

## Comparative Manpower Strategies Étude comparative des stratégies en matière de politique de main-d'oeuvre

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Résumé de l'article

Dans cet article, l'Auteur traite des moyens qui sont utilisés dans les pays membres de l'OCDE pour planifier leur politique en matière de main-d'oeuvre. Pour en comprendre le sens et la portée, il faut les considérer à la lumière du développement économique de chaque pays.

Lorsqu'une nation est au premier stade de son développement industriel alors que les revenus sont relativement peu élevés, le gouvernement accorde généralement priorité à la création d'entreprises nouvelles, à la croissance des investissements et à l'expansion des marchés d'exportation. Il met l'accent sur la mise en place des infrastructures: transports, sources d'énergie, moyens de communications. Il consacre aussi beaucoup de ressources à l'éducation et à la santé. De là, il découle que les programmes de main-d'oeuvre tiennent une place plutôt secondaire dans les préoccupations de l'État.

Ce n'est que plus tard, que les gouvernements en viennent à concentrer plus d'efforts sur des programmes de main-d'oeuvre qui sont la conséquence d'un haut degré d'urbanisation et d'industrialisation, où les progrès technologiques sont rapides, où les postes de travail deviennent vite désuets, où des qualifications professionnelles nouvelles et toujours plus spécialisées s'imposent.

En deuxième lieu, les programmes de main-d'oeuvre ont pour objet de favoriser la mobilité professionnelle, territoriale et industrielle des travailleurs, principalement ceux qui ne sont pas protégés par des conventions collectives de travail. En Europe, par exemple, la formation de la main-d'oeuvre repose principalement sur les épaules des agents économiques, syndicats et employeurs, alors que, aux États-Unis et au Canada, l'initiative a été prise la plupart du temps par les gouvernements.

En troisième lieu, l'Auteur fait remarquer que le choix des gouvernements a été influencé par les coûts, d'où l'existence de deux tendances diverses. L'une de ces tendances consiste à faire absorber presque exclusivement le coût de la formation de la main-d'oeuvre par les employeurs. À l'opposé, il y a des pays où le gouvernement établit les politiques de main-d'oeuvre directement à même ses revenus sans en imposer le fardeau aux employeurs. Dans la plupart des pays de l'OCDE, on retrouve un chevauchement des deux systèmes. Il faut aussi ajouter à cela le phénomène de la création et de la conservation directes d'emplois à des fins de développement régional.

En résumé, on peut dire que chacun des vingt-quatre pays membres de l'organisation possède son propre système de politiques de main-d'oeuvre que l'Auteur analyse brièvement pour les pays suivants: Canada, États-Unis, Japon, Suède, Allemagne, France, Grande-Bretagne. Il en retient qu'un système peut impliquer la coopération des associations de travailleurs et des employeurs, l'État agissant au niveau national. Sous un autre régime, il n'y aura guère de collaboration patronale-syndicale, les politiques de main-d'oeuvre relevant de l'action directe de l'État. Enfin, un troisième système repose presque entièrement sur les employeurs, ce qui ne laisse qu'une responsabilité résiduelle au gouvernement.

# Comparative Manpower Strategies

**R.A. Jenness**

*The author presents a comparison of how different member countries of the OECD have developed their manpower strategies over the past decade in light of the unique institutional and cultural circumstances.*

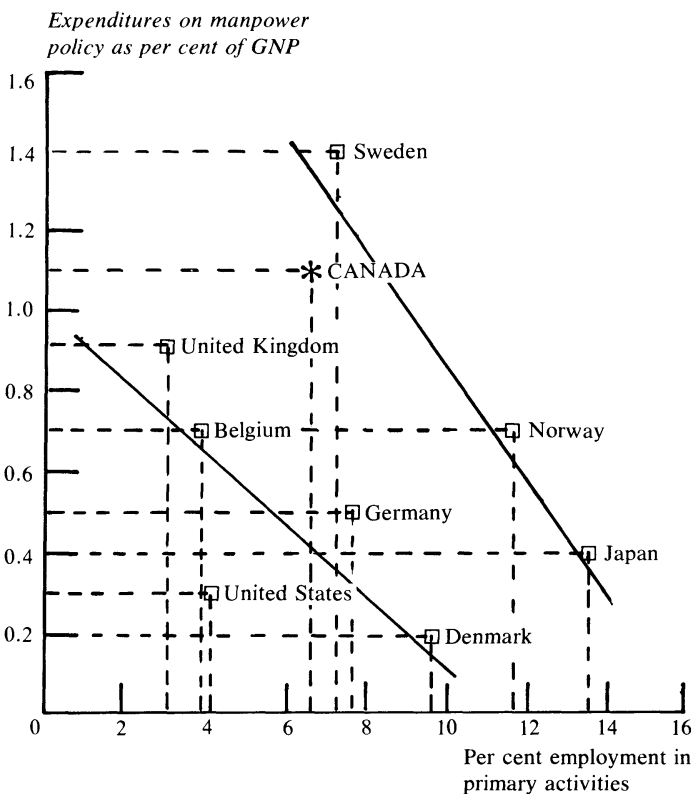
Earlier, in discussions on what I might talk about today, there was some ambiguity on whether I should focus on the Economic Council's recent study on *People and Jobs*, or whether I might cover some of the work I was doing for the OECD in Paris earlier this winter. On the premiss that it would be inefficient to give away as a free good ideas and secrets in the Council's study that you would otherwise have to buy at Information Canada for hard cash, I thought today I would deal with the OECD material. This involved, among other things, a comparison of how different member countries have developed their manpower strategies over the past decade in light of their unique institutional and cultural circumstances, — a comparison which helps put perspective on the path we have pursued in Canada.

First, some fairly general remarks. Manpower policies must, of course, be seen in the light of a country's economic development. During a nation's formative years, when incomes are relatively low, a government's first priority is usually to develop industries, new investment opportunities, and overseas markets for exports. In the process, public infrastructure is also required in the form of transportation, energy and communications, along with public health and basic educational institutions. Manpower programs, as defined here, tend to command a somewhat low priority. Indeed manpower programs have emerged largely as a product of growing urbanization and industrialization, required in societies where technological progress is rapidly advancing, where jobs are becoming obsolete and new skills are required, and where traditional rural customs are giving way to enhanced occupational and geographical mobility. (See Graph 1, which compares manpower-related expenditures with the proportion of the population in primary industries.)

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GRAPH 1

**Manpower Expenditures and Economic Structure,  
Selected OECD Countries**



Source: OECD, *Reviews of Manpower and Social Policies*, 14, «Manpower Policy in Denmark», Paris, 1974; and the *OECD Observer*, No. 74, March-April 1975.

Second, manpower programs, of course, help workers' mobility occupationally, industrially or geographically, and are particularly valuable to those workers not covered by collective agreement. Nonetheless, powerful interrelationships still exist between manpower delivery systems in most countries and the industrial relations systems as broadly interpreted. In Europe, for instance, tripartite control of the Labour Market Board in Sweden and the Federal Labour Institute in Germany brings in trade union and industrial leaders direct to top decision-making. In France, systems of employment security, and training, in specific industries are established and extended by decree

through agreement with labour and management. In Britain, industry-specific Trade Boards carry out the bulk of the selection, funding and training of workers in that country. In short, the European tradition has been to use the system of relatively close social partnership within the industrial relations system through which to develop many of its manpower initiatives. This has not been the case in the United States or Canada, where manpower initiatives were developed by the federal governments quite independently of unions or employer associations. The one exception is the provincial apprenticeship system in Canada where tripartite advisory bodies assist in the selection of apprentices and the contractual arrangements with employers.

Third, the choices that governments have made with respect to their manpower policies have largely determined how the costs are borne. One solution is to have employers bear virtually all of the costs as part of their overhead commitment to their employees. But even in modern Japan which comes closest to this approach, the system of employer-based manpower policy breaks down in the highly competitive or rural-based sectors where enterprises are limited in size and subject to business failures and layoffs. At the other end of the spectrum is for government directly to fund all manpower initiatives from tax revenues, with no particular obligations incumbent on employers. The closest to this approach perhaps is Canada. And perhaps most characteristic of most OECD countries is a mix of the two approaches such that employers through their associations, through regulation, surtaxes, or some variant thereof, are directly involved and responsible, along with unions, for the administration and funding of manpower policies.

And finally there is also the matter, on the demand side, of direct job creation or preservation. Many OECD member governments have linked manpower and regional policies directly and have adopted varying strategies which often reflect their own unique blend of government regulation, direct expenditures, tax incentives, or fiscal transfers. In practice each one's regional development pattern reflects a combination of these stimuli and the profit calculations of its private investors. With respect to the trade-off between job-creating expenditures and traditional supply oriented manpower initiatives, some measure of the differences in OECD practices can be seen from Table 1.

TABLE 1

**Manpower and Regional Job Creative Expenditures,  
Selected OECD Countries**

	<i>Expenditures on Manpower Policy (including Regional Expansion) as Per Cent of GNP<sup>1</sup></i>	<i>Estimated Proportion for Regional Expansion and Permanent Job Creation (Per cent)</i>
Belgium	0.7	57
Canada	1.1	54
Denmark	0.2	10
Germany	0.5	17
Japan	0.4	8
Norway	0.7	58
Sweden	1.4	13
United Kingdom	0.9	68
United States	0.3	12

1. The source years for respective countries vary between 1968 (Belgium and Norway) and 1972-73 (Denmark).

Source: *OECD Reviews of Manpower and Social Policies*, 14, «Manpower Policy in Denmark», Paris, 1974.

#### SYSTEMS OF DELIVERY OF MANPOWER SERVICES

Twenty-four different countries are represented in the OECD, and each of them has in one form or another its own unique set of manpower policies. To portray or to differentiate each separate system of delivering manpower services for all countries would, however, require a separate study in itself; hence, the observations will be confined here to a few countries, starting with Canada and the United States and then moving on to Europe.

#### Canada

Both Canada and the United States feature highly localized collective bargaining, and apart from the formal processes under which union and employer organizations are recognized and industrial disputes resolved, the practice is one of relative independence of labour/management issues from government control or interference in Canada. Industrial relations legislation is largely a responsibility of the provinces and not the federal government. Moreover, only about one-third of the regular work force in Canada comes under collective bargaining, and apart from the Province of Québec there is no tradition, as in France,

for a system of decrees which extend the terms of a collective agreement settlement to unorganized workers in the same industry. In 1966, the Canadian government reorganized its manpower policy and as we have seen consolidated the separate components into a single coherent delivery system, tied closely to Canadian labour market developments and to immigration policy. The public employment offices throughout Canada, renamed Canada Manpower Centres, were made the main delivery points for manpower services to individuals. Canada Manpower counselors were empowered to make placement referrals, authorize training and allowances, advance mobility grants, and provide other related services direct to their clientele. As a consequence the Canadian Government has assumed virtually all residual responsibilities for employment-related income support, manpower training and job creation without the impress of regulations on industries or employers which are a feature of European industrial relations. Canada's manpower system is totally funded from general taxation, and the only area where there is joint employer-employee contribution is in unemployment insurance. And while Canada has kept its public employment and manpower functions separate from unemployment insurance offices, in recent years, with unemployment benefits being extended to virtually all of the gainfully employed labour force and unemployment affecting progressively higher level occupations, there has been some indication of a closer co-ordinated role for the two.\*

### **United States**

By contrast the administrative responsibilities for the U.S. Employment Service, and for the U.S. unemployment insurance and social security systems traditionally come under state rather than federal jurisdiction, although the systems are federally funded under designated allotments. Hence, the standards of service, eligibility, and benefits are fragmented from one state to another. A special concern of the U.S. situation has been the plight of its minorities.

The development of modern manpower initiative in the United States, as in Canada, was done more or less unilaterally by the federal and states governments outside the context of tripartite or industrial relations type arrangements; but unlike Canada, many of the initial programs had to do with federal anti-poverty and equal opportunity objectives, and were delivered through newly formed fragmented administrations separate from the state-administered U.S. Employment Service. Indeed, during the 1960s a range of separate manpower initiatives emerged under separate Congressional authorizations with varying

means of administrative delivery and funding arrangements. These included the Manpower Development and Training Act, Job-Opportunities in the Business Sector (JOBS); Operation Mainstream, a program of public jobs for older workers; New Careers, a program of federal wage subsidies for para-professional public service jobs; Work Initiatives Now, to encourage employers to hire persons on welfare; Public Service Careers, a program for the coloured minority or other disadvantaged groups; and Special Impact, which provided financial inducement to promote business enterprises in ghettos or to rejuvenate slum areas. Adjacent to these initiatives, and sometimes in competition with them, were a variety of Office for Equal Opportunity anti-poverty programs also aimed at reducing discrimination and increasing the opportunities available to minorities.

In 1974, most of the federal U.S. manpower initiatives, including training under M.D.T.A., were reorganized under the Comprehensive Employment and Training Act through which the administrative responsibilities were transferred to local mayors and state and county officials under federal guidelines and funding formulae. The U.S. Employment Service was left principally with placement responsibilities, and kept separate from the unemployment insurance function.

In short, unlike Canada, the U.S. manpower system is now completely locally oriented and multiple-based, and perhaps more than in other OECD countries maintained separately from other government interests in the educational, social security, and regional development fronts.

Let's now take a look at a very different system, — that of Japan.

### **Japan**

The Japanese manpower delivery system reflects the dual nature of the Japanese economy as comprised of a modernized sector of large integrated firms and company unions, and another sector of small labour-intensive businesses and rural activities that offer more tenuous career opportunities or job security. In the modern sector, the Japanese system is marked by a life-long commitment of employees to their employers and vice versa, steep seniority wages related to family circumstances, and vocational and advanced educational training for young people financed by the employing firm. The interactive attachment of workers to their firm and vice versa give employers the assurance of continuity and flexibility in using worker skills; hence there are not nearly the rigidities or barriers between craft occupations found, say,

in the United Kingdom or on the Continent. Neither are there the fears of workers of becoming individually or occupationally redundant. In exchange for the job security of the members, enterprise unions have generally left all management responsibilities with management, and they share an interest in continuous modernization and increased productivity as a source of higher wages.

The Japanese system has much to commend it in times of rapid growth. Employers accept the costs of slack and retain their employees even when production turns down — in effect, bearing the cost of labour hoarding. Public expenditures on manpower and related social policies can be kept low because employers not only carry these costs, but they also pay family-related wage premiums which enable workers to pay for their children's education and training. At the age of 55, workers get a lump sum severance or lower paid and less demanding work within the firm.

In general, the Japanese system has worked well, with the modernized sector successfully absorbing migrant labour from the rural sector and substantive cohorts of school graduates selectively chosen by the large corporate firms. Admittedly though the enterprise-based system, with worker benefits «locked in», does result in some loss of inter-firm or inter-industry mobility. Moreover in times of slow growth it creates problems for the new labour market entrant.

Let us now turn to the various European systems.

### **Sweden**

Take, for example, Sweden. The main characteristics of the Swedish manpower delivery model is the existence of the Labour Market Board, a joint government/labour/management body which administers the over 400 decentralized local employment offices throughout Sweden. The Labour Market Board and its programs are funded directly from general revenue, and it is linked closely to the economic planning mechanism of Sweden — complementing, among other things, the Swedish Investment Fund administration and participating in major decisions affecting the Swedish economy. The Swedish system presupposes, of course, a high degree of unionization — the Swedish labour market is about 75 per cent organized — and a tradition of close union-management co-operation and consultation. The local Boards administer a very wide range of expenditure options and responsibilities, ranging from placements, adult training, resettlement grants, regional invest-



ment expenditures, to decisions on local public works and housing construction.

In the Swedish system, unemployment insurance is administered separately from the Labour Market Boards, through roughly 20 different funds organized by the unions themselves. Where workers are not members of unions, or where their unemployment insurance has run out, there is a *needs*-based unemployment assistance program, administered by the Swedish government. Maximization of labour force participation has been a continuing theme in Sweden; tax incentives are provided to encourage married women to work, and the commencement age for retirement on public pensions has traditionally been somewhat higher than in comparable OECD countries.

### **Germany**

Now Germany. The manpower and employment system in Germany is run by the Federal Institute of Labour, an independent body composed equally of labour and management, funded directly from payroll taxes (roughly 1.7 per cent of the total wage bill). As with the Swedish model, the Federal Institute of Labour in running the German public employment agencies, exercises substantial expenditure options, ranging from resettlements grants, short-time pay, bad weather pay, employers' subsidies and regional investment subsidies. On the other hand, unlike the Swedish system, the German public employment agencies administer unemployment insurance from the overall funds over which they exercise discretion. Thus in Germany unemployment insurance is traditionally an integral part of a larger allocation of resources which can be used for job creation, training, resettlement or straight income support.

A traditional concern of manpower policy in Germany until very recently, has been on labour shortages, and Germany has relied very greatly on migrant workers to do much of its construction and other semi-skilled or physical work. Guest workers tend to settle in, and today it is estimated that close to 15 per cent of the resident population in Germany is foreign born.

This concern for labour shortages has undoubtedly contributed to the heavy emphasis which the German system puts on the links between school, apprenticeship, vocational education, and employment, using a module system and a commitment to the idea of a life-long learning process. In Germany, compulsory education extends to 18 years of age; employed school leavers between the ages of 15 and 18 are obliged to

take part-time courses in vocational institutes along with their on-the-job training — under contractual arrangements with their employers that reflect the high degree of apprenticeship in that country. Indeed, roughly 65 per cent of male school-leavers enter apprenticeship courses. Unlike Sweden, which invests heavily in workshops, archives programs, and subsidies to provide work for the disabled, the German government simply requires employers to hire a certain proportion of disabled workers or pay a penalty tax.

### **France**

How about France? The principal characteristic of the French labour and manpower system is legislation which confers certain basic responsibilities on the social partners, and contractual relationships worked out by national employers and union organizations in each industry extended to the whole industry by legislative decree. These commit employers and employees to certain lines of activity, including the provision of occupational and institutional training, and various forms of employment security. Similarly, the unemployment insurance system in France is administered with the agreement of the social partners and takes account not only of complete unemployment but compensation for short-time employment as well.

The impetus in France during the last decade has been a complete modernization of the French economy, and the government has looked to labour market institutions and instruments in the broadest sense to bring about its economic and social objectives. This clearly has blurred traditional demarcations between economic labour market and social policies, all of which are taken up together in the planning process. Hence, in 1968, the government, with the social partners, guaranteed a near minimum wage, increased pensions, arranged for inter-industry agreements on employee security, for joint consultation in the case of dismissal, for extensive advance notice and ultimate appeal to a joint-employment committee within each industry. More recently steps have been taken to lower the hours of work and the pensionable age of workers in designated industries — measures which will also be administered by joint labour-management committees at the industry level.

### **United Kingdom**

Finally, the United Kingdom. Manpower policy in the United Kingdom developed largely under loosely linked tripartite industrial strategies (which in turn emerged from the larger economic planning carried out by the National Economic Development Council).

In Britain there has been a much greater stress on industrial strategy and regional planning than, say, in Sweden, and manpower strategies have played a somewhat subordinate role. Implicit has been the view that the free market growth has too heavily favoured the large urban metropolises, particularly London, and part of the strategy has been to move jobs to people outside these major areas and effectively decentralize industrial activity and employment.

Thus there is in Britain no single manpower department or agency with the same broad powers as the Labour Market Board in Sweden. Adult training is carried out under about 20 Industrial-Specific Employment and Development Councils, through Industrial Training Boards.

These Boards and Committees for individual industries identify areas of labour shortage, encourage companies to plan for their manpower needs more effectively, remove obstacles to labour mobility, and tackle restrictive practices. The system is financed by a payroll tax applied selectively to employers and refundable to some, depending upon their growth potential. From this surtax are financed employment-creating or job-protective initiatives, along with a major share of the redundancy payments in cases of major layoffs.

While the British system of training new labour force entrants is not as tightly interwoven as the German, apprenticeship and day release to take vocational training courses are at the heart of her industrial training system. The Industrial Training Boards, composed of equal numbers from labour and management, raise levies from employers to spread the cost of training over each industry. Since employers are obliged to pay into the scheme, they are equally encouraged to provide institutional or in-plant training for their employees.

The National Employment Service in Britain is little involved in manpower training in contrast, say, to Swedish local Labour Market Boards or Canada Manpower Centres. On the other hand, paralleling the public employment offices are Youth Employment Services which operate separately and are closely integrated with the school system. Moreover, with the regional decentralization thrust of British policy, the National Employment Service also administers various mobility and transfer aids, including resettlement grants, key workers grants, nucleus labour force grants, and the like; and in addition, like Germany but unlike Canada or the United States, the National Employment Service administers the system of flat rate and earnings-related supplementary unemployment insurance benefits.

TABLE 2

Thrust of Manpower Policies — Some International Comparisons<sup>1</sup>

	<i>Sweden</i>	<i>France</i>	<i>Germany</i>	<i>U.S.</i>	<i>U.K.</i>	<i>Canada</i>	<i>Japan</i>
Manpower services delivered mainly through the public employment agency	x		x		x		
Federal responsibility for the public employment agencies	x	x	x(a)	x		x	x
Private employment agencies allowed to compete freely				x	x	x	
Public employment agency administration of unemployment insurance as well as job counselling and placements			x	x			x
<i>Adult Training Initiatives</i>							
Mainly work experience and industrial on-job training		x		x			x
Mainly institutional training	x					x	
Mainly apprenticeship training		x		x			
Labour/Management participation in the selection of adult trainees other than apprentices		x	x	x			
Mobility or resettlement grants	x		x	x		x	x
Regional development initiatives as significant manpower policy concerns	x		x(b)	x(g)			
Manpower policies closely integrated with educational policies	(c)	(d)	x	(f)		(c)	
Main emphasis of manpower policy on disadvantaged groups				x			
Job preservation a significant manpower policy concern (subsidies, short-time pay)		x	x	x			
Direct job creation a significant manpower policy concern	x			x		x	

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## CONCLUSIONS

What may we conclude from this review? Our main purpose today was to emphasize the institutional diversity possible in achieving roughly similar purposes in manpower policy. One system can involve the close co-operation of organized labour/employer associations, and government at a national level, or through industrial committees and boards. Another system may involve very limited co-operation and therefore require greater direct government initiative and

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<sup>1</sup> The exclusion of some countries in some of the specified manpower initiative categories does not necessarily mean they do not have specific policies or are not active in this area, but rather that in the author's opinion they attach a relatively subordinate place for that activity or alternatively that the activity is pursued independently of manpower policy.

- (a) Administered under the Federal Institute of Labour, a semi-autonomous agency of representatives of unions, employer associations and federal corporations.
- (b) Although the main thrust of regional development is carried out separately through Federal Länder initiatives, regional initiatives, including employer subsidies, use part of the manpower options administered through the public employment services.
- (c) In general, Canadian manpower policy and provincial educational policies are only loosely interrelated — and in most communities there are insufficient linkages at the school-CMC-employer levels. There is, however, a substantial harmonization in the identification of adult training courses, through federal-provincial manpower training committees.
- (d) In France, adult training is conceived as part of a recurrent process of education; hence the recent strengthening of secondary B technical educational facilities and les Grandes Ecoles. Public employment agency counsellors do not, however, play the same integrative role between students and employers as they do in Germany.
- (e) In Sweden, students in their graduating years secure through the aegis of the local Labour Board two or three weeks exposure to different employers and work-places. There is also inter-co-operation in the planning for and provision of adult institutional training.
- (f) In the U.K., the conjoining of educational and manpower policy occurs at two points — in the Youth Employment Service, which operates as a separate part of the Public Employment Service, and on the Industrial Training Boards and the Central Training Council advising the Secretary of State.
- (g) While the U.K. devotes a substantial portion of its Selective Employment Tax and related expenditures to regional development incentives and to developing areas, it is not clear that this can be considered part of a coherent manpower approach. On the other hand these funds, along with worker transfer schemes and loans, are a very important element in the U.K.'s industrial strategy.

Source: OECD country reviews.

funding either through federally or more locally channeled delivery systems. And a third may presuppose a very heavy commitment by employers to their workers and vice versa throughout most of their working lifetime, with only residual government responsibilities. In the process a large, medium or fairly light burden of the costs and related responsibilities may be borne by the taxpayers and show up as significant elements in terms of government policy and proportions of GNP. Similarly, a large or light cost burden may be carried by employers in addition to their normal payroll expenditures, and indirectly passed on to consumers in the form of higher prices.

From this overall perspective, it is clear that there is no single necessarily better or worse way of delivering manpower services. There are at best more efficient or less efficient ways of achieving manpower options within the institutional and social parameters that mark one nation from another.

### **Étude comparative des stratégies en matières de politique de main-d'œuvre**

Dans cet article, l'Auteur traite des moyens qui sont utilisés dans les pays membres de l'OCDE pour planifier leur politique en matière de main-d'œuvre. Pour en comprendre le sens et la portée, il faut les considérer à la lumière du développement économique de chaque pays.

Lorsqu'une nation est au premier stade de son développement industriel alors que les revenus sont relativement peu élevés, le gouvernement accorde généralement priorité à la création d'entreprises nouvelles, à la croissance des investissements et à l'expansion des marchés d'exportation. Il met l'accent sur la mise en place des infrastructures: transports, sources d'énergie, moyens de communications. Il consacre aussi beaucoup de ressources à l'éducation et à la santé. De là, il découle que les programmes de main-d'œuvre tiennent une place plutôt secondaire dans les préoccupations de l'État.

Ce n'est que plus tard, que les gouvernements en viennent à concentrer plus d'efforts sur des programmes de main-d'œuvre qui sont la conséquence d'un haut degré d'urbanisation et d'industrialisation, où les progrès technologiques sont rapides, où les postes de travail deviennent vite désuets, où des qualifications professionnelles nouvelles et toujours plus spécialisées s'imposent.

En deuxième lieu, les programmes de main-d'œuvre ont pour objet de favoriser la mobilité professionnelle, territoriale et industrielle des travailleurs, principalement ceux qui ne sont pas protégés par des conventions collectives de travail. En Europe, par exemple, la formation de la main-d'œuvre repose principalement sur les épaules des agents économiques, syndicats et employeurs, alors que, aux États-Unis et au Canada, l'initiative a été prise la plupart du temps par les gouvernements.

En troisième lieu, l'Auteur fait remarquer que le choix des gouvernements a été influencé par les coûts, d'où l'existence de deux tendances diverses. L'une de ces ten-

dances consiste à faire absorber presque exclusivement le coût de la formation de la main-d'œuvre par les employeurs. À l'opposé, il y a des pays où le gouvernement établit les politiques de main-d'œuvre directement à même ses revenus sans en imposer le fardeau aux employeurs. Dans la plupart des pays de l'OCDE, on retrouve un chevauchement des deux systèmes. Il faut aussi ajouter à cela le phénomène de la création et de la conservation directes d'emplois à des fins de développement régional.

En résumé, on peut dire que chacun des vingt-quatre pays membres de l'organisation possède son propre système de politiques de main-d'œuvre que l'Auteur analyse brièvement pour les pays suivants: Canada, États-Unis, Japon, Suède, Allemagne, France, Grande-Bretagne. Il en retient qu'un système peut impliquer la coopération des associations de travailleurs et des employeurs, l'État agissant au niveau national. Sous un autre régime, il n'y aura guère de collaboration patronale-syndicale, les politiques de main-d'œuvre relevant de l'action directe de l'État. Enfin, un troisième système repose presque entièrement sur les employeurs, ce qui ne laisse qu'une responsabilité résiduelle au gouvernement.

## L'AMÉNAGEMENT DES TEMPS DE TRAVAIL

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