RESEARCH ARTICLE

Professionalisation and convergence-divergence of HRM: China, Hong Kong, and the United Kingdom compared

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Abstract

HRM has long claimed professional status. The global prevalence of national-level people management associations (PMA) supports this claim. Aside from prescribing practices appropriate for differing national contexts, PMAs simultaneously claim to share international best practices. This divergence/convergence tension raises questions about whether common institutional circumstances trigger PMA formation and if universal associational features develop over time. This article addresses both concerns by extrapolating a *reanalysis* of two historical accounts of *PMA* formation in the United Kingdom (from 1913) and Hong Kong (from 1968) to commensurate developments in contemporary China (from 2001). Its application of a modified version of trait theory with institutional analysis finds that a *family resemblance* occurs between PMAs created by adapting to employment regulation from the state while promoting employers' substantive interests. A *path-dependent* legacy of these tensions reflects the HR

professionalisation project's broader *institutional* subordination to state and market forces.

Practitioner notes

What is currently known about the subject matter,

- Institutional factors comprise a key variable explaining the divergence of firm-level HR practice.
- As *projects of professionalisation*, the worldwide establishment of people management associations (PMA) has potential to disrupt prevailing *institutional* arrangements.

What their paper adds to this,

- Demonstrates how knowledge of PMA formation explains the normative values and institutional influence of HR professionalisation.
- Discovers a *family resemblance* of HR professionalisation projects in the formation of PMAs influenced by national employment regulation and substantial employers' interests.
- Observes how a *path-dependent* legacy of associational tensions reflects the project's *institutional* subordination to state and market forces.

The implications of study findings for practitioners.

- Remain mindful of the historical complementarity between professional HR and social welfare.
- Recognise contradictions in prevailing associational representations (e.g., efficiency vs. welfare, compliance vs. independence, international vs. domestic).

1 | INTRODUCTION

When reviewing *institutional* explanations of convergence/divergence in international and comparative HRM (Doellgast & Marsden, 2019; Knappert et al., 2023; Schotter et al., 2021; Wood et al., 2012), the worldwide prevalence of national-level people management associations (PMA) attracts surprisingly little attention. Despite carrying "*projects of institutionalisation*" (Suddaby & Viale, 2011, p. 423), it remains unclear why such professional associations form and the normalising influence they exert at different levels of social complexity (Mayrhofer & Reichel, 2009). The omission matters since, as a conduit for HR professionalisation, global PMA formation[1] exerts a dual divergence/convergence effect of national normative controls and international best practice transfer. Theoretically, any explanation of how PMAs contain these competing forces is likely to be found in their process of formation and adaptation. Adopting a macro-level perspective (Budhwar et al., 2016), our study examines both tendencies complementing existing national accounts focussing on state institutions and collective associations of workers and employers (Hall & Soskice, 2001).

To perform the comparative analysis, we apply Millerson's (1964) classic associational framework in a modified form. Originally, Millerson (1964) examined professionalising projects in the United Kingdom (UK), identifying eight key barriers to professional association and four mobilising features. However, whereas Millerson's study held the

country context constant and varied the occupational choice, our study reverses the two selection criteria. Spanning a century of associational activity, it extrapolates a reanalysis of two historical accounts of PMA formation in the UK and Hong Kong (HK) to commensurate developments in contemporary China. As part of the theoretical modification, we augment the institutional subtleties of Millerson's associational framework, drawing on Krause's (199) state, market, and associational model. Our study's modified approach contributes to international and comparative HRM research by unearthing some fundamental properties of the HR role when positioned at the *institutional* level of social complexity (Mayrhofer & Reichel, 2009).

Akin to the distinction between *universals* and *specifics* in conventional firm-level international HRM studies (Brewster & Mayrhofer, 2012; Kaufman, 2016), our comparative case study evidence suggests that *institutional-level* PMA formation engenders a dual divergence/convergence corollary demarcated at two levels. First, on convergence, our study identifies how a *family resemblance* of employment regulations and substantial employer interests governs the institutional remit of PMA *formation*. Second, on divergence, our study unearths a series of *path-dependent* legacies in associational positions commensurate with the role's *institutional* subordination to state and market pressures (Krause, 1996). Relatedly, PMAs' heightened social complexity produces a series of tensions in associational positioning (e.g., efficiency vs. welfare, compliance vs. independence, international vs. domestic) commensurate with the HR professionalisation project *replicating* rather than *disrupting* prevailing institutional arrangements.

In the following sections, we continue by connecting PMA formation to the process of HR professionalisation before elaborating this analytical focus with a combined trait and institutional framing. Following a summary of our case methodology, we apply our analytical framework to each of our three case PMAs before a cross-case analysis draws out the most pertinent themes, contributions, and practical implications. Finally, a conclusion section rounds off the paper.

2 | PMAs AND HR PROFESSIONALISATION

A large body of research has examined the *evolution* of HRM as a *firm-level* entity devoted to ensuring effective employee performance (e.g., Baron et al., 1986; Gospel, 2009; Kaufman, 2014; Rotich, 2015). However, the work does not discuss how national-level PMAs have contributed to these developments and whether they exert diverging/converging pressures across national contexts. As Greenwood et al. (2002) maintain, professional associations create an arena where understandings of reasonable conduct and behavioural dues emerge to regulate firm-level activity. Through their engagement with state and market actors, professional associations play a decisive role in legitimising a specialist body of knowledge, regulating practice, and providing a source of internal and external identity for qualified practitioners (Farndale & Brewster, 2005). Consequently, professionalisation includes aspects related to both field and firm levels (Nicklich et al., 2020).

While no profession configures precisely like any other, PMAs play a substantial role in articulating HRM's national normative identity, gaining legitimacy from voluntary (e.g., certification) rather than mandatory (e.g., licensure) credentials. Consequently, while PMAs may develop certification standards and act as qualifying bodies, a key factor influencing the outcome of their institutionalisation is whether the state grants them authority to act as a regulator within the field (ibid.). Otherwise, the relational embeddedness of voluntary certification raises the prospect of 'corporate capture' as the professional association becomes increasingly subject to employer prerogatives (Paton et al., 2013). However, while professionalisation scholars conventionally describe HRM as a corporate profession (e.g., Muzio et al., 2011; Reed, 1996), historical analysis points to a more complex set of circumstances, predating contemporary theorisation. Table 1's summary of key professionalisation concepts and theories situates the HR circumstance.

Irrespective of professionalising form (e.g., semi, managerial, organisational), PMAs claim to provide practice appropriate for national-specific contexts and, in some cases, international contexts. Consider, for instance, the

TABLE 1 Summary of key concepts and theories.

Concept	Description	HR application
Profession	An occupation that meets defensible criteria for its institutional status. Typically comprising specialised threshold and continuing education, independent judgement, expert knowledge, ethical ethos, trust, duties to the public, and governed by a professional body (Becker, 1970).	Debate as to how far HRM is professionalised. The role is variously referred to as 'semi', 'incomplete', 'corporate', 'managerial', 'organisational' and 'non' profession (Farndale & Brewster, 2005; Higgins et al., 2016).
Professional	Qualified persons able to practice a licensed or certified occupation (Scanlon, 2011).	The HR profession typically claims certified rather than licensed status (Aguinis et al., 2005). No legal requirement to practice.
Professionalisation	The process of an occupation becoming a profession (Wilensky, 1964). De-professionalisation can also occur, so professional status is never absolute (Freidson, 2001).	Worldwide PMA formation (WFPMA) signifies widespread HR professionalisation. The institutional magnitude of HR professionalisation warrants investigation within a broader ecology of competing/collaborative institutions (Suddaby & Muzio, 2015).
Professionalism	Professional *practice* typically comprises ethical and technical competencies (Larson, 1977).	HR professional standards typically include skills and knowledge (i.e., competencies) and attitudes (i.e., behaviours) (e.g., CIPD, 2021).
Licensure	The legal permission required to perform specific actions disallowed to those without (Law & Kim, 2005). However, licensing does not guarantee quality. It merely conveys that an individual has met a set of minimal standards to practice (McKillip & Owens, 2000).	Licensure is not typically required for HR. Canada provides an interesting exception (Pohler & Willness, 2014)
Certification	A voluntary arrangement focussing on using a particular professional title limited to individuals who have met specified standards for education, experience, and examination performance (Gilley & Galbraith, 1986). Certification is designed to persuade relevant stakeholders that incumbents exhibit high levels of job performance.	HR certification may improve practitioner job prospects assuming employer endorsement (Aguinis et al., 2005).

Theory	Summary	HR application
Traits and functions	Longstanding attempts to establish the stabilising role professions play in society (e.g., maintaining health and justice, Parsons, 1939) and to distinguish their attributes from non-professional occupations (Carr-Saunders & Wilson, 1933).	Numerous attempts have been made to identify the traits of the HR profession (see Farndale & Brewster, 2005 for a summary). Wittgenstein's (1953) 'family resemblance' notion is useful when deciphering international variations.
Source and use of power	Professions form for self-interest (create barriers to entry, control clients) rather than to further some higher social calling (Johnson, 1972; Larson, 1977).	Not a major motivation for initial PMA formation (external circumstances matter more) but consolidating status for instrumental ends may gather momentum once the PMA is established.
System	Professions are embedded within a broader system of inter-professional relations (e.g., the law profession referring clients to the psychiatry profession, Abbott, 1988).	Accounting interacts with payroll decisions. Finance may initiate HR outsourcing. Marketing may encroach on employee voice.
Institutional	Professions comprise one of many social institutions fighting for relevance and status in an ongoing	Directly influenced by broader state (regulatory) and market (strategic) pressures (Krause, 1996).

TABLE 1 (Continued)

Theory	Summary	HR application
	ecology of competing institutions (Suddaby & Viale, 2011).	
Third logic	Freidson (2001) construes professionalism as an 'ideal' type of expert employment distinct from management (bureaucracy) and markets (consumerism).	HR practice combines elements of regulatory compliance (bureaucracy) and organisational (market) prerogatives (e.g., strategic HRM).

Chartered Institute of Personnel and Development's (CIPD, 2012, p. 4) professional standards model, which captures '*the breadth and depth of the HR profession, from small to large organisations, from fundamental to sophisticated practice, local to global, corporate to consulting, charity to public sector, traditional to progressive*'. Alternatively, the Hong Kong Institute of Human Resource Management's (HKIHRM) (2011, p.3) career ladder assumes a more *localised* position which encapsulates all practitioner grades to help members '*understand the key competencies and experience they should possess at different levels and functions of work*'.

Either way, akin to a multinational corporation (MNC) standardising certain HR practices across *global* operations (Brewster et al., 2016), PMAs find it similarly effective to do so (at least) *domestically*, publishing a panoply of professional standards, ethics codes, and certification criteria. Since professional standards likely differ across countries, their within-firm institutionalisation (i.e., normative control pressure) contributes to national *variations* in HR practice. Conversely, aided by regional and world representation, domestic HR standards could feasibly *converge* across countries as global members share local insights for international 'best practice' transfer. However, it remains questionable what practical impact any such transfer would have since PMAs do not typically control the market for HR practitioners, relying instead on employer endorsements (Aguinis et al., 2005). Moreover, even if employers stipulate HR certification as an essential person specification (ibid.), they face no corresponding obligation to relinquish managerial authority over the organisational application of people management expertise. Instead, HR certification serves only as a screening function rather than some indisputable mode of regulated practice.

Such compromised institutional power begs the question of why have so many PMAs formed worldwide? Was their creation a product of some internally derived and proactive power/status-seeking endeavour (Johnson, 1972; Larson, 1977) or triggered in response to *external* circumstances (Meyer et al., 1990)? In the first instance, one runs the risk of unearthing a "*convergence of rhetoric*" (Brewster & Mayrhofer, 2012, p. 7) as mobilising agents produce little more than an adapted list of highly abstracted values and standards commensurate with some generally accepted professionalisation claim. In the second instance, one encounters the more deeply engrained and *deterministic* variant of convergence, which reflects a "*more general macro-level idea to describe a pattern of increasing similarity in the economic, social, and political organisation between countries that may be driven by industrialisation, globalisation, and regionalisation*" (Stone, 2001, p. 6).

3 | MODIFYING THE TRAIT MODEL OF PROFESSIONS

Akin to many other sociological concepts, defining a 'profession' remains tricky. As Millerson (1964: 2) notes, the term is "*often employed without definition, suggesting that the reader already knows the true meaning and value*". Alternatively, strivings "*towards a definition, and the characteristics distinguishing a profession from other occupations*" tend *not* to resort "*to an actual definition*" (ibid.). While one can create a list of prospective professional traits (see Table 1), recourse to the classic professions of medicine, divinity, and law reveals some striking disparities. Such idiosyncrasies

pertain not only to the profession's objectives but also to its associational structure. For instance, must the profession be organised? Must a professional pass an examination to show competence? Is a code of professional conduct always necessary to enforce integrity? Do professionals always operate a valuable public service?

In helping to overcome the definitional challenge, one can deploy Wittgenstein's (1953) 'family resemblance' notion, which identifies recognisable entities that, though traditionally grouped, do not share a set of necessary and jointly sufficient conditions but have some relevant common features. Millerson (1964) implicitly deployed such a *family resemblance* logic when establishing his eight key barriers to and four mobilising features of qualifying association. Drawing evidence from 160 cases in England and Wales, he acknowledged that "*there is no simple clear-cut answer to why are qualifying associations formed...Occasionally, these elements resemble a set of circumstances unearthed in the case of another association*" (ibid.: 53).

However, a more refined analysis ensues when reversing Millerson's (1964) selection logic to compare a *single* profession across *different* jurisdictions. Thus, as Table 2 illustrates, associational HR assumes professional status through the universalistic claim of being internationally recognisable and distinct as an occupation and commanding a national-level area of specialist expertise. To further corroborate professional status, Farndale and Brewster (2005: 36) suggest that PMAs should be working to maintain a certified community with a strong sense of professional identity, common standards of entry, performance and ethics, a distinct body of knowledge and competencies, and a requirement for training and certification.

Despite the structuring commonalities of end-point PMA establishment, the antecedents of qualifying association assume a more diverse form. Contained within a broader institutional ecology of entities fighting for relevance and status (Suddaby & Muzio, 2015), the process of professionalisation remains a highly embedded undertaking whose agents have the potential to disrupt prevailing institutional arrangements. Thus, as the lower half of Table 2 details, while the history of professional association is a record of one or more devoted individuals igniting a movement (Millerson, 1964), the particulars remain highly contextualised and need elaboration. Likewise, while Millerson posits that professionalisation evolves in line with industrial and institutional developments, the circumstances triggering associational HR likely remain context dependent. Thus, while worldwide PMA establishment suggests that corresponding proponents are keen to organise, one must identify their precise inspiration source.

Contextual variability is equally, if not even more, apparent when accommodating Millerson's (1964) four mobilising features. Thus, in preparation for this paper's comparative HR focus, Table 3 presents classic examples drawn from Millerson's original study. First, akin to the *power and control* model of professions (Johnson, 1972; Larson, 1977), Millerson identifies professional association as an attempt to *achieve or consolidate* status. Distinct from the prospect of an association forming *in response* to some external circumstance (Meyer et al., 1990), status-seeking reflects protagonists' proactive efforts to gain institutional power. Pre-empting subsequent professionalisation theorisation, Millerson (1964: 10) recognises the institutional significance of professional association, maintaining that: "*As with other forms of institutionalisation, professionalisation entails conformity, internalisation, and sanction of specific norms, in this case, by members of a particular occupation. Forming an association is the easiest method of inducing a normative pattern*". Millerson also acknowledges the importance of *agency*, arguing that *devoted individuals or organisations* must physically create and maintain professional association. Hence, when establishing the circumstances and motivations of PMA formation, one must unpack the respective *institutional* and *agentic* properties.

4 | AUGMENTING THE INSTITUTIONAL SUBTLETIES OF MILLERSON'S FRAMEWORK

While the range of institutions potentially impinging on a profession's jurisdiction is vast (Suddaby & Muzio, 2015), Krause's (1996) state, market, and associational model warrants mention because it prioritises the most powerful state and market actors and connects with Freidson's (2001) claim that professional practice provides a 'third logic' between bureaucracy and markets.

TABLE 2 Universal and specific HR professionalisation barriers.

	Barrier	Summary	HRM's situation
Universal	1. Small practitioner numbers	May restrict the potential size, scope, resourcing, and specificity of professional association but is conducive to practitioner comradery and focus.	An instantly recognisable and distinct occupation prevalent in many medium and large organisations.
	2. Geographical isolation	Primarily a product of history when imperfect transport and postal services compromised national association. Compounded by the lack of cheap copying and printing facilities.	Typically adopts a *national* associational form. Technological advances increasingly facilitate long distant or remote membership access.
	3. Underdeveloped subject matter and/or practice	May encourage untrained practitioners to maintain the status quo. Professional practice may only materialise if one can translate practice into theoretical terms.	Established discipline with dedicated theory, concepts, and practices.
	4. Occupational/ Organisational rivalry	Where a specialism overlaps existing professional areas forming a new association may be difficult.	While the role's body of knowledge may encroach upon tangential disciplines (e.g., law, psychology, finance), none sufficiently overlap to generate *occupational* rivalry.
Contextual	5. Low internal/external pressure to organise.	Incumbent satisfaction with unorganised and unregulated practice and training may thwart professional organisation. Conversely, external pressure can encourage association.	Global PMA establishment suggests that proponents are keen to organise, but the inspiration source needs detail.
	6. High practitioner training variation.	'Respectable' practitioners may decline to join those felt to be less respectable; senior occupational members may prefer to form their own association, leading to splinter groups.	To varying degrees of exclusivity, PMAs tend to offer all-encompassing multi-level membership.
	7. Undeveloped government, industry, or commercial structure	A more complex employment structure stimulates the growth of organisation. Bureaucratisation precipitates specialisms, enabling specialist groups to form.	HR typically evolves in line with industrial and institutional developments, whose circumstances vary historically and contextually.
	8. Lack of enterprising individuals	Every association's history records one or more devoted individuals igniting a movement.	The mobilising agent's identity warrants investigation, given contextual variations.

Source: The barrier and summary columns adapted from Millerson (1964, pp. 48–50).

Combining combative and symbiotic elements, Krause (1996) visualises a triangle with the state, capitalism, and the professions at the corners. Respectively, just as the state influences and shapes capitalism and professions, capitalism influences and shapes the state and professions, and the professions act to influence and confront the power of both capitalism and the state (ibid.). Krause (1996) posits that who eventually gains or loses power

TABLE 3 The rationale for professional association.

	Rationale	Description	Historical examples
1	To (a) achieve (b) consolidate status	Some associations were conceived to achieve status for an occupation. Others were formed to consolidate status. The key difference lies in the status-development stage existing at the time.	*Achieve*—The Chartered Society of Physiotherapy (1894) emerged to counter accusations that practitioners operated in '*houses of ill fame*'. *Consolidate*—Comprising a select group of 19 architects, The Architects Club (founded in 1791) preceded the Royal Institute of British Architects (founded in 1834).
2	Modify an existing association(s) following (a) break from (b) reaction to (c) help from (d) consolidation of existing associations.	Few "new" associations have been established as a direct *break* from existing ones. Instead, a *reaction* to an existing association is more common. Occasionally, associations in the same (or adjacent) field will *help* a new association to form. Typically, with declining geographical barriers, an association will form from *consolidating* related associations.	*Break*—The Company of Surgeons broke from the Company of Barber Surgeons in 1745. *React*—The Institution of Mechanical Engineers (1847) was formed in response to the reservations of the Institution of Civil Engineers (1818) that the former lacked a commensurate scientific knowledge base. *Help*—The Royal Meteorological Society, the Faraday Society and the British Institute of Radiology helped the Institute of Physics to form. *Consolidate*—The Institute of Chartered Accountants emerged from consolidating several related associations that agreed to petition for a Royal Charter collectively.
3	Coordinate existing practitioner activities	Some associations were created to coordinate, bringing together members in an occupation without any pretensions. However, as such groups developed, aims were modified, and associations extended their work to include education, publication, and status building.	The Institute of Hospital Administrators (1902) began merely to promote good fellowship amongst practitioners and further, in every possible way, their mutual interests.
4	Respond to new technologies and external circumstances	Akin to Meyer et al.'s (1990) notion of a 'jolt' captures technological, political, legal, or social disruptions.	During the 1914-18 war, accelerated expansion of production methods caused a new branch of production engineering to emerge. It gained representation from the Institution of production Engineers in February 1921.

Source: Adapted from Millerson (1964, pp. 54–85).

depends upon what the relevant sectors of capitalism are doing, directly or indirectly through the state, to influence the profession's power. Empirically, either a *collegiate* or *corporate* profession will emerge from the association's state and market interaction.

Respectively, whereas collegiate professions typically strike a 'regulative bargain' with the state to advance the stabilising institutions of, say, justice (in law) and health (in medicine) (Suddaby & Muzio, 2015), corporate professions typically embody a market logic where _"controlling 'high value-added applications' within organisations may be equally, if not more, important for enhancing status than is closure in the labour market"_ (Brint, 1994, p. 73). Theoretically, the institutional status of HR professionalisation warrants attention because it straddles both _traditional_ and _corporate_ possibilities. First, construed as a product of _state_ subordination (Aydinli, 2010; Gert & Weinert, 1982), public policy directly affects HR practitioners via employment legislation and regulatory codes of practice (e.g., Bailey, 2011; Scheibmayr & Reichel, 2023). Second, construed as a product of _market_ subordination, employer interests shape practitioner identities around corporate priorities (e.g., strategy, Paauwe & Boselie, 2003), legitimising occupational change processes, which favour rationalisation, standardisation, and accountability over individual autonomy, discretion, and judgement (Muzio et al., 2011).

While conventional discussions of HR professionalisation tend to categorise HRM as a managerial profession (e.g., Paton et al., 2013; Reed, 1996), historical evidence points to a contrasting set of mobilising antecedents (see case studies below). Evolving out of broader institutional contexts (Suddaby & Muzio, 2015), PMAs did not necessarily begin in a highly corporatised form. Instead, professionalisation protagonists legitimised PMA establishment by _placating_ more powerful state and market interests. By implication, such associational _subordination_ qualifies Freidson's (2001) notion of (HR) professionalisation, providing a 'third logic' _between_ bureaucracy and consumerism. It suggests that a PMA's institutional positioning depends on broader employment regulations and economic policies. Hence, when tracking the legacy of PMA formation, one should observe parallels in prior state intervention and liberalisation.

5 | METHODOLOGY

Our comparative case study methodology involves analysing and reanalysing historical documentary sources and semi-structured interviews with leading PMA figures. Unlike conventional firm-level explorations of convergence-divergence in international comparative HRM (Bieman et al., 2023; Kaufman, 2016; Knappert et al., 2023), HR professionalisation captures a historically situated 'project' with given timescales and associational parameters. Of foremost interest to our study is what circumstances or institutional 'jolts' (Meyer et al., 1990) destabilised established practices (Greenwood et al., 2002), precipitating the entry of new players (i.e., new PMAs). Akin to Millerson's (1964) _"response to new developments"_ feature (Table 3), institutional jolts may take the form of social upheaval, technological disruptions, competitive discontinuities, or regulatory change (Greenwood et al., 2002). Identifying the source and substance of such triggers matters when explaining why and to what _institutional_ effect PMAs form.

Despite the strong historical association between our three cases—the UK's influence over HK leading up to 1997, China's influence on HK after 1997, and so—me reciprocation between HK and China after 1997—their collation veers towards a 'most different system design' (MDSD) logic (Landman, 2002). Specifically, we aim to demonstrate the robustness of a relationship between institutional antecedents and PMA formation by showing commonality across diverse (e.g., varieties of capitalism,[2] professionalisation status) settings (Levi-Faur, 2006). As Landman (2002) elaborates, instead of providing evidence of an association by studying _similar_ cases, the MDSD logic aims to provide proof by studying _variance_ in cases. Thus, our inclusion of the UK case is historically significant in that, as the first HR professionalisation project, it cannot manifest institutional mimicry. Likewise, our inclusion of the China case (an incomplete HR professionalisation project) guards against selection bias by seeking to demonstrate that an observed relationship holds despite the possibility of contrasting cases (ibid.).

Methodologically, we adopt a form of _reanalysis_ for the more established UK and HK cases, which means rereading published historical accounts supplemented with relevant official documentation (Köhler et al., 2023). The theoretical purpose of reanalysis is not _necessarily_ to verify the original study's results but to propose an

additional interpretation that reframes and extends one's understanding of the studied phenomenon (in our case, using modified trait theory and institutional analysis). While at least four forms of restudy are possible—reanalysis, revisit, revision, and repurposing—we adopt the former to unpack fresh themes and perspectives. The result is a richer theoretical explanation of the initial empirical phenomenon, subsequently transposed and tested in a mainland Chinese context.

5.1 | Data sources

For our UK case study, we reanalysed the following historical texts: Niven (1967), Evans (2003), and Slater (2019), enabling secondary analysis of the period leading up to the CIPD's predecessor founding in 1913 and its substantial modification in 1931. We also sourced supplementary archival documents pinpointing the relatively short but intensive period of history (circa 1913–1931) covered. Next, having re-theorised the antecedents of the UK's PMA, the legacy issue came into view. Here, we adopted a more contemporary approach, drawing insight from six semi-structured CIPD interviews discussing professionalisation origins, consolidation, legacy, and domestic and international agendas. Following gatekeeper referrals, our elite interviewees comprise a former Executive team member, branch Lead Chair, Research Head, Capability Head, International Capability Manager, and Membership Manager.

We applied a similar approach for HK, drawing on a commensurate set of historical documentation (England, 1976; England & Rear, 1981; Ng & Sit, 1989; Poon, 1995; Turner, 1980; Waters, 1985) together with the Institute's newsletter (1977–1986), and newspaper articles. Likewise, following gatekeeper referrals, we conducted eight semi-structured interviews with two former associational Presidents, a former Chief Executive, and five Committee Members. Given the relative recency of the HK case, one participant was able to reflect first-hand on the association's origins.

Finally, following China's entry into the World Trade Organisation (WTO) in 2001, our third case assumes an even more contemporary feel. First, we made recourse to the following documentation (translated from simplified Chinese): *National Medium-term and Long-term Talent Development Plan (2010–2020)* (Communist Party of China [CPC] Central Committee and State Council, 2010), *National Occupational Standards* (General Office of the Ministry of Labor and Social Security, 2004), *Opinions on Accelerating the National Development of the HR Profession* (MHRSS et al., 2014); *National HR Service Profession Development Action Plan* (MHRSS, 2017), *Regulating the Organisation and Staffing of the Ministry of Human Resource and Social Security* (State Commission Office of Public Sectors Reform, 2008, 2019), *Professional Standards* (HRA, 2010), *Ethics Code* (HRA, 2012), plus *China Daily* articles. Second, following gatekeeper referrals, we conducted thirteen semi-structured interviews, three with representatives from the MHRSS, China's most authoritative HR agency, two with the Central Organisational Department, arguably the world's largest HR department[3] (Deputy Minister, Local Government Minister, Senior International Officer, and Researcher) and eight with associational representatives (Director, three Committee Members, Consultant, and three HR managers).

To avoid the dangers of 'safari research' (Peterson, 2001), each author led interviews in their respective jurisdiction. Interviews were conducted in English for the UK and HK (where English is an official language used daily in the workplace) cases and in Mandarin for the China case. In the latter case, the author analysed the interviews in both simplified Chinese and translated English for the benefit of the research team. We also took precautions to handle the challenges of translation and analysis between different language contexts. For instance, when translating the Chinese materials into English, we extracted any latent meaning, given that participants may use declarative words when responding to unfamiliar people (Karra & Phillips, 2008). Consequently, the interviewer asked the same question in different ways and at various points of the interview (Cannell et al., 1981), together with backward translation (Brislin, 1970), and allowing interviewees to check the transcribed and translated

versions of the material (Mero-Jaffe, 2011). Otherwise, an advantage of secondary data is that subsequent readers can source the referenced material to verify the conclusions drawn (Bowen, 2009).

5.2 | Data analysis

Having translated the Chinese materials into English, data analysis began by examining the documentary sources to establish primary (i.e., policy documentation, interview data) and secondary (i.e., historical accounts) evidence of institutionalised PMA formation. In some cases, the documents verified that a case had achieved a particular professionalisation milestone (e.g., a code of ethics or the presence of a professional standard). In other cases, the documentary material facilitated data triangulation by matching the historical/official documentation to interview data. Meanwhile, we adopted a social constructionist position (Berger & Luckmann, 1967) when tracking the three cases' institutional legacies to gain interviewee assurance that certain PMA legacies had formed based on shared (cultural-contextual) understandings of appropriate practice. Specifically, we examined how regulatory processes that normatively and/or coercively exert conformity upon constituent communities (Greenwood et al., 2002) reinforced such shared understandings.

Working as a team, we thematised the primary and secondary data according to (top-down) conceptual categories derived from a combination of Millerson's (1964) associational framework and Krause's (1996) institutional model. Across both dimensions, we adopted a bounded variability approach (Hantrais, 1999), which means comparing cases against a common concept (e.g., HR professionalisation, PMA formation), accepting that the meaning of that concept may vary while retaining recognisable properties. Two possible dangers are concept stretching, which relaxes a concept's defining characteristics to fit more cases (Sartori, 1970), and false universalism (Kessler, 2000), which assumes that a theory designed and tested in a single country will universally apply. However, as will become apparent below, Millerson's (1964) framework remains remarkably robust in accommodating contextual diversity, enabling insightful comparison of three distinct HR professionalisation attempts—two relatively complete and one incomplete—with China serving as the 'outlier', having yet to establish a national associational presence tantamount to PMA autonomy.

When compiling the case evidence, we allowed theoretically insightful themes to emerge from the data (i.e., open coding), including those that *refined* our analytical framework. First, for the UK case, and, to some extent for HK's, theoretical corroboration entailed relating different documented sources to establish relevant themes (Bowen, 2009). Second, for the China case and, to some extent, HK's, a more primary feel ensued (e.g., interview data). We achieved data saturation in both cases as no new documentary or interview insights materialised on any of the traits and institutional factors examined. Otherwise, an advantage of studying multiple cases is that it increases theoretical generalisability while deepening understanding and explanation (Miles et al., 2020).

Finally, to enrich the resulting cross-case analysis, we combined a degree of *case* orientation (i.e., comparable thematic families built from examining PMA formation and HR professionalisation) and *variable* orientation (i.e., cross-cutting themes built from considering barriers, mobilisers, and institutional factors). Across both orientations, we 'stacked' our comparative case study evidence, deploying a layer of selective coding (Williams & Moser, 2019) to refine initial codes to fit the data better and to produce more generalisable insight (Table 4). Hence, the final analysis stage involved the research team identifying (and explaining) any resulting case similarities and differences.

6 | FINDINGS

Chronologically, our first case covers the oldest of our three PMAs before moving to HK and China. For each case, we detail the antecedents of PMA formation before covering the resulting legacy. As part of the (re) analysis, we deploy a reporting system that indicates in parentheses which qualifying attributes (Tables 2 and 3) resonate

TABLE 4 A family resemblance of professional HR antecedents, rationales, and impacts.

Feature	UK	Hong Kong	China
Rationale			
Achieve/ consolidate status	To enhance welfare worker factory recognition	To respond to the Employment Ordinance's legal complexities.	To contribute to national development and increasingly complex legal regulations.
	Chartered status in 2000.	*Become the pre-eminent Asia-Pacific PMA.*	
Coordinate/help existing practitioner activities	Social work assistance, addressing welfare workers' need for association.	Activities of large employers facing growing employment regulation.	Deal with practitioner shortages via shared HR service firms.
Modify existing association	WWA and ILM strands of association.	PMC break from HKMA, simultaneous UK PMA membership.	MHRSS-led, provincial and city-level PMA formation.
Evolution	Growing scientific management influence.	MNC management and technology diffusion.	Market reform and an increasingly complex legal environment.
Antecedents			
Enterprising entities	Progressive employers, welfare workers.	Influential British conglomerates.	The state (MHRSS).
Internal/ External pressure	Poor factory conditions for women and Children. *A Compulsion for welfare workers.*	'Sweatshop Colony' Employment. Ordinance.	WTO and 'opening up', progressive legal regulations, for example, labour Contract law, Employment Promotion law, labour disputes mediation and Arbitration law
Practitioner variation	Welfare workers undertaking basic personnel management	Expand and organise qualified HR entry.	Create a cadre of qualified personnel specialists.
Employment structure	Internalisation strategies.	Increasing bureaucratic specialism and MNC influence.	Social stability maintenance and employer externalisation strategies.
Legacy			
Legacy	Industrial betterment.	Pay Trend Survey.	National development contribution.
Tension	Welfare-efficiency.	Compliance-independence.	Domestic-international.

Note: *italicised* items depict *secondary* influence.

empirically at the point of PMA formation by matching the documented evidence to the corresponding data (using a Table, Point and Sub-Point format).

6.1 | United Kingdom

One of the most fascinating facets of the CIPD case is that its associational establishment assumes an epochal tone punctuated with a series of substantial milestones and associational name changes (Slater, 2019). Historically, our study centres on the Welfare Workers Association's (WWA) founding in 1913 and its substantial reincarnation as the Institute of Labour Management (ILM) in 1931.

Transposing the key historical evidence to Millerson's (1964) framework, the presence of enterprising individuals and organisations (Table 1, 8) resonates most, given that a handful of pioneer employers and welfare workers initiated the professionalisation project by seeing the need for improving working and social conditions through industrial betterment (Niven, 1967). Notable individuals influencing HR professionalisation include Mary Wood, a prominent welfare worker (1896) and Percy Alden (a British Institute of Social Service member), who initiated a meeting of firms (e.g., Boots, Cadbury, Bournville and Rowntree) interested in industrial betterment (1907). Critically, far from viewing personnel management as rivalling social work (Table 1, 4), its closest occupational counterpart, Alden's contribution lay in providing the latter with an established supporting structure (Table 2, 2c). Gathering to discuss the related problems of health and working conditions in a range of female and child-dominated industries, welfare workers soon found themselves undertaking selection, education and training, the study of wage payments and consultation, essentially implementing basic personnel management tasks (ibid.).

As the coordination of existing practitioner activities gained structure (Tables 3 and 4), among the 20 or so firms attending a follow-up meeting in 1909, the legal and voluntary means by which employers could improve factory conditions featured heavily. Although no one named the association, Niven (1967) argues that the meeting marked its real beginning rather than its official founding 4 years later. Otherwise, the event formally establishing the WWA began in York on 6 June 1913 when 34 welfare workers and their employers met at Seebohm Rowntree's (another philanthropic enterprising individual) invitation. Aside from addressing the welfare workers' need for association (Table 3, 3), employers and welfare workers shared an interest in the problem of the worker, discussing two fundamental problems set to determine subsequent debates. First, whether the welfare worker should participate in factory work, moderating the manager's right to manage (Evans, 2003). Second, the deleterious impact that overly paternalistic methods of industrial betterment might have on employees' work motivation (ibid.), hinting at the association's growing scientific management interest. One widely shared observation concerned the all-too-common case of the inefficient worker merely content to '*plod along only for a moderate wage instead of trying to earn more*' (Niven, 1967, p. 34).

Relatedly, welfare work became an established strategy for organisational efficiency in many large organisations struggling to gain recognition as an essential part of factory staff (Slater, 2019, Table 3, 1a). Historians attribute the emergence of welfare departments to the growing size of industrial enterprises and the joint stock company (Proud, 1916) and legal compulsion within the Ministry of Munitions and the sectors it controlled (Evans, 2003). Strategically, employers increasingly recognised that well-being schemes were essential on humanitarian grounds and a step towards efficient business operations (ibid.). Evans (2003) even attributes commercial motivations behind employers appointing welfare workers, noting that since many of the former derived from food, soap-making, and pharmaceutical industries, the recruitment strategy provided a form of advertisement that boosted confidence in the product's hygienic qualities.

Coexistent with the somewhat instrumental welfare motivations of early associational formation but far more enduring and influential in the association's longer-term legacy resides a managerial strand which flowered in 1931 as the ILM materialised as the association's namesake (Table 3, 2d). Transposed to the higher *institutional* level of state and market interaction (Krause, 1996), it becomes apparent that the labour management influence derived partly from employers increasingly adopting strategies of 'internalisation' (rather than subcontracting or 'putting out'), adding much complexity to their newly acquired (direct) employment responsibility (Evans, 2003). However, despite employers seeking to embrace a more coherent strategic and scientific management outlook, welfare still played an essential part in many personnel practitioners' roles. Hence, a somewhat conflicted associational stance materialised: how to marry increasingly progressive employment regulations (i.e., welfare) with the corporate need for value-added and efficiency.

Indeed, despite one hundred years of associational establishment, a branch Lead Chair explained how the 'welfare-efficiency' tension continues to plague the institute. A notable example concerns the association's response to the 2008-09 global financial crisis, which, based on the content of CIPD branch meetings, reflected a legitimacy crisis in the association's strategic positioning as members implicated the occupation as co-conspirator:

"*carrying accountability for management's interaction with remuneration committees and some highly leveraged bonus plans*". Moreover, the fact that the institute was "*simultaneously promoting an employee well-being agenda*" (Executive Member) parallels the association's somewhat awkward welfare worker and labour management hybridity. Likewise, moving forward a further 10 years, the CIPD's (2021) latest professional standards documentation does little to reconcile the welfare-efficiency tension. Instead, welfarist commitments such as ethical practice, valuing people, and working inclusively nestle beside such efficiency-seeking endeavours as fostering commercial drive, people analytics, and (selective) talent management (ibid.).

6.2 | Hong Kong

Akin to the harsh industrial circumstances that inspired Britain's welfarist intervention, HK's HR professionalisation project also emerged from an impoverished regulatory environment comprising basic health and safety provisions. As England and Rear (1981: 231) document, in an arduous setting, "*where autocratic employers often acted without considering the human results, where trade unions were regarded as organisations concerned with re-enacting the ideological struggles of China's civil war, and where formal procedures for settling disputes were rare, a self-effacing government neither promoted social justice nor safeguarded industrial peace*" (ibid.: 231). Unsurprisingly, the welfare cost of minimal employment protection was high, and HK infamously earned the title of the 'sweatshop colony' (England, 1976).

Despite growing external criticism, history points to the internal disturbances of 1966 and 1967 (when sustained price rises and labour disputes escalated into large-scale anti-government riots) as provoking the crucial shift of establishment attitudes to improve working conditions (Turner, 1980). In February 1968, the government passed the Employment Ordinance, which protects wages, employment conditions, and employment agencies (England & Rear, 1981). Transposed to Millerson's (1964) framework, the coercive regulatory power of the Ordinance proved pivotal in triggering the resulting professionalisation project (Table 2, 5) when the leaders of four major corporations (Table 2, 8)—Imperial Chemical Industries, Jardines group, Shell HK, and Swire Group—established the Personnel Management Club (PMC). However, unlike the philanthropic motivations of the CIPD case, HK's need for association was purely pragmatic (i.e., how to deal with an increasingly complex legal environment).

An appendage to the HK Management Association—a statutory body created to promote local *management* in the territory (Ng & Sit, 1989)—the creation of the PMC reflected members' perceived need to establish greater *personnel management* specialisation (Table 3, 2c). As Poon (1995) explains, the Employment Ordinance's legal implications provided sufficient reasons for firms to recruit a dedicated and trained personnel manager (Table 3, 4b) and to address such common personnel issues as recruitment, market rates, and employee benefits (Table 3, 3). However, notwithstanding the territory's diversity of Cantonese, Shanghainese, and American companies, joint-stock British companies exerted the most striking professionalisation impact, reflecting their unique influence on the territory and forming themselves into employers' associations (Kirkbride & Tang, 1989).

The flurry of associational activity reflected HK's growing bureaucratisation and occupational specialism (Table 2, 7), resulting in the establishment of such tangential entities as the Kwun Tong PMA (comprising Chinese personnel/administration managers employed in local factories), the HK Society for Training and Development (later merging with the PMC's successor), and the HK Branch of the Institute for Training and Development (Tsui & Wong, 2020). Substantively, the growing sophistication and ambition of the workforce, coupled with sustained labour shortages and wage rises, greatly increased the workforce premium as a factor of production (Ng & Sit, 1989). Meanwhile, the territory's growing MNC presence of advanced technology, modern managerial skills, and organisational techniques exerted another external force, encouraging the PMC to expand and organise 'qualified' entry to its membership (Poon, 1995, Table 3, 4a).

Initially reliant on the HKMA for financial and secretarial support, the PMC gradually gained self-sufficiency via income-generating training programmes (Table 3, 2b). At the same time, leading PMC protagonists'

simultaneous membership of the UK's PMA further buttressed the professionalisation effort (Table 3, 2c), encouraging the formation of the HK Institute of Personnel Management (HKIPM) in 1977, mainly structured on the model of its British counterpart (Poon, 1995). However, aiming to become the "pre-eminent Asia-Pacific PMA", the institute expanded its coverage by integrating "Chinese-speaking personnel managers with HKIPM members" and establishing "relationships with other institutes in South-East Asia" (founding objectives, HKIPM, 1977; Table 3, 1a).

Otherwise, on domestic matters, far from being exposed to Britain's then more pluralist employment relations (e.g., Donovan Commission, 1965–1968), the HKIPM's associational positioning merely replicated the territory's prevailing unitarist position as expressed in its business-friendly founding objectives to "establish appropriate relationships with business and government" and to "analyse change in business and personnel environment" (HKIPM, 1977). Relatedly, while the Employment Ordinance imposed substantive conditions and limitations upon the employers' freedom of contract, it did not consider how workers might influence wages and conditions (England & Rear, 1981), as per Britain's then-prevailing collective bargaining.

Instead, when positioned at the higher level of state and market interactions (Krause, 1996), HK's most notable PMA legacy concerns the founding of the Pay Trend Survey (in 1977), whose system of annual pay recommendations reflected implicit understandings between employers, keen not to compete on basic wages for fear of drawing attention to volatile capital-labour tensions (Turner, 1980), and the state, eager not to move too far from *conditional* laissez-faire (Burns, 2019). While such mediation may chime with the notion of the profession as a 'third logic' between bureaucracy and the market (Freidson, 2001), it also creates a compliance-independence tension in legacy terms. Indeed, when consulted on the government's proposed minimum wage (enacted in 2011), the institute was minded not to "discuss the level but instead considered the operational implications. Is the policy workable? What are the technical implications?" (Committee Member). A former associational president noted that such "sincere but impartial" inputs helped to maintain the government's respect, with the association later invited to develop the HR Competency Standards for the government's Qualifications Framework (2017).

6.3 | China

China's WTO entry provided a substantial turning point that significantly influenced several occupations' professionalisation efforts (e.g., accountancy, Gillis, 2014; social work, Leung, 2012), including HRM (Zhu & Warner, 2004, Table 2, 5). Exposed to the opportunities and threats posed by growing internationalisation (Table 3, 4ab), China's state authorities view human resources as critical to enhancing the nation's competitiveness through upskilling, innovation, and high value-added production (e.g., National Thirteenth Five-Year Plan, 2016 to 2020; Reports of the 20th National Congress, 2022, Table 3, 1a). The manifold development priorities require the establishment of a regulated and *professional* HRM (Table 3, 6) to help achieve internal stability while connecting the country's human resources to the outside world. Transposed to Millerson's (1964) associational framework, China's case study evidence points to a combination of internal and external factors inspiring the country's HR professionalisation project the most.

Internally, akin to the Employment Ordinance's influence in HK, three substantial pieces of (2008) legislation designed to rebalance the employment relations landscape in favour of the worker proved pivotal in progressing the need for a more 'professional' HR role during China's ongoing marketisation: the Labour Contract Law, the Employment Promotion Law, and the Labour Disputes Mediation and Arbitration law (Cooke, 2013). The three statutes span the employment relationship and bolstered HR's professionalisation momentum by requiring practitioners to ensure regulatory compliance and reduce organisational risk. As an associational representative elaborated:

> Mastering Chinese legal knowledge is essential for HR professionals handling labour issues. The essential knowledge and skills related to the law can easily distinguish HR professionals from non-professionals.

Substantively, as China's HR professionalisation project gathers pace (MHRSS et al., 2014), its associational remit pertains to forming an occupational boundary space comprising competent and dutiful experts rather than some conventional notion of professional independence (Freidson, 2001). As Nankervis et al. (2013) elaborate, professional associations are mere conduits for implementing state initiatives in China. Hence, what would ideally manifest as an *independent* PMA falls between two related but distinct entities.

First, far too large, and powerful to gain mere PMA categorisation, the MHRSS comprises China's most authoritative HRM agency. Formed in 1982 from the merger of the Ministry of Personnel and the Ministry of Labour and Social Security, its primary contributions include devising laws and regulations, cooperating with other relevant departments to lead personnel management reforms, overseeing professional certification (General Office of the Ministry of Labor and Social Security, 2004), and developing HR professional services (*State Commission Office of Public Sectors Reform*, 2008).

Second, far too small and local to exert a national-level identity reside a range of provincial and city-level associations, among which China's HRA remains the most established. Officially registered with the Beijing Municipal Civil Affairs Bureau in March 1998, the HRA is a non-profit corporation founded in 1996. Despite lacking the independent professional status of comparable PMAs as the CIPD and regional or world PMA representation, the HRA nevertheless enjoys relatively more associational capacity to attract foreign-invested enterprises into China than its provincial/city-level counterparts.

Meanwhile, commensurate with the manifold external opportunities (e.g., economic growth) and threats (e.g., increasing inequality, rising social instability) posed by the country's 'opening up' lies a need to generate a balanced HR profession founded on knowledge, technical discussion, and training, to cover both domestic and international concerns. When transposed to the institutional level of state-market interaction (Krause, 1996), it seems that while China's thirst for HR association derives in a state-driven rather than a corporate/practitioner-driven form (Table 2, 8). For instance, its main protagonist is notable for being located within a Ministry carrying adjacent social security oversight (the MHRSS). Hence, far from manifesting occupational rivalry (Table 2, 4) and akin to the UK's early associational effort, China's MHRSS centrality engenders a potent HR and social welfare nexus. Specifically, just as the Chinese state has maintained its determination to develop professional managers able to handle growing international (and domestic) management challenges (MHRSS et al., 2014), ensuring social stability (*Reports of the 20th National Congress*, 2022) remains paramount.

While it may be too early to decipher China's HR professionalisation *legacy*, as the range of legal complexity grows—for example, the New Labour Contract Law (2012), the Employment Promotion Law (2015), and the Social Insurance Law (2018)—new configurations of HR identity (e.g., consultancy and outsourcing firms) have emerged to address practitioner shortages in legal competencies (Cooke, 2013). Networks of 'shared services' practitioners and large employing organisations could thus propel non-state actors to make a more active *institutional* contribution, just as they contribute to *organisational* practice. If so, a second phase of HR professionalisation may materialise, likely established from the market rather than central state planning (i.e., bureaucrats). Alternatively, one managerial consequence of consolidating HR outsourcing and shared services provision to address supply shortages in legal competencies is that akin to Britain's industrialising sub-contracting experience (Evans, 2003), China-based employers may seek to avoid the complexities associated with *directly* employing labour. In certain special economic zones, such as Shenzhen, large-scale industrial HR consulting service parks have emerged to address shortages in qualified HR practitioners. Only time will tell whether such shared service firms will associate. For now, case study participants accepted that China's HR profession must accommodate the growing variety of domestic employers' needs while maintaining a globally interconnected MNC presence—all within a broader umbrella of state compliance and national development.

7 | DISCUSSION

Pitched at the institutional level of social complexity (Mayrhofer & Reichel, 2009), our study's contribution to the longstanding convergence/divergence debate in international and comparative HRM lies in establishing how knowledge of PMA formation explains the normative values and institutional legacy of HR professionalisation. Applied to three distinct but historically related cases, Millerson's (1964) associational model proves a remarkably robust tool when modified to accommodate a single profession across different contexts. However, more profound insights emerge when adding the institutional pressures and legacies of state, market, and associational interactions (Krause, 1996). Table 4 summarises the results of our comparative analysis by PMA rationale, antecedent, and legacy.

Concerning rationale, in contraposition to the *power and control* model of professions (Johnson, 1972; Larson, 1977), a search for status does not apply to any of our three cases, at least initially. Instead, a collective need to respond to internal/external circumstances *triggered* (e.g., HK's Employment Ordinance and China's WTO entry) or *influenced* (e.g., the UK's compulsion to protect welfare workers) PMA formation. In contrast, status *consolidation* becomes increasingly prominent as HR professionalisation evolves. For instance, as associational momentum gathered, the HKIPM sought to become the *"pre-eminent Asia Pacific PMA"* while the UK's PMA achieved *Chartered* status in 2000.

Meanwhile, the most striking professionalisation *antecedents* observed across our three cases derived from such *external* circumstances as increasingly complex legal regulations (e.g., three substantial pieces of legislation in China and HK's Employment Ordinance), employee welfare concerns (e.g., 'progressive' employers in the UK, MHRSS in China, HK's 'sweatshop colony'), and international influence (e.g., China's WTO entry, HK's dense MNC presence). While substantial employer organisations also proved pivotal in HK and the UK (e.g., four *conglomerates* in HK and 25–50 *progressive* employers in the UK), state intervention (Cooke, 2011) comprises China's most potent professionalisation actor. Relatedly, increasingly complex legal regulations provide another discerning antecedent, particularly in China and HK, where specific legislative demands resulted in qualified practitioner shortages to ensure organisational compliance. Although such striking legal influences did not directly inspire the UK case, subsequent legislative upheavals (e.g., collective bargaining, nationalisation, and the welfare state) influenced succeeding PMA iterations, before neo-liberal reforms exerted a market orientation. Nevertheless, at the point of PMA establishment, social work comprises HR professionalisation's closest *occupational* complementarity (e.g., Alden in the UK and China's MHRSS).

The explanation behind the more reactive than proactive PMA initiation lies in the HR role's *institutional* subordination to more powerful national and corporate agendas. Tantamount to the presence of a deterministic force beyond mere *imitation*, one conjectures the presence of a generic HRM feature: incumbents need the sophisticated equipment and systems of the organisation to practice their profession. In contrast, one notes how the professions Millerson (1964) identified as engendering a more established scientific knowledge base (e.g., Architecture, Civil Engineering, and Veterinary services) enjoy greater professional independence (e.g., the partnership governance form). It would be interesting to examine how these more independently established professions have since evolved and whether any discerning trends materialise among them.

Second, refining conventional notions of corporate professions evolving out of organisational contexts (Brint, 1994; Muzio et al., 2011; Suddaby & Viale, 2011), our HK and UK case study evidence suggests the presence of a more relational or networked confluence of *likeminded* enterprises. From a social constructivist position, shared cultural understanding (Zucker, 1977) of, say, welfare predicaments (UK) or a more institutionalised legal (HK) circumstance triggered the protagonists' professionalisation efforts with the state providing a similar institutionalising role in China. Even though the HKIPM structured its associational structure on the model of its British counterpart (Poon, 1995), such mimicry amounted to *form* rather than *substance*. To grasp the analytical difference, one need only compare the two entities' resulting legacies. Otherwise, management researchers interested in

tracking HR professionalisation origins elsewhere might usefully begin by considering the role of substantial employer interests and employment regulation in institutionalising the domain.

Third, while the HR profession may not have necessarily started with *corporate* intentions—*social* considerations (e.g., welfare, social work) initially mattered more—organisational prerogatives (both public and private) have since gained momentum. The institutional subordination matters because, far from providing a 'third logic' between bureaucracy and consumerism (Freidson, 2001), HR professionalisation placates state and market interests by ensuring regulatory compliance and identifying ways to extract surplus labour value, respectively. Combining both concerns, any resulting tensions in these two exogenous objectives produce a series of path-dependent legacies in associational positions.

First, the CIPD's *industrial betterment* legacy sits uncomfortably with its equally prominent labour management strand (Evans, 2003), producing a welfare-efficiency tension in contemporary parlance. Although the CIPD's strapline of championing *"better work and working lives"* retains a welfare connotation, one need only scratch the surface to unearth a plethora of efficiency-driven standards (e.g., 'commercial drive', 'people analytics'; CIPD, 2021). Second, in the absence of collective bargaining, HK's most enduring PMA legacy comprises the Pay Trend Survey. A product of an *"unholy alliance of business and bureaucrats"* (Harris, 1988, p. 57), the association's subsequent technical, rather than substantive, public policy influence continues to embed the institute into national priorities (e.g., advising on minimum wage technicalities) rather than carving a more *independent* path. Finally, while the relative recency of the China case renders it difficult to decipher a professionalisation *legacy*, its growing international embeddedness must coexist with state-driven efforts to maintain social stability and enhance national development. One of China's most intriguing professionalisation developments concerns the widespread formation of large-scale HR service firms with scope for more market-led associational influence.

8 | PRACTICAL IMPLICATIONS

Qualifying the HR community's apparent rush to embrace a more technologically savvy, individualistic, and psychologically infused HRM (Godard, 2014), our cross-case findings suggest that practitioners should continue to appreciate the role's ethical and legal (Bailey, 2011; Scheibmayr & Reichel, 2023) gatekeeper role and recognise its industrial heritage (Roper & Higgins, 2020). Practitioners should also reflect on the historical complementarity between social work and professional HR. Indeed, by broadening the initial firm-level welfarist commitments of early HR professionalisation to the macro-economic context of PMA formation, one could envisage the prospect of associational HR assisting the stabilising institutions of national development (i.e., a 'regulatory bargain', Suddaby & Muzio, 2015). One notes how China's comparatively more interventionist PMA position (i.e., MHRSS-led) engenders the more functionalist, state-directed post-war era of Western professional bodies (i.e., regulatory bargain), which stresses the importance of such entities achieving their *"social obligation"* (Meigh, 1966). In other words, HR professionalisation does not *necessarily* need to adopt a *corporate* form (Paton et al., 2013; Reed, 1996) but could foster a broader *social* identity.

Finally, when scaled internationally, the prospect of PMA connectivity provides significant opportunities for practitioner networking and lesson learning, however modest. One notes how a dual universal-contingent effect (as a microcosm of the convergence-divergence debate) prevails when comparing the *abstracted* nature of professional standards stipulations. For instance, while PMAs broadly accept that HR practitioners should understand *'key employment/labour law'* or *'how to lead complex legal cases'* (CIPD, 2012), the specifics remain highly contextualised. Professional HR practitioners worldwide, it seems, are engaged in the same sort of people management activities, and there could be more scope for lesson learning and policy transfer (De Cieri et al., 2007; Higgins, 2024) than that ruled out by strong path-dependent (divergence) claims (Farndale et al., 2017).

9 | CONCLUSION

Conventional firm-level explorations of convergence/divergence in international comparative HRM overlook PMAs' potential to institutionalise the professionalisation domain. The omission is significant because PMAs provide the conduit through which associations define best practice HR for any national context, and an understanding of convergence/divergence of HRM is incomplete without a sense of PMAs' roles. By comparing the antecedents and legacies of HR professionalisation in China, HK, and the UK, our study unearthed a dual convergence/divergence effect comprising a *family resemblance* of associating features and a *path-dependent* legacy of broader state and market influences. Akin to universals and specifics in comparative HRM (Brewster & Mayrhofer, 2012; Kaufman, 2016), the stratified effect occurs partly because our analytical focus privileges form (i.e., PMA establishment) over substance (e.g., professional standards content). Nevertheless, such abstract positioning says something profound about the institutional status of HR globally. *Replicating* rather than *disrupting* prevailing institutional arrangements, is it time for HR representatives to reconsider the placation of state and market interests in favour of a more independent outlook? If so, would such a re-positioning be *structurally* possible?

CONFLICT OF INTEREST STATEMENT
No conflict of interest.

DATA AVAILABILITY STATEMENT
The data that support the findings of this study are available from the corresponding author upon reasonable request.

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ENDNOTES
[1] According to the World Federation of People Management Associations (WFPMA) membership, at least 90 such PMAs exist globally, boasting a combined membership of over 600,000 HR practitioners, indicating that PMAs are significant

[2] Comprising the UK's liberal market economy (Hall & Soskice, 2001), Hong Kong's fragmented approach (Whitley, 1999), and China's socialism with Chinese characteristics (Xin, 2020).

[3] Responsible for managing over 90 million Party members and approximately 600,000 cadres.

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