

COMPARATIVE LABOUR LAW IN LEGAL
COMPLIANCE MANAGEMENT

NAGY, ZOLTÁN GÁBOR
PHD STUDENT

University of Debrecen

Academic supervisor: Dr. Henriett Nádasné Dr. Rab associate professor

Research field: Labour Law

E-mail: zoltan.dr.nagy@lego.com

Application of comparative method in labour law must lead to the revelation that there are other ways for the law to deal with an economic or social question, that are more effective, that have lower transaction costs or fewer negative externalities. Accordingly comparative method's is the main driver when we look for solution to a legal dilemma that a domestic legal structure cannot sufficiently handle. Such transnational transfer of legal ideas in today's global economic network happens on a daily basis at multinational corporations and legal networks of legal professionals.

Based on these premises, it is imperative to analyse and research other legal systems approach of labour law compliance and occupational fraud prevention. By nature of this social problem, I argue that the multidimensional approaches of comparative law methods could be the proper approach to explain and find solutions to this labour law challenge of legal compliance. As Hugh Collins has observed, labour law is a contextual field of study, not a doctrinal category, and the social context of an occupational fraud could determine the regulator's response. Therefore, examples of legal compliance approaches in the United States should be interpreted with significant care. Furthermore, to the social context the economic aspects of certain regulatory actions needs to be taken into account as Simon Deakin's work indicates.

Keywords: Multidimensional comparative approach, Comparative Labour Law, Labour Law and Economics