

Welfare to Work Policies in Europe

The Current Challenges of Activation Policies

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Welfare to Work Policies in Europe The Current Challenges of Activation Policies

Jean-Claude Barbier

Abstract

In the context of globalization (and its presumed contradiction with welfare state budget expansion), most national systems of social protection in Europe have undergone transformations enhancing the role of “paid work” within social policy. Broadly speaking, and in spite of some intrinsic fuzziness, “activation” may be used as a notion to describe this common, if not universal, feature of the changing relationship between employment/work and social protection.

Under this general category, however, hugely differing programmes and policies have been implemented for the last decade. All of them appear as embedded in their societal coherence, in terms of the systems of social protection, the values and norms upon which these are based, as well as the industrial relations systems they are linked to.

Two polar ideal-types of activation can be constructed, the *liberal* and the *universalistic*. These are consistent with significant divergence in policy and programme substance, in terms of services and benefits delivered, as well as in terms of obligations and entitlements of beneficiaries.

Although the divergence of national values obviously blurs the possibility of strict comparison of programmes across countries, empirical cases more or less close to either of the ideal types display contrasted performances, depending on the indicators selected for their assessment.

Key words : Activation, labour market policies, systems of social protection, welfare to work, workfare.

Les politiques de « Welfare to Work » en Europe Les défis actuels des politiques d'activation

Résumé

Dans le contexte de la mondialisation (et sa prétendue contradiction avec l'expansion budgétaire de l'État-providence), la plupart des systèmes nationaux de protection sociale en Europe se sont transformés, conférant un rôle accru à “l'activité professionnelle” dans la politique sociale. D'une façon générale, et en dépit de quelque flou intrinsèque, l'“activation” peut être utilisée comme une notion décrivant ce trait commun, si ce n'est universel, de la relation changeante entre emploi, travail et protection sociale.

Des programmes et des politiques extrêmement différents ont été mis en œuvre sous cette appellation générale au cours de la dernière décennie. Tous apparaissent ancrés dans leur

contexte sociétal, en termes de systèmes de protection sociale, de valeurs et de normes sur lesquels ils s'appuient, ainsi que de systèmes de relations industrielles auxquels ils sont liés.

Deux idéaux-types d'activation peuvent être opposés, le libéral et l'universaliste. Ils traduisent des écarts importants dans la nature des politiques et des programmes, en termes de services et d'allocations versées, de même qu'en termes de devoirs et de droits de la part des bénéficiaires.

Bien que les divergences entre valeurs nationales empêchent de toute évidence une comparaison stricte des programmes à travers les pays, l'observation de cas particuliers plus ou moins proches de l'un des types laisse entrevoir des résultats contradictoires, suivant les indicateurs retenus pour leur évaluation.

Mots-clefs : *Activation, politiques du marché du travail, systèmes de protection sociale, aide à l'emploi, mise au travail.*

INTRODUCTION ¹

In the current globalization process the search for labour market flexibility is obviously led by global competition and the role played by wages and related labour costs is prominent. (Barbier, Nadel, 2000). That the welfare state acts as an impeding factor, increasing indirect labour costs while at the same time encouraging people to live “on welfare” or to be “dependent”, is a very commonly shared view, at least among orthodox economists across the world. In this perspective, it is often argued that all welfare states should be restructured in order to raise incentives for people to enter the labour market (to go “from welfare to work”) and to implement “make work pay” strategies. In this ideological and cognitive context, most National Systems of Social Protection (NSSPs) in Europe have undergone some form of transformation leading to enhancing the role of work within social policy.

Broadly speaking, and in spite of some intrinsic fuzziness, “activation”² may be used as a notion to describe a very common, if not universal, feature of the changing relationship between employment/work and social protection. We will define activation here as *an increased and explicit dynamic linkage introduced in public policy between social, welfare, employment and labour market programmes, which implies critical redesigning of previous income support, assistance and social protection policies in terms of efficiency and equity, as well as enhancing the various social functions of paid work and labour force participation.*

But, leaving aside universalistic macro-economic or macro-sociological analysis, national diversity cannot be ignored. Contrasted national institutions exist and persist in the United States and Europe (Barbier, 1996, 1998c ; Geldof, 1999) or in the United States and France (Morel, 2000). “Continental” welfare states (all shades of “corporatist” and “social democratic”³) differ from the British liberal model. The United Kingdom, however very different, is much closer to the US. The values that inform national policies are hugely contrasted across national states. They influence the relationship between government and citizens, the labour market, families and social protection. It is no wonder that these variations are closely related to different social consequences of policies for the assisted, the unemployed and the poor. On top of this, various alternative social policy strategies can coexist with a *dominant* orientation⁴ within one single country. Policies aiming at turning social benefits recipients into jobholders may belong to a “social investment” type of programmes, where, contrary to workfare in its original sense, society’s collective responsibility is balanced with attention to legitimate demands from individuals. Instances of these are easy to find, especially in the Scandinavian countries. “Workfare”, “welfare to

¹ Paper presented to the Expert meeting on “Unemployment and Health in Europe”, Berlin, July 6-7th, 2001.

² Many different strategies are implemented under the general and fashionable banner of “activation”. This is notably linked to the positive general connotation of “activity” *versus* “passivity” (Barbier, 1998a). In France, for instance, “activation” may refer either to “activation of unemployment benefits”, to employment programmes where participants are regular employees (for instance, in temporary public employment) or to “insertion” programmes (see further). As will be shown below, these are only three examples of the diversity of programmes considered as active across the world.

³ We use Esping-Andersen’s typology (1990), but in our own interpretation (Barbier, 1998a).

⁴ Peck (1998) documents this in the US case, where “human capital model” strategies could be opposed to “work first” ones at the beginning of the 1990s. Rodgers (1981) had already alluded to these important variations in US programmes. A recent evaluation review of eleven programmes under the former AFDC (Aids for Families with Dependent Children) and JOBS programmes in the US confirms this diversity (Freedman *et alii*, 2000). The programmes reviewed are different in their content and in the way sanctions are enforced for non-compliers.

work” and “activation” should therefore be discussed while considering social policies as institutions embedded in diverse “societal coherences” (Maurice *et alii*, 1982) and at least closely related to, if not always coherent with, NSSPs (Barbier, Théret, 2000, 2001).

We will first turn to the original notions involved in the discussion (workfare, active labour market policies). This will enable us to distinguish between two ideal-types of activation policies. The US, UK, French and Danish cases provide empirical case studies to illustrate their societal coherence and nationally specific approaches of activation strategies.

1. WORKFARE AND ACTIVE LABOUR MARKET POLICIES : ORIGINS OF ACTIVATION

1.1. The US origin of workfare and its ensuing inconsistent use

Workfare schemes were first introduced in the United States in the 70s. Ever since they have always borne one constant characteristic, i.e. the demand imposed on individuals claiming assistance benefits to perform some type of work related “requirement” (under various forms but always mandatory). Although he did not exactly coin the term, Nixon gave it its classical meaning in the context of US “welfare reform”⁵. Although it has been associated with constant practice in the US from the 1980s on, workfare became however particularly fashionable in the late 1990s. It has been especially encapsulated in 1996 Clinton’s “welfare reform”, with the passing of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWOA) and the transformation of the long existing AFDC (Aid for Families with Dependent Children) into the new TANF (Temporary Assistance for Needy Families). This reform resulted in the current implementation of various programmes across States in the USA⁶.

Basically, the notion of *workfare* has operated in the US as an “ideological totem” for conservative thought on social assistance (Peck, 1998 ; Morel, 2000). Conservative literature, of which C. Murray is a good example, has advocated the necessity of imposing work obligations on individuals claiming “welfare”, but this stance further extended to other circles and became dominant before spilling over outside the USA.

Indeed, taken out of its original context, workfare gained success as a “catchword” in Europe. It has gradually emerged as a no less ideological term for instance in French sociological literature. This literature assumes that “workfare” has come to be a structural feature of a “post welfare state” period. It may be first used by radical critics of this presumed situation: “workfare” then functions as a half-baked notion to describe a generalised downgrading of welfare services and benefits almost akin to imposing forced labour on the poor, when it is not seen as a penal strategy (Wacquant, 2000). Alternatively, it is used for pointing to a functionalist and inevitable adaptation of NSSPs to current socio-economic circumstances (among others, Rosanvallon, 1995, p. 166). Unorthodox economic literature also uses “workfare” as a totemic notion. Jessop (1996) for instance, has used it in a typically universalistic perspective as a new principle of “regulation regimes”

⁵ Its first use is attributed to Nixon in 1969 (Peck, 1998, p. 138). Obviously, “welfare reform” is also a specific US question and “welfare” cannot be used as a universal equivalent of “social protection” or *la question sociale*.

⁶ Freedman *et alii* (2000, p. 2) show that they might be “employment” or “education-focused” and that they entail different degrees of participation enforcement.

(“Schumpeterian workfare”), where the workfare element is ideal-typically supposed to describe the subordination of current social policies to labour market’s flexibility requirements in the age of globalization.

1.2. Active Labour Market Policies (ALMPs)

The original “Active Labour Market Policy” (ALMP) was created in Sweden. It is embedded in a socio-historical context very different from American workfare. Discussed from the 30s on, the original policy was actually implemented from the 50s. At LO (the employee union federation)’s Congress, in 1951, a group of Swedish economists and unionists were convinced that their government should implement a selective policy aiming at full employment (Roehn, 1985, p. 66). This implied a mix of macro-economic policies, solidaristic wage policies and various selective interventions that gave Swedish policy its originality. B. Rehnberg (1984, p. 105), a former head of the Swedish employment service, typically advocated such selective measures as being based on “an equitable balance between the individuals’ rights to freely choose their jobs and society’s obligation to citizens’ expectations”. Despite the considerable subsequent transformation of Swedish policies, and their emulation in other Scandinavian countries, these historical roots ought to be seen as informing a distinctive type of “activation”. Indeed it is present as the current “cornerstone”⁷ of labour market policies in Sweden and Denmark (Arbetsmarknadsverket, 1996 ; Jorgensen *et al.*, 1998, p. 165 ; Hviden, 1999, p. 30-31).

OECD (Organisation for Economic Cooperation and Development) experts later disseminated the notion, which was officially adopted by the organisation’s council in 1964. In this process, the original Swedish meaning of the term was transformed and influenced - notably by references to US programmes focusing on “human resources investment” (OECD, 1990, p. 15). The revisited notion provided the organisation with a basis for a typically universalistic characterisation and promotion of a mix of supply side labour market programmes, including vocational training, the employment service, employment creation for “disadvantaged groups”.

“Active Labour Market Policies” have thus been separated from their original historical circumstances, which entailed a close relationship with macroeconomic as well as wage policies. The notion subsequently became systematically associated with a general derogative assessment of labour market “rigidities”, notably supposed to originate in what was deemed inadequate and excessive “employment protection”, for the measurement of which OECD later produced statistical indexes (OECD, 1999). For the organisation, these supply side measures were supposed to simultaneously address efficiency and equity goals and allowed for the design of programmes in three main sectors : labour supply quality enhancement, labour market flexibility and structural adjustment (OECD, 1990, p. 20). This gave way to the standard classification most commonly used in international literature (OECD, 1993, p. 70-71) :

⁷ Ove Hygum, of the Danish ministry of Labour states that this is one of its key features : “The needs-oriented approach leads to providing services adapted at the same time to the unemployed’ needs and abilities and to the labour market’s demands. This is why it simultaneously entails *rights and obligations* for the unemployed to accept the services offered” (Schmid *et alii*, 1999, p. 12).

- (i) *active* expenditure (i. e. public employment service and administration ; vocational training for the unemployed; youth measures ; subsidised employment ; measures for the disabled) ;
- (ii) *passive* expenditure (i.e. unemployment compensation and early retirement for labour market reasons).

Despite widespread scepticism with regard to its intrinsic limits, this methodological framework has nevertheless internationally been used since, and has provided the basis for gross assessments of the comparative degree of “activation” across countries. From the 1994 Essen summit on (Barbier, 1998b), the European Commission has used the notion of “active policies” very extensively to promote the European Employment Strategy (EES).

Table 1
Instances of activation services

	United Kingdom	Denmark
Types of services	Mainstream “Restart” interviews The “New Deals” targeting various groups as enhanced provision of services	Mainstream <i>Handlingsplan</i> (devising an individualised and multi-services approach to integration or re-integration into the labour market)
Implementing institution	Employment Service (ES)	Employment service, Labour market regional authorities (insurance) and municipalities (assistance)
The “contract” : the benefit side	Job Seeker’s Allowance (JSA) (6 months maximum : monthly 208£ ⁸ (for the over 25) (162£ ⁹ for the under 25) (or the mainstream welfare benefit possibly being topped up)	Special benefit for the under-25 For the over-25 : Unemployment insurance benefit up to four years ¹⁰ (around monthly 1,600 Euros) Assistance benefit monthly DKr 9,000 (parents) et DKr 7,000 ¹¹ (single persons)
The “contract” : the recipient’s obligation	Follow up of job search and possible training achievements	Co-definition by the unemployed and the administration of an individual “path to integration”
The “contract” : the public administration’s obligation	Mostly short or one-off providing of services And market oriented	The administration has an obligation to find solutions including possible employment “of last resort”
Sanctions	JSA is suspended or cancelled when the unemployed does not comply with ES requirements	Benefit suspended or cancelled when the unemployed does not fulfil the plan’s agreement

Indeed OECD indicators provide useful tools for “first aid” international comparison, based on an universalistic and a-historical representation of labour markets. However, using these first aid tools may lead to mendacious use. Illegitimate and groundless equivalence may thus

⁸ I.e., 306 Euros (as of October 2000).

⁹ I. e., 238 Euros (as of October 2000).

¹⁰ The insured are eligible once they have contributed to the fund for 52 weeks in three years. Contrary to previous regulation, participation in labour market programmes does not result in building up renewed insurance entitlement.

¹¹ As of October 2000, Danish Kronen 9,000 and 7,000 respectively equal 1,208 and 940 Euros.

be made of policies and programmes, which are embedded in different national traditions, and informed by totally opposite values, not to mention their different systems of social actors and their historical traditions. This explains why, under a so-called universal activation - or worse –“workfare” logic, US and British punitive (disciplinary) programmes (King, 1995) are very often mixed with the Nordic balanced approach or with the solidaristic French approach to *insertion* (see further), to name only two instances.

However, as time and fads pass, the importance of distinctions among activation strategies is taken into account in a growing corpus of literature (Morel, 1996 ; Barbier, 1996, 1998c ; Kosonen, 1998 ; Geldof, 1999 ; Abrahamson, 2000 ; Morel, 2000).

Consequently, other categories are needed to discriminate among labour market policies. Explicitly relating them to their wider “welfare regime”, we have proposed to primarily classify policies and programmes according to *the types of services they provide*, for citizens, assistance claimants, unemployed and other candidates to employment schemes. Roughly speaking, policies and programmes may provide short term, “work first” - even simple or “one-off” - mediation services : this is our first category (Barbier, 1998a). On the opposite, “social investment”¹², or “human capital” oriented strategies and programmes entail the production of much more elaborate and often long-term services. The table 1 provides an illustration of the rather clear-cut divide between instances of the so-called contemporary ALMPs.

Basically, these empirical types of services reflect two opposite conceptions of the role of the labour market, but also of the legitimacy of individuals’ claims from society, of their freedom of choice, the nature of citizenship and of obligations of the state as a social state.

1.3. Liberal versus universalistic

The opposition may be more systematically analysed according to table 2, which contrasts two ideal-types, the *liberal* and the *universalistic*, representative of polar situations in Europe. Their equity and efficiency content are at odds.

Contrary to the universalistic ideal-type, the liberal one is chiefly polarised around the individuals’ relationships with the labour market, which, *per se*, are assumed to yield social equity and efficiency. ALMPs as well as social policies thus take on a limited role, restricted to inciting individuals to seek work, providing quick information and matching services, as well as investing in short term vocational training.

On the other hand, the universalistic type not only cares for the provision of complex and extended services to all citizens, but simultaneously guarantees relatively high standards of living for the assisted, and, for the lower paid sections of the labour force, benefit levels close to actual minimum wages¹³.

¹² This notion may be used in very contrasted ways. For instance, Giddens (1998, p. 99) equates the “social investment state” with a very complex array of features. He takes an explicitly universalistic stance on social policy, implying that all countries have now turned out as proponents of the same “third way stream” (Giddens, 2000, p. 31) in spite of their differences. Among his six “fundamentals of third way politics”, features “a new social contract based on the theorem ‘no rights without responsibilities’ ” (*ib.*, p. 52).

¹³ In certain countries, this brings underlying conflicts to the fore, as is seen for instance in the case of Germany, where the state’s constitutional *Fürsorgepflicht* (minimum income assistance obligation) leads to the provision of benefits which some see as lowering incentives for individuals to seek work. Orthodox economic literature often treats this

Table 2
Activation : two opposite ideal-types

		The liberal approach	The universalistic approach
Societal coherence	National system of social protection	Liberal welfare state	Universalistic welfare state
	General ideological/political references and dominant contemporary values	Individualism, self-reliance of individuals (on the labour market) The welfare state as a provider of an assistance safety net	Demands of society and demands of individuals should be balanced. Society has a responsibility not only to provide last resort benefits but also to provide universal services.
	“Activation” justification (labour market and social protection)	Incentive are of primary importance Social assistance recipients are basically profiting on welfare payments ; only some are “needy” => the punitive (disciplinary) approach	A balance has to be struck between incentives, sanctions and the providing of services and benefits => the reciprocal engagement strategy
	Employment law and industrial relations (employment flexibility)	Extensive freedom for employers Firm-based agreements Limited say of “social partners” in social protection institutions	Extensive freedom of employers High socialisation of the unemployment and poverty risks Corporatism and extensive role of social partners
	Employment and activity regime	High employment rates but prevalence of inactivity for certain groups ; Part time, gender inequalities in employment and full time participation rates	Very high full time employment rates across the labour force, equal opportunities for men and women on the labour market Significant proportion of labour force in public jobs (employer of last resort)
Policies	Types of programmes and services	Social assistance policies and programmes are supposed to be linked to work incentives (social or fiscal - tax credits) => the “welfare to work” strategy	The provision of universal services (not targeted) should encompass various segments and sequences of social policy, in an “activation” perspective => universalistic activation
	Target of programmes and policies	-The poor, “dependent on welfare” (usual categories among them are lone parents, unemployed people, workless households, disabled people) -The working poor	- Citizens - No working poor
	Benefits provided	Low value and short term, generally a small proportion of market wages	High value and long term, low differentials with market wages ; additional “wage-based” labour market programmes
	Sanctions’ implementation	High enforcement of active job search of market jobs	Enforcement of active participation
	Employment service and institutions	Central administration New Public management, benchmarking and targets	Decentralized, involving social actors including local authorities

Table 2 does not empirically fit with any country, although Denmark for instance is close to the universalistic ideal-type, as opposed to the United Kingdom, which is close to the liberal one. The two countries probably represent the most polar examples in Europe, and France

problem as if it only demonstrated universalistic functional “poverty traps” whatever their specific content of conflicting *substantive values*.

somehow is a hybrid case, as is very often the case with French social protection policies (Barbier, Théret, 2000).

1.4. Diversity within the “activation” dynamics

That a general movement has occurred from the eighties on, towards increased “activation” of benefits and provision of services seems beyond doubt today, when activation is defined as we did.

However, this general dynamics has not resulted into a common and universal adaptation of social states to the US born workfare rationale, as will be illustrated more empirically in the following section. Models have emerged, dependent on their historical and societal traditions, which combine elements from both ideal-types. Various activation strategies may thus be seen as path-dependent. Intermediate or hybrid cases exist among European Union member States.

The activation dynamics is related to the evolution of so-called “tax and benefits” systems (in terms of funding sources and of types of benefits). This is also a domain where universalistic half-baked notions tend to circulate, which lead to very inadequate assessments of the options available for social protection reform. One of them is the possible implementation of what Johnston (1998) once termed in French *prestations liées à l'exercice d'une activité* (i.e., combining income from welfare benefits and from paid work). In the British context, these would be termed “in-work” benefits, or more recently “tax credits” strategies (Barbier, 2000b). But, in certain countries, like for instance France since 1962 (Join-Lambert, 2000, p. 632), the insured unemployed have been eligible to complementary and temporary insurance payments while being employed. This has also been the case in this country for RMI (*revenu minimum d'insertion*) recipients. But the rationale of such regulations is totally different from strategies implying a permanent reduction of employers' social contributions for low wage earners, or for specific target groups (also existing in France). It is also different from across the board indirect subsidization of low wages as implemented in the United States, *via* the Earned Income Tax Credit (EITC), which, in its turn is also not exactly equivalent to the gradually increasing introduction of tax credits in Britain. After much hesitation, the French government introduced a new *prime pour l'emploi* at the end of 2000. Thus an element of tax credit has been incorporated within the already very complex and hybrid French system ; its logic is of an additional layer of social policy *via* an individual tax channel and not, at least as yet, leading to an overhaul of the social protection and tax systems. Here again analysing these mechanisms from a purely functional point of view typically would blur the essential enduring differences between NSSPs (Gilbert, Van Voorhis, 2001).

2. CONTRASTED NATIONAL CASES OF “ACTIVATION”

2.1. The United States

In the United States, where a welfare state in the European tradition has never existed, *proper workfare* (historically, and more recently, “welfare to work”) strategies have constituted the US brand of activation for a long time. These strategies actually play a very marginal role

within the US “social protection” system¹⁴. They have only targeted AFDC (and then, TANF)¹⁵ recipients, most of them being young lone mothers.

Recent figures indicate that, since the 1996 Clinton welfare reform, there has been a dramatic decline in the number of people receiving benefits (and Food Stamps). From a peak of 5.5 million families in 1994, the AFDC/TANF caseload declined to around 3 million families as of December 1998 (i.e., 8.8 million individuals, about 3.3 % of the US population) (Hearings, 1999). In December 1999, TANF recipients were 2.2 million families, i.e. 6.3 million people, or 2.3 % of the US population (Office of Family Assistance, 2000). Whatever the much debated explanations for that decline¹⁶, in the meantime, EITC (Earned Income Tax Credit), despite its tax content, has emerged as a major *de facto* “social policy programme”. Its recipients, (also a majority of families with children) now constitute about 20 % of all American households, accounting for roughly 30 billion dollars, while TANF payments amount to about 23 billion dollars (Office of Family Assistance, 2000). TANF accounts for less than 2 % of the federal budget and is of relatively marginal importance according to European social budget standards.

Leaving aside the question of how so-called “underclass” single mothers “living on welfare” have entered the labour market as a consequence of TANF, it should be stressed that AFDC has also represented the particular brand of US “Family Policy” as Morel (2000) has extensively shown. Significantly, present TANF evaluation reports to the Congress analyse indicators concerning the evolution of teenage birth rates, out of wedlock births and marriage behaviours, as outcomes attributable to welfare reform (Office of Family Assistance, 2000)¹⁷.

Comparing TANF (ex-AFDC) and EITC, in terms of numbers of participants (also more recently in financial terms), clearly indicates that EITC has been the main US “in-work” programme to alleviate poverty, whereas workfare has targeted a considerably smaller number of people. On top of this, when not directed to ordinary jobs, workfare participants remain assisted (*versus* accessing to employee status), whereas the bulk of the poor are working EITC recipients (the working poor).

In that context and notwithstanding its important symbolic and rhetorical function, workfare emerges as marginal to the US system. Meanwhile, the Federal Reserve is not only in charge of inflation, but also of full employment. Because of high participation rates in the labour force and because of the buoying economy, the question of transferring people from “welfare” (i.e. TANF and Food Stamps) to work is strictly limited in present US circumstances. Most “ordinary” poor and the unemployed, who enjoy limited access to unemployment compensation, have to look for jobs on the market (including possible “bad”

¹⁴ Which encompasses many different programmes, such as Medicaid, Supplemental Security Income, Food Stamps, EITC (Earned Income Tax Credit), etc. (Morel, 2000).

¹⁵ AFDC : Aids for Families with Dependent Children. TANF : Temporary Assistance for Needy Families.

¹⁶ What remains to be assessed is the *net contribution* attributable to “welfare reform”. Obviously the buoyant US economy has played an important role. Tentative evaluations have recently been published (Office of Family Assistance, 2000). One important finding of the review of previous comparable programmes is that they did not produce large change in peoples’ lives during the follow-up period. The programmes helped a substantial number of individuals to replace income from AFDC and Food Stamps with income from jobs, but had not, as of two years, lifted many families out of poverty (Freedman *et alii*, 2000, p. 21).

¹⁷ The third TANF report to the Congress for instance stresses that teenage birth rates fell in all States, as well as out of wedlock births (Office for Family Assistance, 2000, p. 4).

jobs). Income and wealth inequalities are also a very well documented US characteristic, although the poverty rate has been decreasing for the last three years¹⁸.

This means that activation plays a limited role in the US, despite its important symbolic function. Ordinary labour market jobs and tax credits do play the prominent role, in the context of government policies that foster full employment through traditional monetary and fiscal policies.

2.2. The United Kingdom

The British case is very dissimilar, although its ideological inspiration is very American today (Deacon, 1999). Both British and US labour market policy approaches have been close to each other for a long time (King, 1995). But common ideological inspiration does not translate automatically into similar policies and social protection system coherence (Barbier, 1999). Contrary to a rather accepted belief (in France at least), UK conservatives have resisted the introduction of proper workfare schemes for a long time. Only in 1996, just before Labour came to power, did John Major's government launch his short lived "Project work" for the long term unemployed in ten pilot areas (Finn, 1998). Why the Thatcherites doggedly opposed such schemes is no mystery : they were acutely wary of the danger that the state, at the end of the day, would emerge as an "employer of last resort".

This British approach to activation has to be considered in the wider context of an effectively existing and wide-ranging UK welfare state. Its main elements include (i) a universal healthcare system - the NHS (National Health Service), combined with (ii) a universal safety net. *Income Support* is the key benefit for the assisted people. It somehow constitutes the standard reference, the universal welfare basis for the *out-of-work* poor. Separate unemployment insurance benefits have been merged with the traditional assistance benefit. Moreover, under different benefit names, a dramatically expanding number of disabled people - i.e. Sickness/Disability benefit recipients, have been catered for. The disabled caseload has now come to represent one of the main social protection *items* on Labour's agenda, along with state pensioners, who earn similar levels of benefits on a universal flat rate basis.

Key benefits mainly include the Job Seeker's Allowance (JSA), three Benefits for the disabled and Income Support. They are all benefits for people of working age. Family Credits, now transformed into Working Families Tax Credits (WFTC) are to be added to this group of benefits. The overall number of claimants of all these benefits and credits has fallen from about 6.5 million people in February 1997 to 6.1 in February 2000 (Bivand, 2000 ; Department of Social Security-DSS, 2000). These 6 million people receiving benefits are to be compared with an active population in employment of 27.8 million, and an ILO (International Labour Organisation) unemployment figure of 1.7 million, as of January-February 2000¹⁹. Excluding those beneficiaries who claim tax credits and in-work benefits (0.95 million, mainly on WFTC), 5.2 million, i.e. 15 % of the working age population are presently eligible to one of the key benefits, a very considerable figure if compared with the

¹⁸ 11.8 % of households were living with incomes under the poverty line in 1999 (as against 12.7 in 1998), i.e., 32.3 million people as against 34.5 in 1998 (Dalaker *et alii*, 2000). Morel (2000, p. 144) indicated that there were 9.4 million US working poor in 1997, i.e. 6.6 % of all workers. This proportion is 6.1 % as of 1999 for 9.1 million workers (Dalaker *et alii*, 2000).

¹⁹ The February-April 2001 ILO (International Labour Organisation) rate is 5.0 %.

small proportion of the US population on TANF. This is one of the key differences between Britain and the US. Moreover, in the last period, the proportion in this overall category of “out-of-work” assistance claimants, who are considered disabled, has increased tremendously. The sick and disabled roughly account for half the population of working age on key benefits²⁰ and tax credits (2.880 million in February 2000 as against 6.14 million).

In this context, the Blair government initiated an undeniable turn from 1997/1998 onwards. The 18-24 years old unemployed on the Claimant Count were first targeted by the “New Deal” programme for the young which is currently being implemented (Finn, 1997). Older long-term unemployed and single mothers²¹ have been the next target groups. However, one essential challenge for the Labour administration lies with the population presently considered as disabled (and amounting to more than 8 % of the potential labour force)²², most of them being over-45 ex-workers that left the labour force at some time in the last decade. The British “making work pay” anti-“welfare dependency” strategy is thus totally different from US workfare programmes. It is supposed to cater for a very important section of the labour force in a context where underemployment is endemic (notwithstanding recent vigorous job creation). As *The Economist* (1999) recently acknowledged, “employment and activity rates for men of all ages are several percentage points lower than they were at the start of this decade”. The British activation problem is thus of a thoroughly different nature as the US’s, with its “full employment” achievement. As France, Germany and Italy, whatever their huge *prima facie* differences in terms of unemployment rates in the decade before 1996, the UK also experienced low net job creation.

From October 1999, the Labour administration has engaged in an important new social/fiscal policy development, i.e., the transformation and extension of the existing Family Credit benefit. The new WFTC is the most prominent “in-work” benefit so far in the UK system (catering presently for about 1 million recipients). The number of its recipients has grown sharply in recent years. Indeed, developments should be closely scrutinized, as to what will be the extent of the new tax credit policy, building up on WFTC and other differential benefits²³. Another matter of interrogation is whether it will eventually match the EITC model, thus extensively substituting traditional benefits for the poor out of the labour force, and transforming them into “US-style” working poor eligible to tax credits, with the on-going introduction of an “Employment Credit” for the low paid. The extent of underemployment in the UK is obviously a crucial point here, as well as the potential capacity of the UK economy to deliver an appropriate number of jobs (and, what is more, matching them with the slack labour force’ skills and qualifications).

²⁰ Contrary to the unemployed claiming JSA, the number of people on any of the sickness and disability benefits has continued to grow from 1997 to 2000 (from 2.792 to 2.880 million) (DSS, 2000). Whereas the number of unemployed claimants decreased by 600,000 in the same period, the number of disabled continued to increase slightly. At the same time, the number of tax credits recipients grew from around 700 to nearly 950,000 people.

²¹ UK single mothers experience one of the lowest labour force participation rate in Europe. Bradshaw *et alii* (2000, p. 13) show for instance that, in the UK, whereas 67 % of married mothers are active, only 45 % of lone mothers are (as against respectively 89 and 73 % in Denmark).

²² The proportion of the potential working-age population being “spirited” out of the effective labour force is obviously a crucial point when comparing countries. It is well known that the famous Netherlands miracle may be explained significantly by the fact that the inactive working age population in this country has been steadily higher than 10 % for the last decade (Barbier, 1998a).

²³ For instance, a Child Credit has been introduced in 1999. In March 2000, the Government announced that, from April 2001, all long term unemployed were to be guaranteed a minimum income in their first year (£60 a week on top of wages up to yearly £15,000).

Before the introduction of the new credits, substantial evidence nevertheless has shown that there was a considerable gap between the politicians' rhetoric and the actual effects of welfare reforms on patterns of labour market participation and activity, at least with regard to lone parents (Bradshaw *et alii*, 2000). Given the quantitative problem involved, it is a matter of interrogation whether the UK system could achieve to transform assistance into US style tax credits incentives for people in jobs.

This interrogation also applies to the less "employable", particularly in certain areas affected by high unemployment and local labour market and development problems. Probably one of the most important evaluation findings of the New Deal for the young has been that it succeeded in helping the most "employable" into conventional market jobs. But at the same time, similar success has not yet been achieved for the less employable, which has prompted new current policy initiatives for targeted zones.

2.3. France

France has experienced a protracted period of low creation of jobs/net job destruction to 1997 (from 1997 onwards, net job creation has been very significant, i.e. about 1,5 million jobs for the 1997-2000 period). Although still relatively very high according to international standards (8.7 % in April 2001), the French unemployment rate has fallen steadily. But, during the 1990s, the main French social question was not one of transferring people from welfare to work. On the contrary, given the lack of market jobs, it was quite the opposite, i.e., providing welfare for those that were selected out the labour market, because they were young, long term unemployed or unqualified (Barbier, Théret, 2001). This provision of benefits and the associated services has been implemented in conformity with the French solidaristic tradition (Morel, 2000).

Contrary to the UK and the US, the French NSSP is an extensive insurance-based system. It harbours a significant and complex assistance sector, including a mainstream minimum income benefit (RMI) catering for 1 million people, as well as a diversified cluster of minima incomes (Barbier, Théret, 2000, 2001). French family policies are well documented and very diversified (Barbier, 1990). The wide range of Family benefits undoubtedly play a crucial role in alleviating poverty. French "employment policies" have accounted for an increasing proportion of state social expenditure for the last years and emerged as a new systematic area of social protection (Barbier, Théret, 2000).

These policies (ALMPs and employment policies in general) have been very different from the UK's and have had more features in common with Scandinavian and German policies. On top of an ILO unemployment figure that stood over 3 million people for a long period (and an active population about 25 million) roughly 2 million potentially active people have been in employment schemes each year (for the last decade)²⁴. During the recent sharp recovery, this figure has only decreased slowly. Among these, those deemed least "employable" have been proposed with a variety of temporary public and non-profit employment (TPE) schemes. A very high proportion of TPE participants enjoy regular employee status albeit with very low wages and mostly part time jobs requiring relatively poor qualifications. When compared with the British situation, French underemployment

²⁴ This is of course a gross quantitative perspective, which does not take into consideration very important questions of comparability, as regards the notion of "employment schemes".

during the early 1990s has thus resulted both in high long-term unemployment and extensive labour market programmes.

French *insertion* policies are one of the essential elements of activation “à la française” along with wide ranging programmes to lower employers’ social contributions. The notion of *insertion* cannot be easily translated into all languages and definitely not in English. Eme (1997) has described its gradual construction²⁵. He stressed that, as a particular sector of social policy, *insertion* originated jointly in non-profit activities during the 1970s, and public policy innovation that built on them. The joint process eventually resulted into a new separate sector of public intervention, which gradually emerged as an “intermediate” area between traditional social policy and traditional labour market programmes.

But the term itself has other meanings : it also refers to specific social work practice (*activités d'insertion*) and to the individual process (*processus d'insertion*) by which all individuals gradually *integrate in society*. It is not easy to detach the term from its numerous normative connotations, one of those deriving from the decisive institutional push it received from the passing of the *Revenu minimum d'insertion* (RMI) Law. This 1988 legislation introduced a universal (and differential) benefit. At the same time, it created a new universal entitlement to state provision of services and activities (*droit d'insertion*), designed to help individuals to integrate in society and actually enjoy fully-fledged citizenship, as opposed to remaining “excluded” from society, and possibly, from employment (Barbier, Théret, 2001).

Although *normatively* universal in its principle (either the benefit or the right to activities and services), RMI actually caters for the poor and the “socially excluded”, once eligibility to any other benefits is exhausted. This entails that *insertion*’s actual rationale may not be seen as universal, but is “targeted”²⁶ in practice.

As for activities and service provision associated with the benefit, many experts have described RMI’s rationale as ambiguous by nature from its inception. Indeed the programme tentatively excludes two opposite solutions : merely serving people the benefit without caring for other service provision on one side, implementing an effective “counterpart” logic that would entail mandatory participation in work-related activities on the other (Belorgey, 1996). These specific characteristics of *insertion* preclude any analysis in terms of workfare in the French case, contrary to what Rosanvallon (1995) stated. If *insertion* cannot be simply dismissed as workfare, it may however be seen as one among many activation strategies, each of them being informed by the current values implicitly or explicitly agreed upon within national polities.

This is also why “integration” is a very poor English candidate to convey the social and political signification of *insertion* programmes. Integration is too limited, as a classical sociological notion. Integration does not provide an accurate description of the diversified nature of services and activities which RMI claimants may engage in, either to develop their social and political participation in society, or to engage in basic education, vocational training, counselling, and so on. A similar and somehow more extensive and systematic array of services and activities is also a characteristic of Nordic countries activation (Hviden, 1999, p. 32 ; Larsen *et al.*, 2000, p. 14).

²⁵ Other references include Maclouf (1992) and Castel (1995) ; for the specific use of *insertion professionnelle* as an equivalent of “transition from school to work” for the young in France, see Guérin-Plantin (1999) and Vernières (1997).

²⁶ “Targeting” is a very tricky notion for comparisons (Barbier, Théret, 2000b). There is a similarity here with Danish experience, where, notwithstanding universal provision, the separation of services persists between the insured and the assisted unemployed (Jorgensen *et al.*, 1998).

This is also why the long existing French *exclusion sociale*²⁷ bears a significantly different meaning from the current British use of *social exclusion*. This notion recently emerged on the New Labour government's agenda. Contrary to the very inclusive and broad signification of the French term, which refers to all forms of non-participation in society, the Labour government has tended to focus the notion on programmes targeted at particular groups of the population. These groups are affected by specific social problems (teenage pregnancy, truancy, youth crime in derelict dwellings, and so on).

Special *insertion* activities have never been administered on a mandatory basis and no "actively seeking work" clause has been attached to RMI entitlement. As has already been said, *insertion* programmes not only encompass labour market oriented activities, but also various social services. However, their effectiveness has been limited and the amount of resources devoted to them notoriously inadequate. In this latter respect, one of the side effects of French employment and *insertion* policies has been the current development of a 'working poor' stratum. This segment seems to be significantly stuck in a "second market" of bad jobs with low pay²⁸ (Concialdi *et alii*, 2000 ; Barbier, Théret, 2001). In the French case, the absence of the disciplinary element has not led, as evaluation findings extensively demonstrate, to overall incentive or "poverty trap" problems. Although numerous inconsistencies in this regard mark the French system of social protection, even those deemed less "employable", RMI claimants, display job search patterns which are similar to those of the other unemployed²⁹ (Rioux, 2000). As the French situation has constantly shown, insufficient job creation for the last decade to 1997, such potential labour force participants will not be easily transferred to market jobs (long-term unemployment in April 2001 still amounted to 660,000 persons). But, given that the US and the French situations are hugely contrasted in this regard, it is nevertheless interesting to note that TANF claimants who have engaged in paid work in 1999 amounted to 28 % of all participants³⁰ (Office of Family Assistance, 2000). RMI participants, as has been stressed, are not comparable to TANF claimants, but evaluation findings concerning a recent cohort of claimants showed that 16 % were in paid employment³¹ nine months after their registration as unemployed (Rioux, 2000). Both these figures, however not comparable, shed interesting light on the shortcomings of hugely different activation strategies in hugely differing circumstances.

France's contemporary relative performance in Europe in terms of poverty is intermediate between the Scandinavian and northern countries where poverty is lower and the UK, Ireland and the southern countries, where poverty is higher (Paugam, 1999). Measured as a proportion of the population earning less than *half the national mean income*, the French poverty rate was 16 % in 1993 (as against 9 % for Denmark, 13 % for Germany and 14 % for the Netherlands). It was thus closer to European countries with lower rates than to the UK

²⁷ "Exclusion" seems to have first been used by P. Massé, a minister for the French Commissariat du Plan, in his essay *Les dividendes du progrès*, in 1964 (Didier, 2000). But its current accepted meaning and wide dissemination is linked to R. Lenoir's 1974 essay, *Les Exclus, un Français sur dix*. From the mid-70s, *Insertion* programmes were designed for different categories of people considered as "*exclus*" (excluded).

²⁸ Comparing the US and France, Concialdi *et alii* (2000) have shown that the proportion of low pay workers in the US is double the French figure (30 % as against 15 %).

²⁹ Rioux (2000) shows that RMI participants display active job search behaviour. Three quarters of them regularly interact with the employment service.

³⁰ This corresponds to 85 % of all "working recipients", which means that another 5% were engaged in "work experience" or "community service". The figure for 1996, for all working recipients was 11 %, for AFDC participants.

³¹ Two fifths were in subsidised employment (temporary jobs in non-profit or public institutions).

(23 %) or Portugal (29 %). A similar ranking is true for the proportion of the poor among the long-term unemployed (30 % as against 64 % in the UK, but 7.5 % in Denmark) (Paugam, 1999). Recent comparative Eurostat statistical series confirm France's intermediate status among the Union's member States, when the proportion of low-income³² categories is considered (16 %) (as against 11 % in Denmark but 21 % in Ireland and the UK). Eurostat calculates a Gini index of less than 0.30 for France, Belgium and Germany, as against more than 0.33 for the UK, Ireland and Spain (Eurostat, 1999).

Albeit with obviously limited effectiveness (as compared for instance with Denmark or Sweden), French policy has nevertheless tried to foster some balance between individual obligations and entitlements on one hand, and society's collective responsibility on the other. The absence of any systematic and overt punitive element as well as the insistence on citizenship and social rights, entail that French programmes cannot be equated either with British welfare to work or US workfare. The French way of activation appears thus closer, despite its fragmentation, limited effectiveness and indirect fostering of working poor situations, to Danish programmes (Jorgensen *et al.*, 1998). Moreover, France has constantly kept its temporary employment programmes and even extended them for the young.

2.4. Denmark

From the 1993-94 "labour market reform"³³, Denmark has undergone a very significant turn. The emphasis has now been placed by public authorities *on the role of general education* (acquired in the initial education system or vocational training). This contrasts with the previous employment schemes offering people temporary jobs while at the same time recreating their normal entitlement to mainstream social protection, like ordinary social insurance contributors. However, compared to the majority of member States in the European Union, Denmark still is the country where employment policies remain based on relatively extensive forms of temporary employment in the public sector and, first and foremost, in local authorities, *even if this temporary employment now includes a general education and vocational training element*. The turning point of "activation the Danish way" is therefore substantially very different, in nature and content, from what was recorded in Britain from 1987 onward. It goes with an obligation of activation (*aktiveringspligt*), breaking away from the previous "generosity" and absence of sanctions. However, the balance between this obligation and the commitments and services provided in return outlines a coherence much different from the British case.

In the nineties, Denmark had become a country where everyone, including young people, in fact enjoyed a guaranteed social income, calculated on an individual basis, whatever his/her situation in relation to employment or social protection. This situation came as a result of extremely generous (in international relative terms) levels of benefits (insurance benefits conditioned by the previous job, followed by lower welfare benefits but still extremely generous in international terms). The situation was also the result due to duration of entitlement, which was in fact extensible *ad infinitum*. Danish employment schemes in the 80's and early 90's were consistent with the function of *employer of last resort* taken on by

³² Low income is here defined as less than 60 % of the median national income. Data are available for 1995 from the European Households Panel.

³³ This section draws extensively on Barbier (2001), who synthesizes national reports on Italy, Spain, the UK and Denmark. The Danish report was written by Bredgaard (2000).

the state and accepted by Danish society. The proportion of GDP (Gross Domestic Product) dedicated to employment measures reached its peak in 1993 (over 7 %) at the time when the unemployment rate was at its maximum (12.4 %) (it has regularly decreased with the reduction of unemployment rate).

The 1994 turn combined a change in direction of employment policies and a macro-economic policy initiative, original in Europe, where strict convergence *criteria* were limiting innovating capacities in most member States (this resulted in an important budget increase³⁴).

Employment and training programmes have been managed in collaboration with labour market regional authorities. Relevant authorities (PES [Public Employment Service] or municipality, whether the individual is entitled to insurance or welfare) are supposed to mainstream an *individual handlingsplan* (individual action plan), in principle, for all unemployed and welfare beneficiaries. The conventional “activation offer” now takes two main forms : *jobtraining* and the so-called *education* offer (particularly in full-time education). In addition, special “rehabilitation” activities constitute a specific category, which is not explicitly part of the supply of activation offers. In essence, the fundamental change in “activation the Danish way” is not due to a break with the state as an employer of last resort and provider of generous benefits. It is due to the fact that the reform is geared so as to enhance incentives to acquire qualifications and be active. This philosophy and its underlying rationale are far from activation the British or French ways. Therefore, the implementation of sanctions is radically different from UK practice.

Quantitatively, “job-training” has become the major type of activation offer : from 1994 to 1999, it has catered for 45 % of activation beneficiaries. Over three quarters of “job-training” places have been in the public sector. The “education offer” is, quantitatively, the second measure (one third of beneficiaries). In this case, people may enter long-term education programmes. Danish unemployment reached its peak in 1993 (12.3 %) and never ceased to decrease until 2001 (5.3 % in January). Over this period, long-term unemployment went down twice as much as overall unemployment, a considerable achievement. In the meantime, employment expenditure decreased at a slower rate and the number of labour market schemes participants³⁵ remained high (303,000 full time equivalent participants – as against 158,000 unemployed in 1999, and about 90,000 in activation)³⁶.

The Danish model of activation (*aktivering*) resorts to sanctions, but these are negotiated. Their underlying principle is respect of a two-way contract: while the public service provides quality offers, the individual is supposed to abide by his personal negotiated integration programme, which may use a wide array of services (training, education, work experience, temporary employment, support, etc). This investment, on a big scale when compared internationally, explains why Danish employment expenditure decreased slower than unemployment. The generosity of benefits has also, globally, been maintained after the

³⁴ Budget deficit over 3 % to encourage growth over two consecutive years, 1993 and 1994.

³⁵ Including early retirement schemes.

³⁶ Assistance benefits’ recipients also include individuals unable to get employment or who are deemed too far from possible employment (having employability difficulties related to physical or mental abilities or to some social problems). The latter do not come under activation *per se*, but rather under “special rehabilitation activities”. From 1994 to 1999, the total number of welfare beneficiaries in activation did not change much (less than a hundred thousand) ; the number of people involved in special activities did not either (about 70 to 80,000). All in all, the total number of welfare beneficiaries almost remained stable (from 381,000 to 352,000).

1993-94 reform, even if the duration of insurance payments was reduced from seven to four years. Moreover, Danish labour market reform has been structured by conditions absent in France and in the UK. On the one hand, the effective extension of de-centralisation, and on the other hand, the important role of a consensus built with social partners.

Before and after the 1993-94 turn, several characteristics have characterised the Danish type of intervention on the labour market and social protection system. A high proportion of the active population has been constantly involved in employment and vocational training programmes (excluding leave and early retirement). The state has retained a pre-eminent role, about a third of the active population being employed in the public sector. Its role is also due to the extensive range of benefits paid in a generous and universalistic perspective which, at the same time, allows for hire and fire flexibility and for high employee mobility. The state remains, after the reform, an employer of last resort but it changed its orientation: benefits are now allocated in the perspective of a collective investment in training and individual agreement to enter a commitment, at the risk of benefits being suspended or terminated. Three categories of potentially active population emerge: well integrated and mobile workers; more vulnerable workers who, every now and again, turn to the activation system; and a small minority³⁷ who remains on the fringe of society or potentially “excluded”. And this third type raises a constant problem.

CONCLUSION : RELATIVE PERFORMANCE OF ACTIVATION STRATEGIES

However difficult it is to achieve, it is nevertheless indispensable to try and associate different activation strategies with comparative performance in terms of efficiency and equity. This entails in-depth analysis of labour market indicators and we will not be able to delve extensively into that subject here (Barbier, Gautié, 1998). The European Commission, after the successive EES (European Employment Strategy) Luxembourg and Lisbon summits, has embarked on benchmarking performances (Barbier, 2000a).

As more and more authoritative economic literature is being published, which tends to show that contrasted institutional choices are consistent with performances that cannot be analysed from an universalistic perspective (Freeman, 2000; Fitoussi, Passet, 2000; Freyssinet, 2000). This would substantiate the idea that, far from being universally adapting to exogenous demands originating in globalization, national societies have reacted in very contrasted ways. This literature also demonstrates that their comparative outcomes do not oppose flexible and market driven strategies on one hand, to rigid and social protection oriented ones, on the other. In a certain way, the choice of national institutions and compromises is open-ended and many choices appear compatible with high and nationally specific performance. This seems particularly true for the smaller countries in Europe which have managed to combine key but nationally distinctive elements for labour market success (Auer, 2000). The US, British, Danish and French cases illustrate this diversity.

We would assume that the opposition between “human capital” and “work first” strategies retains pertinence in the European context. It is interesting to note that not all activation strategies in Europe and the USA have encompassed the creation of temporary public

³⁷ Denmark is the member State in the European Union which has the lowest rate of income inequality, the highest participation and employment rates as well as the lowest poverty rate.

subsidised jobs. France, in this matter, appears somehow original when compared either to the UK or the USA. The empirical cases illustrate that these public policy strategies are closely intertwined with specific national sets of values and national systems of social protection.

Three main findings thus emerge from the present paper, which are linked to the currently reappearing debate on full employment in Europe :

“Workfare” in a strict sense (as a mandatory treatment for a marginalised “underclass”) is consistent with US-type “full employment” macro-economic policy, supported by an extensive use of tax credits for the working poor. The fact remains that this model ineffectively alleviate poverty and is consistent with increasing inequality (Wendel *et al.*, 1999).

“Welfare to work” in the British sense, however mandatory, potentially targets very large proportions of a slack labour force (presently inactive). What remains to be seen is whether the UK can afford an increasing use of tax credits and deliver enough market jobs to cater for its present endemic underemployment and its large welfare caseloads, while at the same time tackling successfully the problems of the less “employable”.

Activation policies may also aim at transforming social benefits recipients into jobholders *via* “social investment” programmes. In these, contrary either to US workfare or to British welfare to work, society’s collective responsibility is balanced with legitimate individual expectations, in terms of public provision of income replacement and services, as well as temporary employment schemes and education or vocational training schemes that allow access to better qualifications. Instances of this policy strategy exist in the Scandinavian countries, and, to more limited and less efficient extent, in French *insertion* policies, whatever their obvious and well documented shortcomings and side effects.

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