative design (Poelmans, O'Driscoll & Beham, 2005).

Future research is needed to validate and enrich the model. The model would also benefit from an extension to other countries, in particular from other continents. More generally, the multi-level approach should be encouraged in future research in the work-life field, for the unique insights it yields on new practice adoption and effectiveness.

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TABLE 1

Study	Sample	Determinants of work-life practices adoption
Morgan & Milliken, 1992	The US - 175 answers to questionnaires sent to HR officers	Company size, region, industry. Not significant for proportion of women nor unionization.
Goodstein, 1994	The US - 1239 organizations, subsample from a US Department of Labor study	Company size, region, industry, private sector cost/benefits perception, available expertise, women's unemployment.
Ingram & Simons, 1995	The US - replicate Goodstein, 1994 on the <i>National Organizations Study data</i> : 688 workplaces, phone interviews with HR officers	Company size, proportion of women managers, women's unemployment, industry, public sector. Not significant for total proportion of women nor absenteeism rate.
Osterman, 1995	The US - 875 workplaces with more than 50 employees, from Dun & Bradstreet	High-commitment systems, professionals. Not significant for unionization.
Guérin, St Onge, Haines, Trottier & Simard, 1997	Québec - 301 organizations, 236 with more than 250 employees	Unionization public sector and company size. Organizational culture, proportion of women in the qualified workforce.
Bond & Galinsky, 1998 (FWI)	The US - 1057 employers of more than 100 employees ; stratified sample, phone interviews with HR officers+B35	Company size, proportion of executive women, of professionals, of part-time employees, unionization, recent history of restructuring.
Dex & Scheibl, 1999	The UK, after data analyzed by Forth et al (1997)	Large unionized public-sector company.
Konrad & Mangel, 2000	The US - 195 large companies (average of 16 000 employees)	Company size, proportion of women and of professionals, service industry.
Evans, 2001	Analysis of national surveys in Australia, Japan, the UK and the US	Company size, public sector, porportion of qualified employees, employees' tenure, gender equality agreements, high-commitment systems. Importance of welfare regime, women's labour market participation, family role.
Friedman, 2001	The US – Data collected by Galinsky et Bond (2000)	Company size, industry, porportion of women.

TABLE 1 (Continued)

Study	Sample	Determinants of work-life practices adoption
Woodland & al., 2003 (DTI)	The UK - 1509 employers with more than 5 employees ; stratified sample, phone interviews with HR officers	Company size, unionization, public sector, industry.
Wood & al., 2003	The UK - WERS98 (British Workplace Employee Relations Survey)	FWA : public sector, industry, existence of HR cell, proportion of women. Not significant for unionization, workforce qualification, high-commitment systems, proportion of employees with children, leader's values. Early childhood : company size, public sector, industry, existence of HR cell, proportion of women, leader's values, TQM strategy. Not significant for high-commitment systems, proportion of employees with children.
Tremblay, 2004	Canada - Study via a union: 261 union representatives, 163 HR officers	Public sector, service industry, knowledge orientation. Not significant for company size and proportion of women.
den Dulk, 2005	Phone interviews with HR officers of service sector employers with more than 100 employees: 95 in Italy, 113 in the Netherlands, 100 in Sweden and 67 the UK+B17	Company size. Not significant for proportion of women, of women managers, of fixed-termed contracts. More employer variance in countries with less statutory public provisions. Importance of public provisions, expectations towards the State, employers and the family as support providers, labour market.
Bond & al., 2005 (FWI)	The US - 1092 employers with more than 50 employees Stratified sample, phone interviews with HR officers	Company size (practices differ with size).
Budd & Mumford, 2006	The UK - WERS98 (British Workplace Employee Relations Survey). Matching of employees and supervisors responses in 1565 companies	Company size, unionization, existence of HR cell, proportion of women, of parents and of employees with work autonomy, workforce qualification.

Sixteen studies on the adoption of organizational work-life initiatives, in chronological order

TABLE 2

44 interviewees in France		
Within companies	Human Resources Officers	10
	Diversity Officers	5
	Union representatives	5
	Work council members	5
	Non-unionized employees	8
	Nurse	1
	On-site daycare Director	1
At the national level	Service providers	7
	National union officers	2

44

Distribution of the sample: Interviewees

TABLE 3

16 organizations in France		
Industry	Manufacturing	9
	Services	7
Size in France	Large companies (> 500 employees)	10
	Small and medium (< 500 employees)	6
Location of interviewee worksite	Paris region	11
	Other regions	5
Nationality	French	12
	Anglo-Saxon subsidiary in France	4

Distribution of the sample: Organizations

TABLE 4

1. Employers/State legitimacy in the nonwork sphere of life (in 24 interviews)	
a) Employers perceived as pursuing economic interests at the expense of employees; antagonist perception of the employee-employer relationship	"The natural tendency was to say management must not be aware of the life and personal problems of people (...) If we think of the debate on the CPE [contrat première embauche, which allowed employers to hire young people on a two-year fixed-term basis], it struck me to see that one of the selling points against the CPE was "management will use it to fire us", this perception of employers that if we give them a power they will use it against, this I believe is deeply engrained in French people's everyday life." (Works council treasurer)
On-site services make employees wonder about hidden motives or implications on the part of employers	"Ah, there is a grocery shop, so if you don't buy there you get into management's bad books." (Union representative) "I wouldn't like it at all if the company took care of my children." (National union officer)
High sense of entitlement towards State support	A conversation between business developpers at a daycare service provider: "- People expect many free services in France - Yes, but there is this French history linked to the dependency towards the State, we expect everything from the State, social security, services..."
b) Employees' desire to protect their personal life from their employer, manager and colleagues, so that work does not take on their whole life	"Separation of spheres is positive: otherwise, there is no more separation, and you can see right away what might well invade the rest, can't you?" (HR Director)
Employees tend to share little personal information at work and to build friendship and community networks outside work. This contrasts with the US.	"It is a big difference, in the US work takes more time, this notion of hours is less present (...), you make friends at work and you go out with them. Here, we rather have two sides, professional life and personal life, we feel like if we merged the two it would be an imbalance." (Laboratory Director)
c) HR officers very cautious to not be accused of paternalism. French HR in American organizations criticizing headquarters policies as paternalist.	"It would be unwarranted, with respect to business objectives, that is not to be done. (...) We don't have rules on how they must behave. It would be frowned upon." (HR Director)

First factor: Employers/State legitimacy in the nonwork sphere of life

TABLE 5

2. Industrial relations and unions' stance towards work-life practices (in 20 interviews)	
<p>a) Tense climate in France makes HR officers careful and unions suspicious with regards to new practices. HR resort to various strategies such as negotiating at the European level or have more collaborative unions elected.</p>	<p>"You know, I am a union representative, so I think that top management, when they mention something, it's for, generally, their own interests, I don't believe at all to this "I am going to be nice with my employees" stuff." (Union representative)</p>
<p>b) The structure of industrial relations curbs initiatives. Three factors undermine unions' cohesion in France: historical rivalries, a strong centralization that restrains local representatives' leeway and a bipolar structure.</p>	<p>"The problem in France is there are those works councils, this puts a big brake (...). Since the CGT [Confédération Générale du Travail, a communist-inspired union] are in the majority, they think they need to do nothing (...) if it was like in Germany where there is only one union, IG Metall, it would be much better. Now, we still have blood wars, hence it is very difficult in a works council where you have several unions, to find a common ground (...) and also it is a fact that some trade unions are mostly governed by guidelines, the local representative has to consult his trade union in Paris, this also puts a big brake unfortunately." (Union representative)</p>
<p>The social mission of works council is an obstacle because they tend to see the central issues of work design and the underlying norms of the ideal worker (Lewis, 1997) as polemic.</p>	<p>"I'm here to manage a works council, not to talk about trade unionism or propaganda." (Works council Secretary General)</p>
<p>c) The general stance in male-led unions is that work-life practices are a women's issue and therefore not high on the agenda.</p>	<p>"They said "oh no, kids", they didn't find that interesting. (...) In our company, the CGT [the majority union], he's more vindictive when we discuss wages, or work organization, the other topics he somehow avoids them." (Union representative)</p>

Second factor: Industrial relations and unions' stance towards work-life practices

TABLE 6

3. The complexity of the legal framework (in 9 interviews)	
<p>Dissuasive effect on initiatives</p> <ul style="list-style-type: none"> - direct when the 35 hours week impedes negotiations on flexible working arrangements that make work hours more difficult to measure - indirect because of the technical skills and effort required to comply with the legal framework. 	<p>"It's more that we apply the law and collective agreements, for family leaves, parental leaves. We are required by law to accept part-times, paternity leaves, we're not in the mindset where we would have specific incentives for that. (...) All the more that we have a 35 hours agreement (...) it's already quite a lot of machinery to handle delicate situations." (HR Director)</p>

Third factor: The complexity of the legal framework

TABLE 7

4. Awareness of work-life practices within HR departments (in 14 interviews)	
a) HR officers are indeed "gate keepers" for work-life practices, in that they select specific practices over others	"For the moment we rule out on-site services because, obviously, it makes people laugh here (...) I have a colleague with a mum who can't live by herself anymore, the social worker just told her she'll have to find a nursing home, that's what really make people anxious, it's not the dry cleaner." (HR Director)
b) Most French HR have a weak knowledge on work-life practices	"ARE YOU AWARE OF WHAT THE OTHER HIGH-TECH COMPANIES DO? No, not yet, because I haven't had any exchange yet (...) Except for the professional press, that's the only way to know what's going on." (HR Director)

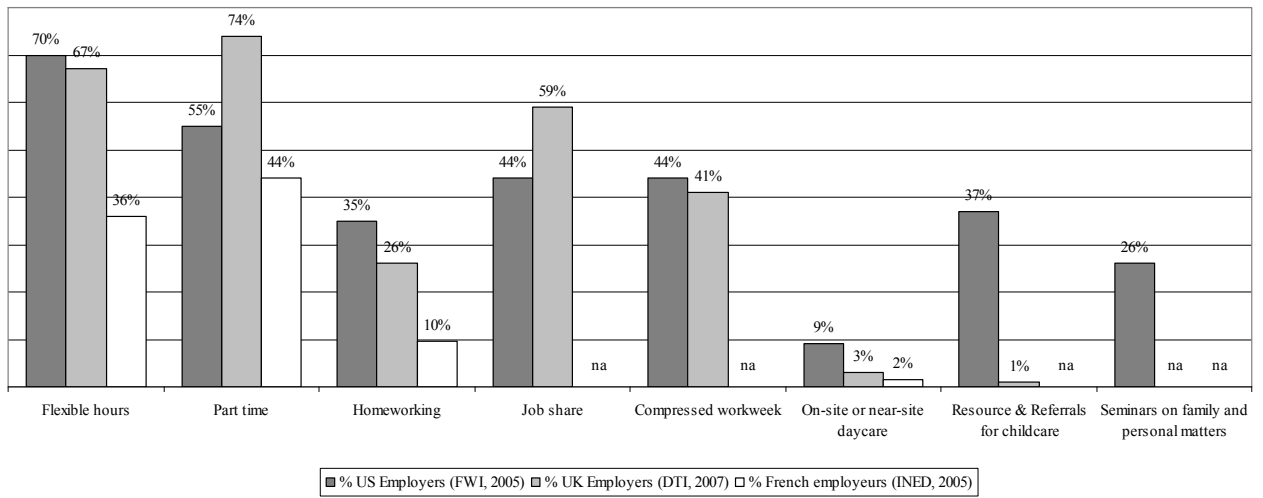
Fourth factor: Awareness of work-life practices within HR departments

TABLE 8

5. Framing of work-life as a business or a social issue (in 19 interviews)	
<p>a) French Management views work-life practices as perks, sometimes used in negotiations with the unions (as in the case of worksites relocation). Since no attempt is made to compute a return on investment on what is considered benefits, their cost is dissuasive.</p>	<p>"IS WORK-LIFE BALANCE SOMETHING YOU DISCUSS IN YOUR COMPANY? [sighs] We have family part-times, and the normal benefits of the works council." (HR manager)</p>
<p>Work-life practices also considered to meet diversity and CSR objectives. Unlike in the UK, where organizations develop a business case for CSR, CSR is often held as a superior moral objective in France, disconnected from economic interests.</p>	<p>"AND THIS PROGRAM TO ENHANCE EMPLOYEE HEALTH, WHAT DOES IT DO ON EMPLOYEE COMMITMENT? No it's not our goal, this is public health (...) We are a corporate citizen." (HR Director)</p>
<p>The business interpretation can be found among influencers (service providers and national unions), American subsidiaries and some French HR - all apologize for it.</p>	<p>"When he's going to spend half an hour on the net, if we have services to help him do this, it's time won, productive time concretely (...) The company wants to implement this because they think it's going to improve productivity! I say this a bit abruptly but it's a reality." (CEO, EAP service provider)</p> <p>"Legitimately, we should support this not only from a social standpoint, but also from an... economic standpoint, in terms of productivity, which is, ugh, very legitimate, I mean HR are not, how can I say, HR are not a union." (HR Director)</p>
<p>b) Work-life practices framed as social because they are seen as a women's issue, linked with recent legislation on Equal Opportunities.</p>	<p>"This topic, conciliation between professional life and personal life, was approached with the logic what can we do for women (...) we decided to gather a group of experienced women managers, all with children, with the question how can we go through the glass ceiling." (HR Director)</p>

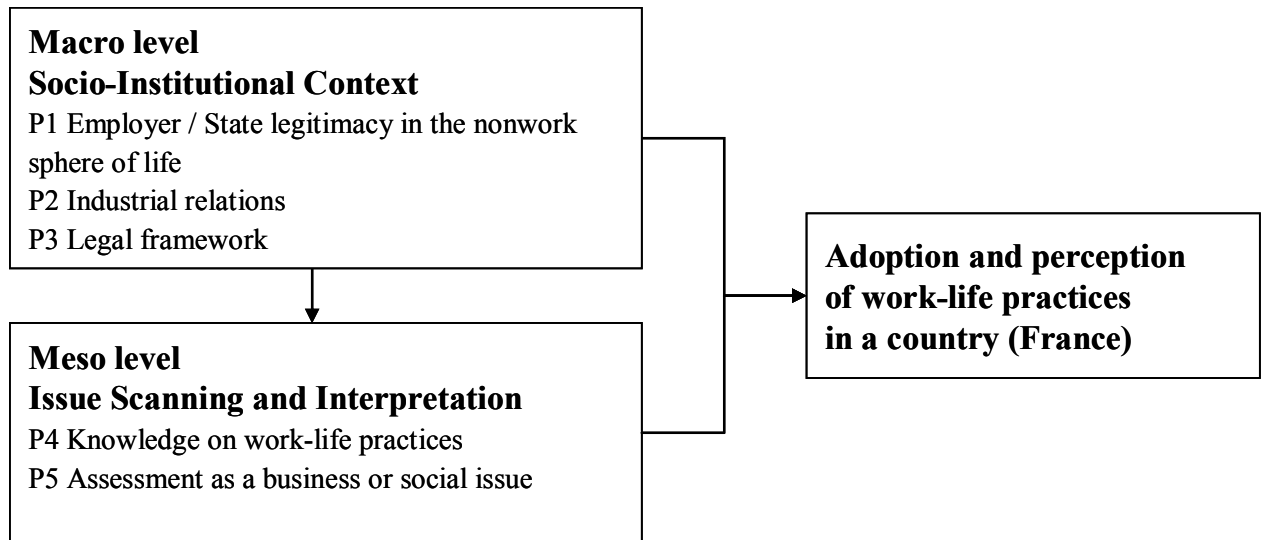
Fifth factor: Framing of work-life as a business or a social issue

FIGURE 1



Organizational work-life initiatives in the US, the UK and France

FIGURE 2



A two-level model to explain the adoption of organizational work-life initiatives
in a country (France)