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[See table of contents](#)

Article abstract

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An International Comparison of Work Sharing Programs

**R.W. Crowley
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INTRODUCTION

The notion of sharing available work to maintain employment levels is not new. In some socialist countries, in fact, it is the basis for the claim that unemployment does not exist.¹ In North America, large unions have long recognized their role in defining work norms to maximize employment and hence union membership. One can trace the origins of formal work sharing programs at least to the 1930s when various programs were put in place to combat the Great Depression.² The only such continuous formal program of work sharing is in Germany where it has been operative for slightly more than 50 years. As in all countries with established work sharing programs, the current Canadian program has grown from humble roots to quite an extensive size. In 1982, about 200,000 workers across the country participated in the program and the program is expected to expand even more in 1983.

In the light of this, it is surprising that there is not more available information comparing experience in different countries. Hence, the purpose of this article is to draw together primarily unpublished information that will provide such comparative information with respect to North America and Western Europe. For those readers unfamiliar with the work sharing pro-

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¹ There may also be other «word games» at work. In 1979, one junior communist party member (tongue in cheek) reported in response to a question on the extent to which young people were experiencing difficulty finding jobs. «There are no unemployed youth in China; we have only youth waiting for employment.» This ranks with the widely reported observation of a very senior Chinese official visiting the United States: «We have no prostitutes in China; but, we do have a problem with women in large cities such as Shanghai who exchange sex for money».

² F. BEST, *Work Sharing: Issues, Policy Options and Prospects*, Kalamazoo, Michigan: The W.E. Upjohn Institute for Employment Research, 1981.

gram in Canada, we commence with a brief description of that program. Table 1 provides a summary comparison of programs to the work sharing program in Canada.

CANADA

In August 1977 amendments to Section 38 of the Unemployment Insurance Act resulted in the 1977 inauguration of an experimental work sharing program in Canada.³ The main objective of this program was to avert layoffs. The initial experimental program (during with work sharing was implemented in 24 different situations) ended in 1979 but a more widely available program was initiated in January 1982. During 1982, approximately eighty-three million dollars was spent on work sharing compensation. This amount is equivalent to almost 1% of the total expenditure for unemployment insurance. There were approximately 181,000 work sharing benefits recipients in 1982, as compared to 3,201,000 regular claimants.

Canada's work sharing program is administered by the Canada Employment and Immigration Commission and involves a formal agreement among the employer, employees, and the federal government. A work sharing agreement is for a maximum of twenty-six weeks but the Commission may extend an agreement for a further twelve weeks if it appears the return to full employment will take longer than originally forecast or if it seems a permanent work reduction is inevitable. In the latter case, work sharing would be extended to provide for a phased reduction in the work force through attrition. Employers cannot reapply for work sharing until one year after the commencement of their last work sharing agreement.

To receive approval to implement work sharing, an employer must submit an application to the Commission demonstrating that certain criteria are met. The firm must be an established enterprise which has been operating for at least two years; the need for reduced output must be unavoidable; firms must be capable of returning to normal production at the end of work sharing period, employers and employees must agree on the need to initiate work sharing; and initially, firms must have a work reduction of at least twenty per cent to be deemed eligible for work sharing. (Subsequently, work reduction may fall to 0% — for a maximum of six weeks — or reach a maximum of 60%, but it must be a minimum 10% over the life of the agreement.)

Employees must also fulfill certain eligibility requirements. Since work sharing is an element of the unemployment insurance system, the entrance requirements are the same; employees must have had ten to fourteen weeks of insurable employment before the commencement of work sharing. The level of work sharing benefits is based on the loss in normal average weekly earnings. Workers receive a proportion of the weekly regular employment insurance benefit equal to the proportion by which the normal weekly earn-

³ For a discussion of the origins of work sharing, «Work Sharing and Layoffs», *Industrial Relations/Relations industrielles*, c.f. R.W. CROWLEY, Vol. 34, No. 2, 1979, pp. 329-334.

ings have been reduced. (Normal weekly earnings are calculated as the average of weekly earnings for the 20 most recent weeks of full employment with the work sharing employer.)

Work sharing claimants may earn income from secondary employers up to 25% of what would be a full weekly U.I. payment. Earnings in excess of this amount are deducted from work sharing benefits.

Work sharing is funded by the regular unemployment insurance fund. However, unlike regular U.I. recipients, work sharing claimants are not currently required to serve a two-week waiting period. The programs also differ in that regular U.I. entitlement requires seven days without earnings before a claimant is said to have experienced an interruption in earnings, whereas a work sharing participant is deemed to have experienced an interruption in earnings when the work sharing agreement starts. Employee entitlement to regular unemployment insurance benefits is not affected should there be a layoff at the conclusion of a work sharing agreement.

CALIFORNIA

Among work sharing programs elsewhere, the California Shared Work Unemployment Insurance Program⁴ is most similar to Canada's. In 1978, an 18-month experimental work sharing program was established. It was extended for an additional two years in 1979 and is now considered an ongoing program. The program aims to be an alternative to layoffs and to serve as an adjustment mechanism by allowing employees to look for new jobs while working short time for firms facing permanent staff reductions. To date, participation in California's shared work program has been limited, no doubt partially reflecting the low level of benefits compared to regular employment earnings (or compared to Canadian work sharing benefits). During 1982 there were 1,200,000 regular unemployment insurance claimants compared with 90,000 short-time compensation recipients.

The program is administered by the California Employment Development Centre which also administers unemployment insurance, disability insurance and the California State Employment Service. The Administrative procedures are relatively simple. Employers are required only to complete a two-page application form which includes names of affected employees, information on the size of earnings and hour reductions, and a statement that work-time reduction is an economic necessity. There is no requirement to document or prove that a work-time reduction cannot be avoided, nor is it necessary to state the number of layoffs that will be averted.⁵

4 Based on unpublished internal assessments by Canada Employment and Immigration officials who interviewed California officials; *California Shared Work Unemployment Insurance Evaluation*, Sacramento, Health and Welfare Agency and Employment Development Department; May 1982.

5 This is estimated later from employer data regarding the size of the employers' work force and their utilization of work sharing benefits.

If an employer's application is approved, and both the employer and employees are deemed eligible to participate in the program, employers provide participating employees with a statement of reduced hours and wages. Employees in turn use this statement to claim short-time benefits. After an initial claim is filed personally by an employee at the local branch of the Employment Development Department, benefits are received by mail directly from the State.

To be eligible to participate in the work sharing program an employer must face an anticipated work reduction of 10% involving at least 10% of the work force. If employees are unionized, the employer must reach an agreement with the collective bargaining unit in order to enter into a work sharing agreement. Worker agreement is not necessary if there is no union.

Since the work sharing program operates under the aegis of the unemployment insurance program, employees must meet the same criteria for benefit eligibility. During 1980 this required that a California worker must have earned at least \$900 in the preceding 12 months in order to qualify for the minimum benefits of \$31 per week. The ceiling on benefits, \$120 per week (or \$24/day), is payable to workers with earnings of \$4,160 or more in the highest quarter of the preceding 12 months or «base period». The amount of unemployment insurance payable to a work sharing claimant is proportional to the reduction in the work week.

Unlike practice in Canada, all work sharing claimants must serve a one week waiting period before receiving initial short-time benefit. After this waiting period is served, a claimant may receive compensation for up to twenty weeks in a fifty-two week period. Extensions are not granted.

If workers are laid off at the conclusion of the work sharing program they are eligible to receive unemployment insurance, but for a shorter duration to reflect the dollar cost of benefits received under work sharing. However, an employee who is laid off immediately following work sharing will receive unemployment insurance at the same rate as under work sharing. (Since this rate is determined using base earnings in the quarter one year prior to claiming benefits, workers who make claims one year after participating in work sharing may have their benefit level effected.)

In California work sharing coverage and entitlement are assigned to employees and not attached to firms. Firms, therefore, have a great deal of freedom while participating in the program. An employer can vary work reduction on a week-to-week basis from 0 to 100% (in the case of 100%, it becomes a week of unemployment benefits and does not count against the employees allotted twenty weeks of short-time benefits). Employers are not restricted in their personnel decisions: they are free to transfer, hire or fire employees while participating in the program. Provisions for fringe benefits have been left to the discretion of employers.

Employees receiving work sharing benefits are not obliged to seek work actively, as are regular unemployment insurance claimants, unless the employer is using the program as a transitional mechanism to a future permanent work reduction. Income from secondary employers is deducted from work sharing benefits.

In California, the unemployment insurance fund is financed by government contributions and by a payroll tax paid by employers. This tax varies from 0.5% to 3.9% of taxable wages (currently \$6,000/year for each employee). Employers with large positive unemployment insurance reserve balances are taxed at the lowest rates. All unemployment insurance benefits paid to a firm's former employees are charged against its account. Work sharing users whose unemployment insurance benefit charges exceed their contributions (negative reserve balance users) must pay a supplementary tax ranging from 0.5% to 3.0%. This surtax helps to ensure the solvency of the unemployment insurance fund but, more importantly, it also aids in discouraging non-stable and/or seasonal employers from using the work sharing program. This requirement is considered to be effective in accomplishing these goals since relatively few negative reserve balance firms participate in the program.

Recently, the U.S. Department of Labour has drafted model legislation for use by state governments considering work sharing programs.⁶ This model legislation largely reflects the California case, though there are some differences. It specifies that employers should continue to provide health and retirement benefits while participating in the shared work program. It also suggests that employee eligibility for short-time compensation be limited to a maximum twenty-six weeks during any twelve month period. The California State government has been considering amending its legislation to increase from twenty to twenty-six weeks the initial period during which benefits are available and implementing «triggering» extensions whenever, and as long as, the unemployment rate is above 7.5%

GERMANY

The Short-Time Allowance Program in the Federal Republic of Germany⁷ has been in effect for over fifty years. The objectives of the program are to maintain employment and to assist employers in preserving their trained work force. The increasing importance of this program as economic conditions deteriorate is demonstrated by its growth: 350,000 recipients (1.3% of the labour force) in 1981 had expanded to 600,000 in 1982 and the forecast for 1983 is 800,000. Table 2 shows, however, that there has been considerable variation over time in the use of the program, presumably reflecting changes in economic conditions.

The German Short-Time Allowance Program is administered by the Federal Employment Institute, an independent organization composed of representatives of labour, business and government. The Institute also administers unemployment insurance and other labour market measures, though these programs are operated separately from work sharing.

⁶ Draft Legislation, Washington, U.S. Department of Labour, August 1982.

⁷ Based on correspondence with the Canadian Embassy, Bonn, F.R.G.; E. YEMIN, ed. *Work force Reductions in Undertakings*, Geneva, International Labour Office, 1982; and R. BEATTY, *Review of Work-Sharing (Short Time Benefit) in Europe*. Ottawa Department of Manpower and Immigration, unpublished paper, March 31, 1977.

The program is available to all firms with at least one paid employee. It is not available to firms in seasonal industries or firms whose hours are irregular. In order to be eligible for work sharing, an employer must demonstrate that short-time working is due to economic causes, that it is temporary and that all steps have been taken to avoid this situation. To receive government approval to introduce work sharing, an employer must initially require a work reduction of at least 10% affecting no less than a third of the work force for four weeks. Short-time working weeks are only sanctioned if, in accordance with the *Works Constitution Act*, both management and employee representatives agree to it. An employer who receives approval for work sharing pays employees their short-time benefits and, in turn, is reimbursed by the Federal Employment Institute.

To be eligible to receive short-time allowances, employees must be on the employer's payroll at the time the application is submitted and must also be making unemployment insurance contributions at that time. Eligibility is not dependent on past employment. The level of benefits is based on the last wage earned in the month preceding the commencement of reduced working weeks. To simplify administration, employers are provided with lists of five wage levels and instructed to identify which level best approximates the wage of each affected employee. An employee's short-time allowance then consists of sixty-eight per cent of this amount. The legal maximum period for which benefits may be received is six months, but the Minister of Labour has always had the right to extend this period for a further six months. Recently, because of the deteriorating labour market conditions, all manpower centres have been authorized to routinely approve extensions for up to eighteen months. The Minister of Labour has also been empowered to approve extensions in the German steel industry for up to thirty months. Once full-time work has been resumed, a three month period must elapse before an employer may reapply for work sharing benefits.

While participating in the work sharing program, employers are generally not permitted to hire or fire employees. A work reduction of at least 10% must be maintained or the employer ceases to be eligible. During work sharing the employer must continue to make contributions to pension funds and health insurance. (The Federal Employment Institute pays 75% and 50%, respectively, of each of these contributions.) Employees face only one restriction. They are required to report earnings from secondary employment which are then deducted from short-time benefits. In cases of layoffs following short-time work, there is no reduction in unemployment insurance entitlement.

Work sharing benefits are financed with regular unemployment insurance premiums. These premiums are now 4.5% of gross wages up to a maximum level of insurable earnings and are shared equally by employers and employees. Any deficit the Federal Employment Institute accumulates is financed by the State. The deficit is forecast to be approximately five billion deutschmarks (2.5 billion dollars) in 1983.

SWEDEN

The administration of Swedish labour market policy is focussed on the workplace. Both regular unemployment insurance and work sharing are administered by unemployment insurance societies, which are closely linked with nationwide unions. These societies are financed by members' dues, employers fees and government grants. The regulations governing work sharing result from employer/employee agreements and the specifics therefore vary from case to case. The details of the following discussion pertain to the Swedish metal workers union.⁸

To be eligible to obtain work sharing compensation, an employee must meet basically the same criteria required for unemployment insurance. Claimants must be available for work on days not worked. Any money which is earned on these days is deducted from short-time compensation, unless the claimant had a permanent second job prior to receiving work sharing benefits.

There are no regulations stating how many layoffs must be prevented or how large a work reduction is required for a firm to introduce work sharing. However, each individual work sharing agreement will most likely require a certain work reduction. Swedish officials claim that union interest in the unemployment fund limits abuse and makes it possible for the state not to have to determine a firm's eligibility to participate in work sharing.

In the metal industry, an agreement has been reached between employers and the union confirming that for the first five days during layoffs and reduced working weeks, employers pay employees full salaries. After this initial five day period, reduced working weeks may continue for up to twelve or fifteen weeks.

The maximum benefit payable to work sharing claimants is 230 kronor/day (\$38) while the average is 200 kronor/day (\$33). This is approximately two-thirds of the daily average income of an industrial worker. Some local agreements between employers and unions specify that employers will compensate employees for the difference between unemployment benefits and full salary.

An employee who is laid off after having received reduced working week benefits is eligible to receive unemployment insurance, but entitlement to these benefits is reduced by the number of days for which short-time compensation was received.

⁸ Based on information from Swedish Labour Counsellor's Office, Embassy of Sweden, Ottawa, Ontario, «Swedish Labour Market Policy», Fact Sheet on Sweden, August 1981.

FRANCE

Work sharing in France⁹ is most often used in cases of a temporary decline in demand, although it sometimes serves as a prelude to a permanent work reduction. It is considerably different from programs in other countries. The program is administered by the State and not by the same independent organization that administers unemployment insurance.

An employer considering a work reduction must first consult (not necessarily obtain agreement of) the Works Committee within the establishment. An application must then be submitted to the Department of Labour. To be given approval to implement work sharing, the expected work reduction must affect no less than 10% of the firm's work force and must be no greater than five hours per week.

All employees who are bound by contract to stay with a firm, and who sustain a reduction in salary because of a reduced working week, are eligible to receive partial unemployment benefits. Seasonal workers are eligible to receive short-time benefits if they can prove that in preceding years they had earned a regular salary at the specified time of year. Short-time compensation generally represents 70% of the minimum wage (\$1.80) (10F 97L/hr. as of July 1, 1982). A worker is eligible to receive work sharing benefits for a maximum of 600 hours per year.

Usually, work sharing benefits are paid by employers who in turn receive a partial reimbursement from the government. The State may compensate for up to 80% of the payments that an employer makes. In some cases, a modest amount of public assistance may be paid directly to individuals.

Ordinarily, agreements for short-time compensation have a maximum duration of six months. If the firm continues to require work force reduction after this period, the agreement can be renewed for the same length of time. If necessary, one further extension can be granted when the first renewal is exhausted. Entitlement to unemployment insurance benefits is not affected, if there is a subsequent layoff.

Under work sharing employers are not permitted to hire new workers. As well, they are prohibited from hiring or laying off employees without the approval of the Department of Employment. Employees are restricted from accepting secondary employment during the hours for which they receive work sharing benefits.

THE UNITED KINGDOM

In the United Kingdom,¹⁰ the Temporary Short-Time Working Compensation Scheme came into effect for a five year period beginning in 1979.

⁹ Based on correspondence with the Canadian Embassy, Paris, France; «*Work-Sharing in Europe*», Ottawa, Department of Manpower and Immigration: unpublished paper May 20, 1977; and E. YEMIN, (ed.), *Workforce Reductions in Undertakings*, Geneva, International Labour Force 1982.

¹⁰ Based on correspondence with the Canadian High Commission, London, U.K. and E. YEMIN, (ed.), *Workforce Reductions in Undertakings*, Geneva, International Labour Organisation, 1982.

Initially, clothing, textiles, and footwear firms were the heavy users of this scheme; engineering firms have now become predominant. Since its inception about three million workers have benefitted.

Employers must submit applications for compensation to the Department of Employment if they wish to initiate short-time compensation. They must demonstrate that at least ten workers are facing imminent layoff and that the decline in work is temporary with a reasonable expectation of returning to full employment. Positions for which the employer requests support must not be presently receiving any other government assistance. Most employees are eligible for short-time compensation with the exceptions of casual and seasonal workers (excluding construction workers). Part-time workers working more than sixteen hours per week and construction workers are also eligible. Both unions and management must agree to involvement in the work sharing scheme before it can be implemented.

Employees must receive benefits from employers equal at least to 50% of their normal wage for the hours by which their work week is reduced. Earnings from secondary employment are not considered in determining benefits. Employers are reimbursed by the government for the minimum payment, up to a maximum of sixty pounds (\$113) per week. This reimbursement can continue for a maximum of six months. Employers are not permitted to apply for an extension of short-time compensation for the same jobs. They are, however, able to apply for subsidies for other positions threatened with redundancy. If this is done, the Department of Employment undertakes a rigorous examination to ensure that the employer has not simply dissembled the formerly subsidized positions. Employers must give a ninety day notice before employees can be declared redundant and laid off. If this notice is given while the employee is receiving short-time compensation, the employer is required to repay the subsidy. Therefore, an employee is generally ensured of at least ninety days of work following the conclusion of short-time working. An employee's entitlement to unemployment benefits is not affected if laid off after receiving short-time compensation.

While participating in the program, firms must provide all affected employees with at least one full day of employment for every seven consecutive days without work. If this commitment cannot be fulfilled, the subsidy is stopped. The subsidy for a specific short-time job is also discontinued if the employee is declared redundant. Should the firm later become insolvent, subsidization is stopped and the employer is required to repay all money granted for reimbursement of short-time employees wages from the date insolvency was clearly suspected.

CONCLUSIONS

The six work sharing programs examined in this paper are generally similar in design and intent, although certainly there are differences in detail. (See Table 1.) With the exception of the U.K., in all of the schemes secondary earnings reduce work sharing compensation. In Canada,

claimants are able to earn up to twenty-five per cent of a full weekly unemployment insurance payment before the weekly benefit level is reduced. In the others, secondary earnings are deducted from work sharing benefits. All of the programs have work reduction requirements for employer eligibility, with the specifics of these requirements varying from country to country. In all but the Swedish program, employers face restrictions concerning the amount of work reduction necessary for continued eligibility, but again these conditions vary from program to program. With the exception of the United Kingdom where construction workers are eligible, seasonal workers are not covered.

Employee eligibility is generally not based on previous employment; Canada and California are the exceptions in this case. The level of benefits is approximately two-thirds of normal salaries (up to a maximum) in most countries, though in the United Kingdom it is only 50% of normal salary. Six months is the standard maximum duration of the benefit period, but in Sweden it is only half this long. Except in California, employers are not free to hire new workers while they are participating in work sharing.

A work sharing benefits claimant's future unemployment insurance entitlement is not affected in three of the countries but is reduced in California and Sweden. The treatment of fringe benefits is also not standard; in Canada, California and the United Kingdom no legal provisions are made, while in the others they are continued during the term of the work sharing agreement. The California program is the only one in which claimants must serve a waiting period before receiving work sharing benefits, though in the Swedish variant the employer pays full salary for the first five days.

All in all, a diversity of detail but a commonality of purpose. With respect to the future, one can expect increasing attention to innovative programs such as work sharing as policy makers grapple with ways to deal with adjustment problems.

Table 1
A Comparison of Work Sharing Schemes as of January, 1983

	<i>Canada</i>	<i>California</i>	<i>Germany</i>	<i>U.K.</i>	<i>Sweden</i>	<i>France</i>
Coverage	Seasonal workers are not covered	Seasonal workers are not covered	Seasonal workers are not covered	Construction workers are eligible	Seasonal workers are not covered	Seasonal workers are covered (if they can prove they normally are employed at that time of year)
Employed Eligibility	Based on previous employment	Based on previous employment	Not Based on Previous Employment	Not Based on Previous Employment	Not Based on Previous Employment	Not Based on Previous Employment
Work Reduction Necessary for Employer Eligibility	At least 20% work reduction affecting at least 2 employees	At least 10% work reduction affecting 10% of employees	At least 10% work reduction affecting one-third of work force	At least 10 employees threatened with redundancy	No specific requirement (see text)	Work reduction must affect no less than 10% of employees
Level of Benefits	Received at same rate as U.I., for number of hours by which work week has been reduced.	Received at same rate as U.I., for number of hours by which work week has been reduced.	68% of normal salary	Minimum is 50% of normal salary	Average is 2/3 normal pay of industrial worker	70% of normal salary
Waiting period	None	1 week	None	None	For first five days employer pays full salary	None
Benefit Period	26 weeks	20 weeks	24 weeks	24 weeks	12-15 weeks	24 weeks
Extension	Extensions subject to C.E.I.C. approval	None (see text)	May be extended for 1 1/2 yrs. (2 1/2 yrs. in steel industry)	May not apply for extensions for same positions	None	May be extended for 24 weeks
Effect on Future U.I. Entitlement	No effect	Reduced	No effect	No effect	Reduced	No Effect
Treatment of Fringe Benefits	No provisions	No provisions	Contributions continued (see text)	No provisions	Not affected	Provisions are made for their continuation
Treatment of secondary earnings	Employees able to earn up to 25% of a full weekly U.I. benefit payment. Secondary earnings in excess of this amount are deducted.	All secondary earnings deducted from benefit	All secondary earnings deducted from benefit	Secondary earnings do not affect short-time benefit	Secondary earnings reduce benefit	Not applicable (see text)
Restrictions on Employer	Generally not free to hire. Maximum permissible reduction is 60% over life of program reduction must be at least 10 per cent.	Work reduction may vary from 0 to 100%. Free to hire, fire and lay-off employees	Generally hiring and lay-offs are not permitted. Must continue to require a 10% work reduction affecting 10% of employees	Firm must provide employees with one full day of employment for every seven consecutive without work days	Not free to hire	Generally hiring and lay-offs are not permitted

Table 2
Annual Averages of Unemployment and Worker
under Short-Time Compensation, West Germany

<i>Year</i>	<i>Registered Short-time Workers (000's)</i>	<i>Registered Unemployment (000's)</i>
1968	10	323
1969	1	179
1970	10	149
1971	86	185
1972	76	246
1973	44	273
1974	292	582
1975	773	1,074
1976	277	1,060
1977	231	1,030
1978	250	1,000
1979	n.a.	n.a.
1980	135	889
1981	350	1,272
1982	600	n.a.
1983	800 est.	

Source: Best, Fred and James Mattesich, «Short-time compensation systems in California and Europe», *Monthly Labour Review*, vol. 103, no. 7, (July 1980), pp. 13-22, and for 1980, 1981, 1982 the Canadian Embassy, Bonn, F.R.G.; O.E.C.D., *Main Economic Indicators*, Paris: November, 1982.