

The Danish Flexicurity Model - a Lesson for the US?

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Abstract

Within recent years, increasing international competition has caused an increase in job transitions worldwide. Many countries find it difficult to manage these transitions in a way that ensures a match between labour and demand. One of the countries that seem to manage the transitions in a successful way is Denmark, where unemployment has been dropping dramatically over the last decade without a drop in job quality. This success is ascribed the so-called Danish flexicurity model, where an easy access to hiring and firing employees (flexibility) is combined with extensive active and passive labour market policies (security).

The Danish results have gained interest not only among other European countries, where unemployment rates remain high, but also in the US, where job loss is often related to lower job quality. It has, however, been subject to much debate both in Europe and in the US, whether or not countries with distinctively different political-economic settings can learn from one another. Some have argued that cultural differences impose barriers to successful policy transfer, whereas others see it as a perfectly rational calculus to introduce 'best practices' from elsewhere.

This paper presents a third strategy. Recent literature on policy transfer suggests, that successful cross national policy transfer is possible, even across the Atlantic, but that one must be cautious in choosing the form, content and level of the learning process. By analysing and comparing the labour market policies and their settings in Denmark and the US in detail, this paper addresses the question, what and how the US can learn from the Danish model.

Where the US and Denmark share a high degree of flexibility, they differ significantly on the level of security. As Danish security budget is seven to ten times higher than the American, as percentage of the GDP, the paper concludes by suggesting a stronger focus on the difference in the local level efficiency on the money already spend. A major reason for the Danish success has been the introduction of tailor made initiatives to the single displaced worker and stronger coordination between local level actors. Both of which are issues, where a lack of efficiency in the American case has been reported.

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Introduction and background

As a consequence of intensified international competition many countries today are struggling with sector specific outsourcing, mass lay offs and new forms of less regulated employment. This creates turbulence at the labour market, where employees are forced to move between jobs with different levels of pay and/or different skill requirements (OECD 2005). These job transitions can be difficult to manage, and many employees find themselves threatened by unemployment. Different countries try to deal with this in different ways corresponding to national institutional and political frame works. Some countries are, however, experiencing great difficulty in managing the increasing number of job transitions within their regulatory frame work and are looking for new ways to reduce unemployment or match labour and demand. Within recent years leading economists and politicians have emphasised the so-called Danish flexicurity model, which seems to have successfully tackled the challenges of international competition (European Commission 2006a; World Bank 2006; OECD 2005). In spite of high tax levels Danish labour market regulation has since the mid 1990s succeeded in not only reducing the level of unemployment dramatically but also increasing already exceptionally high employment rates for both men and women (OECD 2007).

Because of these results, the Danish flexicurity model has attracted increasing interest in Europe over the last five years and is now included in the European Commissions suggestion for modernising labour law in the EU (European Commission 2006b). In 2006-2007 the heated debate on the Danish flexicurity model crossed the Atlantic, too. Stories about European labour market crisis following the high unemployment levels in larger European countries like Germany and France were challenged by stories about a smaller European country handling globalisation with great success. American scholars, journalists and politicians gained interest and the Danish model was debated in leading newspapers and magazines and at a number of seminars and conferences.

The Danish Minister for Employment, Claus Hjort Frederiksen, presented the Danish Flexicurity Model at a series of speeches at American Universities and think tanks in September 2006 including Yale University, Tufts University and Center for Strategic and International Studies. The same year Bruce Stokes wrote 'Jobless, the Danish Way' in *National Journal* focusing on the success of Danish activation and retraining schemes. In early 2007 Jeffrey Stinson from *USA TODAY* highlighted the absence of working poor in Denmark compared to the US, and Jonathan Cohn praised the 'Great Danes' in *The New Republic* in an analysis of the political process behind the model. This made Henrik Rasmussen (the son of the Danish Prime Minister) reply 'Great Dane, Great Pain' in *TCS Daily* stressing the negative effects of the high Danish tax levels. There were other sceptics, among others Professor Susan Martin from Georgetown University, who underlined the exclusion of immigrants on the Danish labour market in an interview performed by the Danish journal *Ugebladet A4*. The American debate created echoes in Denmark as well. It was commented in February by the Danish newspapers *Information* and *ArbejdsMarkedsPolitisk Agenda*, where it caught attention that such a large economy could find inspiration in a small economy like the Danish. It was surprising to the Danes, that not only European countries with somewhat similar labour market conditions but also the United States (US) would catch an interest in Danish flexicurity.

Catching an interest and debating models is one thing, however, putting new ideas into policies and practice is another. This paper raises the question whether the US debate on the Danish Flexicurity Model potentially could be more than the flavour of the month. Or put differently: Would it be possible for the US economy to introduce such policies from a small European economy? And if policies are exchanged: How can they be put into practice? Which elements of the two labour market models could potentially be exchanged and how?

Methodology and structure of the paper

The paper is based on series of interviews with labour market researchers, union representatives and government officials in the US as well as intensive literature studies and analyses of secondary data from Denmark, the US and the OECD.

The paper is structured in three sections and a conclusion. In the first section the contents and effects of the Danish flexicurity model are presented, whereas the following section analyses American labour market regulation in a flexicurity perspective. The third section contains an outline of the European discussion of flexicurity and of the current literature on transferability. Finally, the concluding section answers the question whether or not US can learn a lesson from the Danish labour market regulation and vice versa.

Acknowledgements

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The Danish Flexicurity Model

The concept of flexicurity

Even though the concept of flexicurity is today often associated with Danish labour market regulation, flexicurity is not a Danish invention. The concept was originally launched in 1995 in The Netherlands by the sociologist Hans Adriaansens (Wilthagen 1998). It refers to a political reform process of increasing security for flexibly employed, which attracted a lot of attention from other European countries and the European Commission. More recently the concept has been adopted by a number of academics as an analytical concept in comparative studies of European models of labour market regulation and their overall effects (Wilthagen et al. 2003; Tangian 2005). Academics initially adopted the narrow definition of the concept focusing on security for flexibly employed like contract workers or temporary agencies workers (Klammer & Tilmann 2001; Wilthagen 2002). Today, the concept is often applied to a wider category of employees on the labour market. In the Danish context the concept has first and foremost been applied in the latter sense explaining transitions for a broad group of unemployed (Andersen & Mailand 2005; Madsen 2004).

The term flexicurity has a mixed history as both a policy and an analytical concept, which challenges the analyses within the field. Is it possible to say that all countries possess some degree of flexicurity, which is directly comparable, or do some countries have more flexicurity than others? There seems to be consensus on, among academics, that certain requirements must be fulfilled, if the concept should apply to a given labour market regulation:

- 1) A combination of flexibility for the employers and security for the employees (a so-called trade off).
- 2) That this combination produces advantages for both employers and employees (a positive sum game rather than a zero-sum game).
- 3) That the degree of flexibility and of security balances each other (both in depth, scope and length).
 - *Depth* here refers to the extent of flexibility and security.
 - *Scope* relates to the question of which groups are covered by the flexibility and the security respectively.
 - *Length* refers to the aspect of time: whether the flexibility and security occur simultaneously.

All three requirements are fulfilled in the Danish version of flexicurity as explained in more details below.

The golden triangle

The Danish Flexicurity model is often referred to as the ‘golden triangle’ to underline the successful combination of three core elements in Danish labour market regulation: An easy access to hiring and firing, relative generous unemployment benefits and active labour market policies (see figure 1). On one hand the high level of *flexibility* allows employers to trust themselves to hire employees, because they know that they can fire again if necessary. On the other hand high levels of *security* mean that employees will get substantial income compensation if fired. Furthermore active labour market policies ensure that employees have the skills required on the labour market and keep them motivated to work. The three elements combine in a trade off which produces advantages for both employers and employees. It is relatively easy for employees to find a job again if fired, and employers have access to a relevant and continuously updated workforce.

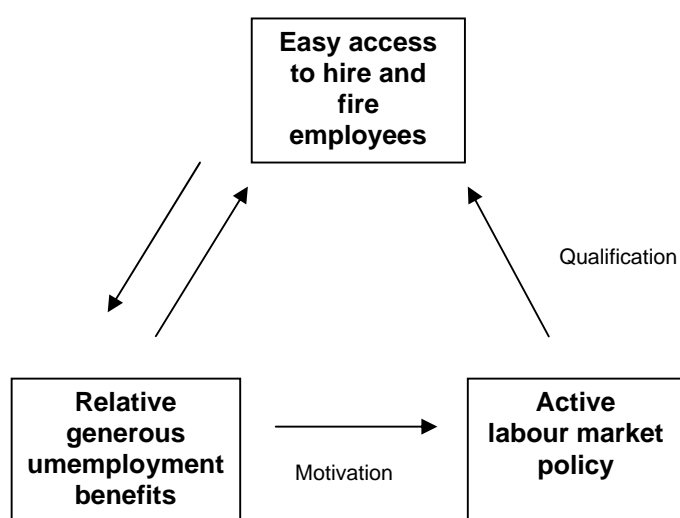


Figure 1: The ‘golden triangle’, i.e. The Danish Flexicurity Model (Bredgaard et al. 2005).

Flexibility, security and active labour market policies

The flexibility side of the Danish model is a relative high *numerical flexibility*, i.e. flexibility for the employers to adjust labour to demand by hiring and firing. In 2003 the OECD measured the general ‘strictness’ of the labour market regulation across the membership countries with regards to hiring and firing. They indexed the total sum of legislation and collective agreements on the issue in each country in order to compare the overall Employment Protection Legislation (EPL). The study shows that Denmark does not follow the pattern of Germany and France with high levels of EPL, but places itself somewhere between these countries and the United States (US) and Great Britain (GB) (see Table 1). This means that the *depth* of the labour market flexibility is large in Denmark compared to other countries in Continental Europe. The difference mainly derives from different regulation of individual lay offs, whereas strictness of EPL seems to be more even between countries regarding mass lay offs.

	EPL Collective	EPL Individual	EPL Average
Denmark	3,88	1,42	1,83
US	2,88	0,21	0,65
GB	2,88	0,75	1,10
Germany	3,75	2,21	2,47
France	2,13	3,05	2,89

Table 1: Strictness of Employment Protection Legislation (EPL) for collective dismissals, individual dismissals and the weighted average (2003). The higher the score, the more strict the regulation. Source: OECD Statistics (www.stats.oecd.org).

The security side of the Danish model takes the shape of a relatively high *income security*, i.e. the security to maintain former income levels, for employees that lose their job (passive labour market policy). As such, the *depth* of the security matches the depth of the flexibility. Employees might be fired with a short notice, but substantial financial support is immediately offered. The vast majority of employees in Denmark (a little less than 80 %) pay contributions to an unemployment insurance system, which is partly government funded but administered by private agencies with close relations to the trade unions (AK-Samvirke 2006). These employees qualify for unemployment benefits for up to four years if fired. Employees without unemployment insurance (or who are not eligible) receive government funded and less generous social insurance, leaving no unemployed financially on their own. The *scope* of financial security is as broad as the labour market flexibility, since all employees that lose their jobs are covered by either unemployment insurance or social insurance. The benefits from the unemployment insurance are relatively high, especially for employees with an income below or on average. Employees with an income at 75 % of the average will receive up to 79 % of that income in unemployment benefits if fired, and employees with an average income will receive 61 %. In contrast, employees with higher salaries are less well covered in case of unemployment. A former salary at 150 % of the average income will only be covered by 46 % (see Table 2).

	75%	100%	125%	150%
Denmark	79	61	52	46
GB	25	20	16	14
Germany	59	58	58	58

Table 2: Net replacement rates in % of former salary in Denmark, Great Britain and Germany at varying former income levels (75, 100, 125 and 150% of average yearly earnings) in 1999 (Hansen 2000).

The third leg in the triangle is the active labour market policies, which are strongly related to the system of unemployment insurance/social insurance. Any unemployed resisting participation in activation/retraining programmes offered or unable to document active job search are denied benefits. In this sense, Danish income security is highly conditioned, as there are strong sanctions if activity requirements are not met. The *length* of the income security will be determined by the willing cooperation of the unemployed. The unemployed will be invited to mandatory meetings with a personal job counsellor at the local 'job centre' right after the job loss and repeatedly every third month. The job counsellor will control if a sufficient level of active job search is taking place and will offer retraining/activation programmes if necessary. The job centres work closely together with local companies in order to target the retraining towards

the demands on the local labour market. The participation in both active and passive labour market policies (ALMP and PLMP, respectively) is high in Denmark and equals the levels in countries like Germany and France (see Table 3). However, the participation seems to have been receding over the last 10 years (Jørgensen 2006). This is not only a result of dropping unemployment, but also a consequence of a some-what reduced funding of retraining and activation programmes. Nevertheless, public funding still remains high compared not only to Great Britain and the US but also to countries with high levels of Employment Protection Legislation like Germany and France (see Table 4). This goes both for passive labour market policies (unemployment benefits), where Denmark spends seven times more of the GDP than the US, as well as active labour market policies, where Danish spending is 10 times higher.

	ALMP	PLMP	Total
Denmark	9,7	4,9	14,6
US	-	-	-
GB	1,7	2,9	3,6
Germany	10,9	4,9	15,8
France	10,2	5,5	15,7

Table 3: Percentage of the labour force participating in programmes under active or passive labour market policies (2004). Source: OECD Statistics (www.stats.oecd.org).

	ALMP	PLMP	Total
Denmark	1,83	2,66	4,49
US	0,16	0,37	0,53
GB	0,52	0,29	0,81
Germany	1,14	2,31	3,45
France	0,97	1,72	2,69

Table 4: Public expenditure on active or passive labour market policies as percentage of GDP (2003). Source: OECD Statistics (www.stats.oecd.org).

The relatively generous unemployment benefits and the active labour market policies in the Danish flexicurity model combine elements of ‘carrot and stick’. The conditioned access to unemployment benefits *motivates* employees to participate in retraining and activation programmes. Furthermore, the programmes *qualify* the employees to get access to available jobs (see Figure 1). This qualification is not only optimised to fit the single employee and his/hers skills and qualification profile but is also tailor made to meet the demands at the local labour market. Personal job counselling at the local job centres play an essential role in this process of matching unemployed and vacant jobs.

Effects of the ‘golden triangle’

The current passive and active labour market policies in Denmark are a result of strong reforms performed in the mid 1990s. At that time the Social Democratic government cut the maximum number of years of unemployment benefits in half and the requirements of active job search were sharpened. Furthermore, the tailor made approach to job counselling was introduced, and participation in activation and retraining schemes was made mandatory. Since their introduction, the reforms of the passive and active labour market policies have had dramatic results. The unemployment rate declined by two percentage points from 1995 to 2005 and is well below the level in Great Britain and the US (see Table 5). In 2006 the unemployment rate in Denmark reached a low of 3,9 % still signifi-

cantly below the corresponding rate of 4,6 % in the US (Source: OECD statistics).

	1995	2005
Denmark	6,8	4,8
US	7,4	6,6
GB	7,3	6,6
Germany	8,0	9,4
France	11,1	9,9

Table 5: Unemployment rates as percentage of the total civilian workforce (1995 and 2005). Source: OECD Factbook 2007 (online).

The reforms have also meant an increase in the already high employment rates, and the Danish levels are still well above the levels in the US and Great Britain (see Table 6). Today, more than three fourths of the working age population in Denmark is employed. There has even been an increase in the employment rate for women, where Denmark traditionally has had higher levels than the four other countries partly due to easier access to cheap day care facilities (see Table 7).

	1995	2005
Denmark	73,9	75,3
US	72,9	71,5
GB	69,7	72,6
Germany	64,6	65,5
France	59,1	62,3

Table 6: Employment rates as percentage of persons of working age (15-64). Source: OECD Factbook 2007 (online).

	1995	2005
Denmark	67,0	70,8
US	65,8	65,6
GB	62,5	66,8
Germany	55,3	59,6
France	51,6	56,9

Table 7: Employment rates for women as percentage of the working age population of women (15-64). Source: OECD Factbook 2007 (online).

The Danish employment and unemployment rates cannot, however, be seen as an isolated result of the labour market policy reforms. As the ‘golden triangle’ implies, the three elements in the Danish flexicurity model are closely interrelated, and the numerical flexicurity has been a critical precondition to the Danish job miracle. This becomes very evident, if the figures on unemployment and employment are combined with statistics on job tenure. The less strict Employment Protection Legislation in Denmark means, that job tenure patterns are more similar to Great Britain and the US than Germany and France (see Table 8). Actually the average tenure is decreasing in Denmark, and more people had tenure of less than one year in year 2000 than in 1992.

	Tenure < 1 year		Tenure >10 years	
	1992	2000	1992	2000
Denmark	17,9	23,0	33,6	31,1
US*	28,8	27,8	26,6	25,8
GB	15,6	19,3	31,5	33,3
Germany	14,0	14,8	41,7	39,7
France	13,8	15,8	42,9	44,8
EU 14	14,2	16,6	41,7	42,0

Table 8: Percentages of employees with a job tenure below one year or over 10 years in 1992 to 2000 (Auer & Cazes 2003). Source: Eurostat and national data sources. *Data for the US refer to 1991 and 1998.

The figures on job tenure show that even though the Danish flexicurity model enhances the chance of finding a job if fired, it does not increase *job security*, i.e. the security to keep the current job. The ‘golden triangle’ first and foremost enhances *employment security*, the security to have a job. This is how the low unemployment rates and the high employment rates are explained. In European countries like Germany and France with high levels of EPL, job security has been a goal in itself in the regulation of the labour market. However, struggling with high levels of unemployment for more than a decade these countries are today looking towards more flexible labour market models and ways to enhance employment security as well. This change in perspective is further addressed in the section on *The European Discussion*.

Historical and political contexts

Danish labour market regulation has been characterised as a hybrid of Liberal Market Economies (LME’s) and Coordinated Market Economies (CME’s), termed Negotiated Economies (NE’s) (Campbell et al. 2006; Hall and Soskice 2001). The hybrid combines elements of the labour market flexibility found in LME’s like the US (numerical flexibility) with elements of the security for employees found in CME’s like Germany (income security). In this sense the hybrid also combines the comparative advantages of highly innovative economies with economies based on high quality production. But the hybrid also has unique characteristics of its own. Negotiated economies are based on a strong and trust based dialogue between employers, employees and the government embedded in extensive societal institutions.

One of the most important institutions in the Danish case is the strong collective bargaining system. It is not possible to understand the character of Danish labour market regulation without a closer look at this. Most of the regulation takes place through collective agreements concluded at sector level, and only a small part is performed through legislation. Even the regulation of the collective bargaining system itself rests on a collective agreement, the famous September Compromise from 1899 (Due et al. 1994). In cases where regulation takes place through legislation, the trade unions and the employer’s organisations often have an influence, too, through the ongoing strong tripartite dialogue with the state.

The importance of collective bargaining and the power of the trade unions and the employer’s organisations rest on high levels of union density and high coverage of collective agreements. Even though the collective bargaining system of Denmark has shown signs of erosion (i.e. dropping union density), as it is the case in the four other countries, the union density remains at a comparatively high level of 70,4 % (see Table 9).

	Union density		Coverage (2004)
	1993	2003	
Denmark	77,3	70,4	77,0
US	15,1	12,4	13,8
GB	36,1	29,3	35,0
Germany	31,8	22,6	66,0
France*	9,6	8,3	95,0

Table 9: Union density and coverage of collective agreements in percent of the total number of employees. Sources: Visser 2006; Dribbusch 2005; DA 2005.

**The figure on coverage refers to the year 2003.*

The collective bargaining system has an essential role in the regulation of the 'golden triangle'. The high numerical flexibility is a result of collective bargaining in the private sector, and the high income security is a result of legislation developed with a strong tripartite dialogue. Furthermore, the administration of the unemployment insurance and the active labour market policy involves all social partners. Both the numerical flexibility and the income security has a long history, and in this sense the Danish model of flexicurity is not a new invention. It is also fair to raise the question, whether it is an invention at all. Employer's organisations have not always loved the high unemployment benefits and trade unions have not always advocated easy access to hire and fire employees. Furthermore, from a government perspective, the triangle has not always been considered golden. In 2003 the government tried to introduce a significant reduction of the unemployment benefits for employees with earnings above average. However, large protests from the trade unions and employer's organisations prevented these reforms (Andersen & Mailand 2005). It is therefore argued that the Danish model of flexicurity first and foremost has developed by chance and must be seen as a result of power struggles and ad hoc policies (Larsen 2004).

A closer look at the Danish collective bargaining system also reveals that Danish labour market regulation is based on many other forms of flexibility and security than those conceptualised by the 'golden triangle' (Andersen & Mailand). If one applies a wider perspective on the flexicurity concept, there is more to the Danish story than numerical flexibility and income security. In the so-called Wilthagen scheme the Dutch flexicurity-researcher Dr. Ton Wilthagen highlights the forms of flexibility and security contributing to important trade offs on the Dutch labour market (see Table 10). Several of these have significantly influenced the Danish labour market as well.

Flexibility/security	Job	Employment	Income	Combination
Numerical				
Working time				
Functional				
Pay				

Table 10: Forms of flexibility and security (Wilthagen 2002; Wilthagen et al. 2003).

On the flexibility side, the working time flexibility and the pay flexibility constitute the most important forms in Denmark besides the numerical flexibility. Both are subject to decentralised collective bargaining within sector level framework agreements, allowing the exact pay and working time to be adjusted to local needs at company level. The pay flexibility has a long tradition dating

back to the early years of the 20th century (Due et al. 1994). Today, the bargaining on wages at sector level only makes up half of the wage levels actually paid leaving large room for company level adjustments. This is very different to the centralised wage setting in for instance Germany. Working time flexibility constitutes another important aspect. More than half of Danish companies have introduced working time banking, and many of these have concluded company level agreements on the subject (Riedmann 2006; Ilsøe 2006). In the industry alone more than one third of the companies have closed such agreements. Shop stewards and management report in several case studies that these agreements have had positive effects not only on productivity and the ability to save/create jobs, they have also contributed to a better work life balance for many of the employees covered (i.e. combination security).

Flaws in Danish labour market regulation

Although the Danish flexicurity model has proven successful, there still are problems hiding behind the general statistics. One of the most important ones is the exclusion of immigrants from the labour market (Andersen & Mailand 2005; Bredgaard et al. 2005; Madsen, forthcoming). Even though the employment rates for the foreign born populations in the all five countries have been improving slightly over the last decade, Denmark still presents with the poorest rates (see Table 11). In spite of costly active labour market policies, Denmark has not succeeded in significantly changing the employment situation for this group on the labour market, and immigrants are to a larger degree dependent on unemployment and social insurance than ethnic Danes. This is especially significant for foreign-born men, where Denmark is lacking behind Germany, France, Great Britain and the US. Foreign-born women have the highest employment rate in the liberal market economies of Great Britain and the US, whereas Denmark, Germany and France lies 10 percent point lower.

	Men 1995	2004	Women 1995	2004
Denmark	51,2	55,8	41,5	44,8
US	77,2	80,2	53,6	56,2
GB	67,4	72,8	51,4	55,0
Germany	-	63,5	-	46,5
France	65,7	66,6	41,4	47,9

Table 11: Employment rates for foreign-born men and women as percentage of the working age (15-64) foreign-born male and female populations. Source: OECD Factbook 2007 (online).

Recent studies suggest that even when immigrants find a job in Denmark, they are more likely to lose it than their colleagues (Ejrnæs 2006). This has to do with the type of jobs and type of sectors immigrants work in. They are more likely to be hired in jobs, where a high numerical flexibility is needed. These employment tendencies among immigrants cannot solely be blamed on the Danish flexicurity model. The relatively high Danish wage level must be kept in mind, when the low integration on the labour market is to be explained. In 2006, for instance, the average wage in Denmark was almost two thirds beyond the average wage in the US (see Table 12). The immigrants arriving to Denmark are often refugees with poor educational backgrounds, which makes it difficult for them to meet the demands at a high wage labour market (Andersen & Mailand 2005).

The high pay flexibility in Denmark does not result in great wage dispersion. One reason for this is the way social security is financed. Unlike France and Germany (and even GB and the US) social security in Denmark is almost solely

financed by personal income taxes paid by the employees (see Table 12). Danish employers' contribution to social security is only 0,6 % of the wages. The social security costs have been externalised from the companies onto the state, and the employers' contribution is therefore only rudimentary in Denmark.

	Wage	Income tax	Employer SCC
Denmark	44.343	40,9	0,6
US	27.362	23,4	7,8
GB	45.395	26,8	10,7
Germany	42.003	42,7	20,5
France	31.464	29,1	42,3

Table 12: Average wage in Euros, average personal income tax (%) and average employer social security contribution (%) for full time workers in the industry (2006). Source: OECD Statistics (online).

Due to the relatively high wage levels employers are playing it safe, when they hire people, and they only hire employees, who they assume are worth the cost. This is also reflected in the fact that descendants of immigrants, who have been educated in Denmark, have far better employment rates than their parents. In 2004 the employment rates for first generation male and female immigrant descendants were 63,2 and 60,6 %, respectively, which is approximately 10 percentage points higher than first generation immigrants (Source: Databank of Statistics Denmark, www.statistikbanken.dk). The exclusion tendencies on the Danish labour market do not only make it difficult for immigrants with different educational backgrounds to enter the labour market. Older workers and low-skilled workers also have somewhat greater difficulties finding new jobs than the average (Bredgaard et al. 2005; Madsen, forthcoming).

US employment regulation in a flexicurity perspective

Flexibility and security in the US

Looking at the US employment regulation from a flexicurity perspective, there seems to be important differences but also elements of strong similarity between the Denmark and the US. On the *flexibility* side there is great similarity, since the US employer have a (very) easy access to hire and fire employees. Even though the strictness of the Employment Protection Legislation is some what lower in the US than in Denmark (se Table 1), a high numerical flexibility is an important element in the overall dynamic of both labour markets. This flexibility is the shared ground of the Liberal Market Economy of the US and the Negotiated Economy of Denmark. However, on the *security* side, there seems to be great difference. US labour market regulation entails elements of passive and active labour market policies, but they are less comprehensive than their Danish counterparts. The most important ones are the Unemployment Insurance (UI) and Trade Adjustment Assistance (TAA), respectively. Both are explained in more detail below and discussed in comparison to the Danish flexicurity model (see Figure 2). Here, we try to answer the question, whether the American elements of flexibility and security add up in a trade off, which benefits both employers and employees, and whether these elements match each other in depth, scope and length.

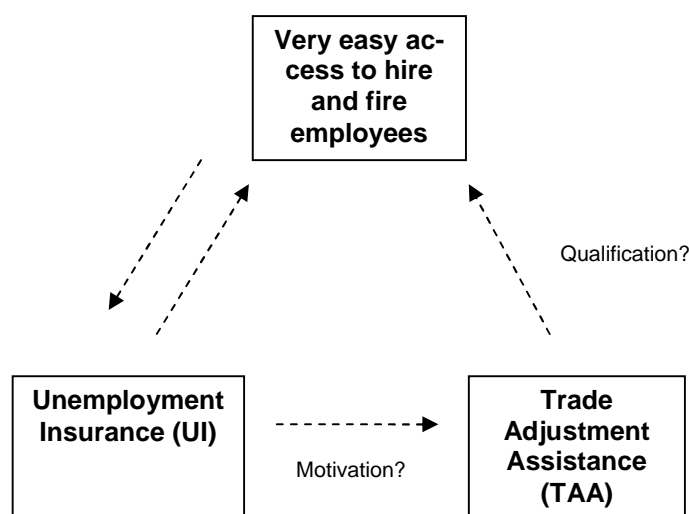


Figure 2: The US flexicurity model?

Unemployment Insurance

Regarding *income security* for unemployed the federal and state funded Unemployment Insurance (UI) has the longest history and covers the largest *scope* of unemployed in the US (Source: Department of Labor, www.doleta.gov). It was established in 1935 as part of New Deal after the Great Depression, and today all employees, who have worked for a minimum of one year and lose their job

through no fault of their own, are entitled to a maximum of 26 weeks of unemployment benefits (Kletzer & Rosen 2006). To obtain benefits active job search and willingness to accept jobs offered is required. The scope of the UI seems to be similar to the scope of the unemployment insurance system in Denmark, since a broad group of workers are covered if fired. The broad coverage of the US system has though been put into question by recent figures, since the number of unemployed found eligible for the programme varies tremendously between states. In 2004 a little less than 80% of all job losers were found eligible and received UI, and there is no system corresponding to the Danish social insurance to cover unemployed not eligible for unemployment insurance (Kletzer & Rosen 2006).

However, the major difference between the Danish system and the UI is to be found with regards to the *length* and the *depth* of the coverage. Firstly, there is a long way from the 26 weeks limit to the Danish limit of four years. In American states experiencing high unemployment it is possible to apply for Extended Benefits adding between 13 and 20 weeks to the length of the basic coverage, but this still leaves a major gap between the length of the Danish and the American coverage. Secondly, the depth of the income security is very different to the Danish one (see Table 13). The maximum weekly benefits, which are set at state level, ranged in 2004 from a low of \$133 in Puerto Rico to a high of \$551-\$826 in Massachusetts. The average weekly benefits paid were lower and ranged from \$107 (Puerto Rico) to \$351 (Massachusetts). Compared to the average weekly earnings lost this gives an overall replacement rate much lower than the Danish one. The US average replacement rate reached a low of 33% in year 2000, which is about half of the Danish replacement rate of 61% in 1999 (see Table 2).

	Maximum weekly benefit	Average weekly benefit	Replacement rates
Massachusetts	\$551-\$826	\$351	33-50%
Hawaii	\$459	-	50%
DC	\$359	-	<25%
Puerto Rico	\$133	\$107	33-50%
US average	\$300-400*	\$263	33%

Table 13: Maximum and average weekly benefits in 2004 in the UI programme. Replacement rates of average weekly earnings in 2000 (Kletzer & Rosen 2006). *Estimate

The large depth of numerical flexibility in the US is therefore not matched by a large depth of income security like in the Danish case. Also the length of the unemployment benefits is significantly lower than in Denmark (see Figure 3). The flexibility and security implies a different kind of trade off. In the US *employment security* has been targeted by a strong economic incentive. One could say that the 'motivation' to active job seeking and to work in the US model has been a limited access to unemployment benefits. At the same time the comparatively lower wage levels and the easy access to hiring and firing have made it easy for unemployed to find new jobs quickly. However, the increased international competition over the last decades has challenged this trade off, and there are strong signs that the trade off has disadvantages for both employers and employees, today. It is therefore disputable, whether the trade off can be characterised as a positive sum game.

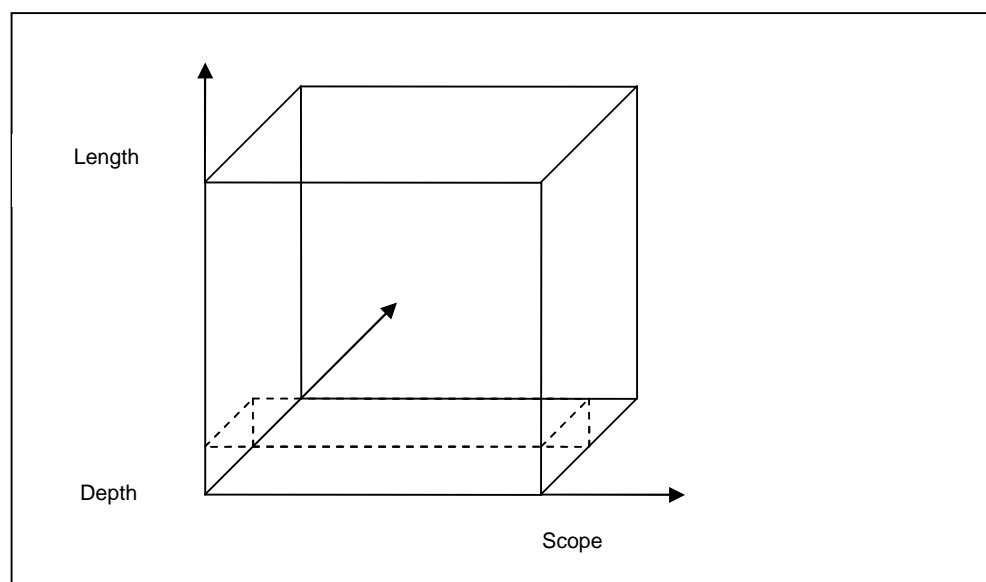


Figure 3: Illustration of the coverage of unemployment insurance in Denmark (black lines) and the US (dotted lines). Length (years), depth (replacement rate) and scope (% of job losers) compared (4 years, 61%, 80% in Denmark and 26 weeks, 33%, 80% in the US, respectively). The Danish system of social insurance is left out in this comparison.

Critiques have pointed at several problems with the current system of UI. One of the major points of critique is the level of the replacement rates (Kletzer & Rosen 2006). Even though the aim of the programme has been a replacement rate of 50% of the former income, only one state (Hawaii) seems to have reached this target. Some argue that this is related to the way the system is financed, since it rests on a tax base that has not been adjusted over the last 20 years. A second point of critique is the limit of duration (ibid.). There are strong signs that the average duration of unemployment in the US is increasing, and therefore a growing number of unemployed exceeds the 26 weeks and are left with no financial coverage at all. The third point is the eligibility requirements of the programme. Due to the strong changes on the labour market a large group of Americans are hired on non-standard contracts (fixed term contracts, part-time work etc.) or work as self employed. The current programme does not cover these groups, as a certain amount of full time work and full time pay is required to obtain benefits. Unlike in Denmark there is no social insurance to cover unemployed, who are not eligible to unemployment insurance.

Trade Adjustment Assistance

The federal Trade Adjustment Assistance (TAA) forms the most significant programme of active labour market policy in the US. It offers a combination of training and supplementary weeks of unemployment benefits (called Trade Readjustment Allowance) for workers, who lose their jobs as a consequence of import. Often the trade unions help workers prove the relation between job loss and import. Today, workers with job loss caused by import can apply for up to two years of training and Trade Readjustment Allowance. The programme has a long history that stretches back to the Trade Expansion Act passed in 1962 (Rosen 2006). It has been developed in line with increasing foreign competition and trade as a political compromise for job loss especially in the manufacturing industry. In order for Republicans to convince labour friendly Democrats and trade unions to agree on further trade liberalisation, they have had to offer certain measures to help workers struck by structural unemployment. Accordingly, the TAA has been reformed several times as acts on trade liberalisation have

been introduced or changed. In the beginning there was no actual take up of the programme due to very narrow eligibility criteria, but a reform in relation to the Trade Act of 1974 changed the criteria, and the take up of the programme expanded during the 1970's. However, reports on trade unions' misuse of the programme to cover short term cyclical unemployment led to critique and reforms cutting the cost of the programme in the early 1980s (ibid.). The efficiency of the programme accordingly dropped through the 1980s and so did the support from trade unions. They began referring to the programme as 'burial insurance'. However, it was still possible to pass a sister programme in relation to the North American Free trade Agreement (NAFTA) in 1993, which introduced less narrow eligibility criteria for workers losing their jobs to import from certain countries.

The coverage and the effects of the Trade Adjustment Assistance have been subject to much debate up through the 1990s as well. One of the issues raised has been the *length* of the Trade Readjustment Allowance, which has not always been in line with the length of the training offered (GAO 2001). Also the *depth* of the coverage has been in question. Shortage of funding has limited the access to training, and in many cases only income maintenance was offered to eligible workers. Furthermore, displaced workers were left without health insurance, since the employer usually pays this, and the replacement rate of the Trade Readjustment Allowance did not leave room for personal contributions (Rosen 2002). One of the most important points of critique towards the coverage has been the *scope* of the programme. Compared to the Danish case, the scope of the coverage is very limited (see Figure 4). A recent estimate (average 2004/2005) suggests that only 12% (70.000) of the total number of displaced workers per year (575.000) are eligible for participating in TAA following the current criteria (Rosen 2006). The actual participation, however, is even lower. The Department of Labor has registered 55.000 new Trade Readjustment Allowance recipients and 38.000 new enrolments in training for the year 2005 (ETA 2005). The vast majority of displaced workers are therefore not participating in the programme. Last but not least the effect of the training offered has been put severely into question, since studies have revealed little effect on earnings compared to unemployed, who did not participate (Decker & Corson 1995).

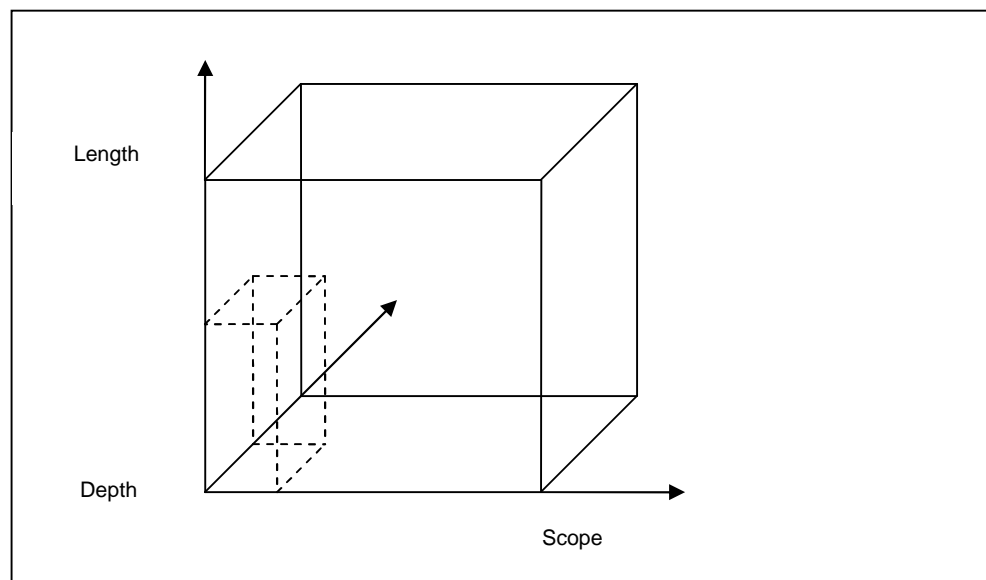


Figure 4: Illustration of the coverage of active labour market policy in Denmark (black lines) and the US (dotted lines). Length (years), depth (replacement rate) and scope (% of job losers) compared (4 years, 61%, 80% in Denmark and 2 years, 33%, 12% in the US, respectively). The Danish system of social insurance is left out in this comparison.

Many of the problems with the programme were addressed in the latest reform (Trade Act of 2002), which also showed to be the most extensive reform since the introduction of TAA (Rosen 2006). First of all, the sister programme, NAFTA-TAA, and TAA were merged to expand and harmonize eligibility criteria as well as reduce bureaucracy. Among others this meant that all secondary workers, who produce parts and ingredients for companies suffering from import, were made eligible for TAA. Secondly, Trade Readjustment Allowances were extended to match the length of training and funding for training was doubled. Thirdly, a tax credit was introduced to help recipients to maintain health insurance. Fourthly, the reform introduced a wage insurance programme (Alternative Trade Adjustment Assistance). Workers over 50 years of age were, within certain limits, made eligible to receive half of the difference between the wage in their old and their new job for up to two years. This group of older workers in the manufacturing industry often has poor educational background and they experience especial difficulty in finding new jobs with similar levels of pay. Fifth, a new deadline for handling applications was introduced to speed up administration.

Evaluations of the effects of the 2002 reform show that the changes made have increased the participation in training, but this has to some extent made the administration of the programme less sensitive to individual training needs (GAO 2004; GAO 2006). Case studies also reveal ongoing problems with maintaining wage levels from the jobs lost, a very poor take up of Alternative Trade Adjustment Assistance and of the health security tax credit. Actually, the general programme of job counselling for unemployed under The Workforce Investment Act (WIA) from 1998 has shown better results than the TAA with regards to reemployment and wage retention, i.e. maintaining the wage level from the job lost (see Table 14). Furthermore, remaining bureaucratic challenges (lack of information, difficulties in proving the relation between job loss and import) as

well as shortage of funding, still means that only a share of eligible workers receives TAA (GAO 2006; Rosen 2006).

	WIA	TAA
Reemployment rate (1st quarter)	85%	68%
Employment retention rate (3rd quarter)	90%	91%
Wage replacement rate (quarterly average)	95%	75%

Table 14: Reemployment in first quarter after job loss, maintenance of employment through the third quarter and wage replacement compared to old job in 2004. A comparison of the effects of the Workforce Investment Act and the Trade Adjustment Assistance (ETA 2006).

There can be several reasons to the questionable effects of Trade Adjustment Assistance. Two thirds of TAA participants enter the programme with a high school diploma or less, and half of the participants are 45 years of age or older (ETA 2005). They have been working in manufacturing industries with relatively high wage levels, but their profile makes it difficult to secure them well paid jobs in other sectors. Displaced workers from the manufacturing industry are most likely to accomplish full wage retention if they find a new job in manufacturing again (Kletzer 2001). However, there seems to be a growing gap between the skills needed in the manufacturing industry and the skills offered by unemployed workers (Eisen et al. 2005). Therefore only a part of them can find new jobs within the sector.

There have been many signs that the challenging profile of the participants is not matched by a sensitive administration of the programme. More than one evaluation shows that the local implementation suffers from bureaucracy and lack of funding/time for individually adjusted training plans. Another general point of critique is too little coordination between state and local government on training capacity and between government and companies on labour demands (ETA 1995; GAO 2001; GAO 2004; GAO 2006). The implementation does not seem to be sufficiently coordinated between local actors and individually adjusted to participant's qualification profiles. This lack of decentralisation in the management of the programme could be related to the structural challenge in the fact that TAA is a federal programme implemented by states. However, also state initiated active labour market policies have shown similar problems. The Wisconsin Welfare Employment Experiment, an extensive workfare and training programme also called the Wisconsin model, did not show convincing effects on reemployment either (Pawasarat & Quinn 1999). Services were not targeted to the individuals most in need, and goals and results were not monitored regularly to adjust programme failures. Furthermore, local officials did not engage in the implementation.

Another point of critique is the public posting of jobs at community or state level. There are reports on funding shortages to post jobs available at state level, and this inhibits or slows down the match between unemployed at vacant positions (AFSCME 2006). Furthermore, the federal online job site, America's Job Bank, will be closed down in 2007, which has been heavily criticised by the users, because it provided interstate job information (Frauenheim 2007). Another challenge is the coordination with the Community Colleges, which are responsible for the largest amount of adult training for low-skilled workers (Osterman

2007). TAA recipients are not offered the same credits as other students, and many of the colleges want to avoid the TAA-bureaucracy. Finally, there is a huge structural challenge in the scale of layoffs of low-skilled workers. The TAA programme is targeted to help displaced workers in import-competing manufacturing industries, where displacement often is a result of mass layoffs. State and community officials have to deal with many applications at one time, and the bureaucracy of that leaves little time to reflect on diverse training needs and local labour market demands (Rosen 2002; GAO 2001).

As a result the targeting of long-term training within TAA to individuals most in need and to needs of nearby companies has not been sufficient. An OECD cross-country comparison suggests that this could be a barrier to the overall success of TAA. Their analyses show best effects from active labour market policies combining general 'work first' strategies for high-skilled workers and specifically targeted long-term retraining programmes for low-skilled workers (OECD 2005). Other studies confirm this picture (Osterman 2007).

Intensified international competition and job quality

As both the Danish and the US labour market policies have succeeded in creating a high level of *employment security*, there is still a major difference when it comes to *job quality*. The current US labour market policies do not match the accomplished horizontal mobility achieved in the Danish system, and critiques fear an increasing hollowing out of the American middle class. From 1979 to 1999 approximately 2,5 million jobs were lost in manufacturing causing a loss of income over 30% for one in every four displaced manufacturing worker (Kletzer 2001). Projections suggest this development will continue, and that the challenge of restoring the American middle class will persist in the coming years. The number of jobs in manufacturing is expected to decline by 0,6% a year, whereas the number of low-paid service jobs and high paid professional jobs will increase by 2,0 % a year (Holzer & Nightingale 2007).

It is an ongoing debate in the US, how this development can be changed so job loss does not mean permanent loss of income (Kletzer 2001; Kochan & Schulman 2007; Holzer & Nightingale 2007). Some argue that Trade Adjustment Assistance and other related costly programmes of retraining is a mere silver bullet leaving the government with great expenses but no significant effects. Others point at the insufficiency of the current Unemployment Insurance, when workers have to move between sectors. Another approach could be to dissect the problems of the current systems in more detail. The OECD study suggests that maybe the idea of the programmes is not the problem but rather the implementation.

The proposal of Wage Insurance

The most recent initiative to fight loss in job quality has been the proposal by congressman Jim McDermott in March 2007 to introduce a general Wage Insurance (WI). The idea is to extend the current Alternative Trade Adjustment Assistance for workers over 50 years of age eligible to TAA to all displaced workers eligible to UI (Committee on Ways and Means 2007). WI would mean that displaced workers could receive half of the wage difference between the old and the new job for up to two years with a yearly limit of 10.000\$. This could equip them with more time to look for a new job with a wage level close to the level of the old job.

The proposal has been heavily debated. Trade unions have spoken against the proposal for several reasons (Lee 2007). First and foremost they are against spending more money on moving displaced workers into low wage jobs. They

would rather invest in improving the effectiveness of retraining to move displaced workers into jobs with higher wage levels (i.e. a 'good jobs' strategy). Secondly, they would rather extend the eligibility for UI to a larger proportion of the work force than improve income maintenance for those already eligible to UI. Thirdly, WI could have a negative influence of workers' motivation to participate in retraining. Academics have criticised the proposal as well. Some argue that WI will subsidise 'downward mobility' and encourage high-productivity workers to accept low-productivity jobs leaving skills and experience unused in the economy (Eisenbrey 2007). In line with this others emphasise a more urgent need for broadening the coverage of the Trade Adjustment Assistance into a 'Globalisation Adjustment Assistance' (Kochan & Shulman 2007). Intensified competition does not only result in increased import but also in introduction of new technology and new work organisation, which affect job loss in the industry (and the service sector) as well. However, some take a more pragmatic approach and support the WI as an important step towards more comprehensive solutions (Rosen 2007).

The costs of expanding the coverage of the UI or the TAA to all displaced workers are large, and it can therefore be difficult to find political support for high levels of security (Zhou 2007). If the Unemployment Insurance should be accessible to all workers, more workers would receive benefits. In the past 25 years only 37% of all unemployed have received benefits. If this rate should increase to 50%, the estimated extra costs would be \$7,4 billion (Kletzer & Rosen 2006). The cost of expanding the Trade Adjustment Assistance to all displaced workers would be even larger. The yearly spending would increase from \$0,9 billion to \$12,1 billion a year (Rosen 2006). Finally, other academics point at a need for a stronger focus on demand side issues and initiatives (Holzer & Nightingale 2007). These issues include reforms of corporate income tax, of the health care system and of public infra structures in order to facilitate the creation of high-skilled high-innovative jobs and thereby strengthen the US comparative advantage as a Liberal Market Economy (Horizon Project 2007).

The question of transferability

Before we move on to the question whether elements of the Danish flexicurity model could be transferred to the US or not, we will first take a look at the European discussion of the transferability of employment strategies in general and the Danish model in particular. The experience from this debate entails some important lesson on the question of transferability and of what can be learned by whom.

The European discussion

The process of learning on employment issues within the European Union (EU) goes back to the European Employment Strategy (EES) from 1997. The EES was integrated in the Lisbon goals concluded in 2000. Here, the members of the EU among others agreed on working towards a common set of goals on employment in order to improve economic growth, the number of high quality jobs and social cohesion by 2010. The goals were to be reached using 'soft' methods of regulation, i.e. the Open Method of Coordination (OMC), a process of 'mutual learning' between member states (ETUI-REHS & CARMA 2006a, 2006b). Inspired by the subsidiary principle this approach allowed a convergence towards common goals sensitive to different national institutional contexts by leaving the implementation to the single member state. However, even though the OMC included ongoing monitoring and evaluation of national results in order to compare performances, it did not prescribe sanctions in a legal sense.

Already in early stages of the European discussion of employment goals in the 1990s the issue of balancing flexibility and security was touched upon, but the discussion on flexicurity has especially intensified in the last couple of years (Spidla 2006; Vermeylen & Hurley 2007). In autumn 2006 the European Commission launched a green paper on modernising labour law in Europe, where the flexicurity concept is offered a main role in structuring the employment goals for the future (European Commission 2006). The green paper represents a shift in discourse from aiming at *job security* to *employment security*. This also means a focus on social security independent of the single company in order to secure employees, who move between jobs, and to make it easier for companies to hire employees.

The hearings of the green paper across Europe have displayed some differences in interpretation of flexicurity as a common goal. The European Trade Union Confederation (ETUC) has warned against cuts in Employment Protection Legislation (which especially is a concern among French and German trade unions) and underlined the need to end the growth in short term hiring. The UEAPME, which represents small and medium-sized companies in Europe, however highlighted the need for a revision of taxation and social protection systems. During the hearings in Denmark the Confederation of Danish Employers (DA) emphasised the easy access to hiring and firing in the Danish flexicurity model, which they believe prevent short term hiring, whereas the Danish Confederation of Trade Unions (LO) expressed their concern of exporting Danish flexibility without Danish security (DA 2006; LO 2006). In general, however, the employer side seems more optimistic on transferring the strategy than the employee side. Recently, the director of the Confederation of German Employers' Association (BDA) has spoken strongly in favour of flexicurity and a focus on employment security (ArbejdsMarkedsPolitisk Agenda 2007).

When and what can we learn

The discussion of the green paper illustrates the fact that flexicurity is more than a common *goal* of employment security. The flexicurity concept originated as a policy in The Netherlands and was later applied to Danish employment strategies. Not any form of employment regulation can be described as flexicurity, since there are certain *strategy* requirements that should be met (see earlier). Unsurprisingly, this has raised the question, whether it is possible to transfer elements of strategy between member states. During the hearings many have highlighted the large institutional and regulatory differences in Europe and questioned the transferability (EurActiv 2007; Vermeulen & Hurley 2007). There are obvious reasons for this concern. When the French government in 2006 launched a plan to increase flexibility on the labour market for young people less than 26 years of age, i.e. create a more easy access to fire (and willingness to hire), this caused large public protests and riots on the streets (EurActiv 2006). Even though the plan also included a somewhat more easy access to unemployment benefits for this group of employees, it was not perceived as a balance between flexibility and security. In public, the plan was looked upon as mere flexibility that would not increase the conditions for young people. This is a good example that a certain degree of trust in increased security is necessary, if populations in countries with high unemployment and high unemployment protection should be willing to take on new risks (Vermeulen & Hurley 2007)

Political, economic and institutional national contexts frame what can be learned when and by whom. More than one study on policy transfer suggests that not everybody can or have an interest in learning. A recent analysis of Open Method of Coordination Committees in Europe and in the Nordic countries arrives at two interesting conclusions on determinants whether learning takes place or not (Nedergaard 2005, 2006). First of all, repeated contact between the tutor country and learning country is important. Secondly, examples of domestic ‘best practices’ can be a driver of learning. Thirdly, similar economic-political background to some extent can be a driver of learning. However, if backgrounds are too similar, as in the Nordic countries, this does not facilitate learning. Very similar economic-political backgrounds are often affiliated with similar performance, and there is a need for some degree of visible political failure to stimulate learning of others ‘best practices’. This is why, for instance countries like France and Germany struggling with high rates of unemployment have shown greater interest the Danish flexicurity model than the other Nordic countries.

Before generalising the findings from the OMC Committees it is important to consider the peculiarities of this setting of learning. Cross-national policy transfer can vary on a number of dimensions (see Table 15). Learning can be more or less voluntary, it can focus on policy goals, structure, content etc., and the policy transferred can be more or less blended with old policies in the learning country. Finally, there can be institutional and cultural constraints on transfer. Learning in the committees demonstrates a *mixture* between voluntary and coercive transfer – with an emphasis on the voluntary element. The ‘soft’ character of the OMC creates a strong voluntary setting, but it must not be ignored that the goals of the European Employment Strategy sets a frame for the discussion and for regularly meeting activities. In that sense the lesson drawing in this setting is not a perfect rationality, but a bounded rationality. Since the aim of the transfer is a European convergence on *goals*, but the means to reach those goals are a member state matter, it is unlikely that the transfer will have the character of *copying* policies. It seems more likely that *inspiration* or *hybridisation* between old and new policies will take place. As described above the different *structural, institutional* and *ideological* backgrounds of the member countries in the European Union can both facilitate and constrain learning. To this might be

added that the simplicity of the policy plays a role as well (Dolowitz & Marsh 1996). A ‘best practice’ will only receive a status of ‘best practice’ if its content and results can easily be monitored and compared.

Why transfer	What is transferred	Degrees of transfer	Constraints on transfer
Voluntary Mixtures Coercive	Goals Structures Content Instruments Institutions Ideology/ideas Negative lessons	Copying Hybridization Inspiration	Complexity Structure Institutions Ideology Culture

Table 15: Dimensions of policy transfer between nation states (inspired by Dolowitz & Marsh 1996, 2000).

Current literature emphasises the importance of remembering that transfer of policies is not always a success. A study on a transatlantic transfer between Great Britain and the US shows that it can also lead to policy failure (Dolowitz & Marsh 2000). In the 1980s the British government was looking for inspiration to reduce benefit expenditure to Child Support Agencies, who supported single parents in the country. Their choice fell on the American Child Support Enforcement System, more specifically the development of the in the US highlighted Wisconsin model. The implementation of a new structure of Child Support Agencies in Great Britain did not work out very well for at least three reasons (ibid.). First, the transfer was *uninformed*. The British government officials concentrated on Wisconsin and did not learn of drawbacks of similar system in other states. As described earlier in this paper, later evaluations of the Wisconsin model documented problematic results (Pawasarat & Quinn 1999). Second, the transfer was *incomplete*. The administrative implementation of the new system in Great Britain did not include important administrative elements and benefit levels came out dissatisfactory to all involved parties. Finally, the transfer could be described as *inappropriate*. The aim of the American system was not primarily to cut expenditure on benefits but to reintegrate single mothers in the workforce. The difference in aims contributed heavily to implementation failure.

The British-American example of transatlantic transfer tells us important lessons, when learning how to learn. Policy transfer can be counterproductive if the involved parties are not cautious. When transferring successful policies nobody want to inherit the diseases of those policies like for instance the lack of integration on the labour market in Denmark. This speaks for repeated ‘mutual learning’ processes like in the OCM, where learning moves in both directions. Such processes makes ongoing adjustment of ideas to different contexts possible as well as leaves time to monitor *negative lessons* related to ‘best practices’. However, the British case also tells us that transfer at central levels must include reflections of implementation instruments at more local levels if policies should succeed in practice.

Can those who want to learn, learn

The study of the OCM Committees in Europe and the study of the transatlantic transfer between US and Great Britain suggest an interesting paradox of cross national learning: can those who want to learn actually learn? The studies report

a large motivation to learn from best practices in countries, which have a somewhat different institutional and economic structure, because, policy performances often will differ significantly (France & Germany vs. Denmark; Great Britain vs. the US). However, the varying national contexts imply large challenges, when implementing those best practices. The paradox can be said to represent two extremes in the debate on policy transfer. First, the ‘best practice’ argument represents the viewpoint of *perfect rationality*. The most rational thing to do, when looking for a solution to a domestic policy failure, is to look for convincing examples of policy success. Second, the ‘context’ argument can in its extreme represent the viewpoint of *cultural determinism*. It is not possible, and it might even be dangerous, to transfer policies between countries with different cultures, because similar policies will be perceived and implemented very differently and have very different effects. There are strengths and weaknesses of both arguments. Whereas it is important to reflect on contexts, when transferring policies, in order to prevent negative side effects and policy failure, a too strong emphasis on cross national cultural differences might keep one from pursuing possible and necessary institutional change (Hall 1986).

Both types of arguments have been used regarding transfer of the Danish flexicurity model. The case of France demonstrates how the rational ‘best practice’ approach has been used in practice, although with not very convincing results. Like the British case it can be described as an incomplete transfer. The main focus was on flexibility instruments leaving too little attention to the security elements, which are an integrated and important part of the Danish flexicurity model. In a context of high levels of Employment Protection Legislation and high unemployment, this led to policy failure. The cultural argument has been used to underline the impossible manoeuvre of transferring the Danish flexicurity model to other countries. Several papers argue that the cultural features of Denmark (high levels of trust and social coherence) remain unmatched by other countries. This makes it extremely difficult to transfer Danish policies to other settings, because Danish labour market policies and their performance are strongly embedded in these cultural peculiarities (Raghuram et al. 2001; Algan and Cahuc 2005; Rasmussen et al. 2003).

The problem of both the rationalist and the cultural-deterministic argument is the scale of the equation. Both underestimate the importance of in-between institutional structures that can both constrain and facilitate implementation of new practices all the way down from central government to local officials. Policy transfer can take place on different levels and touch upon different elements like goals, content or instruments (see Table 15). Others than ministerial representatives can generate change and it can address smaller scale issues than complete labour market models. Policy transfer can be targeted at ‘policies of the middle range’ like for instance administrative procedures and practices in job counselling. However, no matter the level and scale of transfer it seems crucial to closely consider implications of implementation of new policies in relation to local institutions. This speaks for a stronger focus on learning as hybridisation and inspiration than copying in order to leave room for local level adjustments.

Bottom up vs. top down – new roads to learning

There is growing evidence of cross national learning taking place at sub national levels, for instance between state or regional councils or between communities (also across the Atlantic). This implies a learning process with more of a bottom-up than a top-down character. The German Marshall Fund of the United States (GMF) have launched a programme on Comparative Domestic

Policy, where they have funded transatlantic study tours and fellowships between the US and Europe (GMF 2007). The targeted areas have included among others environmental policy, urban policy and social policy. The programme has stimulated learning and policy exchange at both state and community level. At state level, Hessen in Germany has pursued to draw lessons from the welfare-to-work programmes in Wisconsin (the Wisconsin model), whereas the cities of San Francisco and Boston have developed car-sharing programmes inspired by models in Berlin and Freiburg.

Especially within environmental and urban policy learning has been strong. Within these fields, US regions and cities have by their own initiative generated 'learning communities', i.e. partnerships on exchange of best practices with regions and cities in Europe. A strong example is the 'Partnership Agreement' between the Northern Virginia Regional Commission and the Verband Region Stuttgart, Germany (NVRC & VRS 1999, 2004). The two public regional councils concluded the first agreement on exchange of ideas and practices in 1999 and renewed it for another five years in 2004. The focus of the partnership is environmental and urban planning and a variety of successful policies on car-sharing, light rail, architecture and pollution control. Maryland and Schleswig-Holstein (also Germany) have concluded a similar partnership at state level on environmental policies and have especially exchange practices regarding wind energy (Medearis & Swett 2003). On the community level, the city of Cape Charles in Virginia has been transformed into an ecological industrial park with strong inspirations from visits to the city of Kalundborg, Denmark (*ibid.*, Hayes 2007). In Hamburg, the Körber Stiftung together with American collaborators has launched an exchange programme on education and job training of immigrant youth between immigration professionals in Hamburg, Germany, and New York, including study trips and works shops (Körber Stiftung & CDS 2007).

The actors involved in these transatlantic exchanges report great advantages in learning at sub national level. The more local the exchange, the greater the pragmatism and open mindedness to new ideas and best practices (Medearis & Swett 2003; GMF 2007). Cultural barriers at this level are overstated, since local officials and volunteers often are more sensitive to results than ideological fights. Furthermore, existing practices could be balanced against new ones and potential interactions immediately handled. For instance, procedural potentials and barriers can be located at an early stage. However, some of the local level exchanges were more successful than others. Best results were achieved by 'learning communities', where a repeated face to face contact was established. Like in the European coordination of employment strategies within the OMC committees, the repeated personal contact created mutual learning settings, where both positive AND negative lessons could be exchanged over time and 'perfect rationality' mistakes avoided. Constraints on learning were among others lack of will among local politicians to fund cross national exchange programmes. Exchange programmes, which received funding and organisational support from outside the communities, were among the strongest. Lacks of competencies among local actors to support the implementation of new policies were also reported as constraints of learning. Surprisingly, very few reported constraints from existing regulatory frame works, which suggest quite a room for manoeuvre in local exchange of policies.

A lesson for the US – and a lesson for the Danes?

Conclusion and discussion

From Copenhagen to Washington...

Denmark and the US are facing some of the same challenges caused by intensified international competition. The number of job transitions is on the rise and is not always easy to manage, since the developments on the labour market are not only uncertain but also costly. However, the two countries give different answers with different outcomes to the same question asked. The US is experiencing troubles handling the transitions of displaced workers with its current labour market policies, whereas the Danish flexicurity model has been more successful in retraining and reemploying displaced workers without a loss in job quality. The visible difference in policy performance has led to a growing American interest in the Danish model, but does not guarantee that a successful policy transfer can take place. Studies on policy transfer have shown that, while countries with varying political-economical settings have a high motivation for mutual learning of best practices, it remains a challenge to transfer policies between such settings.

If we focus on the *content* of the policies in the two countries, the difference lies more on the security side than the flexibility side. Both the Danish and the US economies are characterised by a large numerical flexibility that ensures an easy access to hiring and firing for employers and high levels of employment security for employees. Regarding passive labour market policies (i.e. unemployment benefits) we find, however, a very different coverage especially on the length of the benefit period offered (4 years in Denmark, 26 weeks in the US). Furthermore, great difference in coverage is found within active labour market policies as well. Here, the scope of the coverage is the turning point. Where all displaced workers in Denmark are eligible to retraining, only one in eight qualifies in the US. The limited access to active labour market policies in the US does not seem sufficient to ensure a match between labour and demand on the labour market. US employers report difficulties in recruiting relevant high-skilled labour simultaneously with dropping job quality for displaced workers. However, economic estimates of costs in adding Danish levels of security to the current US level suggest that it might be difficult to establish political support for the full Danish package.

The analysis of Danish and American labour market regulation has shed light on another important difference, namely the *instruments* used in active labour market policies. Evaluations of American retraining programmes for displaced workers report a variety of problems with the implementation of the programmes at state and local level. First of all, the retraining does not seem to be sufficiently coordinated with local labour market actors like local companies and schools. Displaced workers are therefore not always retrained to match labour demands. Secondly, the retraining is not sufficiently matched with the individual qualification profiles of the displaced workers to add new skills and competencies where needed. The implementation of active labour market policies in Denmark tells a completely different story. Here, a strong coordination at the local level as well as tailor made individual retraining plans is highlighted as some of the most important reasons for successful reemployment in recent years. The only exception seems to be first generation immigrants, who are performing poorer in Denmark than in the US in spite of the focused implementation.

If mutual learning on these administrative techniques and practices should take place it appears crucial to include exchange at *subnational level*. Even though incentives and support from national and supranational institutions (funding, organisational assistance, and reforms of legislation/agreements) can enhance learning, successful implementation of programmes is also highly dependent on local level actors. It can therefore not be left alone to the administration in Copenhagen and Washington. As local level officials administering the Danish and American active labour market policies work in different institutional settings instruments are, however, not straight forward to copy. Rather, exchange must obtain a *hybridisation* character, where new elements can be adjusted to and blended with old ones.

There are a number of important local level structures and institutions, which differ between Denmark and the US and which may impose constraints on learning. First of all, size matters. When a company closes in the industrial sector in the US many thousands of workers are displaced. Company closings also cluster in specific regions leaving an even larger number out of work in the same area. The scale of the mass lay offs is often smaller in Denmark due to a smaller company and country size. A mass lay off in Denmark therefore impose less strain on local officials and local labour markets. The much larger size of the US also implies a different government structure, where coordination unlike in the Danish case not only must be handled between state and local level but also between state and federal level. Another constraint is the different traditions for coordination at local level in the Negotiated Economy of Denmark and the Liberal Economy of the US, respectively. In Denmark there is a long tradition for local level coordination between job centres, companies and public education centres for adults. These links and networks do not seem to be as strong in the US. However, the Danish 'job miracle' did not grow out of these networks alone. It was a reform of the structure and content of this coordination in the 1990's that boosted the employment rates in Denmark. Institutions, structures and procedures did indeed change when policies were transformed, and that should also be possible elsewhere.

Employment security AND job quality

The comparison between the Danish flexicurity model and US labour market regulation can be an important lesson for the Danes and other Europeans, too. Currently, the European discussion on the next European Employment Strategy is highly focused on addressing *employment security* as the new common goal in Europe (Spidla 2006; European Commission 2006b; Vermeylen & Hurley 2007). However, the US case tells us that this focus can be too simple a measure of sustainable employment performance. Displaced American workers often find new jobs again quickly, but many of them end up with significantly lower wages than before. This does not only mean that a growing part of the middle class ends up among the 'working poor', but also that qualifications, and thereby large productivity potentials, are left behind. American employers have in recent years reported increasing difficulties in recruiting relevant highly skilled labour (Kletzer 2001; Mishel et al. 2007; ETUI-REHS & CARMA 2006a). If other European countries were to adopt the Danish aim of employment security, policy instruments should therefore be chosen cautiously in order to ensure balanced trade offs for all workers.

There are trends of segmentation on job quality in Europe as well. Especially in countries with high levels of Employment Protection Legislation like France and Germany, a double movement on job tenure can be studied. Both the group of employees with tenure above 10 years and the groups with tenure less than one year seem to be growing (see Table 8). As a consequence of increasing international competition employers simultaneously become more and more de-

pendent on highly skilled workers and on a high numerical flexibility in order to match labour and demand. This results in an intensified hiring and firing of low-skilled workers. If numerical flexibility is obstructed by high levels of Employment Protection Legislation, employers will make use of hiring on fixed term contracts, temporary agency workers etc. in order to avoid the costly conditions of firing employees on open-ended contracts (DiPrete et al. 2005). This could imply a European version of 'downward mobility', where some groups of workers are left behind with regards to the benefits and the retraining offered only to people in open-ended positions. The downward mobility might endanger the workers' *option* security (i.e. having some degree of choice, when seeking a job) leaving fired with little room to find a job that match their qualifications with regards to tasks, pay and status (Lescke et al. 2006). Over time this can reduce their general level of qualifications and employability.

If employment security is reached by increasing the number of temporary contracts, other problems therefore may occur. The question in Europe is, how we can increase flexibility (and employment) without creating a segmented labour market. Here, as in the US case, tailor-made and locally coordinated active labour market policies seems to provide the most strategy to ensure the future employability of displaced workers.

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