

**Social integration through obligation to work: Current European
“workfare” initiatives and future directions.**

Final Report- Full Version

June 2002

Contract Number: SOE2-CT97-3039

Project coordinator: Fafo, Institute for Applied Social Science

Partners:

Centre de Recherche et d'Information sur la Democratie et l'Autonomie (Crida), France

Loughborough University, Centre for Research in Social Policy (CRSP), UK

The Danish National Institute of Social Research (SFI), Denmark

Universitaet Bremen, Zentrum für Sozialpolitik, Germany

Rijksuniversiteit Utrecht, Vakgroep Algemene Sociale Wetenschappen, The Netherlands

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Abstract

The aim of the research was to explore 'workfare' in six European countries and to consider whether workfare programmes have the potential for furthering social integration. The three objectives of the research were: *To develop a common analytical framework thereby defining the margins of workfare; To evaluate programmes in operation, building on the analytical framework; To develop recommendations for programme evolution and priorities for additional research.*

The analytical framework was developed to describe the programmes in operation in each nation; to position these programmes within the wider policy context; and to analyse the political background for their introduction. In addition to programmes in the six European partner countries, systematic comparison included programmes in three US states. The main output for this part of the work is a book, *An offer You Can't Refuse: Workfare in international perspective* (Lødemel and Trickey eds 2001). As this was the first systematic comparison of workfare programmes in a large number of countries, we needed to agree on a shared definition of workfare: *Programmes or schemes which require people to work in return for social assistance benefits.* This is an ideal type definition, and the comparison focussed on studying deviation from this definition in programmes.

One group of programmes might be labelled 'European centralised programmes' – represented here by programmes in the Denmark, the Netherlands and the UK. The remaining programmes are less easily grouped. The German and Norwegian programmes are similar in that they are decentralised. The French and US programmes are striking (and different from each other) in that they have ideological roots which are not reflected elsewhere.

The evaluation focussed on programmes in the six partner nations. First, depth interviews were carried out to study implementation and delivery. The second task was to carry out a systematic review of available effect (or impact) evaluations in each of the six European countries.

The main policy recommendations are: There is a need to *improve the quality of programmes* by providing individually tailored options with a stronger element of human resource development (HRD). Introduce a *right to activation* to match the obligation to participate. Improve *communication and case work* in implementation. Recognise *outcomes other than paid work only*.

Proposals for improving the evaluation of the impacts of programmes include: In order to produce more robust evidence on the outcome of workfare programmes, *randomised controlled trials (RCT)* should be encouraged. This is necessary in order to further the objective of evidence based policies in this area. It was documented that compared to the US, the European nations exhibit a poor record of producing solid evidence of effects. Traditional effect evaluations tend to focus on easily measurable outcomes, most frequently transitions to work. More attention needs to be given to outcomes such as social participation in important arenas of contact, improvement in self-esteem, a more structured life and reduced use of drugs and alcohol. If these wider aspects of social exclusion and inclusion are to be reflected in research, *qualitative research methodologies* are required. More research is required on programme drop-outs.

1. Executive Summary

Many European countries have adopted ‘workfare’, that is, programmes requiring people to engage in work-related activities as a condition for receiving social assistance. Governments have implemented workfare programmes for a variety of reasons, including:

- To combat increases in joblessness;
- To help (re-)integrate unemployed people in the workforce and society;
- To limit expenditure on social assistance and to make the welfare state more effective in response to increased global competition; and
- To emphasise the rights and responsibilities of benefit recipients.

The emergence of ‘workfare’ programmes towards the end last century was a significant departure in European social welfare policies, nevertheless relatively under researched prior to this study.

Research Aim and Objectives

The aim of the research was to explore ‘workfare’ in six European countries and to consider whether workfare programmes have the potential for furthering social integration. The objectives of the research were:

- *To develop a common analytical framework thereby defining the margins of workfare*
A common analytical framework was developed to describe the programmes under operation in each nation; to position these programmes within the wider policy context; and to analyse the political background to their introduction. Workfare programmes in six European countries and the US have been systematically compared. The main output for this work package is a book, *An Offer You Can't Refuse: Workfare in international perspective*¹.
- *To evaluate programmes in operation, building on the analytical framework*
This second objective was translated into two work tasks. The first was to carry out depth interviews to study implementation and delivery. In each country two groups of respondents were interviewed: staff responsible for implementing the policy on a day-to-day basis and participants in workfare programmes. The second task was to carry out a systematic review of available effect (or impact) evaluations in each of the six European countries. In five of the countries effect evaluations were already available. In Norway no national studies had been carried out, and this partner needed to make a first evaluation as part of the project. This was made possible through additional funding to the project from the Norwegian Research Council.
- *To develop recommendations for programme evolution and priorities for additional research*

Policy recommendations cannot be simply ‘read off’ from research findings. Instead the researchers were aware of the need to be sensitive to the different needs of policy-makers, and were prepared to translate academic language into accessible conclusions. This meant that contact with policy-makers could not be left to the end of the project. Instead links with some groups were formed earlier on in the project, in order for those groups to be kept informed of the development of the research project.

¹ Lødemel, I. and Trickey, H. (eds.) (2001) *An Offer You Can't Refuse Workfare in international perspective*, Bristol: Policy Press.

Defining Workfare and the Main Programmes Studied

At present no consensus exists regarding a single definition of workfare; and its usage varies both over time and between countries. In this project workfare is defined as an ideal policy *form*, as opposed to a policy that results from a specific set of aims. Such an approach permits comparisons across different ideological and policy contexts. It facilitates investigation of how, why, and for which out-of-work populations work-for-benefit policies are used; and how and why policies vary in relation to different policy contexts. For purposes of delineation and comparison, workfare is defined as:

Programmes or schemes that require people to work in return for social assistance benefits.

In this definition the term 'programme' is used to denote a prescribed generic strategy implemented in a range of locations. In contrast, 'scheme' is used to describe locally developed projects. The term 'policy' is reserved to denote the general plan of action adopted by national or local government.

The definition sets out an 'ideal type' programme and one that strongly diverges from the traditional social assistance contract. It can be argued that a proportion of social assistance recipients in each of the countries compared here experienced programmes that could be described in this way. However, the programmes described here vary in the extent to which they meet this definition. Thus, it becomes possible to examine the extent and direction of divergence.

The definition has three elements, namely, that workfare is:

- compulsory;
- primarily about work; and
- essentially about policies tied to the lowest tier of public income support.

Each of the three elements conditions the way social assistance is delivered. Used in combination, the introduction of work and compulsion tied to the receipt of aid represents a fundamental change in the balance between rights and obligations in the provision of assistance.

The research project considered the following workfare programmes or schemes operating in seven countries:

- France – Insertion programmes and schemes operating under the Minimum Income and Insertion Act (1989), the Solidarity Job Contracts Act (1989), and the Jobs for Youth Act (1997).
- Germany – Help Towards Work policies, based on the Social Assistance Act (1961).
- The Netherlands – The programme outlined in the Jobseeker's Employment Act (1998).
- Norway – Local schemes resulting from the Social Services Act (1991).
- Denmark – Programmes and schemes operating under the Active Social Policy Act (1998).
- UK – The New Deal programmes for 18-24s, and for over 25s (introduced in 1997-98) which build on legislation from the Jobseeker's Act (1995). The dual-training system for 16- to 18-year-olds, of Modern Apprenticeships (introduced in 1995) and National Traineeships (introduced in 1997).
- US – programmes in New York City, Wisconsin and California resulting from the Personal Responsibility and Work Opportunity Reconciliation Act (1996).

On the whole, the introduction and evolution of workfare programmes in Europe is a 1990s

phenomenon. However, while the US is often seen as the originator of workfare policies, having a history of programmes going back to the early 1970s, compulsory work-for-benefit measures also have a long history within post-1945 Europe. In Germany a provision for workfare was included in the 1961 social assistance legislation, although the policy was largely dormant until the onset of mass unemployment in the 1970s. Denmark has taken a pioneering role in the more systematic application of compulsory activation policies.

Comparison of Workfare Programmes

The comparison of workfare programmes is based on taking just *one* example of a workfare programme from the six European countries and examples of three programmes from the US². The selected programmes are not representative of the totality of programmes in each country, rather each European programme represents the purest of the then current form of workfare in that country, and the three US programmes represent three of the most developed forms of workfare in the US. The comparative analysis considered differences between programmes in terms of their aims and ideological underpinning; their target groups; their administrative framework; and the extent to which they diverge from the 'ideal-type' workfare model to accommodate different types of claimants.

Programme aims and ideology

The programmes have common roots. Changes in the size and composition of unemployed and inactive populations; growth in the number of social assistance claimants; and, an associated rise in social assistance expenditure can be *everywhere* identified as key motivating factors for the introduction of active labour market policies, including workfare. The use of workfare is also underpinned by common ideological objectives that have been made manifest in rhetoric through the concepts of 'social exclusion' and 'dependency' and to changes in the contract of 'rights and responsibilities' between claimants and the state.

In most cases they combine the dual objectives of preventing dependency and tackling social exclusion to promote integration. Combating social exclusion has involved addressing structural barriers to work, such as lack of transferable skills, qualifications and experience. The focus is on improving supply-side competencies, but the problem is understood as one of a mismatch between supply and demand rather than one of individuals choosing to remain dependent. Preventing individual sources of 'dependency', including rational (or economic) dependency, psychosocial dependency (or poor expectations) and cultural dependency (or non-work focused life-styles) is a concern for architects of all workfare programmes.

Workfare programmes are associated with an ambition to accommodate changes in the job market by targeting 'active' policies towards recipients. However, there is both cross-national and intra-national variation in the extent to which workfare is predicated upon a belief that the target population is exhibiting undesirable 'dependency' type behaviours as opposed to being victims of structural mismatches between supply and demand. It follows that there is variation in the extent to which workfare is used to enforce recipients' 'responsibilities' rather than to provide a service to bridge structural gaps. The result is that the workfare programmes

² Programmes chosen to represent the six European countries are: RMI-based insertion (France); Help Towards Work (Germany); the Jobseeker's Employment Act (JEA) for young people (the Netherlands); local authority schemes resulting from the 1991 Norwegian Social Services Act (Norway); activation (Denmark); and, the New Deal for Young People (the UK). In Germany, France and Norway national legislation is reinterpreted locally to such a degree that a different programme might be considered to exist in each locality. To accommodate this, an 'overall' picture of the programme (or set of schemes) is given from a national viewpoint and the extent of intra-national variation is indicated.

compared here incorporate both demand-side measures (job creation/wage subsidisation), and supply-side measures (to increase flexibility and job mobility) in tackling unemployment.

Broadly, a scale from ‘most integrative’ (focus on structural problems and reinforcing rights) to ‘most preventive’ (on dependency and reinforcing responsibilities) would run from French insertion at one extreme to US state post-PRWORA programmes at the other.

Different target groups

Because social assistance is a ‘last-resort’ measure, social assistance populations tend to include comparatively large numbers of people with multiple barriers to work. Differences in the role of social assistance within the seven countries are important. Beyond this, the composition of the target group is a consequence of policy-makers selecting ‘work-able’ groups *within* the social assistance population that they particularly wish to target with compulsory work measures.

There are very important differences in primary target groups between Europe and the US. Within Europe, the focus is on young unemployed people. Danish activation stands out as the programme most intended to extend to people whose main reason for claiming is not unemployment. Programmes differ as to whether they are applied universally or more selectively to their target populations. The most ‘universal’ programmes are the Danish, Dutch and British programmes, with the German and Norwegian programmes being the most selective.

Administrative framework

Differences between ‘universal’ and ‘selective’ programmes are related to other differences in the way that schemes are administered. In part, variation results from differences in the way that social assistance is delivered. However, in Denmark and the Netherlands in particular, workfare programmes are less guided by such underlying differences. The main distinction is between workfare programmes that are centralised and decentralised. The British New Deal, Dutch JEA, and Danish activation programmes are more centralised than the rest; Norwegian workfare and German Help Towards Work programmes are the most decentralised. Differences in the level of centralisation are related to the extent of intra-national variability in programme delivery (this is greatest where the programmes are least centralised).

Divergence from the ‘ideal-type’ workfare model

Programmes show considerable divergence from an idealised workfare model. Indeed, ‘work-for-benefit placements’ are not used for many clients, and when they are used they include features that move them away from a ‘work-for-benefit’ exchange. Work-for-benefit options are more likely to be experienced by clients with greater difficulties in securing work. Some programmes (Danish, Dutch, British, and Californian) include ‘education and training’ or ‘social activation’ as alternative means of provision for such clients. In addition, the Danish, Dutch, British and US programmes include a ‘case management’ process, in order to tailor the programme to the individual clients. However, of these four sets of programmes, the Danish activation programme is distinguished from the rest in its emphasis on a long-term strategy and on human capital development, whereas the US programmes have greatest emphasis on providing routes for early re-entry into the labour market.

Types of workfare

The comparison across countries also sought to establish the extent to which ‘types’ of workfare could be identified. One group of programmes might be labelled ‘European

centralised programmes' – represented here by activation (Denmark), the Jobseeker's Employment Act for Young People (the Netherlands) and the New Deal for Young People (UK). The remaining programmes are less easily grouped. The German and Norwegian programmes are similar in that they are decentralised, although the German programme shares many of the features with the European centralised programmes, including a tendency towards greater universality. The French and US programmes are striking (and different from each other) in that they have ideological roots which are not reflected elsewhere.

European centralised programmes are not associated with countries sharing a common history with regard to either social security or social assistance provision. A possible explanation for this is that in Europe workfare policies have only recently come to be considered a major factor within social assistance provision. Compulsory work policies expanded during the 1990s, alongside the more general expansion of active labour market policies. Attempts to synthesise traditional social-democratic and neo-classical approaches to labour market policy have been made. In this sense the introduction of workfare policies may represent something of a paradigm shift within social assistance provision. The fact that many workfare policies are currently undergoing rapid transition suggests that the groupings presented above are likely to be altered over a short period of time.

Evaluating the Implementation and Delivery of Workfare

Often there is a discrepancy between the stated intentions of a policy and how it was implemented and delivered in practice. The research also included a study of the actual implementation and delivery of the selected workfare policies in the six European countries. Qualitative interviews with both participants of the selected workfare programmes and those administering the schemes (*i.e.* street level bureaucrats) provided some evidence of how the programmes are delivered in practice. The interviews were conducted and analysed using common protocols to ensure consistency and comparability across schemes and countries. The fieldwork was mainly conducted during the late 1990s.

Key findings relate to the content of the workfare offers, perceptions of clients' rights and responsibilities, how staff select and match clients to programme options and the communication of the programmes to clients.

Content of the offer

The programmes have multiple objectives, and five main types of option, or offer, can be distinguished:

- Placement in an unsubsidised job in the regular labour market;
- Placement in a subsidised job;
- Work experience or job training in the public or not-for-profit sectors;
- Training and education – this option is in addition to any training provided as part of the other options listed above. The training tends to focus on vocational topics or remedying any deficiencies with basic skills, and may lead to a formal qualification;
- Social training or social activation, which aims to improve recipients' self-confidence, motivation to work, social networks, *etc.*

Within any of the programmes clients access to relevant options can vary at the local level. Across the programmes, street level bureaucrats identify the following factors as influencing the availability of options:

- The availability of organisational resources and differences in the size of local authorities;

- A related point is the variation in the level of political support for the programmes at national and local levels;
- State of the economy; and
- Participants' level of awareness of the options.

Street level bureaucrats and clients perceive desirable programme outcomes differently. Although street level bureaucrats seek to help participants move off benefits into regular employment and clients believe that the intention of the programmes is move them from benefit to regular employment, most staff acknowledge that this aim cannot be realised with all clients. In addition, the offer of workfare can be seen by staff (especially in Norway) as a test of whether a client is able and willing to work, and to gauge the problems they may encounter.

Although finding a regular job was generally important to clients, they were also concerned with the extent to which a programme contributed to their current well being. Participants applied a limited set of criteria to evaluate programmes, namely, the extent to which they:

- improved future job prospects; and
- provided meaningful activity, respect and social status, an income, a daily time structure and social contacts.

For clients - unlike for staff - the latter was relatively important. In particular they did not wish to be perceived as 'second rate people'. Indeed, this emphasis on being treated with respect seemed to increase the longer participants stay in the programme and the more pessimistic they became about the prospect of finding regular employment. Clients intensely disliked programmes, and in some case dropped out, if the (offer of) workfare:

- Was seen as exploitative (*i.e.* offering 'meaningless', temporary and/or low pay work);
- Reduced opportunities to find 'real' jobs or pursue educational and professional ambitions;
- Gave them the feeling that employers did not respect them; and
- Appeared to provide too few options.

Client with 'good' qualifications could also argue that the programmes have little to offer them (*c.f.* Germany, Norway and UK).

Rights and responsibilities

Both staff and clients had clearer conceptions about clients' responsibilities, especially about the use of compulsion, than about clients' rights. Nevertheless, some staff (notably in Denmark, Netherlands and UK) saw workfare as successfully balancing rights and responsibilities, whilst French staff could perceive workfare as neither a right nor an obligation but as something in between. This was partly because of the way the French programme was designed (the client is initially entitled to a benefit, then they sign an insertion contract), but also because many staff thought that the right to integration was partly illusionary while there are no 'real' jobs available for clients.

Some street level bureaucrats seemed to doubt the fairness of the balance between opportunities and compulsion. However, they generally did not seem to question the use of compulsion, but rather argued for better opportunities, or an extension of these, to restore the balance between rights and opportunities.

Almost all of the clients were vague about their rights. Many clients tended to focus on the rights they believed they should have had. A common plea was that financial compensation

for participation should have been higher. The lack of clarity about clients' rights made it difficult to gauge the extent to which they were enforced.

Generally, frontline staff were in favour of compulsion (the notable exceptions were some French and UK staff). Not surprisingly clients could be more critical of compulsion, although many were positive about participating in a workfare scheme. Clients' arguments in support of compulsion tended to reflect those of street level bureaucrats. Some clients felt it was almost a privilege to participate as they saw it as a route out of unemployment. Others focused on workfare as way of minimising the fraudulent use of the benefit system or said that the schemes' compulsory nature worked as a key motivational tool. Generally, participants did not think compulsion added anything to their motivation to participate and was only fair for others (whom they considered not to be motivated to obtain employment). However, other clients were very dissatisfied with having to participate in the programmes. These clients often maintained it was unjust that the state could force them to carry out tasks they did not wish to, and they frequently failed to see any benefits accruing from participation. Most clients' reactions appeared to be pragmatic rather than based on principle.

That a programme contains a compulsory element does not mean that staff will communicate or enforce it. Across the countries there is a tendency for frontline staff to emphasise the compulsory nature of the schemes to clients who are less motivated to obtain employment.

All the studied programmes include sanctioning in the form of a reduction or a withdrawal of benefit for those clients who refuse to participate. In some programmes the reduction or withdrawal is time-limited whereas in others it lasts until the client agrees to participate. Another milder and more informal form of sanctioning found in some programmes - and in case of the Norwegian street level bureaucrats their preferred form of sanctioning - consists of repeated meetings with the client. The purpose of sanctions is to change the mind set of the participant. However, sanctions are not always imposed, and there can be considerable local and regional differences in enforcement regimes (as in France and Denmark).

Matching and selecting clients

All of the programmes involve the processes of matching and selection, either because the programmes are selective by design (*e.g.* because of a limited number of placements), or because different options exist within a more universal programme and clients have to be matched to, or selected for a suitable option. These processes determine who is included and excluded from participation in the programmes. The context to the processes of matching and selection is provided by two administrative hierarchies: one of options (or placements) for clients and the other of types of clients.

Hierarchies of options Where more than one option is available, street level bureaucrats can rank them according to their desirability. Generally, clients are unaware of these hierarchies. In practice, and sometimes also officially, options are ranked according to their 'closeness to the regular labour market'. Unsubsidised employment is undoubtedly the 'best' outcome. In addition, there is general agreement that subsidised work options - where participants do (more or less) regular work for a minimum wage, as in Germany (Hamburg, Bremen), France, the UK and the Netherlands - are the best options. However, there is less of a consensus across countries on the relative ranking of the other options.

Hierarchies of clients Hierarchies of clients are generally based on clients relative 'closeness to the labour market'. These hierarchies seem to be commonplace, and notwithstanding policy

differences, there are many similarities between countries. In the Netherlands this hierarchy is formalised, but in practice used more loosely, whereas in other countries although official client hierarchies do not exist, they are used in practice. Staff often defines clients close to the labour market in neutral, objective terms (qualifications and work experience), leaving subjective aspects more implicit. Whereas clients more distanced from the labour market are usually defined in terms of their subjective shortcomings (psychological or social handicaps, unstable lives, inability to deal with authority relations and so on), leaving objective aspects more implicit.

Matching and selection: The processes of selecting clients for programmes, or where more than one option exists in more universal programmes, of matching clients to options, draw upon the street level bureaucrats' hierarchies of options and clients. Matching in most cases (with the exception of Norway) is 'top-down': the best clients are selected for the best option, the next-best clients for the next best option, and so on. Where 'best' is defined in terms of closeness to the regular labour market.

Communication of programmes to clients

Two different styles of communication can be identified: client centred and institution centred. The former involves taking a participant's aims and abilities as a point of departure. It focuses on clients' skills and resources and is aimed at empowering clients. Exercising discretion, or 'bending the rules', can be considered to be a condition for this. Whilst the institution centred approach entails taking services and options offered by a (workfare) organisation as the point of departure. It focuses on clients' problems and shortcomings, and is aimed at pointing clients the way (paternalistically) forward, usually by adhering to institutional rules. This second 'style' of communication seems to be more common than the first, although many street level bureaucrats would probably not want to characterise their style of communication as institution centred. However, many staff note that because of their high workloads and the associated administrative paperwork, they often lack the time to communicate with clients as they wish. This means that they often concentrate on meeting institutional needs (targets), place clients in options with little discussion, and have few contacts with clients once placed in an option. This is in line with the experiences of many of the interviewed clients.

Clients tend to perceive these different styles of communication differently. They seemed in general to be very sensitive to whether or not they were treated respectfully and were taken seriously. Not surprisingly, they tended to be very positive about a client centred style of communication.

Systematic Review of Effect Evaluations of European Workfare Programmes

What do summative evaluation studies in the six countries tell us about the impact of individual workfare programmes³? To address this research question, a systematic review of quantitative evaluation studies of workfare programmes published during the 1990s was

³ The countries and the programmes evaluated are: Denmark, The Activation Line; France, The Minimum Income of Insertion (RMI), Contrat Emploi Solidarité (CES) and the 'Emplois Jeunes'; Germany, Help towards Work; Norway: The Social Service Act (Local authority workfare schemes); The Netherlands; The Jobseekers' Employment Act for Young People (JEA); and United Kingdom, The New Deal for Young People (NDYP) and Project Work

conducted. A common protocol was used in the review. About 35 studies were identified for review and the number of studies by country varied from one (Norway) to 10 (Germany).

Two outcomes tended to be measured in the reviewed evaluation studies: earnings and employment. Employment measures were used far more frequently than earnings measures.

The main findings from the systematic review are:

- Many studies in the six European countries indicated that workfare programs had a positive employment effect. Due to different methodological approaches the size of the effects were difficult to estimate. The same conclusion applied to the few studies that had earnings as the key outcome. Some participants also left for other programmes or for other sorts of public benefits. Evaluation of, for example, the French RMI programme showed that a number of participants did not have a contract even though it was a legal obligation. RMI recipients with a contract are younger and have a higher educational level than recipients without a contract. Having a contract increased the probability of leaving the programme, but not for work. Rather the participants tended to move on to the CES programme. Only one out of four of the recipients left RMI for employment. An evaluation of the Dutch JEA programme suggested that the net employment effect of the programme was approximately 18 per cent. This number is uncertain, because it is based on the subjective statements of the likelihood that the participants would have found a job anyway. In Germany, however, no studies of the Help towards Work programmes establish a firm basis for answering the question whether programme participation affected the likelihood of entering the labour market. The only effect evaluation of the Norwegian compulsory schemes shows mixed results. One year after participation, there is no significant improvement in earnings or employment. Two years later, there were significant and positive effects on earnings, but still no effect on employment. It is not clear whether this somewhat puzzling result is due to measurement problems or to substantive issues. If substantive, it might mean that the effect of participation shows up after a while (two years). The discrepancy between earnings and employment may have different interpretations. One interpretation is that the participants work more hours per year. An alternative explanation is that the participants have obtained jobs that pay better. An advantage of this analysis is that it deals statistically with unobserved selection bias.
- Several studies point out that job training in private firms or activation similar to ordinary work is the most promising approach to increase employment. Nearly all evaluation studies in Denmark suggest that activation with a wage subsidy in a private firm, or job training in a private firm had the highest employment effects. The same applies to the Netherlands: those with placements in private sector jobs stood a better chance of entering regular employment than those in the public sector. However, none of these studies deals with unobserved selection bias. The effect of the French CES programme has been evaluated with more sophisticated statistical methods, which show that participants had a higher probability of getting into employment the more the schemes resemble normal employment conditions.
- Some participants seemed to benefit more from participation than others. Usually young people with higher educational levels and those with less social problems were the most successful. In France the probability of moving into regular employment increased with educational level and decreased with age. Similarly, in the Netherlands, the probability of moving into regular employment is higher for young people, non-migrants, and people with a higher educational level. In United Kingdom, a survey among people leaving the New Deal for Young People (NDYP) within a year found that those with the highest qualification level were more than three times as likely to enter paid work than those

having the lowest qualifications. But there were also examples of the opposite, i.e. that the more disadvantaged benefited the most. The French CES appears to be more useful for people with lower skills than for those with higher skill levels. Programmes involving higher levels of on the job training, such as alternative work/training programmes in private firms are most beneficial for less educated workers.

- In several programmes there is evidence of ‘creaming’ of participants: Welfare officers select participants (or participants select themselves) who are most likely to obtain regular work after leaving the programme. Thus, it is likely that a number of these participants might have found a regular job on their own, without the effort of public agencies. This so called creaming effect, or ‘dead weight’ problem, is evident in programmes in Germany, the Netherlands, and the UK. In the UK, estimates of the size of dead weight in the NDYP suggest that it might be 50 per cent. In the Netherlands, a study suggests that 27 per cent of those who move into the labour market might have succeeded without public aid. But again, there are exceptions: in Norway, workfare schemes seem to attract people who have less resources and who experience more problems in the labour market than ordinary beneficiaries.
- A majority of the participants express satisfaction with the programmes. Participants often report that the programmes give rise to increased self-esteem and that they improve their employability and educational potential. Almost all participants in the Danish studies report that they gained self-confidence, increased their skills, or increased their job-, and education opportunities. In Germany there is evidence that participation entails higher well-being and more frequent contact with other people. Participants in NDYP in the UK are typically satisfied with the programme and with the advice and support services they received from their personal advisers. However, significant numbers of participants in some programmes felt that the activities were boring and a waste of time. Participants’ satisfaction with the Dutch programme was generally quite low; they often complained that the work was boring. There were also indications that the programmes had effects that were detrimental for some of the most vulnerable participants. In the Netherlands, some dropouts from the programme resorted to criminal activity in order to make a living. In the UK, young people from disadvantaged groups were less likely to view the New Deal as useful and more likely to say that it had not been of much help. It is noteworthy that the most disadvantaged people can benefit less and tend to be most dissatisfied with the programmes, and that some participants, in the Netherlands, are worse off after the programme than before.

However, the above findings are generally tentative, both limitations in evaluation designs and the statistical methods used mean the results are generally suggestive rather than conclusive. This relatively weak evidence base is notable when compared with the USA where numerous large-scale randomised controlled trials on different sites have been conducted. None of the studies reviewed entailed random assignment. In fact, most of the studies did not even involve a comparison group.

However, many of the evaluations provide adequate answers to the question: How many, and who are most likely to enter employment after leaving the program? But they tell relatively little or nothing about the net impacts of the programmes. Accordingly, it is impossible to assess if the outcomes of the programmes can be ascribed to the interventions, or to history or to maturation. Where no control or comparison groups exist it is impossible to determine what would have happened in absence of the programme.

Policy implications

Improvements to programmes

Policy recommendations for the development of programmes to give participants more than income maintenance have been made for each European country. There were five issues that emerged across all six countries.

- *Improve the quality of offers to programme participants:* There is a need to improve the quality of programmes by providing individually tailored options with a stronger element of human resource development (HRD). It is argued that only high quality programmes could offer a counterbalance to the curtailment of rights embodied in compulsory participation.
- *Introduce a right to activation:* With the exception of Denmark, where activation is universally applied, the individual obligation to work is not matched with a state commitment to offer all able-bodied recipients a place in a programme. In particular in the selective programmes of Germany and Norway, the lack of such a right compounds the compulsory nature of workfare. There is no guarantee that participants are selected on the basis of need rather than, for example, the desire to use workfare as a diversionary tool. This right must extend beyond a counterbalance to the right to income maintenance. With improved programmes there is the potential of issuing in a new right to social integration.
- *Improve communication and case work:* With the exception of the UK, where social work has been separated from income maintenance, the introduction of workfare changes the communication between social workers and recipients of social assistance. The review of findings from interviews with participants found that the majority asked for improved opportunities to communicate with their social workers when participating in programmes. With a universal right to workfare and several options (of good quality) available, the unequal power balance inherent in workfare may be shifted in favour of the client. As a result communication between SLB's and their clients may improve and a shift from compulsion to negotiation and co-operation may be achieved.
- *Recognise outcomes other than paid work only:* The introduction of workfare was everywhere motivated by a desire to further the labour market integration of people who failed to (re)enter the labour market. As workfare is now being expanded to include wider target populations in all six countries, compulsory programmes are increasingly used to target recipients who have greater and greater barriers to work. In this situation, regular work may be a distant prospect or even an impossible aim for many recipients. It is therefore necessary to secure the right to activation also for these groups (as seen in Denmark) and to tailor the programmes to further the social integration of excluded people.

Proposals for improving the evaluation of the impacts of programmes

The project has identified six proposals for improving the evaluation of the impacts of programmes.

- *The need to encourage randomised control trials:* In order to produce more robust evidence on the outcome of workfare programmes, randomised controlled trials (RCT) should be encouraged. One of the one major objections to the application of this evaluation design in Europe is the ethical argument that it is not right to exclude welfare recipients from the potential benefits of the programme. Two counter arguments should be considered more seriously in this respect. First, no one can say for certain that everyone does benefit from participation in the programmes. Thus, to exclude some from the programme does not inevitably entail less social integration or social well-being. Secondly, in most countries, large proportions of the target group are not offered these

programmes. Even if they are likely to benefit from participation, many are excluded at the outset. It is questionable that it is more unethical to exclude people on the basis of random assignment than on professional discretion.

- *The need for more sophisticated analytical methods:* To improve the knowledge base on workfare in Europe, more sophisticated methods developed in econometrics to model selection bias in quasi experimental designs should be used. Matching and other statistical methods should also be more frequently used to control for observed selection bias.
- *More diversity in the design of programmes and selection of participants:* Evaluation designs that allow investigation of the merits of mandatory versus voluntary participation are required. Further, we also need to know more about whether work first or human capital development approaches – or combinations – are the most promising in the long run. In several programmes there are clear indications of creaming which leads to inefficient allocation of public resources. This problem is paralleled by the findings that the truly disadvantaged seem unable to utilise what some of the current programmes offer, and that they express which greatly distresses them.
- *Additional measures of outcome:* Traditional effect evaluations tend to focus on easily measurable outcomes, most frequently transitions to work. Because programmes are expanding and target people with greater and greater barriers to work, work is not always a realistic outcome, at least in a short perspective. Accordingly, more attention needs to be given to outcomes such as social participation in important arenas of contact, improvement in self-esteem, a more structured life and reduced use of drugs and alcohol.
- *Incorporate qualitative studies in impact evaluations:* If these wider aspects of social exclusion and inclusion are to be reflected in research, qualitative research methodologies are required. For national policy-makers to gain a better understanding, a blend of qualitative and quantitative methodologies is required. The New Deal programme in the UK is an example of a useful mix of evaluation methods.
- *More research is required on programme drop outs:* With the exception of the Netherlands, studies of the potential for further exclusion resulting from participants ‘dropping out’ has not been given particular attention in the national evaluations.

To help inform the policy-making process the research group organised a first dissemination seminar in the summer of 1998. At this seminar senior policy-makers from the six participating nations and from the US were presented with an initial overview of the programmes. This facilitated a discussion across national borders, developed important contacts for the remainder of the project and secured important insights into how policy-makers viewed compulsory programmes. The end of project dissemination conference was held at Fafo, Oslo in October 2002.

In addition, through participation in EU sponsored research ‘Clusters’, members of the group have had several opportunities to share our findings and reflections with policy-makers on both European and national level.

The Research Team

The research project was carried out by six different groups: Fafo Institute of Applied Social Science (Norway), Centre de Recherche et d’Information sur la Democratie et l’Autonomie (France), Loughborough University (UK), The Danish National Institute of Social Research (Denmark), The University of Bremen (Germany), the University of Utrecht (The Netherlands). Fafo was in charge of the over-all co-ordination of the project.

2. Background and objectives of the project

2.1. Background

Many European countries have adopted ‘workfare’, that is, programmes requiring people to engage in work-related activities as a condition for receiving social assistance. Governments have implemented workfare programmes for a variety of reasons, including:

- To combat increases in joblessness;
- To help (re-)integrate unemployed people in the workforce and society;
- To limit expenditure on social assistance and to make the welfare state more effective in response to increased global competition; and
- To emphasise the rights and responsibilities of benefit recipients.

The emergence of ‘workfare’ programmes towards the end last century was a significant departure in European social welfare policies, nevertheless prior to this study relatively under-researched.

2.2. Research Aim and Objectives

The aim of the research was to explore ‘workfare’ in six European countries and to consider whether workfare programmes have the potential for furthering social integration. The objectives of the research were:

- *To develop a common analytical framework thereby defining the margins of workfare:*
A common analytical framework was developed to describe the programmes under operation in each nation; to position these programmes within the wider policy context; and to analyse the political background to their introduction. Workfare programmes in six European countries and the US have been systematically compared. The main output for this work package is a book, *An offer You Can't Refuse Workfare in international perspective*⁴.
- *To evaluate programmes in operation, building on the analytical framework:*
This second objective was translated into two work tasks. The first was to carry out depth interviews to study implementation and delivery. In each country two groups of respondents were interviewed: staff responsible for implementing the policy on a day-to-day basis and participants in workfare programmes. The second task was to carry out a systematic review of available effect (or impact) evaluations in each of the six European countries. In five of the countries effect evaluations were already available. In Norway no national studies had been carried out, and this partner needed to make a first evaluation as part of the project. This was made possible through additional funding to the project from the Norwegian Research Council.
- *To develop recommendations for programme evolution and priorities for additional research*

Policy recommendations cannot be simply ‘read off’ from research findings. Instead the researchers were aware of the need to be sensitive to the different needs of policy-makers, and were prepared to translate academic language into accessible conclusions. This meant that contact with policy-makers could not be left to the end of the project. Instead links with some groups were formed earlier on in the project, and in order for those groups to be kept informed of the development of the research project.

⁴ Lødemel, I. and Trickey, H. (eds.) (2001) *An Offer You Can't Refuse Workfare in international perspective*, Bristol: Policy Press.

3. Scientific description of project results and methodology

3.1. Background to the project

The partner group followed the research methodology set out in the original research proposal. At the time when the partner group submitted the proposal for this project (1996), workfare was receiving little attention in European research. We found, however, that six European nations had already enacted and implemented policies that could be described as workfare. In the course of the project many more nations have introduced such programmes, and workfare is today considered to be central to the development of policies targeted at workless recipients of social assistance.

The enduring high unemployment in the mid-1990s called for new initiatives to further integration in to work and to reduce the large expenditures on social assistance. Today, most of the partner nations of this project have managed to reduce unemployment. Because workless recipients of social assistance often face great barriers to work, the problems of worklessness among the target groups of workfare remain unchanged today. A range of difficult issues arise in formulating appropriate policy responses.

First, there is the limited degree to which macroeconomic policy can be expected to improve the situation in the immediate future. Second, joblessness is likely to continue to be substantial. Therefore an important objective of social policy is to minimise the negative consequences for individual well-being of joblessness.

At the same time, there is growing concern about the ways in which benefits provided the jobless contribute to the very rigidities that complicate macroeconomic policy and imply slow adjustment to changing economic realities. By discouraging initiative and fostering dependence, as they may be alleged to do, such policies may actually contribute to the incidence and duration of the problem they are intended to alleviate. Moreover a high level of unemployment implies a high level of social security spending. It is likely to mean a high level of spending on social assistance, as rights to social insurance are exhausted, and as younger workers and others without contribution records become affected by unemployment. There may therefore be pressure to ensure that budgets are kept in check, and that money is targeted on the individuals most clearly in need of assistance.

In response to these and other concerns, social welfare policies are changing and the boundaries between the social services and the active labor market policies are altered. Many European countries are experimenting with “workfare”, that is programmes requiring people to work in jobs established or authorised by public authorities or to participate in work-related activities as a condition for receiving social assistance. Programmes of this type have been implemented or proposed as aids in achieving workforce integration for young adults and workforce re-integration for the young long-term unemployed, and they have been proposed for various other groups including (particularly in the US) single parents. Workfare has a number of distinctive characteristics, setting it apart from other obligations accompanying social assistance and other programmes on offer to recipients. First, the activity is work rather than training, and second, the work is tied to the provision of (last resort) minimum income benefits by making it a condition for the receipt of aid.

3.2. The different parts of the research

The project was organised in three work packages.

Work package 1 : The development of a common analytical framework or “taxonomy”

- 1.1. national “state of the art” review of workfare policies
- 1.2. international conference
- 1.3. paper setting the conceptual framework

WP2 : Description and evaluation of workfare programmes

- 2.1. collection of new data
- 2.2. re-interpretation and re-analysis of existing studies
- 2.3. depth interviews to study process
- 2.4. synthesis of research strands

WP3 : Policy implications and recommendations for future research

- 3.1. elaboration of programme recommendations
- 3.2. suggestions for future research

Research methodology

In the first year of the project, the group focussed on describing the background to, and key characteristics of, programmes in each of the six nations (WP1). This work resulted in first, an international conference where key policymakers were invited to discuss the findings (See Annex). Additional funding enabled us to invite a US scholar (Michael Wiseman) and policy makers from the US. Drawing also on later work in the project this work resulted in the book which became the main output from the project (Lødemel and Trickey, eds, 2001 *An Offer You Can't Refuse. Workfare in international perspective* Bristol, Policy Press). The main findings are presented in sections 3.1 to 3.4.

The second part of the project was organised as two separate tasks. First, to carry out qualitative studies to study implementation and process. Second, to collect new data in Norway and France and to make a review of available research evidence of the effects of programmes in the six nations. Below we describe these tasks.

It is generally accepted that the most powerful method of evaluation is based on random assignment experiments - if practical and ethical issues can be overcome. These will provide the most robust evidence on whether programmes have met their objectives, and the other effects that the programme has. However often such studies do not indicate why and how the programme has worked, nor how far the results of the programme evaluation may be generalised. For example, it has sometimes been found that people placed in private sector firms have higher chances of moving into employment than those in workfare in the public sector. This could reflect at least three different theories:

- 1 The result of some superiority of private over public sector practices (as perhaps some would allege);
- 2 Some signalling function: private sector experience being more highly valued to future employers; or

3 Quite conceivably the ability of private sector firms to hire those workfare participants they find to be productive, without such flexibility within the public sector.

The third theory would have somewhat different implications than the former two for future policy design. In most cases, the most appropriate means of addressing such questions is through qualitative research with those taking part in the programme. This is closer to the ‘process’ study, whereas the previous two sections have looked more at ‘impact’ studies.

It is planned that this type of study be conducted in each of the countries. The subjects of such research would include up to three different groups:

- those responsible for the design of policy and the objectives of programmes (‘policy-makers’);
- those responsible for implementing the policy day-to-day, including those at street-level;
- the participants in programmes.

Collection of new data:

In several of the countries involved in the network, there have been a number of detailed evaluations, or such studies are on-going and due to report in the course of the proposed research. Indeed, several of the research network have been directly responsible for producing evidence concerning the effects of programs, or are currently engaged in such projects, and were chosen for this strategic position. This means the project will have access to existing material, produced at no cost.

However in certain countries (notably, Norway and France) there have either been no evaluations or only small-scale implementation studies dealing with limited aspects of the relevant programmes. A theoretical model having been developed on the basis of existing studies provides an important opportunity to put this framework into practice in new evaluations. The design means that evaluations under these circumstances would incorporate the keenest scientific thinking on evaluation methodology. We therefore plan that new data collection take place in the course of the research, in Norway and France, adopting the best practices identified elsewhere in programme evaluations. In research terms these could be described as ‘demonstration evaluations’. In the course of the project, evidence from new research became available in France, and the following review was based on this evidence. A separate study (partly financed by the Norwegian Research Council) was made in Norway.

Systematic review of effect evaluations:

We have already commented on the existence of good evaluations and, often, robust data-sets in a number of the countries in the network. New data collection on a large-scale would therefore not be appropriate in those countries. However there exists considerable scope for the re-description of existing research grounded in the research model, and for secondary analysis of those programme evaluations that already exist. This also provides an important chance to scrutinise those studies which have already been conducted. And research from different national settings may provide insights into evaluation problems and methodological difficulties that have received lesser attention elsewhere. This pooling of information will enable the national researchers to validate those studies from their own country, drawing on the best available methods used elsewhere.

Main results from research

3.1.1. Defining workfare (and the main programmes studied)

At present no consensus exists regarding a single definition of workfare. The use of the term varies over time and between countries (Peck, 1998) and the language of workfare is at least as hazy today as it was a decade ago (Standing, 1990). There are two main reasons for this lack of clarity.

First, workfare has always been a politically loaded term. Surveys of public opinion suggest that the idea of replacing unconditional benefits with requirements to work receives substantial support in different welfare states. In Norway, for example, a survey found that an overwhelming majority of those asked supported the idea of young recipients working in exchange for their benefit (Lødemel and Flaa, 1993). Similar results are reported in the US. When it was coined during the Nixon administration in 1969, the term workfare was used to market work-based programmes as a very positive alternative to the passive provision of social assistance, which has not been embraced by policy makers. However, despite support for the idea of work-based programmes, the term workfare has not caught on internationally, and is now seldom used to describe policies other than by those who oppose work requirements, which they perceive to be eroding rights-based entitlement to assistance (Shragge, 1997). In Europe, the word workfare is often used by policy makers as a foil, to explain what the new policies are *not*. Only the political Right in the US still uses the term to describe policies that they advocate.

Second, in comparison to other social policies, workfare policies are not easily defined either in terms of their purpose (for example, as compared to rehabilitation policies) or in terms of their target group (for example, as compared to pension provision schemes). Policies variously described as workfare are often associated with different aims and target different groups of people.

This lack of clarity about the true nature of workfare has not prevented it from increasingly penetrating public and academic discourse. In the three largest US newspapers (*New York Times*, *Washington Post*, *Wall Street Journal*) more references were made to workfare in the year 1995 than in the entire period 1971-80 (Peck, 1998). The academic literature also bears witness to this trend. Of a total of 90 articles describing workfare, only 11 were published before 1990 (Social Science Citation Index). The use of the term in the academic literature reflects its ambiguity as well as the blurred boundaries between workfare and related policies.

The growth in political and academic interest in workfare-like policies, and the confusion about what workfare actually is, means that it is important to begin any overview with a clear definition of the subject. A review of the literature reveals that a key distinction can be made between *aims-based* (Evans, 1995; Morel, 1998; Nathan, 1993) and *form-based* definitions (Walker, 1991; Wiseman, 1991; Jordan, 1996; Shragge, 1997; Mead, 1997a) of workfare.

Aims-based approaches to definition tend to distinguish between programmes which are intended to be more or less overtly punitive. For example, Morel (1998) compares the French 'insertion approach' within social assistance, with a US 'workfare approach'. She suggests that the key difference is that the 'workfare approach' is concerned with a fight against dependency, whereas the insertion approach is intended to counteract social exclusion. Nathan (1993) focuses on the programme aims when he distinguishes between two forms of workfare that can be identified in the US at that time (prior to the 1996 reforms described here). He uses the term 'new-style workfare', now familiar to studies of US programmes, to

refer to a range of «strategies which aim to ... facilitate entry into the labour force» (p 15). By contrast, plain workfare (elsewhere termed 'old-style workfare'), referred to US policies in the 1970s and 1980s, which were understood to be more «restrictive and punitive» (Nathan, 1993). According to Nathan, the different aims *were* reflected in the form of the policies; while the former offered little more than work in exchange for benefits, 'new-style workfare' encompassed a variety of work and training programmes designed to help welfare recipients gain access to regular jobs.

A particularly broad aims-based definition is found in several recent contributions from writers within the so-called 'regulation school' of institutional economics. According to this perspective, workfare encompasses wide-ranging changes in the aims and functions of both social and labour market policies. These writers start from the assumption that social policy is a central element in the State's social model of regulation and serves to facilitate the current reconstruction in the economy. Jessop (1993) coined the phrase 'Schumpeterian Workfare State' to describe the new social policy direction of the neo-liberal economic regime as part of the shift from Keynesian demand-side approaches, of providing benefits to those out of work, to the post-Fordist supply-side policy aimed at facilitating (re)integration into the workforce. In this system social policy is subordinate to the demands of labour market flexibility and structural competitiveness (Jessop, 1993). Following Jessop, several writers (including Grover and Stewart, 1999; Peck, 1998; Torfing, 1999) use the term workfare to describe new policies that embrace both social and labour market initiatives.

Perhaps the broadest use of the term is found in Grover and Stewart's discussion of 'market workfare'. This encompasses both what they term 'traditional workfare', which is directly coercive, *and* wider supply-side policies, which result in depressed wage levels with the result that the market itself creates 'workfare jobs' (Grover and Stewart, 1999, p 85) including direct and indirect methods of wage subsidy. According to these authors, a wide range of policies can be labelled workfare in the sense that they «force people to take work or training on the job which pays less than the current market rate for the same kind of work» (Costello, 1993). While this definition may be useful for studies that focus on wider changes in the labour market, it is too broad to be suitable for a study of arrangements within social assistance provision – the main focus of this report. In addition, this definition focuses exclusively on workfare as a supply-side measure. As this report shows, several countries have adopted work obligation policies that contain strong demand-side characteristics where unemployment is tackled through job creation.

In this report workfare is defined as an ideal policy *form*, as opposed to a policy that results from a specific set of aims. We judge aims-based definitions to be unsuitable for comparative work, which is essentially about mapping a particular phenomenon in the context of the different ideological settings and different policy processes. In addition, aims-based approaches are considered to court the danger of over-simplification of the different and potentially contradictory aims that programmes address, as well as of the process whereby official objectives are translated from the higher policy-making echelons to the implementation level. The links between work-for-benefit policies and various ideological perspectives and associated labour market initiatives are clearly important. However, examination of a specific form of policy initiative permits comparison across different ideological and policy contexts. A form-based definition facilitates investigation of how, why, and for which out-of-work populations, work-for-benefit policies are used; and how and why policies vary in relation to different policy contexts.

The group of researchers involved in this project on which this report is based sought a form-based definition that allowed the following questions to be addressed:

- whether workfare policies occur as a means of satisfying more or less identical aims and objectives across different countries or whether they arise despite these being different;
- to whom workfare policies are targeted and why;
- how different administrative set-ups interact with the operation of workfare policies;
- how the work element within workfare policies operates and how it is supplemented by other components;
- whether ‘types’ of workfare can be identified; and
- whether common challenges arise from a policy form operationalised within different contexts.

These questions are returned to in parts five and six below.

For purposes of delineation and comparison, we have decided to define workfare as:

Programmes or schemes that require people to work in return for social assistance benefits.

In this definition the term ‘programme’ is used to denote a prescribed generic strategy implemented in a range of locations. In contrast, ‘scheme’ is used to describe locally developed projects. The term ‘policy’ is reserved to denote the general plan of action adopted by national or local government.

The definition sets out an ‘ideal type’ programme and one that strongly diverges from the traditional social assistance contract. It can be argued that a proportion of social assistance recipients in each of the countries compared here experienced programmes that could be described in this way. However, the programmes described in this report vary in the extent to which they meet this definition. Thus, it becomes possible to examine the extent and direction of divergence.

The definition has three elements – that workfare is *compulsory*, that workfare is *primarily about work*, and that workfare is essentially about policies tied to the *lowest tier of public income support*. In the next three sections each element is briefly discussed. This is followed by a discussion of their combined effect on the character of the social assistance contract.

Workfare is compulsory

Previous form-based definitions have focused on *compulsion* as workfare’s key distinguishing feature (for example, Walker, 1991; Wiseman, 1991; Jordan, 1996; Shragge, 1997). Here a programme is defined as compulsory if non-compliance with work requirements carries the *risk* of lost or reduced benefits, even if such sanctions are not automatic under the rules of a particular programme. In some cases (for example in Denmark) programmes are presented to social assistance recipients as a new *offer*, and the compulsory character is only revealed when this is not accepted. Because economic necessity often makes clients unable to reject the ‘offer’ of participation, it is perhaps best described as a ‘thoffer’, combining offers and threats in one package (Steiner, 1994; Schmitz and Goodin, 1998).

Compulsion within workfare reveals an assumption on the part of policy makers that at least some of the people to whom they are applied need to be coerced into participation, and, here, this is considered to be a key underlying feature of workfare policies. Whether because some people choose to be dependent on assistance (‘rational dependency’), or because some have

become so distanced from the labour market that they cannot or will not voluntarily re-enter ('irrational dependency') (Bane and Ellwood, 1994), compulsion is deemed necessary for at least a portion of the client group. Neither paid work in the regular labour market nor the work scheme itself are considered to proffer sufficient incentives or opportunities for all target group members to make use of them as a matter of choice. According to Mead, the main argument for compulsion is that it is effective in integrating participants in the labour market (Mead, 1997a). In his view, it is therefore an essential part of the 'new paternalism', which he justifies on grounds of furthering social citizenship through imposing the duty to work (Mead, 1986, 1997b).

Compulsion is important for two reasons. First, because it has a serious impact on the rights of those compelled, and second, because it reveals an underlying assumption among policy makers that the problem of worklessness is not merely a problem of a lack of the right jobs. As a result, compulsion is the most controversial feature of workfare. Critics who otherwise support 'activating' measures challenge the justification for compulsion. Criticism of compulsion is related to both normative considerations and to a perceived increased likelihood of undesirable outcomes.

First, it is argued that benefits must be unconditional in form in order to serve their function of residual safety net (Schmidt and Goodin, 1998), and that entitlement to a guaranteed minimum income expresses the role of welfare as a guarantee of social citizenship (Marshall, 1985) which conditionality undermines. Second, it can be argued (for example, Grimes, 1997) that compulsion is counterproductive as it undermines consumer feedback, so other people are unable to reject poor quality programmes. Basing his argument on evidence from voluntary labour market programmes in Glasgow, Grimes claims that voluntary programmes are more motivating and yield better results in terms of integration into work than compulsory programmes. Finally, Jordan (1996) argues that, in combination, compulsion and poor quality programmes may further a 'culture of resistance' where participants use «the weapons of the weak; malingering, absenteeism, defection, shoddy workmanship and sabotage» (p 208).

Workfare is primarily about work

Here workfare is distinguished from other compulsory schemes through its primary emphasis on work rather than training or other forms of activation. Although work and other forms of activity operate together within workfare programmes, *work* is the primary component and unsubsidised work the official desired outcome. The distinction between work and other kinds of activity (particularly forms of 'on-the-job' training) is obviously problematic. However, it is considered to be important because of the different implications for the risk of displacement in the regular labour market and the use of workfare to fill 'regular' jobs or to carry out 'public work'. Unlike compulsory training programmes, clients who enter workfare schemes are compelled to supply their labour in exchange for financial assistance from the state – or, in the words of Laurence Mead, to «work off the grant» (Mead, 1997a, p viii).

Shragge (1997) uses a broader definition of workfare, which includes both work and *other required activities* linked to benefits; understanding workfare as a manifestation of a «new ideology for the underclass» (p 18). Torfing (1999) discusses workfare in relation to a broad social activation programme and Jordan (1996) groups workfare and what he terms 'trainfare' (to define compulsory training programmes) under the umbrella of the 'politics of enforcement'.

As our study demonstrates, the distinction between work and other compulsory activities in

the programmes described in this report is not always clear. Many of the workfare programmes we describe include other forms of activity including ‘training’, which operate alongside work activities. A major area for comparison is the extent to which alternatives to work-for-benefit are available to programme participants.

Workfare is a part of social assistance

Here, workfare is defined as a *condition* tied to the receipt of social assistance. In general, the term ‘social assistance’ is used to refer to last-resort income support programmes, which in all seven countries have means-tested eligibility requirements (as a modern heir to previous poor law arrangements – Lødemel, 1997b). In some countries other benefits, including housing benefits and categorical benefits for older people, are means tested (Eardley et al, 1996) but are not considered as part of social assistance here.

The focus on social assistance is because the research group was interested in the fate of the most residualised population – where choice is most limited and for whom there is no further safety net.

Most other form-based discussions of workfare focus on programmes tied to social assistance. US writers use the term workfare more uniformly than European writers, referring to programmes tied to means-tested ‘welfare’ benefits, especially cash-based social assistance (Shragge, 1997). However, some European commentators have tended to take a broader view and to define programmes based both on social insurance and social assistance as workfare. This reflects the different composition of populations in Europe compared to the US (generally a greater number of people with insurance entitlement) and follows from a focus on ‘compulsion’ as the key factor. For instance, Standing (1990) focuses on compulsory ‘work-related activities’ so that his overview of workfare programmes includes those for insured and uninsured recipients.

A change in the contract of social assistance

Each of the three elements outlined in the definition of workfare used here conditions the way social assistance is delivered. Used in combination, the introduction of work and compulsion tied to the receipt of aid represents a fundamental change in the balance between rights and obligations in the provision of assistance. The crucial factor is the relationship between work and assistance.

Among the countries considered here, the extent to which access to cash-based social assistance constitutes an individual ‘right’ varies. In the UK, Germany, France and the Netherlands the ‘right’ to assistance (while conditional for some) is universal for needy people who meet the minimum age criteria and levels are legalised at the national level. The French case is unusual, as people under 24 are not normally entitled to assistance. In Norway and Denmark levels of local discretion over the award of assistance benefits are higher (Gough et al, 1997). Even prior to 1996, many US states had, effectively limited ‘rights’ to cash-based assistance to needy women with children; post-1996 the ‘right’ to cash-based assistance for this group was, for practical purposes, removed by new legislation.

It could be argued that to maintain a balance of rights and responsibilities a ‘right to work’ should be introduced alongside a requirement to work in return for benefit. In fact, a right to work remains embedded in the constitutions of some of the countries discussed here (for

example France and Norway, Kjørstad and Syse, 1997) although this ‘right’ is not understood to be enforceable at the individual level. In recent history, only the former communist countries actually instituted a right to work that corresponded to an obligation to work. Alternatively, one could argue that the balance of rights and responsibilities could involve participants having a right to participate in effective programmes to improve their chances of finding work. In some programmes (Danish ‘Activation’ and, in theory, through French Revenue Minimum d’Insertion [RMI] contracts) obligation to participate is explicitly matched with (universal) entitlement to be provided for within the programme. However, guarantees with regard to the ‘quality’ of the programmes are not made.

Although workfare programmes impact on the balance of individual rights and responsibilities, introducing a workfare programme need not necessarily reduce either the quantity or the quality of assistance provided. A programme can either be seen as an extension of opportunities to improve labour market integration chances – *giving more* – or as a means of curtailing existing rights – *giving less*. In the latter case the programme may potentially result in long-term losses for the client, in the form of a negligible or even negative impact on the chances of finding work, as well as short-term losses in the form of curtailed freedom. Clearly, the solution to the more/less equation will depend on the characteristics of pre-existing provision arrangements (including the extensiveness of opportunities to participate in voluntary programmes) as well as on the characteristics of the new compulsory programme.

It also depends on recipients’ own interpretation of what constitutes ‘more’. There is no single measure to determine whether a programme gives individual clients ‘less’ or ‘more’, but factors might include increased feelings of well-being, finding (sustainable) work, and increased income, among other outcomes. From the point of view of policy makers these outcomes are likely to only partially represent the aims of the programme. Some policy objectives, for example, a reduction in case loads or a cut in social assistance expenditure, are usually only coincidental to, and may even be in conflict with, the interests of individual participants as they themselves understand them. The European research group involved in the project from which this report originates is currently pursuing qualitative studies of implementation and a review of the results of effect evaluations in the six European countries included here (Dahl and Pederson, 2002: forthcoming; Lødemel and Stafford, 2002: forthcoming).

3.3 Comparison of workfare programmes

3.3.1. Programmes and timing of legislation

This section considers the main workfare programmes or schemes operating in seven countries. These are listed as follows:

- France – Insertion programmes and schemes operating under the Minimum Income and Insertion Act (1989), the Solidarity Job Contracts Act (1989), and the Jobs for Youth Act (1997).
- Germany – Help towards Work policies, based on the Social Assistance Act (1961).
- The Netherlands – The programme outlined in the Jobseeker’s Employment Act (1998).
- Norway – Local schemes resulting from the Social Services Act (1991).

- Denmark – Programmes and schemes operating under the Active Social Policy Act (1998).
- UK – The New Deal programmes for 18-24s, and for over 25s (introduced in 1997-98) which build on legislation from the Jobseeker’s Act (1995). The dual-training system for 16- to 18-year-olds, of Modern Apprenticeships (introduced in 1995) and National Traineeships (introduced in 1997).
- US – programmes in New York City, Wisconsin and California resulting from the Personal Responsibility and Work Opportunity Reconciliation Act (1996).

On the whole, the introduction and evolution of workfare programmes in Europe is a 1990s phenomenon. However, while the US is often seen as the originator of workfare policies, having a history of programmes going back to the early 1970s, compulsory work-for-benefit measures also have a long history within post-1945 Europe. In Germany a provision for workfare was included in the 1961 social assistance legislation, although the policy was largely dormant until the onset of mass unemployment in the 1970s. Denmark has taken a pioneering role in the more systematic application of compulsory activation policies.

3.3.2. Comparing Programmes

Section one of this paper defined ‘workfare’ programmes or schemes as those which ‘*require people to work in return for social assistance ‘benefits’*’. Section 2 considers differences and similarities in these programmes taking just *one* example of a workfare programme from six European countries and examples of three programmes from the US. The European programmes chosen represent the purest current form of workfare in that country – they are the programmes which exhibit the strongest ‘compulsory element’, the greatest ‘work-relatedness’, and which are most clearly targeted at social assistance clients. The sub-sections that follow consider differences between programmes in terms of their aims and ideological underpinning; their target groups; their administrative framework; and the extent to which they diverge from the ‘ideal-type’ workfare model to accommodate different types of claimants. Patterns of variation are then discussed in order to establish whether distinct ‘types’ of workfare can be distinguished.

Programmes chosen to represent the six European countries are: RMI-based insertion (France); Help Towards Work (Germany); the Jobseeker’s Employment Act (JEA) for young people (the Netherlands); local authority schemes resulting from the 1991 Norwegian Social Services Act (Norway); activation (Denmark); and, the New Deal for Young People (the UK). In Germany, France and Norway national legislation is reinterpreted locally to such a degree that a different programme might be considered to exist in each locality. To accommodate this, an ‘overall’ picture of the programme (or set of schemes) is given from a national viewpoint and the extent of intra-national variation is indicated. Three programmes for claimants of Temporary Assistance for Needy Families represent the US (New York City, Wisconsin and California). The programmes compared here are not representative of the totality of programmes in each country – the three US programmes represent three of the most developed forms of workfare in the US.

3.3.2.1. Aims and ideology

The definition of workfare used here is neutral with regard to the purpose of the programme and to ideological context. It is useful to compare aims and ideological underpinnings as these may be thought to influence the design of the programmes (for example, see Torfing, 1999).

The programmes have common roots. Lack of employment ('worklessness') experienced by population sub-groups is a common concern within all seven nations despite a range of labour market circumstances. Changes in the size and composition of unemployed and inactive populations; growth in the number of social assistance claimants; and, an associated rise in social assistance expenditure can be *everywhere* identified as key motivating factors for the introduction of active labour market policies, including workfare (Heikkilä, 1999). Active labour market policies have been taken forward in the context of a growing international consensus that these are prime tools in targeting specific labour market disadvantage (for example, see OECD, 1994; EC, 1999a; EC, 1999b).

In addition to economic considerations, the use of workfare is underpinned by common ideological objectives related to changes in the way the relationship between paid work and citizenship is understood and described. These have been made manifest in rhetoric through the concepts of 'social exclusion' and 'dependency' – insofar as they refer to exclusion from the labour market and 'dependency' on social assistance – and to changes in the contract of 'rights and responsibilities' between claimants and the state (Halvorsen, 1998).

There is a great deal of ambiguity surrounding the use of the terms 'dependency' and 'exclusion'. This can be seen as being deliberate and advantageous to policy makers who need to sell workfare to a range of audiences. Differences in emphasis can allow policy makers to tailor their presentation of objectives to suit the different concerns of a target group member or a taxpayer (or both at the same time). The ease with which workfare has been adopted by parties of different political persuasions may be, in part, due to the susceptibility for explanations to change with audience and over time. Nevertheless, differences in the ideological underpinning of the programmes can be seen in the extent to which they seek to address individualised dependency as opposed to social exclusion resulting from structural causes.

Section 2ii and [Table on Aims—Table 9.1 \(for all tables and figures see annex 3\)](#) describe variation in emphasis on cost-cutting, on preventing individualised dependency, on removing social exclusion, and on re-balancing rights and responsibilities.

Cost-cutting

Controlling social assistance expenditure is an ambition common to policy makers in all seven nations considered here. However, this is usually expressed as part of a more general direction of policy rather than an explicit aim of a specific workfare programme. Reducing net social assistance expenditure is a relatively long-term ambition for the British, Dutch and Danish programmes, which are highly individualised and resource intensive ([Table on Aims](#), column 1). An accounting distinction is made between expenditure on so-called 'passive' programmes which require limited activity from the participant towards improving employability or flexibility and 'active' programmes, which involve stimulating participants to improve their chances of finding work, and subsequently remaining and progressing in the labour market. Most of the workfare programmes discussed here focus on a short-term goal of reducing what is seen as 'passive' expenditure (even if this occurs via more expensive

‘active’ routes) and a long-term goal of developing human capital to the extent that this will result in fewer claims.

French insertion policies most clearly exemplify an actual and explicitly planned *increase* in expenditure – since Insertion programmes have been introduced alongside a national minimum income scheme. By contrast, in the US the cost-cutting agenda is clearer, and underlined by the fact that workfare has been introduced alongside welfare time limits. Similarly, many of the ‘with-contract’ German Help Towards Work schemes are explicit in their primary aim of reducing local authority expenditure – moving people into the primary labour market is just one means to the end of lifting clients from local assistance into the nationally funded social insurance pool.

Preventing individualised dependency

Preventing individual sources of ‘dependency’, including rational (or economic) dependency, psychosocial dependency (or poor expectations) and cultural dependency (or non-work focused life-styles) is a concern for architects of all workfare programmes. As discussed in Section One, the presumed existence of these forms of dependency constitutes the justification for compulsion. There are, however, clear differences in the extent to which such dependency is prioritised as *the* problem to be overcome. The focus of rhetoric on individualised roots to dependency is more important for the Norwegian workfare schemes and for the US programmes than it is elsewhere (Table on Aims, columns 2 and 3) although this varies considerably between localities in these countries. For most of the programmes considered here, the objective of reducing individualised dependency is seen as being pertinent for only a proportion of the group targeted.

Combating exclusion

Structural barriers to work constitute a lack of transferable skills, qualifications and experience, meaning that the unemployed person is not able to fill available posts – termed ‘exclusion unemployment’ in France. This may involve a lack of ‘soft skills’ – including time keeping or self-presentation – or a lack of formal education or qualifications. The focus is on improving supply-side competencies, but the problem is understood as one of a mismatch between supply and demand rather than one of individuals choosing to remain dependent.

Within Europe, the demise of traditional Keynesian thinking, and the more recent rise of a ‘Third Way’ ideology within social democracy, is associated with the interpretation of worklessness as resulting from supply-side skills deficiencies (for example, see Giddens, 1998). Workfare programmes that set out to resolve such problems aim to develop skills and experience within the labour supply population, through developing human capital or promoting flexibility among their target populations. The introduction and extension of activation in Denmark, the Jobseeker’s Employment Act (the Netherlands), and the New Deal programmes (UK) are associated with the aim of overcoming skills and experience deficits (Table on Aims, column 4). For example, the New Deal for Young People aims to equip young people “with the skills to compete for future jobs” (ES, 1997a).

The compulsory work measures are not restricted in their focus to the supply-side concerns. Relatively poor macroeconomic conditions have led to an emphasis on demand-side solutions to worklessness. This demand-stimulation function occurs most explicitly in East German cities where workfare is used as a means of supporting job creation programmes in the public sector to meet unmet needs, but is also an important component of French insertion programmes (Table on Aims, column 5).

Rights and responsibilities

The balance of emphasis on individual versus structural dependency and on a supply- versus demand-side focus is reflected in rhetoric, concerning the balance of rights and responsibilities between the individual social assistance client and the state.

The first thing which comparison reveals is that the ‘correct’ point of balance between what claimants have a right to, and the duties which they have a responsibility to undertake, is an abstraction. The official determination of the point of balance is entirely in the hands of policy makers, and is determined by cultural, historical and temporal differences in what is expected, and from whom. The fact that the new workfare policies have been introduced *at all* demonstrates that a claimant’s ‘responsibilities’, at least, are open to change.

One way of comparing programme differences in the balance of rights and responsibilities is to consider whether clients have a ‘right’ to participate in a workfare programme, to match their responsibility to comply (Table on Aims, column 6). In principle, Danish and French social assistance clients have a right to *some form of* activation or insertion respectively. RMI (France) is supposed to confer a ‘double-right’ (to a minimum income and to an insertion programme). Nonetheless, it is important to note that, despite the rhetoric, in France this ‘right’ cannot be realised due to a shortage of placements. For people eligible for the New Deal (UK) and the Jobseeker’s Employment Act (the Netherlands) the situation is rather more ambiguous. The programmes are supposed to apply to everyone, but this is not an explicit ‘right’. Finally, it is clear that participants are not *entitled* to participate in Norwegian workfare, German Help towards Work, and US programmes resulting from the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA).

Another way of comparing rights is to consider the extent to which, overall, provision for affected groups is intended to be extended or curtailed alongside the introduction of workfare. At one extreme the introduction of workfare in the US is linked to the ‘end of entitlement’ for a whole group of claimants. Elsewhere programmes set out to ‘give more’ overall (although this is not always the case in the Norwegian and German programmes) in terms of human capital development, but combine this with reinforced responsibilities (Table on Aims, column 7).

In principle, the French schemes (and particularly RMI) are more focused on rights than the other programmes considered here. The French Republican ideal, which states that ‘exclusion’ is the responsibility of society as a whole rather than the excluded individual, explicitly underwrites them. The right to work is enshrined in law (but cannot be fulfilled), and the social integration of people constitutes a ‘national imperative’. Indeed, while some policy makers believe that high levels of youth unemployment are linked to cultural and psycho-social factors, such as criminality and drug addiction, as well as to structural factors such as low labour demand, officially this is still a problem which society as a whole has to solve.

Intra-national variation in aims and ideology

As an added complication, official aims of workfare as articulated and registered at the national level may show considerable divergence at the level of local implementation (hence the variable scores in (Table on Aims)). This is particularly the case where the level of local autonomy over the policy is great. This is an important factor for the Norwegian workfare schemes, where broad national guidelines that the work requirement be used to help people find work in the regular labour market were often ignored by local municipalities in favour of

using the measure as a work-testing tool. In France, a government circular clarifying that the insertion component of RMI constitutes a right, rather than an obligation, has similarly been interpreted differently at the level of implementation. German Help Towards Work programmes serve different objectives according to the agendas of different local authorities.

Summary: aims and ideology

In summary, programmes that require compulsory activity from people in need of social assistance are being implemented and justified within a wide range of ideological settings; from French Republicanism to Anglo-American liberalism. In most cases they combine dual objectives of preventing dependency and tackling social exclusion to promote integration.

Workfare programmes are associated with an ambition to accommodate changes in the job market by targeting ‘active’ policies towards recipients. However, there is both cross-national and intra-national variation in the extent to which workfare is predicated upon a belief that the target population is exhibiting undesirable ‘dependency’ type behaviours as opposed to being victims of structural mismatches between supply and demand. It follows that there is variation in the extent to which workfare is used to enforce recipients’ ‘responsibilities’ rather than to provide a service to bridge structural gaps. The result is that the workfare programmes compared here incorporate both demand-side measures (job creation/wage subsidisation), and supply-side measures (to increase flexibility and job mobility) in tackling unemployment.

Broadly, a scale from ‘most integrative’ (focus on structural problems and reinforcing rights) to ‘most preventive’ (on dependency and reinforcing responsibilities) would run from French insertion at one extreme to US state post-PRWORA programmes at the other.

3.3.2.2. Different target groups

Because social assistance is a ‘last-resort’ measure, social assistance populations tend to include comparatively large numbers of people with multiple barriers to work. These include people with numeracy, literacy, and language problems as well as groups who are known to have greater difficulties in entering the labour market for other reasons, including older people, people from ethnic minorities, disabled people, and people with long-term health problems (for example, see McKay et al, 1997).

Differences in the role of social assistance within the seven countries are important. The workfare target population is necessarily circumscribed by the underlying structure of the social assistance population itself, resulting in some important differences. Beyond this, the composition of the target group is a consequence of policy makers selecting ‘work-able’ groups *within* the social assistance population that they particularly wish to target with compulsory work measures. This section compares workfare programmes in terms of the social assistance clients they are targeted at, the stage in receipt at which they intervene, and the proportion of the defined target population they actually affect. ([Table on Target Group, 9.2](#)) summaries information about the target populations.

Who? Which groups?

Important cross-Atlantic differences in target group exist (Table on Target Group, columns 1 and 2). In the US, the primary target population for workfare is TANF recipients, who are predominantly lone parents. In Europe a large number of people claim social assistance primarily because they have been unable to find work. The focus in Europe (to date) has been on people who would describe themselves as ‘unemployed’ under ILO criteria, rather than

those who would describe themselves as unable to work due to health problems or caring responsibilities. Workfare exists as an extension of a pre-existing requirement to be available for work, and is built on pre-existing legislation regarding seeking work and taking job offers. This difference between the US and Europe is important, as strategies designed for one group may not be directly transferable to other populations. Nonetheless, it is worth noting that early US workfare programmes were introduced for recipients of 'General Assistance' (the social assistance cash benefit that some states provide for non-TANF claimants).

Young unemployed people are the clear focus of European workfare programmes. Changes in the structure of the labour market have caused young people, and particularly poorly skilled young people, to experience increased difficulty in finding work. As a result, average periods of transition from compulsory education to employment have extended. The designation 'young person' varies from country to country but, reflecting the extended transition period, extends well into the 20s, ranging from age 23 and under in the Netherlands to 30 and under in Denmark.

Three justifications are made for compulsory work for benefit level pay for young unemployed people. First, the new programmes act as a replacement for, or extension of, youth training programmes (as in Denmark, France, parts of Germany, the Netherlands and the UK), so that compulsion is considered justifiable in the same way that compulsory education for younger age groups is considered justifiable. Second, the issue of adequate remuneration for labour input is less pertinent for young people. Most young people, with limited work experience, will have been used to earning less than older unemployed people, and have lower expectations. Transitional financial support from families is also often assumed to exist. In many countries a lower minimum wage officially reflects (and reinforces) the lower value attached to the work of young people. Finally, policy makers in all the European countries considered here seem more willing to consider the experience of 'passive' social assistance receipt to be corrupting for young people as they generally have little labour market experience. 'Dependency' early in a labour market career is seen as damaging to the development of a work ethic.

In Denmark, the Netherlands and the UK, compulsory programmes tend to have been introduced first for young people and subsequently extended to other groups of recipients. Programmes for young people have greater priority than programmes for other groups in terms of funding and political drive. Younger people enter programmes after shorter periods of claiming. In Norway, where programmes and target groups are less clearly specified, social workers are guided to target the workfare instrument towards 'young people'. German Help Towards Work schemes are exceptional among the European workfare approaches in not being originally geared to young people, although the focus has now shifted to younger groups.

Long-term unemployed people have become the second target group for European workfare programmes, as concern about young people has begun to subside and to be replaced with a desire to 'do something' about high unemployment among other groups. 'Dependency' is generally considered to be less pertinent for older people, although still present. The barriers to work which members of this latter group experience are more often considered to have a structural root, resulting from a mismatch of skills and experience, or even an insufficiency of labour demand. The result is that programmes *specifically* for long-term unemployed people (as opposed to younger people) in the Netherlands and the UK have a greater focus on combating structural exclusion than individualised dependency. They are less well resourced,

but also contain less comprehensive quid pro quo ‘work for benefit’ measures (for example, the programmes for older unemployed people in the Netherlands and the UK). Similarly, activation is applied in a less ‘workfare-like’ form to older Danish recipients.

In Europe at least, people who have primary reasons for claiming social assistance other than unemployment are, as yet, largely excluded from workfare programmes. People with caring responsibilities or disabilities are seen as being more difficult to integrate into the labour market and consequently the use of compulsory measures has traditionally been seen as less justifiable. However, as ‘passive’ claiming has increasingly come to be seen as a problem which needs to be solved, so the boundaries between ‘work-able’ and ‘non-work-able’ groups are being blurred. Criteria for transition to disability benefits, for example, have been tightened (see the discussion of the background to workfare programmes in the Netherlands and the UK).

Whole groups of claimants, previously understood to be exempt from seeking paid employment, are coming to be seen as potentially economically active. Two striking examples of this kind of ‘re-designation’ have been witnessed in the countries included here. The first is the 1996 US reforms, which re-designated single parents as a group who should be seeking work in the regular labour market. The second is the 1998 Danish Social Assistance Act, which extended compulsory activation (although not necessarily work) to *all* recipients. The introduction of the British ‘ONE’ programme (in 2000) – which includes ‘work-focused’ interviews for all social assistance claimants – also represents a step in this direction.

When? Timing of interventions

This section considers the timing of interventions. One motivation for workfare intervention is evidence that (other things being equal) longer periods of unemployment are associated with reduced chances of re-entry to the labour market (for example, Trickey et al, 1998). There are a number of reasons why this might be so, including a re-enforcing effect of employer’s unwillingness to employ long-term unemployed people. It has also been argued that long-term unemployment is itself responsible for ‘sclerosis’ of job-finding potential – for example, as existing skills and qualifications become less relevant or as jobseekers become disillusioned with jobseeking (Layard, 1999). Finally, when reducing moral hazard is a key policy objective, even a short period of ‘passive’ reciprocity may be considered undesirable.

Programme architects struggle with a trade-off between allowing claimants to remain on benefit too long before intervening and avoiding the ‘dead-weight’ problem. Where the objective is to find a claimant work in the primary labour market, the ‘dead-weight’ problem comprises the risk of ‘wasting’ resources on claimants who would have found ‘real’ work without a workfare intervention. This issue has greater significance for more resource intensive programmes. In less resource intensive programmes, such as the Norwegian workfare schemes, dead weight is not perceived as a problem. The reason for focusing on long-term reciprocity here is primarily to prevent ‘dependency’. The danger of ‘dead-weight’ is compounded by the possibility that the chances of a proportion of claimants getting a regular job may actually diminish as a *result* of participation in the programme (for example, Aucouturier, 1993). This may occur either because they lose time and freedom to seek a job, because participating is demotivating to the participant, or because the experience of participating reduces a participant’s marketability to employers.

In order to avoid ‘dead-weight’, programmes tend to be targeted towards claimants who are not expected to find work within, what policy makers consider to be, an acceptable period.

Judgements regarding an ‘acceptable period’ and an optimum point for intervention depend upon the balance of objectives which policy makers hope to meet and resource constraints. In reality, even given a firm set of objectives and unlimited resources, the optimum point is likely to vary from individual to individual. Programmes use two main methods of avoiding ‘dead-weight’, which are not mutually exclusive:

1. By prescribing a specified length of time before a person becomes eligible for workfare. The scientific basis for decisions about points of intervention is not always clear –although longitudinal studies which consider the relationship between length of unemployment period and chances of finding work can assist here (Leisering and Walker, 1998). In Denmark, the Netherlands and the UK younger recipients enter programmes at an earlier stage than recipients in other age groups. By contrast in Norway, the timing of intervention is left to the discretion of an individual social worker. In France and Germany, depending on how insertion and Help Towards Work programmes are implemented at the level of departments and local authorities, the point of intervention may be imposed by the administration or result from negotiation with the client. In the Netherlands all clients are assessed, and suitability for intervention is determined according to set criteria. Some attempt to take account of the special needs of individuals at greatest risk of being ‘excluded’ can be made through allowing people to queue-jump (enter the programme early), on the basis of specified characteristics (Table on Target Group, column 5).
2. By providing intensive case-management support to divert people from claiming or remaining on benefit before they are placed in a compulsory programme. This method is most strongly adopted in the US (particularly see New York City), but is also the function of the ‘gateway’ in the British New Deal programme, and the ‘rights and responsibilities’ courses in the Danish activation programme.

What proportion? Universal versus selective programmes

This section describes the proportion of people within prescribed target groups who are affected by the introduction of workfare policies. The programmes reviewed here can be differentiated according to how tightly they define their target groups (Table on Target Group, column 6). Danish activation, the British New Deals and the Dutch JEA for young people are ‘universal’, in the sense that the obligation to participate in compulsory activity is designed to relate to every member of the target population meeting the inclusion criteria. Target groups are well defined – according to benefit, duration of claim and even age of the recipient. The US state programmes and the French insertion programme can be described as ‘quasi-universal’, in that they impinge on every eligible client, although not all clients become participants in a work or training activity. In California, New York City and Wisconsin, only the pre-workfare interview stage is applied to all TANF recipients. In France, while RMI ‘insertion’ contracts are supposed to apply to all recipients (and leaving aside the fact that this does not happen), these need not specify compulsory activity.

In contrast, ‘selective’ programmes are designed to encompass only a proportion of the ‘in scope’ target group. Of the programmes compared here, these include the Norwegian workfare schemes and most of the German Help Towards Work programmes.

Taking a selective rather than universal approach to target groups has important consequences for strategy. This is because universal programmes apply to a wider range of recipients within their target groups (who therefore encounter a greater range of barriers to work). Selection is one way of specifically targeting people who are less easily described by firm age

or ‘duration of claim’ criteria. It may be used to target people *within* a social assistance population on more qualitative grounds. For example, in Norway it is used with regard to people who are believed to be in particular need of awakening to the ‘connection between the responsibility of the individual and entitlements’.

The discretion which administrators have to include or exclude individuals into the workfare programme can have positive or negative consequences for social assistance recipients. Administrators and social workers may use it to decide not to involve people who are likely to ‘fail’ within the existing system – for example, German social workers may decline to offer places to people where they think the result will be sanctioning. However, selection is usually associated with localised funding and a lower level of investment in the workfare programme as a whole. As a result, it is often used to target more disaffected recipients (as in Norway), or to push ‘easy wins’ (as in France and Germany) – where there is a higher chance of a return on investment.

Summary: target groups

In summary, there are very important differences in primary target groups between Europe and the US. Within Europe, the focus is on young unemployed people. Danish activation stands out as the programme most intended to extend to people whose main reason for claiming is not unemployment. Programmes differ as to whether they are applied universally or more selectively to their target populations. The most ‘universal’ programmes are the Danish, Dutch and British programmes, with the German and Norwegian programmes being the most selective.

3.3.2.2. Administrative framework

Differences between ‘universal’ and ‘selective’ programmes are related to other differences in the way that schemes are administered. This section describes the differences between the programmes in terms of their administrative framework. In part, variation results from differences in the way that social assistance is delivered. However, in Denmark and the Netherlands in particular, workfare programmes are less guided by such underlying differences. The main distinction made here is between workfare programmes that are centralised and decentralised.

Centralised versus decentralised framework

Programmes that apply universally to defined target populations across the country are able to do so because they are funded and controlled centrally, and can therefore be standardised (Table on Administrative Framework, column 1). Where local bodies control (or part-control) funding, they may determine the extent to which programmes are implemented. A greater degree of centralisation also results in greater intra-national standardisation, as central government has an interest in ensuring that funds are spent in a manner consistent with a national strategy. As a result, programmes are more codified, hence there is less room for administrative discretion, for instance, over sanctioning policy or the range of available placements (Table on Target Group, column 2). Historically, central governments have had responsibility for administering social security for insured population groups, while local authorities have had responsibility for maintaining uninsured populations. As a result, programmes for social assistance clients that are centralised (the British, Dutch and Danish programmes) show a greater degree of overlap with active labour market programmes for insured clients (Table on Target Group, column 3).

The separate systems of administration and provision for insured and uninsured social security claimants, which exist in all the countries except the UK, provide the structure for the introduction of new active labour market policies and are carried forward into separate systems of active labour market provision. In all seven countries, historically, benefits for insured and uninsured clients have been administered through separate government departments, focusing on labour market integration versus social protection respectively. This division has been eliminated in the UK, but remains in the other countries compared here. In Denmark and Norway the distinction has become less clear as ALMPs have become more localised.

Workfare programmes in France and Norway pertain more or less exclusively to social assistance clients. In Germany the level of overlap with programmes for insured clients is in most cases quite low. In the US there is no comparable ‘insured’ population to TANF recipients – but unemployed and general assistance recipients receive entirely separate treatment. As a rule, of the programmes considered here, those that are locally funded and segregated tend to be more ‘preventive’ in their outlook, and less geared to providing a client-focused service, although this varies from region to region. This is particularly the case where local or state authorities are looking to make savings in administration costs as well as on benefit pay-outs (as is usually the case in Germany, Norway and the US).

Intra-national variation

In general, greater levels of segregation between programmes for insured and uninsured groups mean a higher level of local responsibility and control over the funding, objectives, target groups and content of programmes for social assistance clients than for insured unemployed claimants, hence much greater variation in practice. Such variation is related to administrative factors, as well as the political beliefs of local legislators.

National governments tend to consider that such local variability is counter to the ambition of labour market integration. As a result, the introduction by national governments of compulsory activity policies for assistance clients has been associated with a trend towards merging provision for insured and uninsured groups, and bringing assistance clients into contact with programmes traditionally reserved for insured groups. The Dutch JEA and Danish activation programmes display a high degree of programme coordination, so that the same compulsory programmes can, in theory, apply to insured and uninsured clients (although in practice, as in Denmark, the quality of placements may differ).

Attempts to coordinate the activities of relevant government departments have tended to prove problematic – particularly in France where the administrative system for assistance clients is exceedingly complex. In Denmark, Norway and the Netherlands the introduction of the activation, ‘workfare’ and JEA programmes respectively were accompanied by a direction for relevant departments and executive agencies to work more closely together, although, in some cases, achieving this has been more difficult.

Summary: administrative framework

In summary, there are important similarities and differences between the programmes with regard to their degree of centralisation. The British New Deal, Dutch JEA, and Danish activation programmes are more centralised than the rest; Norwegian workfare and German Help Towards Work programmes are most decentralised. Differences in the level of

centralisation are related to the extent of intra-national variability in programme delivery (this is greatest where the programmes are least centralised).

3.3.2.3. Accommodating Heterogeneity

The extent to which programmes diverge from the idealised workfare model outlined in Section 1 is a reflection of the extent to which their architects define the causes of worklessness differently, and, so, seek to accommodate the varied circumstances of individual clients. Different strategies are a reflection of differences in underlying ideological aims, and in attempts to respond to the heterogeneous needs of target populations. This section describes three methods used to accommodate heterogeneity:

1. Selecting suitable clients from within a wider target population.
2. Tailoring placements to individuals within the programme.
3. Applying discretion with regard to sanctioning policy.

Method 1 involves restricting the use of workfare to a narrower and less clearly defined group of clients. Methods 2 and 3 involve divergence from the idealised ‘workfare’ model defined in Section One.

Selecting suitable clients

Selectivity is discussed above. This is a feature of decentralised programmes, and is related to scarcer resources and to more localised funding bases. Traditionally in Norway and Germany selective schemes have focused on ‘work-testing’ (underpinned by an ideological objective of removing ‘rational dependency’). More recently they have been used in France and Germany to ‘cream off’ the members of the target population who are thought most likely to move out of social assistance (and into work) following participation. In Norway, in localities where new coordination programmes are in place these are used to offer different opportunities for ‘job-ready’ uninsured people.

Tailoring placements to individual clients

All seven countries include a range of ‘activation’ placements (to use the terminology of the Danish programme), of which work-for-benefit level pay is just one possibility. Such placements include non-work activities which are nonetheless considered socially valuable because they are underpinned by a normative assumption that ‘an ‘active’ life is better to live than a ‘passive’ one’ (Hvinden, 1999).

As an alternative to ‘passive’ receipt, or to absolute removal of financial assistance, there are five main means by which social assistance clients are ‘activated’ through the programmes reviewed here. These are:

- work-for-benefit (or near benefit) level pay;
- subsidised work placements in the regular labour market or temporarily supported self-employment;
- created public jobs for collectively agreed or standard minimum wages;
- education (or vocational training); and
- social activation.

These are not straight alternatives, and are often combined. For example, German ‘vocational training’ within the Help Towards Work programme may involve a mix of ‘created public jobs’ and ‘education’; and Danish ‘special activation measures’ mix guidance with work training. Rosdahl and Weise list seven possible types of Danish activation ‘offer’, but

essentially they are made up of combinations of the five options above. (Table on Placement Types, 9.4) shows the main methods of activation used within each 'benefit-based' programme.

From the viewpoint of the participant, the rate of pay, and the form that the payment takes, provide key means of distinguishing between more or less 'real' jobs, as well as of assessing the more or less workfare-like aspects of multi-trajectory programmes. The difference between 'work-for-benefit' and 'created public jobs' concerns conditions of employment (labour rights and wage levels) and is one of degree. Both are distinguished from 'subsidised work', in which the state supports only part of the income of the participant.

The range of placements on offer also vary in the extent to which they seek to develop human capital through the use of education and training rather than seeking to place participants directly into the labour market. In addition, some seek to overcome more severe barriers to employment through 'social activation'.

Where administrations create more than one type of placement opportunity, these form an acknowledged or unacknowledged hierarchy as viewed by both recipients and administrators – with subsidised or 'created' jobs at the top. This is unsurprising, as these constitute 'real' work, and come with 'real' pay and conditions. 'Creaming' – picking off easier-to-employ individuals for the more work-like options – occurs everywhere. In Germany the 'gradient' is explicitly described within social assistance legislation. In the Netherlands there is a deliberate hierarchy from 'training and social activation' at the bottom, through 'municipal employment', to 'subsidised work' at the top. These are seen as 'phases' that cumulatively build up participants to the point where they can take unsubsidised jobs. By contrast, in the UK the alternative options are supposed to have parity – and each placement type is independently supposed to support moves into unsubsidised work.

In principle, whether in the short or longer term, all the programmes work towards supporting transitions to unsubsidised employment. However, to different extents administrating organisations tacitly accept that, for some people, a move into work is unrealistic. The experience of French employment programmes is that clients who have little hope of finding regular work are cycled within 'exclusion trajectories'. The programme may fulfil the functions of providing social welfare and ensuring that individuals are participating. This is most clearly the case in Denmark, as activation policy has expanded to net a wider group of recipients with more complex social disadvantages. The tougher ideology underlying the US state programmes, and tighter target populations for Norwegian workfare (selective) and for the UK New Deals (unemployed people only) mean that improving general welfare outside of the context of finding work is not yet an important part of the strategy of these programmes.

Different mechanisms are used to assign recipients to placements. Where programmes are selective (French RMI, German Help Towards Work, Norwegian workfare), an assessment by a case or social worker is used to inform a decision as to whether a recipient should enter the programme at all. In the Dutch, Danish and British universal programmes, and in the quasi-universal programmes of California, New York City and Wisconsin, an assessment is a component of the programme itself and some sort of negotiation process is entered into. However, there is great variation in the extent to which participants can make a free 'choice', or to which they are allowed, at an initial stage, to refuse offers. Facilitating individuals to choose placements is part of the official design of Danish, Dutch and British programmes, although inevitably the range of alternatives are greater for some than for others. For

individuals who are judged by themselves or by administrators to be less than ‘job-ready’, the existence of alternatives – different types of community work, different forms of social activation, different training courses – becomes very important in giving a sense of choice.

Dutch participants are ‘measured’ (according to qualifications, work history, and barriers to work), and this is supposed to determine suitability for the different levels of the JEA programme. Elsewhere the process is less explicit, although all universal (and US quasi-universal) programmes include a discussion with individuals so that action plans and ‘contracts’ can be drawn up to suit the specifics of individual situations. The negotiation process is used to identify special barriers to work, so that these can be acted upon. However, the Danish and French experience is that sticking to such plans and enforcing contracts become more problematic for clients who have many barriers to work.

Discretion in sanctioning individual clients

Failure to attend work-for-benefit placements, or non-work placements, is subject to sanction in all countries (individuals who fail to attend subsidised or created jobs generally risk losing their employment in the same way as ordinary employees). For most programmes, compulsion applies to all clients to whom an offer is made, although not necessarily in the first instance (surveys of German ‘Help Towards Work’ show high rates of refusal which do not necessarily result in sanctioning). However, the severity and extent of sanctioning varies from programme to programme ([Table on Sanctioning, 9.6](#)).

Sanctioning does not always result in full removal of benefit. In Wisconsin, sanctioning is proportionate to the number of hours not ‘worked’ on a scheme. Once registered within the Danish activation programme, participants are only ever sanctioned for up to one fifth of their full benefit. Under the German Help Towards Work programme, only a quarter of a recipient’s benefit is initially removed – although the sanction increases until the individual complies. German recipients who have dependants have a proportion of their benefit protected on behalf of their family. In most countries (but not in the US or in France), sanctioned recipients may apply for discretionary hardship payments from the administering agency.

Programmes vary in the amount of discretion that they afford administrators over sanctioning. As might be expected, greater discretion over other aspects of the programmes is more frequently found in decentralised than centralised programmes. The rate of sanctioning is also very different. Sanctions are more aggressively applied in the three US examples than in Europe; in New York City the number of people undergoing sanctions exceeds the number in workfare; and, in Wisconsin 6% of the caseload is under sanction. There appears to be a greater reluctance to sanction within European programmes, the consequences may nevertheless be severe. Within the Dutch JEA programme, warnings are given and partial sanctions may be applied before benefit is removed completely. Nonetheless, there is evidence that sanctioning policy in the Netherlands has led to ‘drop out’ among those already at greatest risk of exclusion. There is anecdotal evidence that concern about the consequences of sanctioning may have affected a national initiative to toughen up the sanctioning rules for participants in the German Help Towards Work programme, as social workers are reluctant to offer placements to people who they think may refuse.

Summary: accommodating heterogeneity

Programmes show considerable divergence from an idealised workfare model. Indeed, ‘work-for-benefit placements’ are not used for many clients, and when they are used they include features that move them away from a ‘work-for-benefit’ exchange. Work-for-benefit options are more likely to be experienced by clients with greater difficulties in securing work. Some programmes (Danish, Dutch, British, and Californian) include ‘education and training’ or ‘social activation’ as alternative means of provision for such clients. In addition, the Danish, Dutch, British and US programmes include a ‘case management’ process, in order to tailor the programme to the individual clients. However, of these four sets of programmes, the Danish activation programme is distinguished from the rest in its emphasis on a long-term strategy and on human capital development, whereas the US programmes have greatest emphasis on providing routes for early re-entry into the labour market.

3.3.2.4. Types of workfare

Sections 2i-iv have outlined programme differences in aims, target populations, administrative framework, and divergence from an idealised workfare model towards greater emphasis on a human capital development approach and on ‘tailored’ programmes which accommodate heterogeneity. This section demonstrates the extent to which differences in these factors co-vary – and to which recognisable ‘types’ of workfare can be identified.

One group of programmes might be labelled ‘European centralised programmes’ – represented here by activation (Denmark), the Jobseeker’s Employment Act for Young People (the Netherlands) and the New Deal for Young People (UK). The remaining programmes are less easily grouped. The German and Norwegian programmes are similar in that they are decentralised, although the German programme shares many of the features with the European centralised programmes, including a tendency towards greater universality. The French and US programmes are striking (and different from each other) in that they have ideological roots which are not reflected elsewhere.

European centralised programmes

The Danish, Dutch and British programmes are underpinned by an ideology that supports ‘integrative’ as well as ‘preventive’ aims. The relationship between administrative framework and ideology is illustrated by the clustering of these programmes in the top right corner of (Administrative Framework and Aims, Figure 9.1), centralised and integrative. These centralised programmes have a broader target population, are more visible, and so aim to appeal to a broader electorate. A key factor is their ‘universal’ rather than ‘selective’ status. While in these countries the taxpaying public may accept that *some* people choose not to work, they are less likely to accept that this is the cause of worklessness for the vast majority of the target population. As a result, architects of these ‘*European centralised programmes*’ acknowledge a wide range of ‘causes’ of worklessness.

The centralised programmes tend to have a wide range of placement options available, including options which emphasise ‘human capital development’ as well as ‘labour market attachment’. In (Administrative Framework and Strategy, Figure 9.2) the most centralised programmes are situated within the top right hand corner of the figure; centralised, and with an emphasis on human resource development. This reflects a strong funding base enabling more resource intensive forms of assistance. These centralised compulsory work programmes form a strong part of *the* national strategy for overcoming worklessness. Because they recognise a wide range of *causes* of worklessness, they employ a broad range of strategies to negate these causes.

Because they are nationally standardised and highly codified, centralised programmes tend to

have rigorous sanctioning policies – permitting little discretion to individual administrators over sanctioning (**Administrative Framework and Sanctioning Policy, Figure 9.3**). In Figure 9.3 the *European centralised programmes* are situated within the bottom right hand corner of the figure; centralised, and with fairly well defined sanctioning policies that permit little room for discretion.

Of the three *centralised European programmes*, Danish activation is more integrative than the rest, and places a stronger emphasis on human resource development. This may be due to two factors. First, the target population for the Danish activation programme is broader than for the Dutch and British programmes for young people, and includes a higher proportion of non ‘job-ready’ individuals. Second, the Danish activation programme has grown out of a rights-based voluntary scheme.

Other programmes

The more decentralised policies are less easily typified. Nonetheless, in localities where the German Help Towards Work programme is more centralised, the programme is often also more integrative, more human resource development oriented and more formalised with regard to sanctioning policy. The most decentralised programme – Norwegian Workfare – also demonstrates the relationship between centralisation and other factors; being a decentralised, broadly preventive-oriented programme with a strong focus on labour market attachment objectives. Administrators have a high degree of discretion over sanctioning policy (Figure 9.3)

Given that the US programmes are often presented as a model for workfare delivery, the differences between US and European centralised programmes are important. The US programmes described here combine a moderately centralised approach with an emphasis on: preventing claims rather than integrating clients; on labour market attachment rather than human resource development; a limited range of short-term solutions; and strong sanctioning policy. The difference is certainly linked to the strong individual-focused ideology behind US welfare policy making.

In striking contrast, as a result of the republican ideology of French social policy architects, French insertion policies stand out in the strength of their emphasis on the structural causes of unemployment and on the responsibility of society to solve the problem of ‘worklessness’. In principle, at least, sanctioning plays a very limited role.

Summary: types of workfare

European centralised programmes diverge markedly from an ideal-type ‘workfare’ definition with regard to strategy, but low levels of divergence with regard to enforcing compulsion than more decentralised programmes – however, these relationships are not straightforward. Torfing’s term ‘offensive’ might be used to describe these programmes, although Torfing was actually seeking to distinguish Danish workfare from US and pre–New Deal British programmes (Torfing, 1999).

European centralised programmes are not associated with countries sharing a common history with regard to either social security or social assistance provision. A possible explanation for this is that in Europe workfare policies have only recently come to be considered a major factor within social assistance provision. Compulsory work policies have expanded during the 1990s, alongside the more general expansion of active labour market

policies. Attempts to synthesise traditional social-democratic and neo-classical approaches to labour market policy have been made. In this sense the introduction of workfare policies may represent something of a paradigm shift within social assistance provision. The fact that many workfare policies are currently undergoing rapid transition suggests that the groupings presented above are likely to alter over a short period of time.

3.4. A change towards more or less?

In part two of this section, we argued that the introduction of workfare programmes involves a change in the contract of social assistance. Because workfare introduces a new condition to the provision of social assistance, the right to aid is curtailed. In this sense, workfare leads to a reduction of entitlement – or *less*. In spite of this curtailment of rights, the application of workfare may, however, have the potential to provide new resources to participants and thereby improve their chances for labour market integration, an expressed aim of all programs. Where workfare programmes are designed in this way, the change in the contract of assistance may be towards giving *more*.

The distinction between a Human Resource Development Approach (HRD) and a Labour market Attachment (LMA) approach is used here to give a comparative assessment of the extent to which the introduction of workfare can be described as a change in the contract of social assistance towards *more* or *less*. The following discussion presupposes that workfare according to this idealised model (work in exchange for benefits) implies a curtailment in the contract of social assistance, and that an LMA-approach comes closest to this ideal type. Workfare close to an LMA-approach is therefore considered as having a greater chance of providing *less*.

Because, as the name suggests, the HRD-approach focuses more on the development of human resources and opportunities, programmes closer to this approach are considered here to have a greater potential for providing *more*. This presupposes a wider understanding of rights than simply as entitlement to economic support. Social assistance everywhere provides economic support with the aim of helping improve people's lives and helping them become self-reliant. In other words, even if the new obligation to work is a curtailment of existing rights, the new opportunities provided to participants may improve their chances for labour market integration. While we equate *more* with a HRD-approach, an alternative analysis which includes outcomes from participation may find that, for many participants, 'less can be more'. An example is a tight labour market which is able to also offer jobs to people with few skills, and at wages that enable them to achieve an improved standard of living. In this part we assess, first, the more-less equation across programmes and, second, the extent to which the introduction of workfare programmes may have altered the contract of social assistance in each of the seven nations.

When we compare strategy across nations, one group of programmes shares a strong HRD approach (See Figure 9.2). These are the programmes found in Denmark, the UK and the Netherlands. Because these programmes are also more centralised in delivery than the other four, they have been described as centralised European programmes. The strategies chosen suggest that these programmes – in particular the Danish programme – offer their participants *more* than is provided to participants in other countries. The programmes in Germany and France have an approach somewhere between LMA and HRD. The evidence of our research project suggest that programmes in Norway and the US offer their participants *less* in terms of the development of human resources (Lødemel and Trickey 2001 Chapters 5 and 8).

To assess whether workless recipients of assistance in each nation get more or less as a result of participating in a programme, both the strategy of the new workfare programme and the nature of the initial social assistance scheme need to be considered. For ease of analysis, we focus the discussion on the 'less' side of the more–less equation and consider the extent to which the introduction has involved a curtailment in the participant's right to income maintenance. Workfare programmes can be used as a means of checking or conditioning entitlement to social assistance. Prior to the introduction of workfare, six of the seven countries considered in this report had entitlement to means-tested cash benefits in place, although, in France, the RMI programme combined entitlement with a workfare condition from the outset in 1989. In principle, an unconditional right to assistance can only be achieved in a system of a guaranteed minimum income. However, to date, such a guarantee is only found in Alaska (Halvorsen, 2000).

All seven countries conditioned the entitlement to social assistance to different extents and by different methods. The methods applied to check entitlement have been described as *instruments of curtailment* (Midré, 1992, see also De Swaan, 1988). Such instruments have been an integral part of transfer programmes throughout the history of statutory relief. Two main forms can be identified: the suppression of benefit levels and the imposition of various forms of social control. In the Poor Laws of the 19th century, the combined principles of *less eligibility* and the *workhouse test* were applied to curtail entitlement to statutory relief. The less eligibility principle addressed financial incentives by ensuring that benefits were always below the lowest wages in the economy; the workhouse test ensured that the pauper had to give away their freedom and make their labour available to the authorities as a condition for the receipt of aid. We use the terms 'workhouse test' (social control) and 'less eligibility' (low level benefits) in the following discussion.

Albeit usually less draconian in their application, current-day variations of curtailment in social assistance can be described with reference to these two forms (Bradshaw and Terum, 1997; Lødemel, 1997). The study of social assistance within OECD countries referred to earlier (Eardley et al, 1996; Gough et al, 1997) can be used to illustrate the different balance between the two forms of curtailment in the social assistance schemes of each of the seven nations. The extent to which 'less eligibility' is applied can be illustrated by the level of benefit in relation to average earnings (Gough et al, 1997, p 32). Of the countries considered here, the highest levels of benefits were found in the Netherlands and Denmark, followed by Norway. Germany, France and the UK had similar, but lower benefit levels. The lowest levels were found in the US.

More than other forms of curtailment (such as strict means tests, social work intervention or a strong requirement to seek and take work offered) workfare is more similar to the 'workhouse test' in that it conditions entitlement on activity, thereby limiting the freedom of the recipient and, it may be argued, by re-introducing work in return for financial support. The use of the 'workhouse test' as a method of curtailment in social assistance, can be illustrated by the extent to which national schemes provided benefits as a right. Based on data on the administration of social assistance, Eardley et al (1996) constructed an *exclusion index*. This was used to assess the extent to which the national schemes matched the ideal of a citizenship right to social assistance (Gough et al, 1997, p 35). A low exclusion score is used to suggest a low level of curtailment in the form of social control. The country closest to a citizenship right to social assistance was the UK. The Netherlands and, perhaps surprisingly, the US also featured low levels of social control, followed by France and Denmark. The two countries

which deviated the farthest from a citizenship right to social assistance were Germany and Norway.

The social assistance data of Eardley et al (1996) were collected in 1992, making their study well suited to illustrate the situation prior to the introduction (or expansion) of workfare programmes. If we combine the two sets of data we find that Denmark and the Netherlands were the two countries with lowest levels of curtailment in their social assistance scheme (in the early 1990s). These two countries therefore appeared to apply neither benefit levels nor social control as instruments to curtail spending. In France and Germany benefits were average, while a relatively high exclusion rate suggests that curtailment may have been achieved here by the use of social control. In Norway benefit levels were relatively high, while a high degree of exclusion suggests that the extent of curtailment was similar to that found in the German and French schemes. In the UK recipients received below average level benefits, while the right to aid was extensive. In a situation similar to that in the UK, in the early 1990s social assistance in the US was characterised by low level benefits combined with an above average citizenship right to aid.

While the social assistance schemes in France, Germany, Norway, the UK and the US all featured strong levels of curtailment, they appeared to apply either the 'workhouse test' or the 'less eligibility' principle rather than combining the two. This may suggest that where benefits were low (for example in the US) the need for social control was felt less strongly compared to countries where benefits were relatively high, as in Norway.

The extent of curtailment in social assistance prior to the introduction of workfare suggests that, if similar strategies were pursued in workfare programmes, there would be a very different impact on the more-less equation for social assistance recipients targeted by workfare. However, as described above, the workfare programmes considered differed substantially in strategy. By comparing the situation in social assistance in the early 1990s to the later strategy of workfare, we can give a first assessment of the change in the contract of social assistance for the target group of workfare programmes.

Two of the European centralised programmes, the Jobseeker's Employment Act in the Netherlands and Activation in Denmark, may have resulted in similar changes in the social assistance contract. While the social assistance contract changed from a citizenship right to generous benefits in 1992, towards an increase in the 'workhouse test' after the introduction of workfare, the relatively strong HRD-approach taken through these programmes suggests that the citizenship approach to welfare remains fairly strong. In other words, in the social assistance schemes in the Netherlands and Denmark, the new curtailment can be seen to be matched by new opportunities. The high degree of universality in the application of workfare programmes also suggests that their introduction impacts more on the social assistance schemes of these two nations than elsewhere. However, two further factors suggest that workfare programmes in these two nations may be developing in different ways. In Denmark, the recent extension of Activation to include people with little prospect of labour market integration can be viewed as a further strengthening of an HRD-approach. In the Netherlands, the introduction of workfare has been accompanied by a decrease in the level of social assistance benefit. This suggests that, although the social assistance scheme has maintained a lower than average level of 'workhouse testing', policy makers may have reduced attractiveness and expenditure by focusing on the alternative form of curtailment ('less eligibility'). While programmes in both countries have been designed within an HRD-approach to workfare, Danish Activation may have gone furthest in developing workfare with the potential to give participants more than before.

While the UK New Deal programme has much in common with Danish Activation and the Dutch Jobseeker's Employment Act, the change of the social assistance contract has been different and stronger in the UK. Here, compulsory participation in New Deal is today (as was social assistance in 1992) combined with relatively low level out-of-work benefits. It can be argued that the stronger conditionality resulting from compulsion involves a greater change in the contract of assistance when benefits are low. The two forms of curtailment are combined in the UK. Accepting this, one might conclude that, in spite of a relatively strong HRD-approach, it is less clear that the introduction of workfare programmes in the UK represents a change in the contract of assistance towards providing *more*.

In France, the simultaneous introduction in 1989 of general social assistance and workfare as one package makes it difficult to disentangle the impact of workfare on the assistance contract. The fact that prior to 1989 the target group of workfare was not entitled to financial aid indicates that the introduction of RMI may have involved a change towards *more*. Recipients have been offered both a new entitlement *and* a new opportunity to participate. The universal character of insertion is reduced in implementation and only seven out of ten RMI recipients had signed an insertion contract in the mid-1990s. Depending on the strategy followed in implementation, the less than universal application of insertion in RMI may have the potential of being either *more* or *less*. We found that the strategy of RMI-insertion to be positioned between HRD and LMA on the scale (See Figure 9.2). Where insertion represents a new opportunity (HRD), the result of selective application may be that fewer people benefit from these opportunities than those established by law. Where insertion is used selectively to curtail rights (LMA) rather than to offer new opportunities, the result may be that more people have benefited from the new RMI entitlement without experiencing strings attached.

In Germany the Hilfe zur Arbeit programmes contain elements of both HRD and LMA depending on where they are implemented. The fact that the expansion of workfare took place within a social assistance scheme which was average in generosity and with a stronger than average 'workhouse test' suggests that the expansion of workfare is a change towards *less*. However, the amount of local variation in implementation implies that whether the change is towards less or more may also vary. For participants in the contract programmes, the increased curtailment of an LMA-approach may be balanced by a particular German version of providing 'more': after the completion of a one-year workfare contract, participants are entitled to unemployment insurance and participation in ALMP. In this way participants may benefit in the longer run from both higher level benefits and programmes more in line with an HRD approach.

In Norway, the introduction of local workfare schemes with a strong LMA-approach further accentuates the use of the 'workhouse test' as the most common method of curtailment in social assistance. There is no indication that benefit levels have changed in a way that alters Norway's position compared to other countries. Due to substantial local variation in implementation, the more-less equation differs, however, from local authority to local authority. While our impression is that, in Norway, the introduction of local authority-based workfare appears to have been a change towards less for participants who are not able to make use of the opportunities offered by ALMP, the selective use of workfare in local authorities suggests that the majority of recipients are not directly affected by this change .

Taken together, the three US programmes appear to have a stronger LMA-approach to workfare than any of the European programmes. While the Norwegian programme is closest

in strategy, the social assistance schemes in the two countries differ substantially. In the US, a corrective and preventative form of workfare was expanded within a social assistance scheme which had a relatively weak ‘workhouse test’, but had the lowest levels of benefits among the seven nations considered in this project (see also Gough et al, 1997, p 32). That in itself indicates a movement towards *less*. Accompanying changes in social assistance since 1992 strengthen this conclusion and also suggest an increasing US ‘exceptionalism’ in workfare and social assistance. With the end of entitlement to AFDC in 1996, the US is the only country studied which has not only combined the two forms of curtailment in a harsh way, but, in principle, has taken this further than the practice of the 19th-century Poor Laws. In the 19th century ‘less eligibility’ and the ‘workhouse test’ were imposed as an *alternative* to ending entitlement. The recent introduction of compulsory work in exchange for food and lodging, rather than cash benefits, in New York for example (Bernstein, 1999), strengthens the impression that the US’ present social assistance scheme has gone furthest in using workfare as one of several instruments to achieve a change in the contract of social assistance towards providing *less* than it did at the beginning of the 1990s.

The discussion thus far has focused on variations in strategy. A separate factor which influences the more–less equation is the extent to which compulsion ‘sticks’ are matched with ‘carrots’ in the form of additional benefits or pay on top of the standard social assistance benefit. If such additional payments are applied in LMA programmes more than in programmes with an HRD approach, this would alter the picture presented so far. As Chapter Nine in Lødemel and Trickey 2001 documents, such payments can be found in all seven countries. However, it is only in the UK and the Netherlands that such additions are an entitlement for all or some of the participants. Because the programmes in these two countries feature a strong HRD-approach, the inclusion of this factor suggests that differences in the more–less equation between HRD- and LMA-approach programmes may be strengthened. Depending on the level of additional benefits provided, the inclusion of ‘carrots’ may also alter the assessment of the more–less equation of social assistance in the UK.

In conclusion, while the introduction of workfare involves a strengthening of the ‘workhouse test’, in the social assistance schemes of each of the seven countries, the extent to which this involves a change towards *less* differs. In countries where a low level of curtailment in social assistance is followed by HRD-focused workfare (Denmark and the Netherlands), the change of contract is perhaps best described as a change towards new opportunities rather than altering the more–less balance. In countries where pre-workfare curtailments in social assistance were stronger, the more–less equation differs depending on both strategy in workfare and the form of curtailment previously used. In Norway, for example, an LMA approach strengthened an already strong ‘workhouse test’ while the level of benefits remained high. By contrast, a similar LMA approach in the US programmes involved a turn towards the ‘workhouse test’ while the tradition of curtailment through ‘less eligibility’ was strengthened at the same time.

3.4. Does the introduction of workfare programmes involve a convergence of national social assistance schemes?

The idea that welfare states would become more similar, or converge, as they developed, was first put forward in the 1950s. Among others, Wilensky (1976) developed the ‘convergence thesis’ further, maintaining that the welfare state is an integral part of modern capitalist society and that nations at similar levels of development will feature similar arrangements.

Critics have argued that this assertion ignores the role of politics and over-emphasises similarity over difference (see for example Mishra, 1977; Castles, 1981). While the importance of politics dominated academic discourse in the 1980s and early 1990s, discussions about convergence have recently returned to the centre of the academic social policy discourse.

Often, the claim for convergence is associated with vague notions such as 'globalisation'. This is central to the so-called «new convergence theory» (Mabbet and Bolderson, 1999, p 48). The central premise is that in a globalised world «all market economies are subject to competitive constraints on state welfare activity»; Mabbet and Bolderson, 1999, p 48). The introduction of workfare programmes may be a part of one policy development associated with this theory – the «curtailment and targeting of cash transfers» (Mabbet and Bolderson, 1999, p 49). Where workfare is used on a large scale, as in Denmark and the UK, its introduction may, however, equally be described as an increased public investment in welfare, even if the long-term objective is cost containment through reduced dependency. This question will not be pursued further here.

Rather than addressing causal mechanisms, we are concerned with a more limited measure of convergence. Øverbye quotes Seeliger who provides a useful definition of convergence:

To classify the relative direction of policy developments in two countries (eg countries A and B) we need to have one measurement for each country at one point in time (t_1) and a second pair of measurements at a later point in time (t_2). Becoming more similar (convergence) presupposes objective – ie measurable – differences in t_1 . Between t_1 and t_2 country A, country B or both countries must have initiated measures that have reduced the difference measured in t_1 . (Øverbye, 1994, p 208)

Seeliger also makes a distinction between two different levels of convergence. If a country adopts a policy when previously there was none, and another country had the same policy in place at t_1 , this is described as 'nominal' convergence (Seeliger, 1996, p 289). In this report, the introduction of workfare is viewed as a new policy, and the extent of nominal convergence is made with reference to differences in t_1 (the early 1990s) and t_2 (the present day) in the seven countries. In order to discuss the extent of the second form – 'qualified' convergence – it is necessary to apply «a second set of scaled measurements» (Seeliger, 1996, p 289). Because workfare is a part of, or attached to, social assistance, our limited discussion of qualified convergence focuses on the extent to which the introduction of workfare has altered key characteristics of national social assistance schemes. Before we turn to such 'programme effects' of workfare, we will first consider the extent to which the spread of workfare results from the diffusion of ideas across nations.

Convergence resulting from diffusion across nations

Diffusion has been described as a process by which innovations spread from one social system to another (Rogers and Floyd Shoemaker, 1971, p 13). Diffusion can occur either through dispersing ideas across social systems, or through using lessons learned in one system to design policies in another system (Kuhnle, 1984, pp 91-3). The discussion here focuses on the *dissemination of ideas* among nations as this is more pertinent to our findings discussed below. This form of diffusion may be either hierarchical or geographical (Kuhnle, 1984). The recent introduction of a workfare-style programme in South Korea may serve as an example of hierarchical diffusion. Here, the introduction of new programmes to deal with the shocks to the labour market following the 1998 financial crisis was influenced by the advice

of the World Bank (Lødemel and Dahl, 2001). While we will point to the possibility of hierarchical diffusion resulting from the influence of the OECD and the EU for the countries considered here, the emphasis will be on the geographical diffusion of ideas. Because the spread of workfare is often linked to developments in the US, we will focus on the extent to which diffusion from the US to the six European countries is supported by our evidence. We have not been able to study these processes in great detail, and we can therefore only provide tentative interpretations which may be useful for future studies.

The introduction of compulsory programmes in very different welfare states is a sign of *nominal* convergence. At the beginning of the 1990s, only the US and Germany had in place workfare programmes as defined here. A decade later, the five other countries discussed had introduced such programmes. In spite of expressed differences in the understanding of the causes of worklessness, in political orientation, and the scale of the problem, the choice of compulsory rather than voluntary programmes shows that dependency is perceived to be a problem in all seven countries. In the US, this understanding of social problems is both more strongly expressed, and has been an important part of the social policy discourse for a longer period, than in the European nations considered here (Lødemel and Trickey 2001, Chapter One). Despite this move towards a shared understanding, the discussion above shows that strategies of implementation are very different and have had very different effects on the social assistance contracts in each country.

The fact that the programmes considered here were all either introduced or greatly expanded within only one decade, suggest that this convergence may have resulted from a rapid diffusion of ideas across nations. During this decade policy makers in all seven countries shifted their focus towards a greater emphasis on the obligations of the recipients of assistance.

The importance of timing and diffusion is that policy makers are influenced by the prevailing spirit at the time when new policies are decided. Research into the comparative history of welfare has identified several periods when similar ideas have developed in one nation and then spread internationally. A distant example is the Poor Law policies which were introduced as a reaction to the mercantilist emphasis on entitlement and on substituting low wages in Britain in the early 19th century. Those new policies inspired the change towards a more repressive system of relief on both sides of the Atlantic (see for example De Swaan, 1992; Katz, 1986). The cross-Atlantic spread of ideas in the first century of statutory welfare (from 1850 to 1950) can be described as predominantly going from East to West (see for example Rodgers, 1998). However, in the 1950s and 1960s ideas that were first developed in the US had a marked influence on Europe, this time in areas closely related to social assistance. During this period the case-work approach to social work found fertile ground in Europe where the early postwar understanding of social problems as structural problems (Titmuss, 1956) had been replaced by an emphasis on individual causes and, in many cases, pathological interpretations of worklessness and other social problems (Jackson and Valencia, 1989; Lorenz, 1994).

The uneven impact on European social assistance of this example of diffusion may be attributable to differences in the timing of policy changes. The UK, for example, abolished its Poor Law in 1948, and introduced an entitlement-based scheme influenced by a structural understanding of poverty. In Norway, the first modern social assistance scheme was enacted in 1964, and was heavily influenced by a pathological understanding of poverty using case-work as the chosen solution (Lødemel, 1997). The present move towards obligations and

responsibility may be viewed as another change in the understanding of poverty and social problems, resulting in a new prevailing spirit at the beginning of the 21st century (Lødemel and Trickey 2001, Chapter One).

The intensity of legislative activity in seven nations during such a short time period suggests that globalisation resulting from economic interdependence, information technology, the ease of travel and so on (Midgley, 1997), has resulted in faster diffusion today than was possible only a few decades ago. Commenting on the development of social insurance as recently as 1973, Heclø concluded that:

... despite what is declared to be an accelerating rate of diffusion in technical innovation, the rate of diffusion of these social innovations appears to have changed little in the last century. Between 50 and 80 years is the likely diffusion time for all such programs. (1973, p 11)

The combination of the development of a new understanding of worklessness and its appropriate solutions, and the rapid diffusion of these ideas may have facilitated a greater convergence of policies than was considered possible only a few decades ago. In contrast, the diffusion of case-work ideology in the 1950s and 1960s may have resulted in less convergence because the ideas spread at a slower pace, and policy makers reacted more slowly, eventually legislating in times of different understandings of the causes of and remedies for social problems.

As with the spread of case-work ideology, the spread of workfare is also often considered to be a diffusion of ideas from the US to Europe (Hanesch, 1998, p 73). This Americanisation of ideas and lessons has been more central to the debates in Britain than elsewhere in Europe. While some observers in Britain claim that Labour's Welfare to Work programme is inspired by developments in Scandinavia, and Sweden in particular (for example Giddens, 1998, p viii), others argue that the influence of the US is more important (Walker, 1998; Ditch and Oldfield, 1999; Peck, 1999; Deacon, 2000; Dolowitz et al, 2000, among others). The evidence presented here suggests that if diffusion from the US has had an impact in Europe, it is likely that this influence may have facilitated a convergence in the understanding of worklessness, and a corresponding re-balancing of rights and obligations in the provision of welfare. Diffusion may therefore provide a good starting point for future studies of nominal convergence in this policy area.

However, our main finding is that, regardless of this limited convergence, countries pursue different strategies in the design of their workfare programmes. This suggests, first, that understandings other than dependency have guided the design of programmes and, second, that the cross-Atlantic diffusion has been a proliferation of *ideas* about the need to re-balance rights and obligations, more than an application of *lessons learnt* from US programmes. In those European programmes (in Norway and, to a lesser degree, in Germany) which share an LMA approach with the three US programmes, explanations for their similarities can probably be found in the national context of the programmes. Future studies may find that the three countries with European centralised programmes, together with France, have been more influenced by hierarchical diffusion from the EU and the OECD than geographical diffusion from the US. While the EU has influenced the focus on the problem of social exclusion, the OECD and, later, the EU have both promoted policies which combine 'carrots' and 'sticks' with the view to promote more active social and labour market policies (Lødemel and Trickey 2001, Chapter One).

Recent developments in the EU suggest that their influence on policies targeted at young unemployed people in the member states is increasing. The 1998 Employment Guidelines (European Commission, 1998) have been followed up by so-called National Action Plans where member states set out how they will achieve agreed objectives. One of the objectives in the Employment Guidelines is of particular relevance: «every unemployed young person is offered a new start before reaching six months of unemployment, in the form of training, retraining, work practice, a job or other employability measure» (European Commission, 1998, p 4). A new system of coordination (in EU documents termed ‘open coordination’) involves, among other things, the use of ‘benchmarks’ as a basis for evaluating national success in achieving the aims of the guidelines.

The convergent developments found here in the UK, Denmark and the Netherlands may be associated with those countries’ efforts to achieve the aims of these guidelines. The much more active approach of the UK to EU social policy following the change of government in 1997 suggests that the UK is now more open to participation in policy making on a European level. Moreover, the UK has played an instrumental role in working out the tools for implementing the Employment Guidelines. The introduction of ‘benchmarking’ is, for example, a UK export. (Although France and Germany have traditionally played an important role in EU policy making these two large countries are at the same time less open to change in their national traditions of welfare. In contrast, the Netherlands and Denmark are both small nations which have a history of greater openness to foreign and international ideas.) While we have no information to test an assumption about EU-induced convergence in this area, this offers an interesting topic for future research.

Convergence resulting from programme effects

In order to discuss whether the spread of workfare programmes has resulted in *qualified* convergence, we need to focus on the extent to which workfare has impacted on the different social assistance schemes of which it has become a part. Because this is not a study of social assistance per se, the discussion is limited to the information we have available to us on the aspects of social assistance that are most likely to change as a result of the introduction of workfare. While the term ‘programme effect’ is usually associated with ‘path dependency’ rather than convergence, it is used here to discuss the impact on social assistance by shared characteristics of workfare programmes.

Part five of this report considered how the move towards compulsion resulting from the introduction of workfare has impacted on the contract of social assistance. There are two further aspects which are inherent in all workfare programmes and which are likely to have a direct impact on the national social assistance schemes. These are the combination of case-work with the provision of financial aid (cash and care) and the fact that the implementation of workfare programmes is always subject to local variation.

Perhaps the major distinguishing cross-national factor in social assistance schemes has been the extent to which the provision of financial assistance is separated from case-work interventions (Jones, 1985). Without exception, the implementation of workfare programmes involves case-work. Whether the case-work is carried out by those who allocate the benefits or by separate agencies, cash is tied to care and, in turn, both are tied to some form of control due to the conditional nature of workfare.

National social assistance schemes are also distinguished by the extent to which they are

centralised in terms of regulation. Workfare programmes, on the other hand, are implemented at the local level leading to variation resulting from local differences in programme design, in the problems addressed, and in the range of placement options available. Variations in the extent of cash-care multi-functionality and in the degree of centralisation in social assistance schemes at the beginning of the 1990s suggest, therefore, that these convergent trends have had different impacts on the national social assistance schemes. Similar workfare programmes may exert very different influences depending on the characteristics of the social assistance schemes to which they are now attached.

The extent of convergence resulting from programme effects can be summarised as three different developments. The greatest convergence, perhaps resulting in *qualified* convergence, consists of social assistance schemes that were dissimilar and have become more similar after the introduction of workfare. A second group consists of schemes that were different and continue to have different characteristics – are *non-convergent*. A third type, where schemes were similar and are now even more dissimilar can be described as a *divergent* development. We will consider these in turn.

The three countries with European centralised programmes – Denmark, the Netherlands and the UK – represent the clearest case of convergence in social assistance, here viewed as a possible *qualified* convergence resulting from the introduction of workfare. This follows from their shared HRD-approach to the design of workfare programmes and the differences in their social assistance schemes prior to the introduction of workfare (Lødemel and Trickey, 2001, Chapter One). Denmark and the Netherlands had in place similar social assistance schemes which were less centralised and combined cash and care to a greater extent than the UK scheme. However, the *workfare* programmes in all three of these countries are distinguished by being more centralised than elsewhere (Deok- refer to Figure 9.2). While New Deal is the most centralised programme of the seven countries considered here, it is more subject to local variation than the highly centralised social assistance found in the UK in the early 1990s. If future studies find that the social assistance schemes of these three countries converge, it is likely to be the result of further centralisation in Denmark and the Netherlands and a turn towards a more *decentralised* and cash-care multifunctional assistance scheme in the UK. This suggests that an HRD-approach *centralises* local assistance schemes and *decentralises* those which were highly centralised prior to the introduction of workfare.

A possible *qualified* convergence can also be found among the two countries with the strongest LMA-approach to workfare – Norway and the US – which had very different social assistance schemes in the early 1990s. In the US, the AFDC scheme was centralised and the provision of cash was not generally conditioned on case-work interventions (Eardley et al, 1996, p 118). With the expansion of workfare and other accompanying changes as described above, social assistance for workfare recipients in the US is both more decentralised and increasingly tied to case-work interventions. In Norway, the administration of social assistance was local, and the provision of aid was cash-care multifunctional. The impact of workfare on these two aspects of social assistance was therefore limited. While the Norwegian schemes remain unchanged in these two dimensions, there *is* evidence of change in the US programmes. This suggests that an LMA approach is closely linked to *decentralised* cash-care multifunctional social assistance schemes, and is likely to decentralise a previously centralised system. Signs of a move towards an HRD approach in Norway and that this development may *centralise* Norwegian workfare programmes further indicates a close link between central delivery and HRD (Lødemel and Trickey 2001, Chapter Five).

Social assistance in France and Germany has changed since the expansion of workfare in the 1990s. The schemes in these two countries have both been described as belonging to a «dual social assistance regime» (Gough et al, 1997, p 36), and as being separated by a distinction of a «corporatist regime» in Germany and a «latin regime» in France (Lødemel and Schulte, 1992, pp 533-34). We found that the strategy pursued within the RMI and the Hilfe zur Arbeit was similar, although the French programme had more centralised delivery than the German programme. This reflects the different degree of centralisation in the overall social assistance schemes of the two nations (Lødemel and Schulte, 1992). Moreover, because both countries combined the provision of financial aid with case-work in social assistance, the introduction of workfare is not likely to have impacted on these two aspects of the French and German social assistance schemes.

Perhaps the clearest sign of *divergence* in national social assistance schemes is demonstrated by the developments in Denmark and Norway. At the beginning of the 1990s social assistance in Denmark was described as belonging to a Nordic model of decentralised and residual social assistance (Lødemel, 1992). Later comparisons suggest a change towards a scheme more akin to that found in the Netherlands, for example (Bradshaw and Terum, 1997; Gough et al, 1997). The development of a European centralised programme in Denmark may therefore be a sign of a further departure from the Nordic model of social assistance.

In conclusion, the rapid spread of a new emphasis on matching entitlement to obligations in the provision of social assistance may have been facilitated by the diffusion of ideas from the US to policy makers in the six European countries studied. Diffusion is therefore a possible explanation for the *nominal* convergence described here. However, if we look beyond the introduction of compulsory participation at the extent of possible *qualified* convergence, our findings suggest that the cross-Atlantic diffusion of ideas has not been matched by the import of US-style programmes in Europe. This is perhaps best exemplified by the UK where the influence from the US has received the greatest political and academic attention. Further studies into the diffusion of workfare programmes may find it more fruitful to look at intra-European processes of policy transfer. The identification of a cluster of similar programmes in Denmark, the Netherlands and the UK may provide an interesting case for future studies of geographical diffusion.

The impression that there is divergent development between the programmes of the two English-speaking countries considered here is further strengthened when we look at the programme effects of introducing workfare. Among the seven nations considered, the impacts of these changes were greatest in the US and the UK. In spite of widespread assumptions about the diffusion and the shared turnaround in the administration of social assistance, these two countries pursue very different strategies in their workfare programmes. This suggests that similarities in the degree of centralisation and in the extent to which cash and care are separated in social assistance delivery – often regarded as key distinguishing criteria in comparisons of such schemes – may not result in a convergence in the content of the new workfare programmes. The strong divergence of the two programmes in the Nordic model reiterates this. However, the possible *qualified* convergence between the social assistance schemes of the UK, Denmark and the Netherlands has resulted from both a shared strategy to workfare and new similarities in the administration of social assistance.

Because the workfare programmes target only a proportion of social assistance recipients, the new convergent changes in administration caused by the programmes may not have greatly altered the social assistance regimes as they have been described in the mid-1990s. Our

findings indicate, however, that the previously centralised schemes are now more local, less entitlement based and more cash-care multifunctional. With the possible exception of the Dutch and Danish schemes, the introduction of workfare may therefore be part of a convergence towards a model of a local and cash-care multifunctional social assistance previously associated mainly with the Nordic countries (Gough et al, 1997). However, our discussion in the first part of this chapter suggests that this need not result in the emphasis on control and the problems of stigma associated with social assistance in Norway in particular (1997, p 37).

The deviation from previous similarities and the variation in social assistance can perhaps be best summed up as *new diversity* (Enjolras and Lødemel, 1999). If this is the case we need to reassess the social assistance typologies (or regimes) as they were described in the 1990s.

Jessop (1993) has predicted a convergence towards a ‘Schumpeterian workfare state’ and considers the spread of workfare as defined here to be an important part of this convergence (see Chapter One). If we accept Jessop’s description of wide-ranging changes in ‘the model of regulation’, which involves a departure from the welfare states as we have known them, it should not come as a surprise that diversity is the result. There is little to suggest that the ‘Schumpeterian workfare state’ (Jessop, 1993) should engender more similarities than those systems of welfare existing under the former Keynesian or Fordist models of regulation.

3.4?

Discussion

In the previous parts of this chapter the discussion has been limited to highlighting important aspects which need to be considered in order to assess the relevance of each hypothesis, and to provide information about how each programme varied. We now turn to assess the explanatory value of each of these. As we will see, while each of the first three hypotheses contributes to our understanding, the question of how this has resulted in the choice of a particular strategy remains unanswered. This discussion will be based on the assumption that the nature of the target group is the most important lens through which we can see the relevance of each of the other three factors. The figure below illustrates the explanatory framework followed here.

In this project we have found that an HRD approach is associated with centralised delivery in assistance as well as in workfare and, conversely, that an LMA approach is associated with localised delivery. In the discussion of programme effects resulting from the introduction of workfare, we have argued that the introduction of workfare was likely to decentralise social assistance schemes which were highly centralised. This followed from the observation that, in comparison to the provision of cash assistance which is highly centralised in some countries and a local responsibility in others, workfare is always implemented at the local level.

Three countries in particular (the US, Denmark and the Netherlands) did not fit these assumptions. While the three US programmes were relatively centralised, albeit on a state level, the design of these programmes was closer to an LMA strategy than the other programmes considered. Policy makers in the Netherlands and Denmark designed

programmes with a strong HRD strategy in spite of their tradition of relatively decentralised social assistance schemes. Contrary to expectations, the introduction of workfare in these two countries has contributed to a centralisation of social assistance, at least for the target group of workfare.

The clearest and most unsurprising finding is that strategy embodied within a workfare programme is closely related to the characteristics of the social assistance scheme into which it was introduced. While broad country-by-country typologies of social assistance do not co-vary in terms of the workfare strategy adopted in each country, policy inheritance relates to two aspects in particular: the extent of centralisation and the degree of entitlement to benefits. Of the programmes considered in Chapter Nine only Danish activation and the three US programmes did not fit the assumptions of this third hypothesis. However, these two countries emphasise the importance of the group targeted. Danish activation is characterised by a strong HRD strategy – the requirement to participate is matched by the right to an offer of participation. As this is also applied to wide categories of recipients, workfare is more universally applied here than elsewhere.

The strategy embodied in the programmes in Wisconsin, New York and California suggests that neither universal application nor centralisation necessarily result in an HRD strategy. The programmes here are more centralised and more universal than the other LMA programme studied – workfare in the Norwegian Social Services Act. However, the group targeted in the three US programmes was significantly different to that found in the European nations. In the absence of a national general assistance scheme, single parents constitute the main part of the clientele considered available for work. Perhaps because this group is universally seen as being dependent (Fraser and Gordon, 1994), an LMA strategy is applied universally. In this case the existing tradition of central control, now increasingly on a state level, is used to further local compliance with this strategy. In Denmark the introduction of workfare has involved a centralisation of social assistance. This politically-motivated transfer may have proved instrumental in Denmark's further departure from the Nordic approach of localised and social control-oriented social assistance.

The relationship between the degree of centralisation, target group and strategy suggests that, when three national programmes were found to be similar in terms of strategy, they may have arrived at that point for different reasons. In the UK, policy inheritance from income maintenance and a comparatively late move towards more active labour market policies have facilitated a centralised, broad-based HRD strategy. In the Netherlands and, in particular, Denmark workfare is part of a move away from previous social assistance traditions.

Moreover, although this discussion has illustrated that the composition and size of the target group is related to strategy, the causal relationship may differ. Where this appears to result from policy inheritance and recent developments in ALMP (as in the UK, Germany and Norway), our evidence suggests that this impacts on both aims and strategy. The evidence from the Netherlands and Denmark may indicate that the target group for these two programmes is motivated more by political choice (ideology matters) than by tradition (policy inheritance) and the interplay between different income maintenance and labour market policies.

We can summarise this discussion by providing a tentative interpretations of how, and why, the seven programmes studied in this report have arrived at the strategy pursued.

Throughout the discussion in this report the French RMI programme has proved difficult to place, because of two reasons: first, that this scheme did not exhibit a clear LMA or HRD strategy and that it was average in the degree of centralisation and, second, that workfare was introduced as part of the package when RMI (as the country's first general social assistance scheme) was enacted. Large scale unemployment in the target group may have facilitated a structural understanding of these problems, thereby contributing to the emphasis on social exclusion and the resulting strong integrative aims. Perhaps the clearest finding here is that these aims were not necessarily reflected in the strategy of programmes. This indicates that these ideological underpinnings have influenced programmes less than has previously been suggested. This may be because the strong centralisation in the provision of cash benefits has not been followed up in the provision of insertion opportunities, and other aspects of policy inheritance are less important here than elsewhere. In addition to an absence of a social assistance inheritance, alternative programs (ALMP) were poorly developed and the chances of a 'trickle down' effect on workfare were therefore limited. The scale of unemployment among the target group may have also reduced the likelihood of a 'negative social construction' of the target group. The poor development of ALMP, together with unemployment benefits set at the same level as RMI for large proportion of the unemployed may have contributed to an understanding of the workfare target group as part of a wider risk group. The lack of fulfilment of the guarantee of an insertion contract must be understood as an unwillingness or inability by local departments to organise and finance programmes, and thereby meet their obligations to the state and to recipients.

(The insertion contract – largely a result of political compromise, and closely related to long established practices in the Nordic countries and neighbouring Germany – has been presented as a unique French approach, and has since become a major export in an interesting case of diffusion to other Latin countries.)

The fact that the German programme was introduced much earlier than the other six programmes (1961), and that it has recently been expanded rather than introduced anew, suggests that, in Germany, policy inheritance is an important explanatory factor. The inter-relationship between workfare and ALMP may have cemented the character of workfare and broader activating policies. Unlike Norway, where, in principle, all unemployed people have access to ALMP, access for social assistance recipients is secured in Germany by participating in one form of workfare. Those selected for participation in these 'contract' programmes must remain in work for one year for a transfer to state programmes to be achieved. Because successful completion of this contract involves a substantial saving for the local authorities (because the responsibility for both benefits and training is transferred to Federal government), it is in the interests of local authorities to 'cream' participants who are closer to the labour market. As a result, we find a strong social division of programmes, within towns which organise both contract and non-contract programmes, and between towns which either have both in place or where only non-contract programmes are applied. With the exception of the former DDR, workfare has received less political attention in Germany compared to the other countries considered here. In spite of the greater attention given in the East, the much larger scale of the problem addressed has so far, here as elsewhere, resulted in expansion rather than re-direction. Notwithstanding a turn towards 'third way' policies in the current social democratic-led government, and the scale of youth unemployment, Germany has so far been immune to the wide-ranging re-balancing of rights and obligations found in other nations with similar problems. This may partly be due to the fragmentation of responsibility between different levels of government and, perhaps, an apparent dependency on the country's own traditions rather than the adoption of ideas and lessons learnt from abroad (perhaps a feature of a 'conservative welfare regime').

The Netherlands, together with Denmark, is the country in which politics appear to have a strong impact on the strategy pursued in workfare programmes. Here, therefore, policy inheritance appears to have had limited influence. The development in the Netherlands and Denmark represents a departure from previous traditions of social assistance. Moreover, ALMP were poorly developed in the mid-1990s and have, therefore, not exerted a decisive influence on workfare. On the contrary, the development of workfare, and its close integration with expanding programmes for the insured has contributed to a sharp increase in the totality of active measures targeted at the unemployed. The relatively small scale of the problems addressed in these countries suggests that a structural understanding of the problems results mainly from political orientation. Further, the universal coverage of programmes combined with the strong integration with programmes for the insured unemployed may have created a broad risk group and a corresponding avoidance of 'negative constructions' of the target group.

In Norway, the local workfare schemes represent a continuation of the history of a localised, relatively generous social assistance scheme exhibiting strong social control of recipients. The wider context of workfare has added to the importance of policy inheritance as a decisive factor. Among the seven countries, ALMP programmes were more extensive in Norway than elsewhere. The fact that recipients of social assistance were eligible to participate in labour market programmes designed for the insured impacted on workfare in two ways. First, in this situation local authority workfare plays a residual role, selectively targeting people who are both distant from the labour market and who have failed to benefit from the opportunity to participate in ALMP or achieve entry into a tight labour market (which has ample job opportunities for people with few skills). As a result, we can see a 'negative social construction' of the target group has been created, which has led to emphasis on corrective measures rather than investment through an HRD approach. This implies that, in Norway, policy inheritance is the main independent variable, which in turn impacts on the target group and on political decisions about strategy.

Danish activation represents perhaps the clearest case of an independent role played by politics. The choice of universal coverage of programmes and an HRD approach represents both a departure from policy inheritance and the expected programme effects associated with the introduction of workfare. Unlike neighbouring Norway, an already developed ALMP was more integrated with workfare, thereby further facilitating a broad risk group and therefore avoidance of 'negative social construction' of the target group. The recent extension of programmes to also include people with little prospect of labour market integration strengthens the impression of Denmark as a country which goes beyond an emphasis on work and thereby addresses the wider problems associated with social exclusion.

In spite of the high political profile surrounding the introduction of New Deal in the UK, and the fact that its introduction involves a departure from the key characteristics of pre-workfare social assistance, our evidence still suggests that policy inheritance, rather than politics, may offer an explanation for the strategies pursued in workfare programmes. In the words of Rose and Davis (1994) the recent development in the UK may be described as a version of policy inheritance: «change without choice». Three factors may have facilitated this outcome. Social assistance has been more centralised in the UK than in any of the other six countries. Compared to a localised system, a scheme under strong central government control is more easily changed by central government. Also, the unitary form of government «centralising choice in Whitehall and reducing local authorities' scope for choice» may add to the prospect for politically-motivated change. While this may aid our understanding of the dramatic

departure from key the «method of curtailment» in social assistance, we argue that the strategy pursued is best understood to have been formed by the scale of the problem, inheritance and policy context. In addition to the relatively large scale of the problem, the tradition of universally applied policies (a result of centralisation), the marginalisation of unemployment insurance and the poor development of ALMP have created a broad target group. This has, in turn, resulted in the development of an HRD strategy. Thus, the re-balancing of rights and obligations, however dramatic, has been contained by a broad risk. Because the broad drive for ALMPs includes groups with some political weight, this may have possibly resulted in a more ‘positive construction’ of the target group. While the political reorientation of the UK government after 1997 cannot be ignored, and has facilitated the introduction of workfare, we argue that other factors better explain the strategy pursued in New Deal.

3.4.1. Evaluating the Implementation and Delivery of Workfare

Evaluating the Implementation and Delivery of Workfare

Often there is a discrepancy between the stated intentions of a policy and how it was implemented and delivered in practice. The research also included a study of the actual implementation and delivery of the selected workfare policies in the six European countries. Qualitative interviews with both participants of the selected workfare programmes and those administering the schemes (*i.e.* street level bureaucrats) provided some evidence of how the programmes were delivered in practice. The interviews were conducted and analysed using common protocols to ensure consistency and comparability across schemes and countries. The fieldwork was mainly conducted during the late 1990s.

Key findings relate to the content of the workfare offers, perceptions of clients’ rights and responsibilities, how staff select and match clients to programme options and the communication of the programmes to clients.

Content of the offer

The programmes have multiple objectives, and five main types of option, or offer, can be distinguished:

- Placement in an unsubsidised job in the regular labour market;
- Placement in a subsidised job;
- Work experience or job training in the public or not-for-profit sectors;
- Training and education – this option is in addition to any training provided as part of the other options listed above. The training tends to focus on vocational topics or remedying any deficiencies with basic skills, and may lead to a formal qualification;
- Social training or social activation, which aims to improve recipients’ self-confidence, motivation to work, social networks, *etc.*

Within any of the programmes clients access to relevant options can vary at the local level. Across the programmes, street level bureaucrats identify the following factors as influencing the availability of options:

- The availability of organisational resources and differences in the size of local authorities;

- A related point is the variation in the level of political support for the programmes at national and local levels;
- State of the economy; and
- Participants' level of awareness of the options.

Street level bureaucrats and clients perceive desirable programme outcomes differently. Although street level bureaucrats seek to help participants move off benefits into regular employment and clients believe that the intention of the programmes is move them from benefit to regular employment, most staff acknowledge that this aim cannot be realised with all clients. In addition, the offer of workfare can be seen by staff (especially in Norway) as a test of whether a client is able and willing to work, and to gauge the problems they may encounter.

Although finding a regular job is generally important to clients, they are also concerned with the extent to which a programme contributes to their current well being. Participants apply a limited set of criteria to evaluate programmes, namely, the extent to which they:

- improve future job prospects; and
- provide meaningful activity, respect and social status, an income, a daily time structure and social contacts.

For clients - unlike for staff - the latter was relatively important. In particular they did not wish to be perceived as 'second rate people'. Indeed, this emphasis on being treated with respect seems to increase the longer participants stay in the programme and the more pessimistic they become about the prospect of finding regular employment. Clients intensely disliked programmes, and in some case dropped out, if the (offer of) workfare:

- was seen as exploitative (*i.e.* offering 'meaningless', temporary and/or low pay work);
- Reduced opportunities to find 'real' jobs or pursue educational and professional ambitions;
- Gave them the feeling that employers did not respect them; and
- Appeared to provide too few options.

Client with 'good' qualifications could also argue that the programmes had little to offer them (*c.f.* Germany, Norway and UK).

Rights and responsibilities

Both staff and clients had clearer conceptions about clients' responsibilities, especially about the use of compulsion, than about clients' rights. Nevertheless, some staff (notably in Denmark, Netherlands and UK) saw workfare as successfully balancing rights and responsibilities. Whilst French staff could perceive workfare as neither a right nor an obligation but as something in between. This was partly because of the way the French programme is designed (the client is initially entitled to a benefit, then they sign an insertion contract), but also because many staff thought that the right to integration was partly illusionary while there were no 'real' jobs available for clients.

Some street level bureaucrats seemed to doubt the fairness of the balance between opportunities and compulsion. However, they generally did not seem to question the use of compulsion, but rather argued for better opportunities, or an extension of these, to restore the balance between rights and opportunities.

Almost all of the clients were vague about their rights. Many clients tended to focus on the rights they believed they should have had. A common plea was that financial compensation for participation should have been higher. The lack of clarity about clients' rights made it difficult to gauge the extent to which they were enforced.

Generally, frontline staff were in favour of compulsion (the notable exceptions were some French and UK staff). Not surprisingly clients could be more critical of compulsion, although many were positive about participating in a workfare scheme. Clients' arguments in support of compulsion tended to reflect those of street level bureaucrats. Some clients felt it was almost a privilege to participate as they saw it as a route out of unemployment. Others focused on workfare as way of minimising the fraudulent use of the benefit system or said that the schemes' compulsory nature worked as a key motivational tool. Although, generally, participants did not think compulsion adds anything to their motivation to participate, and was only fair for others (whom they considered not to be motivated to obtain employment). However, other clients were very dissatisfied with having to participate in the programmes. These clients often maintain it was unjust that the state can force them to carry out tasks they did not wish to, and they frequently failed to see any benefits accruing from participation. Most clients' reactions appeared to be pragmatic rather than based on principle.

That a programme contains a compulsory element does not mean that staff will communicate or enforce it. Across the countries there is a tendency for frontline staff to emphasise the compulsory nature of the schemes to clients who are less motivated to obtain employment.

All the studied programmes include sanctioning in the form of a reduction or a withdrawal of benefit for those clients who refuse to participate. In some programmes the reduction or withdrawal is time-limited whereas in others it lasts until the client agrees to participate. Another milder and more informal form of sanctioning found in some programmes - and in case of the Norwegian street level bureaucrats is their preferred form of sanctioning - consists of repeated meetings with the client. The purpose of sanctions is to change the mind set of the participant. However, sanctions are not always imposed, and there can be considerable local and regional differences in enforcement regimes (as in France and Denmark).

Matching and selecting clients

All of the programmes involve the processes of matching and selection, either because the programmes are selective by design (*e.g.* because of a limited number of placements), or because different options exist within a more universal programme and clients have to be matched to, or selected for a suitable option. These processes determine who is included and excluded from participation in the programmes. The context to the processes of matching and selection is provided by two administrative hierarchies: one of options (or placements) for clients and the other of types of clients.

Hierarchies of options Where more than one option is available, street level bureaucrats can rank them according to their desirability. Generally, clients are unaware of these hierarchies. In practice, and sometimes also officially, options are ranked according to their 'closeness to the regular labour market'. Unsubsidised employment is undoubtedly the 'best' outcome. In addition, there is general agreement that subsidised work options - where participants do (more or less) regular work for a minimum wage, as in Germany (Hamburg, Bremen), France, the UK and the Netherlands - are the best options. However, there is less of a consensus across countries on the relative ranking of the other options.

Hierarchies of clients: Hierarchies of clients are generally based on clients relative ‘closeness to the labour market’. These hierarchies seem to be commonplace, and notwithstanding policy differences, there are many similarities between countries. In the Netherlands this hierarchy is formalised, but in practice used more loosely, whereas in other countries although official client hierarchies do not exist, they are used in practice. Staff often defines clients close to the labour market in neutral, objective terms (qualifications and work experience), leaving subjective aspects more implicit. Whereas clients more distanced from the labour market are usually defined in terms of their subjective shortcomings (psychological or social handicaps, unstable lives, inability to deal with authority relations and so on), leaving objective aspects more implicit.

Matching and selection: The processes of selecting clients for programmes, or where more than one option exists in more universal programmes, of matching clients to options, draw upon the street level bureaucrats’ hierarchies of options and clients. Matching in most cases (with the exception of Norway) is ‘top-down’: the best clients are selected for the best option, the next-best clients for the next best option, and so on. Where ‘best’ is defined in terms of closeness to the regular labour market.

Communication of programmes to clients

Two different styles of communication can be identified: client centred and institution centred. The former involves taking a participant’s aims and abilities as a point of departure. It focuses on clients’ skills and resources and is aimed at empowering clients. Exercising discretion, or ‘bending the rules’, can be considered to be a condition for this. Whilst the institution centred approach entails taking services and options offered by a (workfare) organisation as the point of departure. It focuses on clients’ problems and shortcomings, and is aimed at pointing clients the way (paternalistically) forward, usually by adhering to institutional rules. This second ‘style’ of communication seems to be more common than the first, although many street level bureaucrats would probably not want to characterise their style of communication as institution centred. However, many staff note that because of their high workloads and the associated administrative paperwork, they often lack the time to communicate with clients as they wished. This means that they often concentrate on meeting institutional needs (targets), place clients in options with little discussion, and have few contacts with clients once placed in an option. This is in line with the experiences of many of the interviewed clients.

Clients tended to perceive these different styles of communication differently. They seemed in general to be very sensitive to whether or not they were treated respectfully and were taken seriously. Not surprisingly, they tended to be very positive about a client centred style of communication.

Systematic Review of Effect Evaluations of European Workfare Programmes

What do summative evaluation studies in the six countries tell us about the impact of individual workfare programmes⁵? To address this research question, a systematic review of

⁵ The countries and the programmes evaluated are: Denmark, The Activation Line; France, The Minimum Income of Insertion (RMI), Contrat Emploi Solidarité (CES) and the ‘Emplois Jeunes’; Germany, Help towards Work; Norway: The Social Service Act (Local authority workfare schemes); The Netherlands; The Jobseekers’ Employment Act for Young People (JEA); and United Kingdom, The New Deal for Young People (NDYP) and Project Work

quantitative evaluation studies of workfare programmes published during the 1990s was conducted. A common protocol was used in the review. About 35 studies were identified for review and the number of studies by country varied from one (Norway) to 10 (Germany).

Two outcomes tended to be measured in the reviewed evaluation studies: earnings and employment. Employment measures were used far more frequently than earnings measures.

The main findings from the systematic review are:

- Many studies in the six European countries indicated that workfare programs had a positive employment effect. Due to different methodological approaches the size of the effects were difficult to estimate. The same conclusion applied to the few studies that had earnings as the key outcome. Some participants also left for other programmes or for other sorts of public benefits. Evaluation of, for example, the French RMI programme showed that a number of participants did not have a contract even though it was a legal obligation. RMI recipients with a contract were younger and had a higher educational level than recipients without a contract. Having a contract increased the probability of leaving the programme, but not for work. Rather the participants tended to move on to the CES programme. Only one out of four of the recipients left RMI for employment. An evaluation of the Dutch JEA programme suggests that the net employment effect of the programme is approximately 18 per cent. This number is uncertain, because it is based on the subjective statements of the likelihood that the participants would have found a job anyway. In Germany, however, no studies of the Help towards Work programmes establish a firm basis for answering the question whether programme participation affected the likelihood of entering the labour market. The only effect evaluation of the Norwegian compulsory schemes shows mixed results. One year after participation, there is no significant improvement in earnings or employment. Two years later, there are significant and positive effects on earnings, but still no effect on employment. It is not clear whether this somewhat puzzling result is due to measurement problems or to substantive issues. If substantive, it might mean that the effect of participation shows up after a while (two years). The discrepancy between earnings and employment may have different interpretations. One interpretation is that the participants work more hours per year. An alternative explanation is that the participants have obtained jobs that pay better. An advantage of this analysis is that it deals statistically with unobserved selection bias.
- Several studies point out that job training in private firms or activation similar to ordinary work is the most promising approach to increase employment. Nearly all evaluation studies in Denmark suggest that activation with a wage subsidy in a private firm, or job training in a private firm had the highest employment effects. The same applies to the Netherlands: those with placements in private sector jobs stood a better chance of entering regular employment than those in the public sector. However, none of these studies deals with unobserved selection bias. The effect of the French CES programme have been evaluated with more sophisticated statistical methods, which show that participants had a higher probability of getting into employment the more the schemes resemble normal employment conditions.
- Some participants seemed to benefit more from participation than others. Usually young people with higher educational levels and those with less social problems are the most successful. In France the probability of moving into regular employment increases with educational level and decreased with age. Similarly, in the Netherlands, the probability of moving into regular employment is higher for young people, non-migrants, and people

with a higher educational level. In United Kingdom, a survey among people leaving the New Deal for Young People (NDYP) within a year found that those with the highest qualification level were more than three times as likely to enter paid work than those having the lowest qualifications. But there are also examples of the opposite, i.e. that the more disadvantaged benefit the most. The French CES appears to be more useful for people with lower skills than for those with higher skill levels. Programmes involving higher levels of on the job training, such as alternative work/training programmes in private firms are most beneficial for less educated workers.

- In several programmes there is evidence of ‘creaming’ of participants: Welfare officers select participants (or participants select themselves) who are most likely to obtain regular work after leaving the programme. Thus, it is likely that a number of these participants might have found a regular job on their own, without the effort of public agencies. This so called creaming effect, or ‘dead weight’ problem, is evident in programmes in Germany, the Netherlands, and the UK. In the UK, estimates of the size of dead weight in the NDYP suggest that it might be 50 per cent. In the Netherlands, a study suggests that 27 per cent of those who move into the labour market might have succeeded without public aid. But again, there are exceptions: in Norway, workfare schemes seem to attract people who have less resources and who experience more problems in the labour market than ordinary beneficiaries.
- A majority of the participants express satisfaction with the programmes. Participants often report that the programmes give rise to increased self-esteem and that they improve their employability and educational potential. Almost all participants in the Danish studies report that they gained self-confidence, increased their skills, or increased their job-, and education opportunities. In Germany there is evidence that participation entails higher well-being and more frequent contact with other people. Participants in NDYP in the UK are typically satisfied with the programme and with the advice and support services they received from their personal advisers. However, significant numbers of participants in some programmes feel that the activities were boring and a waste of time. Participants’ satisfaction with the Dutch programme was generally quite low; they often complain that the work was boring. There are also indications that the programmes had effects that are detrimental for some of the most vulnerable participants. In the Netherlands, some dropouts from the programme resorted to criminal activity in order to make a living. In the UK, young people from disadvantaged groups were less likely to view the New Deal as useful and more likely to say that it had not been of much help. It is noteworthy that the most disadvantaged people can benefit less and tend to be most dissatisfied with the programmes, and that some participants, in the Netherlands, are worse off after the programme than before.

However, the above findings are generally tentative, both limitations in evaluation designs and the statistical methods used mean the results are generally suggestive rather than conclusive. This relatively weak evidence base is notable when compared with the USA where numerous large-scale randomised controlled trials on different sites have been conducted. None of the studies reviewed entailed random assignment. In fact, most of the studies did not even involve a comparison group.

However, many of the evaluations provide adequate answers to the question: How many, and who are most likely to enter employment after leaving the program? But they tell relatively little or nothing about the net impacts of the programmes. Accordingly, it is impossible to assess if the outcomes of the programmes can be ascribed to the interventions, or to history or

to maturation. Where no control or comparison groups exist it is impossible to determine what would have happened in absence of the programme.

4. Conclusions and policy recommendations

4.1. Conclusions

The authors of this report have made an attempt to survey an uncharted area for comparative studies. We needed to define workfare in order to select programmes and make comparisons. However, our evidence shows that the idealised definition of workfare only applies to some of the programmes considered. While this covers only a part of the options available to social assistance recipients, it has enabled us to do two things. First, through our focus, we have been able to address the change of the contract of social assistance for the most vulnerable groups of social assistance clientele. Second, by studying deviation from the idealised model, we have been able to study the boundaries between workfare and related programs. As these were found, more often than not, to be blurred, our advice for future comparatists interested in the current move towards more activating policies is to take a broader view and include other forms of activation – voluntary as well as compulsory. As this study has demonstrated, the options available and the extent to which workfare programmes are integrated with other activating programmes impacts on what workfare involves for the individual workless social assistance recipient.

This discussion has also highlighted two different developments which may impact on the way workfare will develop in the future. On the one hand, the clientele targeted by workfare is likely to be more distant from the labour market in the future. At the same time, a tendency towards a stronger HRD approach in most of the countries studied may suggest that future programmes will be better tailored to the needs of these groups.

On both sides of the Atlantic we are witnessing a redirection of welfare provision with the aim of furthering integration and inclusion. At the moment we can distinguish between two different experiments taking place. In Europe – particularly among the European centralised programmes – the experiment involves a move away from entitlement to unconditional aid and, perhaps, towards a new kind of entitlement more suited to the risks and changes in modern society (Leisering and Walker, 1998). In the US the experiment is more dramatic. By combining an *end* to entitlement and an accompanying emphasis on harassment rather than help, the nation goes beyond the principle of the 1934 UK Poor Law and, instead, follows the advice provided by Malthus at that time: «if welfare is the root of exclusion, the best way to inclusion is to do away with welfare». It will take time, and more long-term evaluation will be necessary before we can begin to assess the success of either experiment. On both sides of the Atlantic, changes in policy may contain elements of a new way to conceptualise social security as well as elements of the old. The LMA strategy can be interpreted as an ‘old’ element that can be assessed in traditional terms of ‘less or more’ (the workhouse test). However, the HRD strategy partly intends to substitute an old form of more (security) with a new form of more (security) – opportunities for participation in ‘social production’ rather than merely opportunities to participate in consumption (by providing income). Evaluation in this case depends on the extent to which this strategy succeeds in providing individuals with real and new opportunities, which future research should aim to find out. For workfare policies to be successful, in many (but not all) cases they need to compensate for providing ‘less’ in a traditional sense, by providing ‘more’ in this new sense.

4.2. Policy implications

Improvements to programmes

Policy recommendations for the development of programmes to give participants more than income maintenance have been made for each European country. There were five issues that emerged across all six countries.

- *Improve the quality of offers to programme participants:* There is a need to improve the quality of programmes by providing individually tailored options with a stronger element of human resource development (HRD). It is argued that only high quality programmes could offer a counterbalance to the curtailment of rights embodied in compulsory participation.
- *Introduce a right to activation:* With the exception of Denmark, where activation is universally applied, the individual obligation to work is not matched with a state commitment to offer all able-bodied recipients a place in a programme. In particular in the selective programmes of Germany and Norway, the lack of such a right compounds the compulsory nature of workfare. There is no guarantee that participants are selected on the basis of need rather than, for example, the desire to use workfare as a diversionary tool. This right must extend beyond a counterbalance to the right to income maintenance. With improved programmes it has the potential of becoming a new right to social integration.
- *Improve communication and case work:* With the exception of the UK, where social work has been separated from income maintenance, the introduction of workfare changes the communication between social workers and recipients of social assistance. The review of findings from interviews with participants found that the majority asked for improved opportunities to communicate with their social workers when they were participating in programmes. With a universal right to workfare and several options (of good quality) available, the unequal power balance inherent in workfare may be shifted in favour of the client. As a result communication between SLB's and their clients may improve and a shift from compulsion to negotiation and co-operation may be achieved.
- *Recognising outcomes other than paid work only:* The introduction of workfare was everywhere motivated by a desire to further the labour market integration of people who failed to (re)enter the labour market. As workfare now expands to include wider target populations in all six countries, compulsory programmes are increasingly used to target recipients who have greater and greater barriers to work. In this situation, regular work may be a distant prospect or even an impossible aim for many recipients. It is therefore necessary to secure the right to activation also for these groups (as seen in Denmark) and to tailor the programmes to further the social integration of excluded people.

Proposals for improving the evaluation of the impacts of programmes

The project has identified six proposals for improving the evaluation of the impacts of programmes.

- *The need to encourage randomised control trials:* In order to produce more robust evidence on the outcome of workfare programmes, randomised controlled trials (RCT) should be encouraged. One of the one major objections to the application of this evaluation design in Europe is the ethical argument that it is not right to exclude welfare

recipients from the potential benefits of the programme. Two counter arguments should be considered more seriously in this respect. First, no one can say for certain that everyone does benefit from participation in the programmes. Thus, to exclude some from the programme does not inevitably entail less social integration or social well-being. Secondly, in most countries, large proportions of the target group are not offered these programmes. Even if they are likely to benefit from participation, many are excluded at the outset. It is questionable that it is more unethical to exclude people on the basis of random assignment than on professional discretion.

- *The need for more sophisticated analytical methods:* To improve the knowledge base on workfare in Europe, more sophisticated methods developed in econometrics to model selection bias in quasi experimental designs should be used. Matching and other statistical methods should also be more frequently used to control for observed selection bias.
- *More diversity in the design of programmes and selection of participants:* Evaluation designs that allow investigation of the merits of mandatory versus voluntary participation are required. Further, we also need to know more about whether work first or human capital development approaches – or combinations – are the most promising in the long run. In several programmes there are clear indications of creaming which leads to inefficient allocation of public resources. This problem is paralleled by the findings that the truly disadvantaged seem unable to utilise what some of the current programmes offer, and that they express a high degree distress about it..
- *Additional measures of outcome:* Traditional effect evaluations tend to focus on easily measurable outcomes, most frequently transitions to work. Because programmes are expanding and target people with greater and greater barriers to work, work is not always a realistic outcome, at least in a short perspective. Accordingly, more attention needs to be given to outcomes such as social participation in important arenas of contact, improvement in self-esteem, a more structured life and reduced use of drugs and alcohol.
- *Incorporate qualitative studies in impact evaluations:* If these wider aspects of social exclusion and inclusion are to be reflected in research, qualitative research methodologies are required. For national policy-makers to gain a better understanding, a blend of qualitative and quantitative methodologies is required. The New Deal programme in the UK is an example of a useful mix of evaluation methods.
- *More research is required on programme drop outs:* With the exception of the Netherlands, studies of the potential for further exclusion resulting from participants ‘dropping out’ has not been given particular attention in the national evaluations.

5. Dissimination

The research group has from the outset worked on the assumption that policy recommendations cannot simply be “read-off” from research finding. We have been aware of the need to translate academic language into accessible conclusions. For this reason we decided not to leave contact with policymakers to the end of the project.

The format of the conference which we organized in London in June 1998 must be understood in this perspective. At the meeting we presented our overview and interpretations of the policies to persons who had played a key role in their introduction and implementation. In this way we were able to get an early check on our understanding, and to benefit from the input of policymakers in the planning of the next stages of the research.

The main deliverable of the first year, the "taxonomy paper" formed the core of the comparative book, and was presented as a research paper at the European Sociology Conference in Amsterdam in August 1999 (Lødemel and Trickey 1999). In November 1999 the research group was invited to present papers at the annual conference of APPAM in Washington DC.

By deciding to produce a book based on the research in Work package 1, we are moreover ensured to get a much wider audience than we would otherwise have achieved. The pioneering nature of our study has already attracted a lot of interest from the research community, and the book has already received considerable interest, both from the academic community (several reviews) and from policy makers. Rather than writing a pure academic book, we have decided to present it in a form which will attract interest in the political milieu and among the wider public.

In January 2001 Ivar Lødemel was invited by Hebrew University (Israel) to present findings and share experiences with EU-funded research.

In May 2001 Ivar Lødemel was invited by the World Bank to present findings and make recommendations for the development of workfare programmes in South Korea (Lødemel and Dahl 2001)

Bruce Stafford and Ivar Lødemel participate in the EU-funded cluster Unemployment Work and Welfare (UWWCLUS). Lødemel will contribute a chapter on the diverse origins of workfare to a book to be published by Oxford University Press in 2003 (editor: Duncan Gallie, Nuffield College, Oxford).

Ivar Lødemel has been invited by several national and European organisations to present the findings of the research. In October 2002, he will present at a conference organized by the Social Exclusion Committee.

In (Lødemel and Trickey 1999

To help inform the policy-making process the research group organised a first dissemination seminar in the summer of 1998. At this seminar senior policy-makers from the six participating nations and from the US were presented with an initial overview of the programmes. This facilitated a discussion across national borders, developed important contacts for the remainder of the project and secured important insights into how policy-makers viewed compulsory programmes. The end of project dissemination conference was held at Fafo, Oslo in October 2001 (Lødemel, ed 2001).

6. Acknowledgement and References

This report was drafted by Ivar Lødemel (Fafo) and Bruce Stafford (CRSP). It draws on the work of the whole research team (as listed in Annex 2)

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Annex 1: Output from the project

List of project deliverables

WP1

Between subsidiarity and social assistance, the French republican route to activation - Bernard Enjolras (ISR - CRIDA), Jean-Louis Laville (CRIDA), Lauren Fraisse (CRIDA), Heather Trickey (CRSP) // completed

Welfare to Work in Europe (1998, London)

Wiseman, Michael. "Workfare in the United States"

Trickey, Heather & Walker, Robert. "Working for Welfare in the UK"

Jacobs, Herbert & Voges, Wolfgang. Workfare ("Hilfe zur Arbeit") in Germany"

Spies, Henk, van Berkel, Rik & Valkenberg, Ben. "Workfare in the Netherlands: the young unemployed and the jobseekers Employment Act"

Enjolras, Bernard, Laville, Jean Louis & Fraisse, Laurent. "Action and Workfare Related Policies in France"

Lødemel, Ivar. "Workfare in Norway"

Roshdal, Anders. "Activation and 'workfare' in Denmark"

WP2 –

The «Insertion» part of the RMI, Summary of the interviewees with Policy makers-Laurent Fraise (CRIDA) // completed

The «Insertion» part of the RMI, Report on Research with Street levels bureaucrats - Laurent Fraise (CRIDA) // completed

The «Inclusion» part of the RMI, Report on research with income support recipients - Laurent Fraise (CRIDA) // completed

Workfare evaluation studies in France, Systematic review - Bernard Enjolras (ISR - CRIDA) // completed

Content of programmes (contribution for comparative qualitative reports) - Laurent Fraise (CRIDA) // partially completed

Cornwell, E., Stafford, B. and Trickey, H. (2000) *Report of Systematic Review of UK Workfare Interventions*, Loughborough: Centre for Research in Social Policy Working Paper No. 401

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WP3

Summary and recommendations - Laurent Fraise (CRIDA) // completed

Conference reports

"Integration and workfare in Europe : a historical and ideological perspective, reflections based on example of France", Jean-Louis Laville (CRIDA) in Almancil

European Seminar Policies and instruments to fight poverty in the European union

: the guarantee of a minimum income, february 2000.

"Nouveaux emplois et insertion, les politiques françaises au regard des expériences européennes", Laurent Fraise (CRIDA) - Insertion par l'économie et travail social, journée de l'Institut régional du travail social d'Aquitaine,

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Neth

Workfare in the Netherlands. The Jobseekers Employment Act for young people. Executive summary. Dr. Henk Spies, Utrecht University, september 2001.

Assessments of outcomes of European workfare programmes: winning and losing. Henk Spies, Utrecht University. October 2000.

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Spies, H., Participatiebeleid voor jongeren. Mogelijkheden voor maatwerk in de Wet Inschakeling Werkzoekenden? In: Tijdschrift voor Arbeid en Participatie 21-4, 1999. Utrecht: Jan van Arkel. (Participation policies for young people. Opportunities for Tailoring in the Jobseekers Employment Act?)

Other outputs:

Project Book

Lødemel, I and Trickey, H (eds 2001) "An Offer you can't Refuse. Workfare in International Perspective". Policy Press, Bristol.

Contents

- one* A new contract for social assistance
Ivar Lødemel and Heather Trickey
- two* Between subsidiarity and social assistance – the French republican route to activation
Bernard Enjolras, Jean Louis Laville, Laurent Fraisse and Heather Trickey
- three* Uneven development – local authorities and workfare in Germany
Wolfgang Voges, Herbert Jacobs and Heather Trickey
- four* Workfare in the Netherlands: young unemployed people

- and the Jobseeker's Employment Act
Henk Spies and Rik van Berkel
- five* National objectives and local implementation of workfare
in Norway
Ivar Lødemel
- six* When all must be active – workfare in Denmark
Anders Rosdahl and Hanne Weise
- seven* Steps to compulsion within British labour market policies
Heather Trickey and Robert Walker
- eight* Making work for welfare in the United States
Michael Wiseman
- nine* Comparing workfare programmes – features and
implications
Heather Trickey
- ten* Discussion: workfare in the welfare state
Ivar Lødemel

1999 "Convergence and divergence in European Welfare: the challenge of social exclusion and youth unemployment" in the report "Towards flexible welfare states: The future of social solidarity in Europe. Europaprogrammet. Oslo

Project reports

Welfare to Work in Europe (1998, London)

Contents

- Wiseman, Michael. "Workfare in the United States"
- Trickey, Heather & Walker, Robert. "Working for Welfare in the UK"
- Jacobs, Herbert & Voges, Wolfgang. Workfare ("Hilfe zur Arbeit") in Germany"
- Spies, Henk, van Berkel, Rik & Valkenberg, Ben. "Workfare in the Netherlands: the young unemployed and the jobseekers Employment Act"
- Enjolras, Bernard, Laville, Jean Louis & Fraisse, Laurent. "Action and Workfare Related Policies in France"
- Lødemel, Ivar. "Workfare in Norway"
- Rosdahl, Anders. "Activation and 'workfare' in Denmark"

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- 1.2 Defining Workfare
- 1.3 Programmes and timing of legislation

Chapter 2

Executive Summary: France

Laurent Fraise

- 2.1 Main Findings
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Executive Summary: Germany

Wolfgang Voes and Jörg Lemnitzer

- 3.1 Main characteristics of the German workfare program, background and position for wider activation policies
- 3.2 Description of recent developments in HTW
- 3.3 Interviews with Clients and Street Level Bureaucrats
- 3.4 Finding from review of effect evaluations

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Executive Summary: The Netherlands

Henk Spies

- 4.1 Design of the policy
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Executive Summary: Norway

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Espen Dahl and Lisbeth Pedersen

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 - 9.2 Methods
 - 9.3 What does the Systematic Review show?
 - 9.4 Discussion and assessment of the evidence
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Chapter 10

Recommendations for programme development and for research

Ivar Lødemel with Laurant Fraisse, Wolfgang Voges, Henk Spies, Bruce Stafford, Heather Trickey, Espen Dahl and Lisbet Pedersen

- 10.1 Introduction
- 10.2 Recommendation for the future development of national programmes
- 10.3 Different systems, shared problems
- 10.4 Recommendations for research

Contributions to books

Lødemel, I and Enjolras B. (1999) "Activation of Social protection in France and Norway: new divergence in a time of convergence" in Abrahamson et al "Comparing social welfare systems in Nordic Europe and France.

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Journal articles:

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Lødemel and Trickey (1999) Workfare in six European countries. Paper presented at the European Sociology Conference, Amsterdam August 6-7.

Other reports:

Stafford, B. (2001) 'The implementation of programmes – Comparative findings from interviews with participants and local organisers', *Welfare to Work in Europe and the US*, 4-5 October, Oslo, Norway.

Stafford, B. (ed.) (2000) *Social Integration through Obligations to Work? Current European "Workfare" Initiatives and Future Direction, UK Report: New Deal for Young People*, Loughborough: Centre for Research in Social Policy Working Paper No. 2328

Cornwell, E. and Stafford, B. (2000) *Social Integration Through Obligations to Work? Current European 'workfare' initiatives*, Loughborough: Centre for Research in Social Policy Working Paper No. 406.

Annex 2: Partner Institutions and Individuals

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Table 9.2 Target Group

		1	2	3	4
	Name of Programme	Benefit Group	Age Group	Exclusion Criterion	Period of Benefit receipt prior to participation in compulsory activity
DE	Activation	Social Assistance (Similar programme for insured groups)	None – but differential entry dates.	Poor health/ Pregnancy/ Mothers of young children	13 weeks or 52 weeks
FR	Insertion (RMI)	Social Assistance (Minimum Insertion Income)	>25	None	Any length of time or none
GE	Help towards work	Unemployment Related Social Assistance (sometimes also Unemployment Insurance)	Any	No	Any length of time or none
NE	Jobseeker’s Employment Act – Young People	Unemployment Related Social Assistance <i>and</i> Unemployment Insurance	16 – 23 years	Physically and/or mentally disabled. Women with young children	0 – 1 year (older people enter a version of the programme after one year)
NO	Schemes resulting from the 1991 Social Services Act	General Social Assistance	None: broadly ‘young people’	Disabled/Lone parents with young children	None: broadly ‘long term’
UK	New Deal – Young People	Unemployment related Social Assistance	18 – 24 years	Exceptional	6 months (older people enter a version of the programme after 18 months)
US	California: CalWORKS	Temporary Assistance for Needy Families	Any	Families without recipient adults, adults receiving a Federal disability benefit, adults temporarily incapacitated, adults caring for children aged under 3.	0 months
	New York: Work Experience Program	Temporary Assistance for Needy Families <i>and</i> Home Relief (Social Assistance)	Any	As above	0 months
	Wisconsin: Wisconsin Works	Temporary Assistance for Needy Families	Any	As above, but exemption occurs only if child aged under 3 months	0 months

Table 9.3 Centralised vs. Decentralised Programmes

	Name of Programme (or collection of schemes)	National – Local ¹	Codified-Disci
DE	Activation	2	2-
FR	Insertion	2	2
GE	Help towards work	2	2
NE	JEA – Young People	3	3
NO	Schemes resulting from the 1991 Social Services Act	1	1
UK	New Deal – Young People	4	3
US	State Programmes resulting from PRWORA	3	3

* But no comparable insured group (in the UK unemployed people are not eligible for insured benefits after six months, prior to this the benefits are more or less unified: hence score = (4)).

¹ Degree of central (National / Federal) control over funding and main components of delivery. (1) least control, to, (4) most control.

² Level of discretion held by individual administrator / social worker over inclusion, placement strategy and sanctioning. (1) = greatest, to, (4) = least

3 Extent of distinction within the programme between clients receiving insurance based benefits and clients receiving assistance benefits. (1) = programmes for insured clients are nearly always completely separate from this programme, (2) = this programme may overlap with programmes for insured groups – though this varies from locality to locality, (3) = this programme overlaps with a programme for insured clients who enter through a different doorway, (4) = there are no distinctions between insured and uninsured clients according to the design of this programme.

Table 9.4 Placement types

	De	Fr	Ge	Ne	No	UK
	Activation	RMI	Hilfe zur Arbeit	JEA – Young People	Norwegian Social Services Act	New Deal for Young People
Work for benefit (or near benefit) pay	X	X	X	X	X	X
Subsidised work in the regular labour market	X	X	X	X		X
Created public jobs for ‘regular’ wages		X	X			
Education and training	X		X	X		X
Social activation	X			X		
Universal / Selective⁶	U	Q-U	S	U	S	U

⁶ Universal/selective: See Table 2:-Target Populations; U= Universal, S- Selective, Q-U – Quasi-Universal.

Table 9.5 Negotiating Placements

Name of Programme		1	2
		Negotiation ⁷	Use of advisor – client contracts ⁸
DE	Activation	3	2
FR	Insertion	2	3
GE	Help towards work	2	1-2 (varies)
NE	JEA – Young People	3	3
NO	Schemes resulting from the 1991 Social Services Act	1 – 2 (varies)	1
UK	New Deal – Young People	3	3
US	California: CalWORKS	2	3
	New York: Work Experience Program	2	3
	Wisconsin: Wisconsin Works	2	3

⁷ By design: (1) No negotiation, (2) Consultation where alternatives available, (3) Intention that a range of alternatives *should* be available in order that suitable placements can be made in consultation with the client.

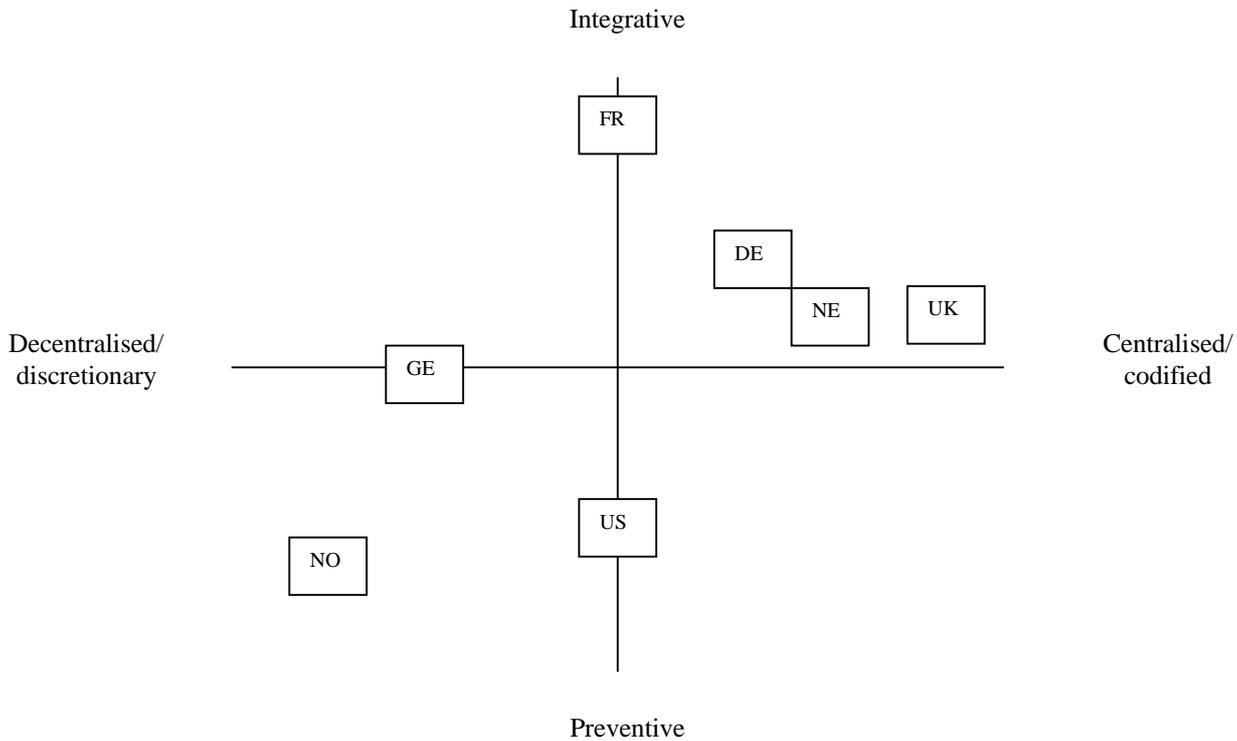
⁸ By design: Contracts to specify client's responsibilities and plan of action: (1) seldom used, (2) often used, (3) always used.

⁹ For example, housing problems, addiction problems.

Table 9.6 Sanctioning

	Scheme	1 Sanction: initial failure to participate	2 Sanction: subsequent failure to attend	3 Hardship fund available for sanctioned clients?	
DE	Activation	100 per cent until compliant	20 per cent until compliant	No	P
FR	Insertion (RMI)	100 per cent until compliant	100 per cent until compliant	No	F
GE	Help towards work	25 per cent in the first instance, up to 100 per cent, until compliant	25 per cent in the first instance, up to 100 per cent, until compliant	One time discretionary payments available.	P
NE	JEA – Young People	100 per cent, one month, then renewed sanction or benefit reduction until compliant	100 per cent, one month, then renewed sanction or benefit reduction until compliant	Discretionary hardship payments.	F C (t
NO	Schemes resulting from the 1991 Social Services Act	100 per cent, until compliant	Discretionary withdrawal, until compliant	Discretionary hardship payments.	F
UK	New Deal – Young People	100 per cent, two weeks renewable, four weeks in second instance	100 per cent, two weeks renewable, four weeks in second instance.	Discretionary hardship payments if deemed to be in a 'vulnerable group'	F
US	CalWORKS (California)	Partial	Partial	No	P
	Work Experience Program (New York)	Partial	Partial	No	P
	Wisconsin Works (Wisconsin)	Complete	Proportionate to hours not participating.	No	P

Figure 9.1 Administrative Framework and Aims



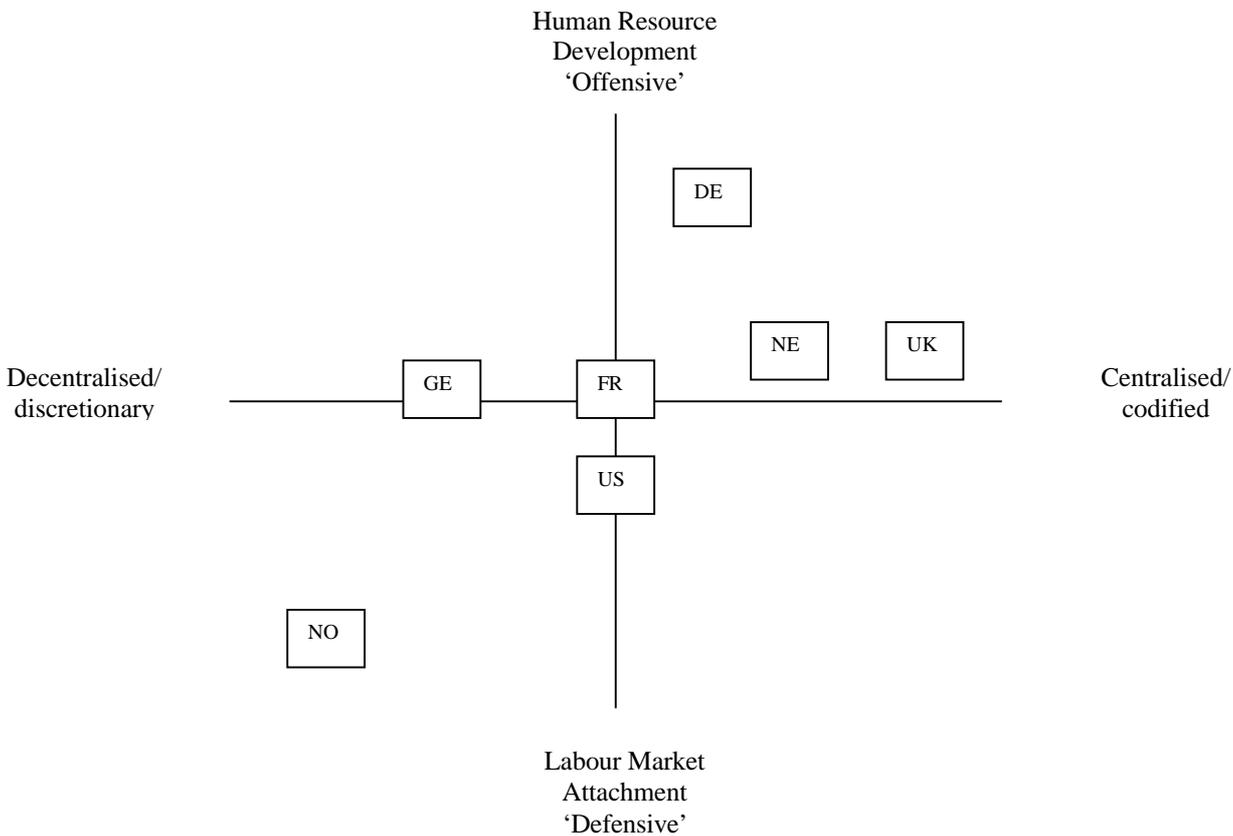
Key:

Y-axis: overall qualitative assessment of ideological underpinnings based on Table 9.1, from integrative-preventive.

For ease of presentation programmes are denoted by the initial letters of the country in which they operate. This Figure is supposed to illustrate the positioning of individual programmes and should *not* be taken to represent the totality of compulsory work programmes within each country.

- DE – ‘Activation’
- FR – ‘RMI based Insertion’
- GE – ‘Help Towards Work’
- NE – ‘Jobseekers Employment Act’ for young people
- NO – Local authority based workfare schemes following the 1991 Social Assistance Act
- UK – ‘New Deal for Young People’.
- US – State programmes following from PRWORA, *but*, represented by programmes for TANF recipients operating in California, New York and Wisconsin.

Figure 9.2 Administrative Framework and Strategy



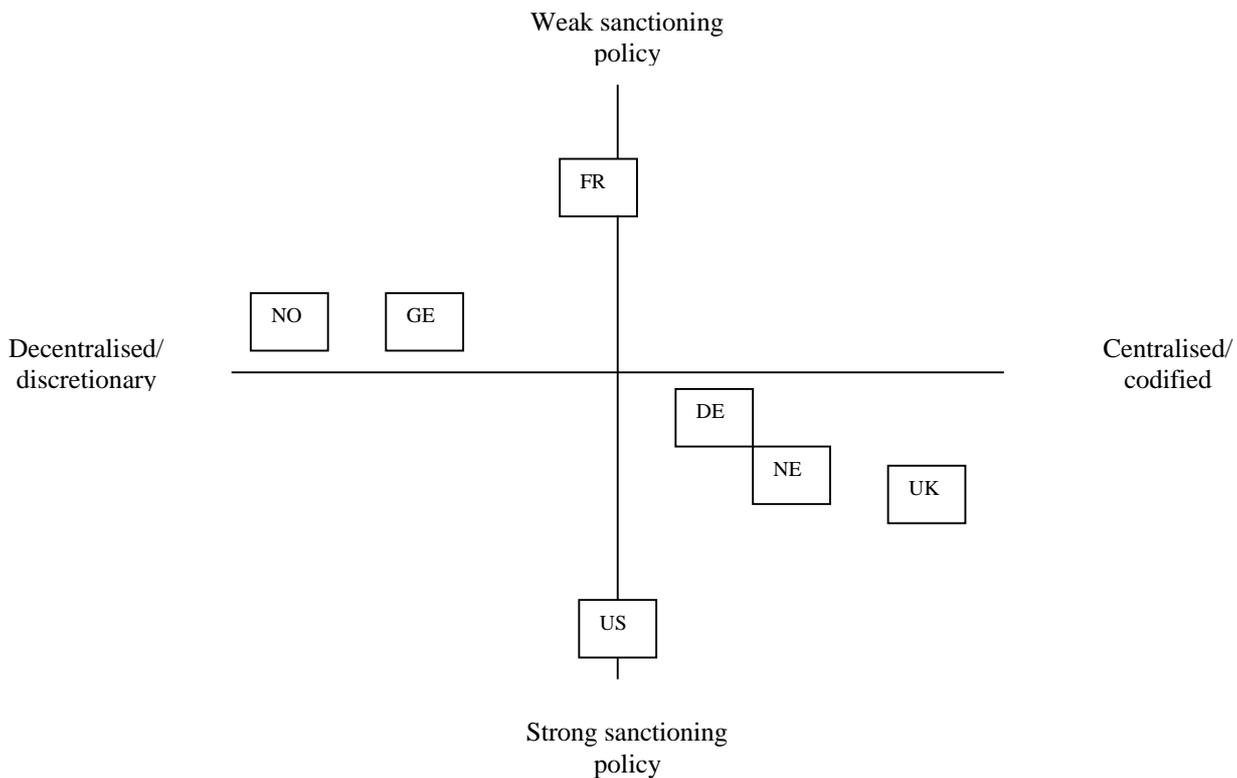
Key:

Y-axis: overall qualitative assessment of the strategy embodied by individual programmes, ranging from 'labour market attachment' to 'human resource development'.

For ease of presentation programmes are denoted by the initial letters of the country in which they operate. This positioning should not be taken to represent the totality of compulsory work programmes within each country.

- DE – 'Activation'
- FR – 'RMI based Insertion'
- GE – 'Help Towards Work'
- NE – 'Jobseekers Employment Act' for young people
- NO – Local authority based workfare schemes following the 1991 Social Assistance Act
- UK – 'New Deal for Young People'.
- US – State programmes following from PRWORA, *but*, represented by programmes for TANF recipients operating in California, New York and Wisconsin.

Figure 9.3 Administrative Framework and Sanctioning Policy



Key:

Y-axis: overall qualitative assessment of the strength of the programmes' sanctioning policy

For ease of presentation programmes are denoted by the initial letters of the country in which they operate. This positioning should not be taken to represent the totality of compulsory work programmes within each country.

DE – 'Activation'

FR – 'RMI based Insertion'

GE – 'Help Towards Work'

NE – 'Jobseekers Employment Act' for young people

NO – Local authority based workfare schemes following the 1991 Social Assistance Act

UK – 'New Deal for Young People'.

US – State programmes following from PRWORA, *but*, represented by programmes for TANF recipients operating in California, New York and Wisconsin.