



## Examining Comparative Industrial Relations in African Countries, A comparative study

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### ABSTRACT

Many African countries have Industrial Relations systems that were previously shaped by colonial regimes but eventually transformed by the prevailing socio-political and economic situations. This study was conducted on a few African countries i.e. Uganda, Kenya, Tanzania, and South Africa examining the comparative Industrial Relations in play with insights on Industrial Relation practices in Southern African countries. The general comprehensive objective for this study is to examine the comparative Industrial relations of the aforementioned countries, broken down specifically to comparing IR systems in play in these countries and to determine recommendations necessary for rife issues within the IR systems. The methodology employed in conducting the study was a descriptive research design comprised of case reviews from past researches/studies and existing literature on the topic. The findings of the study indicated that in terms of (i) Colonial Legacies and Post-independence Trajectories: Uganda and Nigeria both faced military rule disrupting IR frameworks, (ii) Institutional Frameworks and Tripartism: Uganda struggled more than S.A, (iii) Conflict Resolution Mechanisms: Uganda's system is destabilized while S.A's system is robust, (iv) Globalization and MNC Influence: Uganda and Kenya face exploitation while S.A is stricter. The contemporary challenges and innovations included Legislative Fragmentation, Political Co-optation, and Foreign Exchange Dependence. The findings on regional comparisons summarized that Kenya and Uganda share a hybrid IR system blending colonial and tripartite structures while Tanzania has a centralized unionism system.

**KEYWORDS:** Comparative Industrial Relations, Employer, Labor force, Approach, Tripartite, Trade Union, Collective Bargaining.

### INTRODUCTION

Industrial relations in sectors, industry, countries and the wide world have constantly had several varying influential factors across different spheres with each becoming more malleable in this globalized economy characterized by high competitiveness among organizations. The uniqueness of an Industrial Relations system is most often determined by the historical foundations, social characteristics, as well as economic and political atmospheres where they operate. However, the most important actors of Industrial Relations are the people with the means to facilitate production, and the people whose only contribution is their labor in expectation of a pay. This therefore implies that the human resources is the core aspect in Industrial Relations and the productivity in any organization is the outcome of the joint efforts of two distinct elements i.e., technological and human resources (Akinbode J. O., 2017). Notably, it has always been difficult

to manipulate and properly manage the human element because they are the causes and results of interactions, duties, social issues, responsibilities and other activities. The skyrocketing rate in the growth of industry in this globalized community manifests with an increasingly evolving workforce thus compelling adjustments in Industrial Relations and as such, any negligence afforded to the human element has the capacity to generate misunderstandings between employers and employees leading to forestalling of the organization.

The practice of improving issues in IR is therefore is compelled not only by the need to develop an Industrial Relations system that accommodates the emerging business environment, but also the recognition that it is very necessary to develop an Industrial Relations system that reduces industrial conflict and fosters social stability. In this context therefore, the concept of industrial relations is of global

interest. This article comparatively studies Industrial Relations in Uganda, Kenya, Tanzania, South Africa and Nigeria and provides brief insights on their development and present practices including recommendations on rife issues needing for improvement.

## BACKGROUND OF STUDY

Industrial relations (IR) in Africa are deeply rooted in colonial histories, post-independence political transitions, and evolving socio-economic dynamics (Koçer & Hayter, 2011). Colonial regimes institutionalized labor controls to exploit resources, leaving legacies of fragmented unionism and state-dominated IR frameworks (Fashoyin, 1998). Post-independence, countries like Uganda and Nigeria grappled with authoritarian regimes that disrupted labor rights, while South Africa’s apartheid system delayed equitable IR reforms until the 1990s (Bamwesigye, 1994; Wood & Brewster, 2007). Despite shared challenges, regional disparities persist: East African nations like Kenya and Tanzania adopted hybrid or centralized systems, whereas Southern Africa reflects varied institutional maturity (Russell, 2015). This study contextualizes these trajectories to analyze contemporary IR practices and their implications for labor governance.

## Problem Statement

While comparative IR studies have focused on Europe and Asia, African systems remain underexplored, particularly regarding colonial legacies, institutional resilience, and globalization’s impact (Akinbode, 2017). Existing research often isolates country-specific cases, neglecting cross-regional analyses that could inform policy harmonization (Koçer & Hayter, 2011). For instance, Uganda’s IR system, destabilized by political co-optation and legislative fragmentation, contrasts sharply with South Africa’s robust tripartism (Bamwesigye, 1994; Greg, 2020). This gap limits policymakers’ ability to address shared challenges like exploitation in multinational corporations (MNCs) and weak conflict resolution. This study addresses these gaps by systematically comparing IR systems in Uganda, Kenya, Tanzania, South Africa, and Nigeria.

## Objectives of the study

To examine the comparative industrial relations systems in Uganda, Kenya, Tanzania, South Africa, and Nigeria.

### Specific Objectives:

1. To analyze the institutional factors shaping industrial relations (IR) systems in Uganda, Kenya, Tanzania, South Africa, and Nigeria.
2. To assess the impact of globalization in multinational corporations (MNCs) on labor practices in Uganda, Kenya, Tanzania, South Africa, and Nigeria
3. To identify strategies for strengthening IR frameworks, in Uganda, Kenya, Tanzania, South Africa, and Nigeria.

## Research Questions

1. What are the institutional factors that are shaping industrial relations (IR) systems in Uganda, Kenya, Tanzania, South Africa, and Nigeria?
2. What is the impact of globalization in multinational corporations (MNCs) on labor practices in Uganda, Kenya, Tanzania, South Africa, and Nigeria?
3. To identify strategies for strengthening IR frameworks, in Uganda, Kenya, Tanzania, South Africa, and Nigeria.

## Scope of the Study

The study focuses on Uganda, Kenya, Tanzania, South Africa, and Nigeria, selected for their divergent colonial histories (British vs. apartheid influences) and IR trajectories. The temporal scope spans post-independence (1960s) to 2023, emphasizing legislative reforms, union activism, and globalization. The analysis covers four themes: colonial legacies, institutional frameworks, conflict resolution, and MNC influence.

## Significance of the Study

This research contributes to decolonial IR scholarship by highlighting African perspectives often marginalized in Eurocentric frameworks (Akinbode, 2017). Practically, it aids policymakers in designing labor laws responsive to globalization pressures (e.g., the African Continental Free Trade Area). For unions, it identifies strategies to resist political co-optation, as seen in Uganda’s alignment with ruling parties (Koçer & Hayter, 2011). Academically, it enriches comparative IR literature with cross-regional insights, addressing gaps noted by Budlender (2009).

## LITERATURE REVIEW

### Industrial relations

To define industrial relations, one has to take into consideration the meaning of industry and relations. Industry simply refers to any activity an individual engages in that is productive (e.g., manufacturing, agricultural production, mining, trade, transport, banking etc., whereas relations refers to the relations existing between the employers and their labor force. Therefore, several authors have defined industrial relations in different ways. There are however conflicting perspectives amongst scholars on the focus and approaches of industrial relations in their attempts to arrive at a comprehensive definition. Girigiri (2002), for example, proposes perspectives including industrial sociology, Unitary, Integrated, System, Class conflict, Oxford, Industrial conflict, Economic and Political approaches. In an attempt, Green (1994) defines IR with a focus on particular institutions, their characteristics, procedures and topics, but this too seems not to be sufficient in solving the conundrum of definition and analysis.

Nevertheless, G. Wood & C. Brewster, (2007) in their definition state that Industrial Relations is a study and practice field that embodies a set of workplace interactions

founded upon a contract of employment comprising work parties and their representatives within regulations pertaining to the job. He asserts that IR started after the industrial revolution of the 18<sup>th</sup> century as the factory employment system and subsequently evolved into an independent discipline with a more significant recognition in society. Alternatively, a 2016 Eurofound report mapping key dimensions of IR fronts a definition as the collective and individual governance of work and employment. The core dimensions highlighted in this definition include: (a) Industrial democracy, that describes the employers and employees' rights to govern their relationship underscoring their autonomies as collective groups and their capacities to influence decision-making collectively; (b) Industrial competitiveness, which elucidates the essentiality of promoting competition through research and innovation, education and training, technological adoptions and information technology among many other factors necessary to boost competitiveness; (c) Social justice, a dimension that focuses on fair and equitable distribution of outcomes and opportunities in the industry necessary for capacity building and individual self-realization; and (d) Quality of work and employment, the final dimension that promotes health and well-being, skills and talent development opportunities, career and employment security, and a work-life balance (Eurofound, 2017).

The objectives of good industrial relations can thus be stated as two-fold, i.e. to maintain industrial peace and to steer industrial co-operation through assuring workers of proper working conditions, fair compensation, holidays and the basic life amenities.

#### **Theoretical Review:**

Generally industrial relations deals with relations among workers, relations among employers or worker-employee relations. Diving deeper into the subject however, IR is broken down to four types including; Labor relations, Group relations, Employer-Worker relations, and Public/Community relations. The discipline is further categorized in layers that consist of the Employer, the Employee, the Government, and Trade Unions.

#### **Understanding the different approaches to Industrial Relations:**

According to (D. Budlender, 2009) Industrial relations theorizes various approaches such as, the Psychological Approach, Sociological Approach, Human Relations Approach, Socio Ethical Aspects, Gandhian Approach, Unitary Approach, Pluralistic Approach, and the Marxist Approach. Earlier scholars however postulate these approaches specially focusing on the Marxists approach, the Pluralistic approach, and Trade Unionism.

#### **The Marxists Approach**

Also known as the Radical approach, (Bamwesigye, F. K., 1994) stipulates that this approach was promoted by the radical marxist school. Its emphasis is driven towards the

central significance of the division of those owning the production means and those with only the ability to offer their labor for compensation. He further cites (A. Schienstock, 1981)'s marxist thesis in subtle terms; "Capitalists and wage-workers stand at each side of the labor market as buyers and sellers respectively of the commodity, present themselves on the labor market in order to sell their labor in exchange for the financial means to sustain their existence. This labor is completely valueless to them until it is combined with the means of production. However, since these are owned by the capitalists, wage workers can capitalize on their labor only by selling it. Capitalists for their part, present themselves on the labor market in order to purchase the labor required for the profitable deployment of their means of production" (A. Schienstock; 1981: 180).

#### **Dunlop's systems approach**

(Bamwesigye K, 1994) explains the works of (Neil Smelser, & Talcot Persons, 1956), both sociologists influenced Dunlop's systems model of IR. Both scholars were functionalists who earlier suggested that the social part of the world would be considered to be a 'total system' consisting of four subsystems, namely; political, integrative, pattern-maintenance, and economic subsystems. In this approach Dunlop further stipulates that there is variation in scope of an IR system from across enterprises, sectors and economies. Despite these variations, some structures, properties and response maintain commonality to all Industrial Relations systems. For instance, it encompasses three categories of actors: a hierarchy of employees and/or their representatives (trade union); employers and their associations; and specialized state agencies whose purpose is to regulate work place and work community aspects, e.g., labor ministries, industrial arbitration tribunals, panels, wage boards, etc. Together these groups work in juxtaposition with a shared ideology to answer the welfare needs of the community as a whole.

#### **Plurist approach**

(Bamwesigye F. K., 1994) stipulates that this approach espouses the establishment of rules and guidelines that are binding to all industry actors. The determination of these rules involves a Collective Bargaining rule-making process seen as a political institution that includes a power relationship between the employees and employers. This approach provides an acknowledgment that conflict exists between employers and their workers, and generally between different actors in the society. Since it is believed that the interests of employers and those of workers diverge, there's bound to be conflict and therefore acknowledging that conflict is endemic in society, adopting institutions, enterprises or societies can foster compromise among actors, thus facilitating continuity in collaboration.

#### **The Trade Union approach**

(Isaac Zeb-Obipi, 2018) postulates that the search for an IR theory commenced with debate amongst scholars on what the

key focus of Industrial Relations should be. Until the end of WWII, trade unionism held the foundation of IR theory. Trade union issues dominated the analysis of Industrial Relations; economically biased at the beginning, followed with a political bias, and then with both economic and political approaches in combination. The Trade Union approach to IR holds a conception that Industrial Relations is the relationships amongst unions, the institutions and processes established to give them a structure. Such unions may include employer’s associations and trade unions wherein these trade unions could include staff association (associations of senior employees) and labor unions (associations of junior workers).

This approach conjoins a second dimension that provides for the analysis of the government’s role as an intervener into relationships prevailing between employer’s ad/or employer’s organization and workers and/or their trade unions. In the case where the government is the employer, its role as an intervener constitutes a different analysis unit. This implies that public legislation and regulatory policies developed to influence relations between workers and employers must be binding to the government as an employer (Isaac Zeb-Obipi 2018).

Further delving into the Trade Union approach, many scholars have posited in different ways, expanding the debate on trade unions. Whereas Dunlop (1958) describes a trade union as an institution that is economic leaning aiming to fully exploit some wage or employment aspects for the good of its members, Perlman (1949) defines a trade union as a design, to protect the job interests of employees and opportunities for sharing employment. Nonetheless, Commons (1925) explained that a labor union is a liberating force, which aided the establishment of constitutional government in industry and defines the power one of the parties possess over the other. According to Ross (1948) a union is a political institution that functions in an economic context with "orbits of coercive comparison" having the ability to determine a common wage policy. This approach that was used to develop the theory of Industrial Relations around unionism paved way to others such as social subsystems, party interrelationships at the work place and collective bargaining (Isaac Zeb-Obipi 2018).

### **Comparative Industrial Relations:**

According to (Akinbode, J. O., 2017) Comparative IR is the systematic study or examination of two or more industrial relations systems in respect to their historical development, theories and practice, philosophies, objectives, aims, policies, socio-cultural and economic relevance in comparison to others with the view of seeking solutions to inherent problems for improvement. With the continuously changing economic, political, and social environments globally, industrial relations in many countries are being influenced by a number of factors that have compelled the need to develop more effective and efficient Industrial Relations systems tailored to

meet the prevailing situation. However, in doing so HR managers are guided by organizational, socio-economic and political expectations in order to develop acceptable mechanisms that are aimed to meet them. (Akinbode, J. O., 2017) highlights the most significant objectives of the Comparative IR as to provide sufficient and reliable information about Industrial Relations systems e.g., their institutions, processes, activities, methods, context, prospects, problems, issues, to provide comprehensive knowledge of one’s system of IR, to widen horizons of students, scholars, managers, researchers, among others by aiding critical thinking, to assist in understanding what industrial relations is and is not, to enable an understanding of the forces within Industrial Relations, e.g., the actors and their varying roles and to facilitate and promote industrial harmony through adoption of modern techniques of IR practices from other parts of the world to one’s country.

### **Approaches to studying Comparative IR**

Studying Industrial Relations comparatively varies from one discipline to another. Nonetheless, there are most common approaches that have been employed by many researchers across the globe in handling issues pertaining to Comparative Industrial Relations. (Akinbode, J. O., 2017) states these approaches as: Descriptive approach; Problem-Solving approach; and the Historical approach. These are explained as below.

#### **Descriptive Approach**

This is a fact-based approach in which a researcher collects data and describes their observation. This data can relate to a particular issue which can be compared, such as, compensation scales, industrial strikes, etc. (Akinbode, J. O., 2017).

#### **Problem-Solving approach**

This involves problem identification in IR in various contexts, e.g. organizations, industry, sectors, countries, etc. facing similar problems in their Industrial Relations. It is followed by studying how the problems are handled in one’s context. For example, it may provide insights on whether a solution applied in one IR problem can be applied to another country’s IR problem (Akinbode, J. O., 2017).

#### **Holistic approach**

This the most applied approach because it uses historical method to study issues in the IR of a country or countries. It involves examining what was in place in the past before and what exists in the present so as to derive solutions that could guide the future. This precisely means the historical development of a countries IR will be studied in juxtaposition with the current IR practice so as to develop improvements for the future. For example, in most developed economies, there was no minimum wage policy in the past centuries but in the present, they are core to IR practices. Hence the introduction of the wage policy is symbolic in their Industrial relations (Akinbode, J. O., 2017).

### **Overview of African Industrial Relations:**

There are basically three models of Industrial Relations i.e., Developed/Capitalist model, Communist/Socialist model, and Semi-developed capitalist model (Krislov, 1987; Fajana, 2010).

Since this article focuses on African countries, it is imperative that emphasis is placed on the Semi-developed capitalist model to guide this study.

### **Development of industrial relations in African countries:**

Koçer, R.G. and Hayter, S. (2011) argue that in as much as the use of a historical approach may not straightforward be as beneficial as expected in the comprehension of the dynamics of organized contemporary IR, for Africa's case, any attempt to study the present institutional IR arrangements would require one to put into consideration past developments for better insights. This informed by the fact that industrial relations actors in Africa (i.e. trade unions) have quite very often allowed new governance and regulation forms to take over. This is a revelation that operations and organization of trade unions and industrial relations, respectively, had influence in the transitions from colonial rule to independence (Orr 1966), and played significant roles in establishing multi-party democracies from the claws of several dictatorial regimes (Kraus 2007), consequently paving way for and labor markets employment regulation. Therefore, if these developments are properly conceptualized, some clues for the future prospects of industrial relations in Africa may be guaranteed.

### **Cases:**

In Uganda's case as an example in East Africa, (Bamwesigye, F. K., 1994) reveals that after the country achieved its independence, the government of Obote 1 having been motivated by the need to attract foreign investment, developed a labor controls regime targeting the organization of trade unions, and enacted laws to govern pay and pay conditions including restrictions on industrial strikes. These laws favored the employers at the expense of the workforce. As a consequence, it was unnecessary for private employers to involve in IR matters owing to the fact that it was the state's responsibility. Observations were made of interjections occasionally by trade unions who from onset were established by the colonial state as a means to diminish the militancy and politically embodied unionism which was a daily normal as had been in other colonies. Hence, this resonates with Gladstone (1980)'s assertion that the establishment of trade unionism and indeed Industrial Relations would be steered to the line of a not too militant "economism" instead of political goals. Scott, (1996) states that the same legislation that was used to give legitimacy to trade unions acted as a control measure and provided the pathway for trade unions into "constitutional channels".

In the case of Southern African countries (T. Fashoyin, 1998) states that the prevailing IR systems can be grouped into three broad development levels. The justification the researcher

provides is that this approach of IR analysis strives at improving our comprehension of not only the fundamental regional employment relations and the implications resulting from recent fundamental environmental changes but also kind of the challenges faced by the main industrial relations actors. The first category thus encompasses, the comparatively advanced South African IR system. This system reflects a comparatively high industrial and economic level of development in the country comprising of highly developed institutions and processes. It was historically, more conspicuous during the apartheid policy which oversaw the denial of fundamental human rights to the majority population including the denial of the right to organize freely and collectively bargain. However, the introduction of a full democratic state founded the dismantlement of this policy, a factor which birthed extensive reforms of IR policies (T. Fashoyin, 1998).

The second category as expounded by (T. Fashoyin, 1998) consists of the IR systems in countries such as Zimbabwe, Zambia and Eswatini (formerly Swaziland. Given that these countries were not significantly affected by apartheid, their history depicts that the labor force experienced freedom of organization and collective bargaining for a rather longer period. Excluding Zimbabwe whose independence was realized in 1980, the political situation in these countries has relatively been stable after over a couple of decades under oppressive minority rule. For Eswatini (formerly Swaziland) specifically, the current governance system, combined with other factors internal and external have denied the actors in IR the freedom necessary to contribute to labor relations. This is mirrored by state policies that do not favor good IR.

The third group consisting of countries such as Namibia, Botswana, Malawi, Mozambique, and Lesotho with industrial relations systems where some are old in some cases, have stagnated in underdevelopment till only presently. This was a consequence of political instability internally and in part as an overspill of the influence of the South African overbearing apartheid system, which posed as obstacles to desirable development of institutions in the labor market. As for Namibia, after its governance by South Africa independence was only realized in 1990 and Mozambique plunged into a devastating civil war soon after Industrial Relations were taking shape, but improvements have been oscillating (T. Fashoyin, 1998).

(T. Fashoyin, 1998) states that despite Malawi and Lesotho attaining independence way back in the 1960's, these countries have lived through political systems marred by democratic insufficiencies which have had a negative bearing on the tenets of their basic industrial relations, such as workers' freedom of organization/association and their right of collective bargaining. Botswana as a country in this group bears the uniqueness of a country that has been the most economically stable and prosperous in the continent and yet still is comparatively less experienced in collective

bargaining, in as much as they have free trade unions. (T. Fashoyin, 1998) further elucidates that until recently, wage determination in the country has been facilitated by the government.

From the onset, one needs to bear in mind that the development of industrial relations in the whole of Southern Africa had, in varying degrees, been negatively influenced by the prevailing system in South Africa particularly before the collapse of apartheid. In the other countries of the region, workers' rights to form organizations of their choice and bargain collectively with employers are recognized. However, owing to the dominance of S.A's economy in all neighboring countries virtually implied, practically, the significant influence of S.A's IR practice in these countries. In elaboration, this simply means South Africa's apartheid-backed HRM policies, considering the country's superiority over others in industrial development, inhibited the progressive development of IR in these countries. Another implication was that numerous employers in these countries, but originating from South Africa advanced the anti-labor posture where there unfortunately the trade unions were inherently were weak or particularly public policies were favorable to employers' associations, as explained by (T. Fashoyin, 1998).

#### **study gap**

In terms of contextual Gap there has been limited regional coverage and the study focuses on Uganda, Kenya, Tanzania, South Africa, and Nigeria but excludes Francophone and North African countries (e.g., Senegal, Morocco), where colonial legacies and IR systems differ significantly due to French/Arab influences (Koçer & Hayter, 2011). There has also been underrepresentation of Informal Labor. While findings note informal sector exclusion (e.g., Uganda's fragmented laws), the study lacks granular analysis of informal workers' roles in shaping IR systems, a critical gap given that informal labor dominates African economies (ILO, 2022).

#### **Theoretical Gaps**

There has been over emphasis on Colonial Legacies: The analysis prioritizes colonial history but under-explores *post-2000 institutional innovations* (e.g., digital union mobilization in Kenya) that redefine IR beyond historical path dependency (Vivian & John, 2023). The Limited Integration of Feminist IR Theories means that the study neglects gendered labor dynamics (e.g., women's overrepresentation in informal/MNC sectors), despite evidence of gender-based wage disparities in Uganda and Nigeria (Budlender, 2009).

#### **Methodological Gaps**

There has been over reliance on Secondary Data. The descriptive design depends on existing literature and case reviews, lacking primary data (e.g., interviews with unions, MNCs) to validate findings like political co-optation in Uganda or South Africa's CCMA efficacy (Russell, 2015).

which explains the static Comparative Analysis: The study compares countries but does not track IR system *evolution over time* (e.g., pre/post-Apartheid South Africa or Uganda's post-1986 NRM reforms) to identify causal mechanisms (Akinbode, 2017).

## **METHODOLOGY**

### **Research Design:**

A qualitative comparative case study design was employed, analyzing IR systems in Uganda, Kenya, Tanzania, South Africa, and Nigeria. This approach aligns with Bamwesigye's (1994) historical-institutional framework, which emphasizes path dependency and actor interactions.

### **Data Collection:**

Secondary data was extracted from Peer-reviewed articles (Scopus, Web of Science) and books on African IR. National labor laws, policy documents, and reports (e.g., Uganda's Labour Act, South Africa's Labour Relations Act). International Labour Organization (ILO) databases and Eurofound reports.

### **Sampling Design:**

Purposive sampling selected 45 studies (2010–2023) focusing on the colonial and post-independence IR reforms. Tripartite institutions (e.g., Uganda's National Organization of Trade Unions). MNC labor practices (e.g., tea plantations in Kenya, mining in South Africa).

### **Data Analysis:**

Thematic analysis using NVivo identified patterns across the colonial legacies: Coding for labor laws (e.g., Uganda's Caravan Porter's Regulations) and union suppression. Institutional Resilience was used in assessing tripartite bodies' autonomy (e.g., South Africa's CCMA vs. Uganda's politicized unions). Globalization and exploitation trends in MNC-dominated sectors (Russell, 2020).

### **Ethical Considerations:**

there was proper citation of all sources to avoid plagiarism. Bias mitigation through triangulation of findings across databases.

## **FINDINGS & DISCUSSION**

The findings delve into the comparative analysis of industrial relations (IR) systems in Africa, emphasizing colonial histories, institutional frameworks, dispute resolution, globalization impacts, and contemporary challenges. Key comparisons are drawn between Uganda, Nigeria, Kenya, Tanzania, and South Africa.

### **Institutional factors that are shaping industrial relations (IR) systems in Uganda, Kenya, Tanzania, South Africa, and Nigeria?**

Uganda's Industrial Relations system, like many African nations, was shaped by British colonial policies. The Caravan Porter's Regulations of 1899 marked the first formal labor regulation under colonial rule, establishing a framework for

wage labor and dispute resolution that mirrored UK practices (Bamwesigye F. K., 1994). Post-independence, Uganda's IR evolved through political turbulence, including Idi Amin's (1971-1979) regime, which dismantled unions and centralized labor control, mirroring Nigeria's military-era state dominance (Koçer, R.G. and Hayter, S. (2011). However, Uganda's Industrial Relations Charter of 1964 initially promoted tripartite dialogue, akin to Kenya's post-colonial tripartite structures though political instability later eroded these structures (Koçer, R.G. and Hayter, S. (2011).

Key comparisons between Uganda and Nigeria indicate both countries faced military rule disrupting IR frameworks, but Uganda's labor laws were more systematically dismantled under Amin, whereas Nigeria retained fragmented union structures (Elliot J. Berg., 1968; Bamwesigye F. K., 1914). Comparing Uganda and Tanzania similarly indicated that while Tanzania maintained *Ujumaa*-driven union centralization, Uganda's Unions were co-opted by authoritarian regimes, leading to weaker institutional resilience (Bamwesigye F. K., 1914).

Uganda's tripartite system has struggled with political interference, particularly from budgetary ministries (e.g., Ministry of Finance and Economic Development) prioritizing export-oriented policies over domestically focused IR reforms (Russell D., 2015). This contrasts with South Africa's robust tripartite institutions like the Commission for Conciliation, Mediation and Arbitration (CCMA), which enforce procedural fairness despite complexity (Koçer, R.G. and Hayter, S., 2011).

Uganda's Challenges: The Buy Uganda, Build Uganda (BUBU) policy faced opposition from international actors (e.g., US threats to revoke AGOA benefits over used-clothing import bans) and domestic coalitions, highlighting tensions global trade pressures and local IR priorities (Greg J. B., 2020). South Africa's Strength: Legislative clarity in the *Labour Relations Act (1995)* enabled more predictable dispute resolution, whereas Uganda's system remained fragmented by regime changes (Koçer, R.G. and Hayter, S., 2011).

Uganda's dispute resolution system has been destabilized by frequent political transitions. For example, the Labor Disputes (Arbitration and Settlement) Act of 1964 was undermined by Amin's abolition of independent unions, leading to ad-hoc mediation processes (Bamwesigye F. K., 1994). In contrast, South Africa's CCMA mandates conciliation before strikes, reducing prolonged conflicts (Greg J. B., 2020).

#### **Uganda vs. South Africa:**

Uganda's system lacks institutional continuity, with each regime altering dispute resolution rules (Koçer, R.G. and Hayter, S., 2011). However, South Africa's CCMA, despite criticism for complexity, provides a structured pathway for resolving grievances (Vivian & John, 2023).

#### **The impact of globalization in multinational corporations (MNCs) on labor practices in Uganda, Kenya, Tanzania, South Africa, and Nigeria?**

Multinational corporations (MNCs) in Uganda's plantation sector have exploited weak enforcement of labor laws, particularly in the tea, coffee, and sugar industries, where informal labor dominates (Russell D., 2020). This is similar to challenges in Nigeria but contrasts with South Africa, where stricter regulations (e.g., *Compensation for Occupational Injuries Act*) protect formal-sector workers (Koçer, R.G. and Hayter, S., 2011).

Uganda's vulnerability emanating from its reliance on commodity exports, such as coffee, leaves it susceptible to foreign exchange shortages, forcing concessions to MNC demands (Harry C. Katz, 2004). Regional trends also show that East African countries like Kenya and Uganda alike face similar pressures from bilateral treaties (e.g., AGOA), which prioritize export-oriented policies over domestic labor protections (Harry C. Katz, 2004).

#### **Strategies for strengthening IR frameworks, in Uganda, Kenya, Tanzania, South Africa, and Nigeria.**

Uganda's key issues in this context are majorly categorized in three: -*Legislative Fragmentation*: Outdated laws fail to cover 80% of workers in the formal sector (Koçer, R.G. and Hayter, S., 2011). -*Political Co-optation*: Unions are often aligned with the ruling political party, weakening collective bargaining (Koçer, R.G. and Hayter, S., 2011). -*Foreign Exchange Dependence*: Export-focused policies constrain industrial policy experimentation, unlike South Africa's diversified economy (Koçer, R.G. and Hayter, S. 2011). Kenya's hybrid IR systems blend colonial and modern tripartite structures but face enforcement gaps similar to Uganda (Russell D., 2015). In Tanzania nevertheless, centralized unionism reduces strikes but sacrifices worker autonomy, a trade-off Uganda has not institutionalized (Greg J. B., 2020; Russell D., 2015).

#### **CONCLUSION**

Uganda's IR system exemplifies the interplay of colonial legacies, political volatility, and globalization pressures common across Africa. While South Africa and Tanzania have achieved relative stability through institutionalization, Uganda's system remains fragmented, reflecting broader challenges in balancing domestic priorities with global economic demands. The same applies to Kenya. Nigeria despite political hindrances is also steadily moving towards stability in there IR system.

#### **RECOMMENDATIONS**

**Strengthen Tripartite Institutions:** Reform politicized bodies (e.g., Uganda, Nigeria) and expand inclusivity to informal workers (e.g., Tanzania). There is need of **decolonize Labor Laws:** Replace colonial-era statutes (e.g., Uganda's 1899 regulations) with locally responsive

frameworks to Regulate MNCs: Enforce stricter labor inspections (Uganda/Kenya) and harmonize regional standards (EAC/SADC). Consolidate Fragmented Laws: Merge outdated codes (e.g., Uganda’s Employment Act) and extend protections to informal sectors. Diversify Economies will reduce commodity dependence (Uganda/Nigeria) via regional value chains (e.g., East African textiles). Safeguard Union Autonomy: Legally mandate independence from political interference (e.g., South Africa’s model). Promote Regional Collaboration: Share best practices (e.g., South Africa’s CCMA training Ugandan arbitrators). Challenges: Political resistance (authoritarian regimes) and funding gaps (low-income states) may hinder implementation. Prioritize tripartite dialogue and decolonial reforms to build equitable systems.

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