

# Comparing welfare state models: Approaches to addressing labour shortages

Awasthi, Sushriya Niranka

## Citation

Awasthi, S. N. (2023). Comparing welfare state models:: Approaches to addressing labour shortages.

Version: Not Applicable (or Unknown)

License: License to inclusion and publication of a Bachelor or Master Thesis,

2023

Downloaded from: <a href="https://hdl.handle.net/1887/3621420">https://hdl.handle.net/1887/3621420</a>

**Note:** To cite this publication please use the final published version (if applicable).



# Comparing welfare state models:

Approaches to addressing labour shortages

Sushriya Awasthi (s2779986)

Supervisor: Dr. ir. A.A.H.E. van Reuler

Leiden University

BSc Political science

Specialisation International Relations and Organisations

Date of submission : 26<sup>th</sup> of May 2023

Word Count: 6976

# Contents

Introduction	2
Literature review	3
Theoretical framework	6
Conceptualisation	8
Welfare states regimes	8
Methodology	9
Research design	9
Case Selection	9
Similarities	9
Crucial difference	10
Method of data analysis	10
Method of data collection	10
Qualitative content analysis	13
Liberal regime type	13
Social Democratic regime type	14
United Kingdom	14
The Netherlands	15
Comparative analysis	17
Discussion	17
Conclusion	18
Reflection	18
Societal implications and recommendations for further research	19
Bibliography	19
Primary sources	19
References of case the United Kingdom - Chronological	19
References of case the Netherlands - Chronological	21
Secondary sources	22
Appendix A	26
Appendix B	31

## Introduction

Multiple economic shocks have taken place since 2020. First, Covid-19 led to a fall in Europe's economy and a suffering labour market (European Labour Authority [ELA], 2023). As the ELA mentions in their report, the EU unemployment rate had risen to 7.4% during COVID-19, but then in 2022 in dropped to 6.1% and now it is historically low (insert source for what number now) (ELA, 2023). Secondly, the war in Ukraine that began in 2022 continues to have an impact on the economies (Badiani-Magnusson et al., 2022). Thirdly, the global inflation rate of 8.8% in 2022 which have led for example to a decline of the purchasing power of some consumers. Moreover, these economic shocks are accompanied by labour market shortages as in 2021, the World Employment Confederation Europe (WEC) reported that 70% of companies had reported they were having trouble in hiring new people for their vacancies (World Employment Confederation, 2021)

As the labour market shortages have been a hot topic all year because the unemployment rate is low, this topic needs to be researched. The understanding of what the consequences of a low unemployment rate are and what different policies governments are implementing could give valuable insights into the strengths and weaknesses of the policies. As countries apply different strategies to unemployment rates, it is important to describe which strategies there are, and which ones are most often used in order to prevent too low unemployment rates.

Moreover, as technological change and in particular, increasing investments in automation technologies have also raised the question whether robots will replace human jobs, or which jobs (Damelang & Otto, 2023). Although robotization does not mean that all jobs will disappear, as more jobs will be created in other industry sectors like service, *technology and IT* (Dauth et al., 2021).

As the International Labour Organisations (ILO) has released a report that there is a large chance that the current global economic slowdown will force workers to accept a lower quality and poorly paid job, but also that global unemployment is to rise about 5.8% in 2023 (ILO, 2023). Additionally, Brunello and Wruuck (2021) point out in their research on labour shortages during and after COVID-19 that not much research has been done on this topic and that it is important to evaluate the government policies that are implemented to solve skill shortages (p. 1160). Following the academic literature on demographic shifts and ageing populations, more western countries will have an ongoing labour shortage and this field of

research is still very small (Maurer, 2023). This gives reason to believe the topic of low unemployment rates is relevant for understanding the labour market shortages, but also important to research in order to fill the gap to understand how governments respond to labour market shortages.

## Literature review

During the COVID-19 pandemic, Dias et al. (2020) discuss the labour market policies that were implemented in the United Kingdom in the first half of 2020. On the one hand, sectors like non-essential retail and tourism which includes travelling and hospitality were closed down because of the pandemic and many of the workers in these sectors were left without work in the lockdown (Dias et al, 2020). On the other hand, there where labour shortages in other sectors like health, supermarkets and delivery services. According to Dias et al (2020), the initial policy response was focused on helping the sectors that were forced to close down and protect the income of their workers which was called the Coronavirus Job Retention Scheme (p. 373). As the article was published in June 2020, they only predicted the following policy, which was scaling back support, but this only happened in September 2021 (Hutton & Keep, 2023). Dias et al. (2020) conclude from their paper that policymakers will have challenges after the pandemic to get people who have lost their job back into that same job again, especially if they already have another job, which might not be the right job (p. 380).

As the research of Dias et al. (2020) was done in the first months during COVID-19, Causa et al. 2022 have published an article on the effects on the labour market since the COVID-19 pandemic, namely the labour market is tightening and labour shortages are seen in multiple advanced countries (Causa et al., 2022). Causa et al. (2022) argue in their paper that the causes of these labour shortages might go beyond the economic cycle and include structural changes like the changes in the preferences of people. The indicators they used are the vacancy to unemployed ratio, the vacancy rate and the quit rate and they look into the data of the OECD countries (Causa et al., 2022). They conclude from their paper that for the structural factors, the COVID-19 pandemic may have created a change in preference of workers based on that workers no longer accept low quality jobs, low pay and bad working conditions. Although to support this with data, they only looked at data of the United States which was supportive for this statement, further research should be done to provide a more generalisable argument.'

Regarding labour shortages, there is not much recent research to be found, however, Henkens et al. (2008) are presenting the results of a national survey that was filled in among Dutch employers on which strategy they use to deal with a tight labour market of which the data was gathered in 2002 (p. 1315). Although this data might be called outdated, the outcome of this article is still worth mentioning. Henkens et al. (2008) found that there are four strategies that employers use to solve labour shortages. The first one is "Tapping into new target groups", which includes for example women, or elderly, the second "increasing the supply of labour from among existing workers", the third "outsourcing work and collaborating", the last one is "structural adjustments" (pp. 1323-1324). Structural adjustments is one of the most important ones considering recent research, as it includes the introduction of technological innovation. Lastly, Henkens et al. (2008) conclude that although the retirement age might go up in the future, employers do not see the elderly as a new target group to solve their labour shortages (p. 1328).

To build further on the technological innovation strategy of Henkens et al. (2008), more recent literature has discussed the role it will have. As global automation will play a big role, there is a need for more skilled employees, and although corporations offer skill development programs often for their current employees, they do not offer it to new or future employees, which might help them to fill the vacancy faster (Moldoveanu et al., 2022). On the contrary, Dauth et al. (2021) studied the potential impact of industrial robots on the labour market and although some positions within companies are replaced by robots, those employees often get a new position within the same company (p. 3142). Moreover, Dauth et al. (2021) also find that young people are upgrading their skills before they enter the labour market, or in other words, they are increasing their level of education as does the regression on the data of the case study of Germany proves (p. 3132).

The following part will discuss the literature on comparisons of employment and welfare state types as there is no existing literature on labour market shortages based on welfare state types of which it is believed to be relevant for this research. In light of this, the paper of Scharpf (2000) is on the institutional differences between welfare states and employment systems and examines the problems and solutions within the different countries (p. 399). He performs a cluster analysis of which the clusters of countries falls in the same classification on welfare states regime types that Esping-Andersen (1990) has made, only he renamed them to Scandinavian, Continental and Anglo-Saxon (Scharpf, 2000, p. 402). To summarise this analysis, the following characters of the welfare state regime types are the most important per

type. The Scandinavian welfare states have very high levels of employment and very low levels of wage differences (Scharpf, 2000, p. 412). The Continental welfare states have low rates of total employment, but also low or moderate differences in wages (Scharpf, 2000, p. 417). The Anglo-Saxon welfare states have high levels of total employment and moderate to high levels of differences in wages (Scharpf, 2000, p. 415). Scharpf (2000) concludes that as each welfare state has a different level of vulnerability towards international economic pressure, each state also has a different set of policy options because of their different institutional constraints to address the problems that financing the welfare state and its benefits bring towards for example employment (p. 421).

The paper of Kemmerling (2005) focusses on analysing the employment effects between different strategies of funding in welfare state regimes in OECD countries (p. 2). In this analysis, he builds on the arguments made by Scharpf (2000) that the tax mix could be an indicator of explaining the differences in labour markets in welfare states and uses the same classification for welfare state regime types as Scharpf (2000) which makes these articles complementary to each other (p. 3). Kemmerling (2005) finds from a comparative welfare state analysis that tax mixes are important in the short run, but more importantly evidence that taxation has a high impact on the labour market in continental welfare states (pp. 18-19). However, it is a weakness of the article that he does not conclude on the other welfare state types. He does mention the problem of causality for this research, as taxation might slow down the overall economic growth of a country which then has an effect on the labour market (p. 19).

Following the Great Recession, Shahidi (2015) has done a qualitative content analysis to explain welfare state recommodification of labour market reforms after this recession in a sample of eighteen welfare states between 2008 and 2013 (pp. 663-664). Recommodification is explained as "one's ability to subsist depends to a greater extent upon one's participation in the labour market" (Shahidi, 2015, p. 663). Shahidi (2015) includes conditions that are considered relevant following the literature, namely political, institutional, and economic variables (p. 666). However, this research is unable to find a cause to explain the diversity that is observed in the cross national analysis within political and institutional variables, although an explanation for the variable of fiscal capacity of a welfare state is found (Shahidi, 2015, p. 677).

Dingeldey (2009) discusses the changes in governments in activating labour market policy. Based on a comparative case study with three countries each representing one of the three welfare state regime types, she concludes that the regimes are all changing, but as a result of

the paradigm shift, differences that existed between the welfare state regimes remained or it created new difference between the countries (Dingeldey, 2009, p. 26).

Researching the topic of labour market shortages is necessary, as the existing literature is not giving a definitive answer on how governments of welfare state regimes are addressing labour market shortages and what the variations are between the regimes. Therefore, this leads to the following research question:

What are the variations in approaches between different types of welfare states in addressing labour market shortages?

## Theoretical framework

The literature of welfare state regime types has been compared to employment research, but not to labour market shortages. Therefore, this thesis tries to offer a new approach in this field of research by addressing labour market shortages in different types of welfare state regime types. However, the academic literature knows multiple classifications of welfare state regime types. The most well-known is the one of Esping-Andersen (1990), although it also has been widely criticized. Thus, in the following section, the classification of Esping-Andersen (1990) will be discussed, then the critics on this typology and then why the typology of Esping-Andersen (1990) is used for this research.

When Gøsta Esping-Andersen (1990) published *The Three Worlds of Welfare Capitalism*, it was revolutionary in the sense that his work made it possible to have a deeper comprehension of welfare states because he introduced the welfare state regime types. These regime types were found based on differences in the quality of social rights, welfare-state stratification systems and the level of decommodification by performing a cluster analysis (Esping-Andersen, 1990, p. 26). Esping-Andersen (1990) explains the level of decommodification as "the degree to which [a person] can uphold a socially acceptable standard of living independently of market participation" (p. 37). Drawing from this cluster analysis, the first cluster was named the liberal welfare state regime, the second the corporatist welfare state regime and the third was the social democratic welfare state regime (Esping-Andersen, 1990, pp. 26-27).

As stated before, since the publication of the welfare state regime, multiple authors have critiqued the regime typology (Bambra, 2007; Kersbergen & Vis, 2014). One of the main criticisms is the operationalisation of the level of decommodification, as Esping-Andersen (1990) does not justify how he clusters the ranking of the countries, only that he has based them around the mean (Kersbergen & Vis, 2014, p. 60).

As discussed in the literature review, Scharpf (2000) and Kemmerling (2005) both have used a variation on the welfare state regime type classification of Esping-Andersen (1990), which is Scandinavian, Continental and Anglo-Saxon. Additionally, Greve (2017) also uses this classification to investigate the relationship between labour market changes and the welfare state regime types, only does he not use Anglo-Saxon but Liberal regime types. Greve (2017) finds that there are three factors that are different between the regimes, the financing, accessibility to benefits, and active labour market policy (p. 397). He concludes that Liberal welfare states are better prepared for labour market changes than Nordic or Continental welfare states as they have lower levels of taxation (p. 397). Multiple authors suggest that the difference is taxation of the welfare state have an impact on how they deal with labour market changes (Greve, 2017; Kemmerling, 2005; Scharpf, 2000). Therefore, it is a reason to believe that this could be a variation in approach between the different types of welfare states.

Shahidi (2015) has used institutionalist theory to explain the differences between welfare states regimes (p. 661). As is pointed out by Allen and Wood (2018), institutions vary between different countries and regions (p. 140). As these institutions include the rights and responsibilities that employers have to follow, but also the rights employees have. This theory helps to explain how institutions contribute to helping or hindering employees and or companies. Additionally, if for this research it might be necessary to look into the past, historical institutionalism might be helpful. This theory focusses on "the circumstances under which institutional arrangements are established or bedded down, and the long-term processes that involve internal and external forces and that lead to institutional change" (Allen & Wood, 2018; Thelen & Steinmo, 1992).

Hypothesis 1: Liberal regime types address labour shortages with minimal provisions and rely predominantly on market mechanisms.

Hypothesis 2: Social Democratic regimes types address labour shortages with universal policies and maximum provisions for the complete the labour sector.

## Conceptualisation

## Labour market shortages

The dependent variable in this research is the labour market shortages. Although the literature does not offer a unanimously accepted definition of Labour market shortages, the basis of the definition is widely used as that a market shortage occurs when the demand for labour exceeds the supply of the available workers (Healy et al., 2015). The literature makes a distinction in two types of shortages, qualitative and quantitative. The qualitative shortage is the concept of a skill shortage which implies that there are enough candidates for a specific job, however their skill set is not adequate enough to fulfil the job according to the employer, whereas the quantitative shortage is that there are not enough people in the area to fill the open job positions (Alake-Apata, 2020; European Union, 2015). Alake-Apata (2020) points out why it is important to make the distinction between the two types of shortages as both require a different policy solution. Labour shortages for example require people to move to new areas to solve the shortage, whereas skill shortages require persons to gain more skills by entering training programs or the educational programs to be renewed as they do not match the requirement of the job market anymore (Alake-Apata, 2020). Therefore, this research will use the concepts of qualitative and quantitative shortages to investigate how and which shortage is addressed by the governments in welfare states with which policy solution.

## Welfare states regimes

The independent variable in this research are the welfare state regime types, liberal, conservative and social democratic. It is necessary to conceptualize the welfare state regimes, because scholars have been interpreting them differently. First, to give a general definition of a welfare state that is commonly used is pointed out by Esping-Andersen (1990), which includes that in welfare states, the state is responsible "for securing some basic modicum of welfare for its citizens" (p. 19). However, as Esping-Andersen rightfully criticizes, it is not clear what is actually meant by this. Although this definition might not be the most conceptualised version, the focus of this research will be on the labour market problems and therefore, a little more in depth version of this independent variable will be given in the Qualitative content analysis.

## Methodology

## Research design

This part will offer an overview of which methodology will be used for this research. As this research is investigating differences in labour market shortages within different welfare state regimes, the best way to approach the research question is a comparative case study. This design gives the research the option to compare the policies in countries, and to see which policies are implemented as a solution for the labour shortage problem and whether there are differences or similarities between countries. Additionally, a small-N study will be used to allow a more in depth analysis of the cases that are compared (Halperin & Heath, 2020).

#### Case Selection

For the comparative case study, the Netherlands and the United Kingdom are chosen to compare. This case selection is based on a Most Similar Systems Design, because this design allows to control for variables that also might have an impact on the dependent variable. The following overview of variables are considered to be the same for the UK and the Netherlands and are pointed out by the literature to have an impact on addressing labour market shortages in general, this allows to investigate whether there are differences in the approaches of welfare state regimes to address the labour market shortages with the similar variables as a control. The are a couple of reasons why there is chosen for two cases instead of three in which each case could represent one of the three types of welfare state regimes. The first one is that with two cases, still a comparison can be made which therefore can also be in depth for a longer period of time. Second, the limited time in which this research needs to be conducted. Third, the limited access to sources of countries in the Conservative regime, because of a language barrier.

#### **Similarities**

In general, the UK and the NL are both democratic western European countries who have the same form of government, namely a parliamentary constitutional monarchy. Below is an overview of more similarities between the cases and they all are considered to be an indicator of labour market shortages, or have an impact on them.

## Economy

The unemployment rate is consider to be an important indicator for labour market shortages, and the rate is almost the same, as in the UK it is 4.8 in 2023 and in the NL 4.2% (*Country Comparison: United Kingdom / Netherlands*, n.d.)

## Demographics

Both the UK and the NL have to deal with an ageing population as in the UK, 19% of the total population is over 65 years in 2019 and in the NL, 20% of the population is over 65 years in 2021 (Lewis et al., 2021; O'Neill, 2023). This ageing population has an impact on the available workforce, as it reduces economic growth because it reduce the size of the labour force, but also older people are believed to be less productive as they have more sick days, but also are slower in doing their work (Jimeno, 2020).

## Crucial difference

The crucial difference between the two cases it that the United Kingdom has a Liberal regime type and the Netherlands has a Social Democratic regime type (Esping-Andersen, 1990). Although there are more differences between the Netherlands and the United Kingdom, these are not considered for this research to be an influence and are therefore not included.

#### Method of data analysis

To answer the research question, a qualitative content analysis of policy documents is conducted. Policy documents are chosen to analyse because the aim of this research is to investigate the different approaches to address labour market shortages, and these addresses can be goals, or strategies which are often put into policy documents. As from the theory it is established that there are differences between the regime types, the objective is to analyse these documents and investigate what the differences are between the goals and strategies in a Liberal welfare state regime and a Social Democratic welfare state regime.

#### Method of data collection

As this research is looking for an in depth analysis, a longitudinal analysis is conducted. Therefore, the period that is chosen is between 2008 to 2022. The reason that is chosen for

this period is the Great Recession which started in 2007 with financial distress in the United States. However, Verick et al. (2022) state that the recession had a greater impact on most economies and labour markets in 2009 (p. 126). Thus, the research period will start in 2008, a year before it had a greater impact on the labour markets. Additionally, this time period might be a bit problematic, because the UK left the European Union in 2020. Portes and Springford (2023) discuss the impact of Brexit on the UK labour market and concludes that it reduced the labour supply significantly for certain sectors (p. 24). As this might give us valuable insights into policies that have been implemented in years between 2020 and 2022 for the UK, these will still be included. Moreover, choosing to end the period with the year 2022 will provide this research with recent qualitative data which includes the COVID-19 pandemic, the War in Ukraine and the increasing global inflation rate which were accompanied by the labour market shortages.

To describe what the variations in approaches are between the United Kingdom and the Netherlands, the policy documents will be analysed based on three categories, namely the labour sector, the type of shortage and the type of solution. The choice of the names of the labour sectors is based on the categorisation of the International Labour Organisation which includes a total of 22 sectors (n.d.). The specified categories are Health services, Chemical industries, mechanical and electrical engineering and these were chosen based on two sectors of labour market shortages per country which are mentioned in the shortage occupations list of the United Kingdom (UK Visas and Immigration, 2023) and an article of De Nederlandse Bank (2023). The sectors that were mentioned in both lists are Health services and the mechanical and electrical engineering sectors. The type of shortage, namely qualitative and quantitative is based on the article of Alake-Apata (2020). However, a third category needs to be added, as this allows to analyse policy documents that might address qualitative and quantitative shortages at the same time, this category will be called mix of quantitative and qualitative measure.

As for the type of solution, Reymen et al. (2015) mentions a few approaches to solve labour market shortages in their study for the European Parliament. The first one is training the (unemployed). The second is to attract workers from abroad, for this research, this solution is combined with the approach to stimulate geographical mobility within a Member State because for the scope of the research, it is predicted that not enough sources will be obtained to make this distinction. The third type is investing in automation, as from the literature review, it is seen as a solution to the labour shortages (Moldoveanu et al., 2022). The fourth is

financial support and the fifth is other solutions, as from the analysis of the policy documents, more solutions might come up.

The full coding frame can be found below and the findings of the qualitative content analysis are summarised in table 2. and table 3. which will be explained in their respective paragraph.

Table 1. Coding framework on Labour market shortages

Categories	Subcategory	<b>Definition-Description</b>	Indicators	Code
A Sector	Health services	This sector includes healthcare, but also businesses that deliver medical services, drugs or medical equipment.	Care workers, doctors nurses	A1
	Chemical industries	This sector includes the manufacturing of chemicals.	Laboratory technicians	A2
	Mechanical and electrical engineering	This sector includes manufacturing and repairing a wide range of small and big electrical products.	IT, computers, engines, technical industy	A3
	Education	This sector includes all schools and learning institutions	Teachers, training,	A4
	Other sectors	This category includes all other labour sectors which are named by the ILO. (ILO, n.d.). This category is meant for documents addressing.  other sector	Any other sector from the ILO labour sector categorisatio n	A5
	Multiple sector approach	This category includes all other labour sectors which are named by the ILO. (ILO, n.d.). This category can be used when the documents address multiple sectors at once.	More than 1 sector is addressed	A6
<b>B</b> Type of shortage	Quantitative	The concept of a quantitative shortage implies that there are not enough people in the area to fill the open job positions (Alake-Apata, 2020).	Recruiting new people through migration. Recruiting new target groups like women or elderly.	B1
	Qualitative	The concept of a skill shortage which implies that there are enough candidates for a specific job, however their skill set is not adequate enough (Alake-Apata, 2020).	High unemployme nt rate, vacancies for skilled people	B2
	Mix of quantitative and qualitative measure.	This category addresses a skill shortages by number, but also by skills.	Indicators are a combination of the	В3

			qualitative and quantitative indicators.	
C Type of solutions	Training the (un)employed	This solution focusses on the mismatch in skills between the worker and the shortages and tries to close the gap.	Creating new programs	C1
	Attract workers from abroad	This solutions attracts new workers from other locations or countries.	Migration, easier visa application.	C2
	Investing in automation	This solutions includes that instead of attracting new people, countries will invest in automation technology		C3
	Financial support	This solution includes extra financial support for an already existing program.		C4
	Other solutions	Any other solution which could not be included in the other categories		C5

## Qualitative content analysis

As has been stated in the case selection, this research will only look into the Liberal regime type and the Social Democratic regime type of Esping-Andersen (1990). To give a more in depth analysis of what this independent variable is, this section will discuss the characteristics of the Liberal and Social Democratic regime type. This will be followed by the selected cases that will be discussed separately, followed by a comparative analysis of the United Kingdom and the Netherlands.

## Liberal regime type

For the Liberal regime type the key characteristics according to Esping-Andersen (1990) are "modest universal transfers, or modest social insurance plans" (p. 26). Or in other words, the states provides minimal in welfare spending and the benefits are also the minimum. Moreover, as is pointed out by Bambra (2007), the criteria for entitlement for benefits are strict (p. 1098). In the liberal regime the "sanctity of the market" is for example more important than discouraging women from working as would be the case in a conservative regime (Esping-Andersen, 1990, p. 28).

## Social Democratic regime type

As is pointed out by Esping-Andersen (1990), one of the most important characteristics is the merging of welfare and work (p. 28). The best way for a Social Democratic regime to work is that most people in the country are working and a low number of people are having social benefits (Esping-Andersen, 1990, p. 28). The reason for this is that the welfare provisions are often universal and generous compared to the other regime types (Bambra, 2007, p. 1098). Moreover, Social Democratic regimes have "a commitment to full employment and income protection and a strongly interventionist state used to promote equality through a redistributive social security system (Bambra, 2007, p. 1098).

In the following section, the cases will be discussed separately, followed by a comparative analysis of the United Kingdom and the Netherlands.

## United Kingdom

After conducting the analysis of the United Kingdom, the collected qualitative data is summarized in table 2. which gives an overview of all coded data per category.

Table 2.					
Labour market shortages in the United Kingdom (see Appendix A)					
Year	A Sector	B Type of shortage	C Type of solution		
2022	Mechanical and electrical engineering	Qualitative	Other solution		
2021	Multiple sector approach	Quantitative	Attract workers from abroad		
2020	Multiple sector approach	Mix of quantitative and qualitative measures.	Attract workers from abroad		
2018a	Multiple sector approach	Qualitative	Training the (un)employed		
2018b	Mechanical and electrical engineering	Qualitative	Training the (un)employed		
2018c	Other sector	Qualitative	Training the (un)employed		
2017	Other sector	Qualitative	Training the (un)employed		
2013	Multiple sector approach	Quantitative	Attract workers from abroad		

Mix of quantitative Training the and qualitative (un)employed measures

From this table can be noticed that the dominant type of shortage is qualitative, or it is a mix with quantitative measures, which leaves only two policy documents with a quantitative shortage type. The type of solutions that are mentioned often are addressing the skill mismatch between the existing unemployed workers with the vacancies that need fulfilling which is categorized as training the (un)employed. This also includes training the already employed workers like is mentioned in Department for Transport (2017) which mentions that they support the development of already employed people in the rail sector (p. 40). Other solutions that are mentioned in the category of training the (un)employed are improving existing education systems (HM Government, 2018a) and initiatives to support recruiting and training workers with disabilities within an online environment (HM Government, 2018c).

When analysing the years of the policy documents compared with whether it is addressed to a specific labour sector, or a multiple sector approach, there are three notable patterns. Firstly, between 2018 and 2021, there are only multiple sector approaches. Secondly, in 2018, there were three separate policy documents spread out through the year. Thirdly, the policy documents of 2020 and 2021, mention the solution to the labour shortages at that time would be to attract workers from abroad, however, this is during the COVID-19 pandemic when most borders were closed, which seems a bit odd.

Lastly, the policy document of HM Government (2020) is a mix of qualitative and quantitative measure as it first wants to simplify the immigration rules and lift the cap on Tier 2 visas for skilled workers entering the United Kingdom, second it also wants to attract students with a combination of education with experience in the field.

#### The Netherlands

After conducting the analysis of the Netherlands, the collected qualitative data is summarized in table 3. which gives an overview of all coded data per category.

Labour n	narket shortages in the Nether	lands (see Appendix B)	
Vear	A Sector	R Type of shortage	$\overline{\mathbf{C}}$

Year	A Sector	B Type of shortage	C Type of solution
2022	Health services	Qualitative	Financial support

2020	Multiple sector approach	Quantitative	Training the
2018	Multiple sector approach	Quantitative	(un)employed Attract workers from
	1		abroad
2013	Multiple sector approach	Qualitative	Training the
			(un)employed
2011	Multiple sector approach	Quantitative	Financial support
2009	Multiple sector approach	Mix of quantitative	Training the
		and qualitative	(un)employed
		measures.	

In this table can be noticed that all the policy document are having a multiple sector approach except for one which is on the Health services sector. However, most of the documents do address the same sectors namely, the technical sector, which falls into the Mechanical and electrical engineering sector of the ILO Classification of the labour market (Staatsblad, 2013) and the Health service sector (Staatscourant, 2022; Staatsblad, 2013).

The dominant type of shortages is the quantitative shortage, which has different types of solutions. However, one notable difference is the Staatscourant (2020), as it has a quantitative shortage and has a solution that the training the (un)employed solution, which is more often seen as a qualitative solution. However, upon closer examination of the policy document, this is about women having more economic interdependence in which the program of living labs is the solution. As this programme includes targeting a new target group, namely women who are not economically independent yet, this is a quantitative shortage. Moreover, because the living labs include a training program to help these women look for a skill match with a company, this was placed under the training solution. Additionally, in Staatscourant (2009) was found a mix of quantitative and qualitative shortage. As this was during the Great Recession, companies were struggling as there was a lack of work and employers needed to decide whether they wanted to fire their employees or keep their employees (Staatscourant, 2009, p. 3). Therefore, as a possible solution to help these employers to keep their employees, was to second their employees to other companies which were in need of workers (Staatscourant, 2009, p. 5). Another criteria to this solution was that the employee should follow a training to improve its skills to either to take on another job within the current company, or to be able to do other work on a secondment contract for another company (Staatscourant, 2009, p. 5). As these criteria are both qualitative and quantitative, this is categorised as a mix.

## Comparative analysis

While comparing the two cases on labour market shortages a few things are noteworthy. Firstly, on the one hand, the Netherlands employs a multiple sector approach for almost all documents discussed in this research. On the other hand, the United Kingdom has more policy documents appointed toward specific industries. Secondly, in the Netherlands, quantitative shortages were more often found in the policy documents rather than qualitative shortages as was the case for the United Kingdom.

## Discussion

As was pointed out in the analysis of results from the United Kingdom, between 2018 and 2021 the government addressed a multiple sector approach, which would imply that there were shortages over a large number of labour sectors based on their Liberal welfare state regime type characteristic that it only provides for minimal welfare benefits. Or one could argue that the United Kingdom does not only provide as minimal as possible and has become more lenient on this aspect.

As is discussed in the comparative analysis, the United Kingdom has more policies appointed to specific industries, instead of a multiple sector approach. This can be explained by the corresponding welfare state regime types of the countries. Namely, as the United Kingdom has a Liberal welfare state regime type, one of the main characteristics is that the state only provides for minimal welfare benefits. Therefore, it can be assumed that when there are problems in a specific sector, the government of the United Kingdom will only address that sector, and not implement the policy for the complete labour sector. On the other hand, as the Netherlands is a Social Democratic welfare state regime type, it is more likely that policies will be implemented for the complete labour sector, as one of the key characteristics of this regime type is that welfare provisions are often universal.

## Conclusion

This research started off asking what the variations in approaches are between different types of welfare states in addressing labour market shortages. By analysing policy documents of the Netherlands and the United Kingdom, different approaches where found. For the Liberal welfare state regime type, the analysis provides evidence that the theory was correct on the characteristics of the welfare state. It was found that, in the case of the United Kingdom, there are indeed minimal welfare provisions in the policy documents included in this research with a lot of criteria to be even eligible to a training program or entitled to social benefits. For the Social Democratic regime type, in the case of the Netherlands, it was predicted that it would have more policies for the overall labour sector as the characteristic for the Social Democratic regime is that the states provision are often universal. This was indeed what was found in the analysis of the Netherlands. Noteworthy is that for the category of automation no policy document was found which touched upon it and ageing was also not seen as a cause of the labour shortages in most of the policy document, which makes me wonder whether these causes are for example discussed in parliamentary debates or whether they are not discussed at all. One of the crucial findings from the analysis was that the United Kingdom has used multiple sector approach in the period between 2018 and 2021. Therefore, a possible research question for future might be to investigate whether the United Kingdom has become or will become a Social democratic regime type.

#### Reflection

Unfortunately, this research has had some limitations. First to begin with the case selection, one big limitation for me was that I only speak Dutch and English, which has limited me in selecting the countries to analyze. If it would have been possible, this research would have been more thorough if a third country would have been picked and could represent the conservative welfare state regime of Esping-Andersen.

Second, the period the research is conducted in. Initially, it was planned to do a longitudinal analysis over a period of 30 years to give an in depth analysis, however, the sources were not digitalized before 2008, which was the case for the United Kingdom and for The Netherlands.

One of the major weaknesses of this research is that I believe not enough policy documents where used for this analysis. Although it was hard to find these policy documents in the first place, I believe if I had more time, this research has a lot of relevance. Especially as we are

still experiencing major labour shortages and we do have an ageing population which might cause problems in the future.

It was disappointing that the policy documents hardly touched upon automation as I believe that this will have a tremendous impact in the future and especially on the labour market.

## Societal implications and recommendations for further research

For further research I am suggesting that a bigger time period will be used to give a more in depth version of what is done in this research. Additionally, it would be better to use all three types of welfare state regime type to give a more extended and thorough study on what the differences are between the regime types.

As for societal implications, this research was relevant as it addresses the labour market shortages which are still very important that we address these and find solutions, as relocating people from our country will only create a problem there and not solve the quantitative shortage. As for qualitative shortages, training employees will always be important.

## Bibliography

Primary sources

References of case the United Kingdom - Chronological

Department for Work & Pensions. (2022). Helping people secure, stay and succeed in higher quality, higher paying jobs. Retrieved from

- https://www.gov.uk/government/publications/helping-people-secure-stay-and-succeed-in-higher-quality-higher-paying-jobs
- HM Government. (2021). New plan for immigration: legal migration and border control.

  Retrieved from https://www.gov.uk/government/publications/new-plan-for-immigration-legal-migration-and-border-control
- HM Government. (2020). The UK's points-based immigration system. Retrieved from https://www.gov.uk/government/publications/uk-points-based-immigration-system-further-details-statement
- HM Government. (2018a). Industrial strategy: construction sector deal. Retrieved from https://www.gov.uk/government/publications/construction-sector-deal#full-publication-update-history
- HM Government. (2018b). Industrial strategy: rail sector deal. Retrieved from https://www.gov.uk/government/publications/rail-sector-deal
- HM Government. (2018c). Industrial strategy: creative industries sector deal. Retrieved from https://www.gov.uk/government/publications/creative-industries-sector-deal
- Department for Transport. (2017). Connecting people: a strategic vision for rail. Retrieved from https://www.gov.uk/government/publications/a-strategic-vision-for-rail
- HM Government. (2013). The coalition: together in the national interest mid-term review.

  Retrieved from https://www.gov.uk/government/publications/the-coalition-government-mid-term-review
- HM Government. (2008). Government response to the communities and local government committee's report: planning matters labour shortages and skill gaps. Retrieved from https://www.gov.uk/government/publications/government-response-to-the-communities-and-local-government-committees-report-november-2008

## References of case the Netherlands - Chronological

- Regeling van de Minister voor Langdurige Zorg en Sport van 19 juli 2022, kenmerk 3396937-1032605-MEVA, houdende de wijziging van de Subsidieregeling stageplaatsen zorg II in verband met de verlenging van de werkingstermijn tot 1 augustus 2027. (2022). *Staatscourant*, 2022(19652). Retrieved from https://zoek.officielebekendmakingen.nl/stcrt-2022-19652.html
- Call for proposals Economische veerkracht van vrouwen, Nederlandse Organisatie voor Wetenschappelijk Onderzoek. (2020). *Staatscourant, 2020(25920)*. Retrieved from https://zoek.officielebekendmakingen.nl/stcrt-2020-25920.html
- Regeling van de Minister van Sociale Zaken en Werkgelegenheid van 25 mei 2018, nr. 2018-0000084347, tot aanpassing van de Regeling van de Minister van Sociale Zaken en Werkgelegenheid van 22 augustus 2016, 2016-0000171123, tot aanwijzing van het Uitvoeringsinstituut werknemersverzekeringen als nationaal coördinatiebureau als bedoeld in artikel 9 van de EURES-verordening en aanwijzing van vertegenwoordigers van het nationale coördinatiebureau. (2018). *Staatscourant, 2018* (30297). Retrieved from https://zoek.officielebekendmakingen.nl/stb-2013-370.html
- Besluit van 16 september 2013, houdende vaststelling van regels omtrent experimenten doorlopende leerlijnen vmbo-mbo (Besluit experimenten doorlopende leerlijnen vmbo-mbo 2014–2022). (2013). *Staatsblad, 2013 (370)*. Retrieved from https://zoek.officielebekendmakingen.nl/stb-2013-370.html
- Regeling van de Staatssecretaris van Sociale Zaken en Werkgelegenheid van 20 juni 2011, nr. R&P/RA/2011/11033, tot wijziging van de Subsidieregeling ESF 2007–2013 (herzien) in verband met de invoering van een vernieuwde Actie E sociale innovatie. *Staatscourant, 2011 (11210).* Retrieved from https://zoek.officielebekendmakingen.nl/stcrt-2011-11210.html
- Besluit van de Minister van Sociale Zaken en Werkgelegenheid van 31 maart 2009, nr. IVV/I/2009/7428, tot tijdelijke algemene ontheffing van artikel 8, eerste lid, van het Buitengewoon Besluit Arbeidsverhoudingen 1945 in verband met deeltijd WW tot behoud van vakkrachten (Besluit deeltijd WW tot behoud van vakkrachten).

- Staatscourant, 2009 (64). Retrieved from https://zoek.officielebekendmakingen.nl/stcrt-2009-4913.html
- Regeling van de Minister van Sociale Zaken en Werkgelegenheid van 21 januari 2009, nr. AV/AR/2009/614, tot vaststelling van de verlengde bijzondere beleidsregels inzake ontheffing van het verbod op werktijdverkorting 2008 (Verlengde bijzondere beleidsregels ontheffing verbod op werktijdverkorting 2008). *Staatscourant*, 2009 (15). Retrieved from https://zoek.officielebekendmakingen.nl/stcrt-2009-1062.html

## Secondary sources

- Alake-Apata, B. (2020). Understanding and dealing with labour and skill shortages. *LMIC-CIMT*. https://lmic-cimt.ca/understanding-and-dealing-with-labour-and-skill-shortages/
- Allen, M., Wood, G. (2018). Institutional theory and employment relations. In Wilkinson, A., Dundon, T., Donaghey, J., & Colvin, A. (2018). *The Routledge Companion to Employment Relations*. Routledge
- Badiani-Magnusson, R., Prasad, M., Timmis, E., Vincelette, G., & Wheeler, C. (2022, September 20). Two large shocks in quick succession—how can Europe avoid another decade of growth disappointment? *Brookings*. https://www.brookings.edu/blog/future-development/2022/09/20/two-large-shocks-in-quick-succession-how-can-europe-avoid-another-decade-of-growth-disappointment/
- Bambra, C. (2007). Going beyond the three worlds of welfare capitalism: regime theory and public health research. *Journal of Epidemiology and Community Health*, 61(12), 1098–1102. https://doi.org/10.1136/jech.2007.064295
- Brunello, G., & Wruuck, P. (2021). Skill shortages and skill mismatch: A review of the literature. *Journal of Economic Surveys*, *35*(4), 1145–1167. https://doi.org/10.1111/joes.12424

- Causa, O., Abendschein, M., Luu, N., Soldani, E., Soriolo, C. (2022), "The post-COVID-19 rise in labour shortages", *OECD economics department working papers*, No. 1721, OECD Publishing, Paris, https://doi.org/10.1787/e60c2d1c-en.
- Country comparison: United Kingdom / Netherlands. (n.d.). Worlddata.info. https://www.worlddata.info/country-comparison.php?country1=GBR&country2=NLD
- Damelang, A., & Otto, M. (2023). Who is replaced by robots? Robotization and the risk of unemployment for different types of workers. *Work and Occupations*, 073088842311629. https://doi.org/10.1177/07308884231162953
- Dauth, W., Findeisen, S., Suedekum, J., & Woessner, N. (2021). The adjustment of labor markets to robots. *Journal of the European Economic Association*, 19(6), 3104–3153. https://doi.org/10.1093/jeea/jvab012
- De Nederlandse Bank. (2023). Labour market. Retrieved from https://www.dnb.nl/en/current-economic-issues/labour-market/
- Dias, M. C., Joyce, R., Postel-Vinay, F., & Xu, X. (2020). The challenges for labour market policy during the COVID-19 pandemic. *Fiscal Studies*, 41(2), 371–382. https://doi.org/10.1111/1475-5890.12233
- Dingeldey, Irene (2009): Activating labour market policies and the restructuring of welfare and state: a comparative view on changing forms of governance, ZeSArbeitspapier, No. 01/2009, Universität Bremen, Zentrum für Sozialpolitik (ZeS), Bremen. http://hdl.handle.net/10419/27149
- Esping-Andersen, G. (1990). *The three worlds of welfare capitalism*. Princeton University Press.
- European Labour Authority. (2023, March 29). *Labour shortages in Europe is the labour market tightening?* https://www.ela.europa.eu/en/news/labour-shortages-europe-labour-market-tightening
- European Union. (2015). Labour market shortages in the European Union.

- $https://www.europarl.europa.eu/RegData/etudes/STUD/2015/542202/IPOL\_STU\%282015\%\\ 29542202\_EN.pdf$
- Greve, B. (2017). Welfare states and labour market change: What is the possible relation? *Social Policy & Administration*, *51*(2), 389–403. https://doi.org/10.1111/spol.12293
- Healy, J., Mavromaras, K., & Sloane, P. J. (2015). Adjusting to skill shortages in Australian SMEs. *Applied Economics*, 47(24), 2470–2487. https://doi.org/10.1080/00036846.2015.1008764
- Henkens, K., Remery, C., & Schippers, J. (2008). Shortages in an ageing labour market: an analysis of employers' behaviour. *International Journal of Human Resource Management*, 19(7), 1314–1329. https://doi.org/10.1080/09585190802110117
- Hutton, G. & Keep, M. (2023). Coronavirus business support schemes: Statistics. In UK Parliament (CBP-8938). Commons Library. https://commonslibrary.parliament.uk/research-briefings/cbp-8938/
- International Labour Organization. (2023, January 16). *Economic slowdown likely to force workers to accept lower quality jobs*. https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS\_865256/lang--en/index.htm
- International Labour Organisation. (n.d.). *Industries and sectors*. https://www.ilo.org/global/industries-and-sectors/lang--en/index.htm
- Jimeno, E. L. I. (2020, April 16). The impact of ageing on the labour force and productivity: six of one, half a dozen of the other. *CaixaBank Research*. https://www.caixabankresearch.com/en/economics-markets/labour-market-demographics/impact-ageing-labour-force-and-productivity-six-one
- Kemmerling, A. (2005). Tax mixes, welfare states and employment: tracking diverging vulnerabilities. *Journal of European Public Policy*, *12*(1), 1–22. https://doi.org/10.1080/1350176042000311880
- Kersbergen, K., & Vis, B. (2014). Welfare State Regimes: Why Did We Get Different Worlds of Welfare and Do We Still Have Them? In *Comparative Welfare State*

- *Politics: Development, Opportunities, and Reform* (pp. 53-77). Cambridge: Cambridge University Press. doi:10.1017/CBO9781139021852.005
- Lewis, A., Cromarty, H., Barton, C. (2021). Housing an ageing population: a reading list. *UK Parliament*. https://commonslibrary.parliament.uk/research-briefings/cbp-9239/#:~:text=The%20UK's%20ageing%20population,life%20expectancy%20and%20declining%20fertility.
- Maurer, R. (2023, January 23). Labor shortages forecast to persist for years. *SHRM*. https://www.shrm.org/resourcesandtools/hr-topics/talent-acquisition/pages/labor-shortages-forecast-to-persist-2023.aspx
- Moldoveanu, M., Frey, K., & Moritz, B. (2022, March 23). *4 ways to bridge the global skills gap*. Harvard Business Review. https://hbr.org/2022/03/4-ways-to-bridge-the-global-skills-gap
- O'Neill, A. (2023). Age distribution in the Netherlands 2011-2021. *Statista*. https://www.statista.com/statistics/276710/age-distribution-in-the-netherlands/#statisticContainer
- Portes, J., and Springford, J. (2023, January 17). *The impact of the post-Brexit migration system on the UK labour market* (UKICE working paper 01/2023). https://ukandeu.ac.uk/working-paper/the-impact-of-the-post-brexit-migration-system-on-the-uk-labour-market/
- Reymen, D., Gerard, M., Beer, P., Meierkord, A., Paskove, M., Di Stasio, V., Donlevy, V., Atkinson, I., Makulec, A., Famira-Mühlberger, U., and Lutz, H. (2015). Labour market shortages in the European Union. Policy department A. Retrieved from https://www.europarl.europa.eu/studies/
- Scharpf, F. W. (2000). The viability of advanced welfare states in the international economy. Vulnerabilities and options. *European Review*, 8(3), 399–425. https://doi.org/10.1017/s106279870000497x

- Shahidi, F. V. (2015). Welfare capitalism in crisis: A qualitative comparative analysis of labour market policy responses to the Great Recession. *Journal of Social Policy*, 44(4), 659–686. https://doi.org/10.1017/S004727941500029X
- Thelen, K., & Steinmo, S. (1992). Historical institutionalism in comparative politics. In S. Steinmo, K. Thelen, & F. Longstreth (Eds.), *Structuring Politics: Historical Institutionalism in Comparative Analysis* (Cambridge Studies in Comparative Politics, pp. 1-32). Cambridge: Cambridge University Press. doi:10.1017/CBO9780511528125.002
- UK Visas and Immigration. Skilled worker visa: shortage occupations (2023, May 15).

  Retrieved from: https://www.gov.uk/government/publications/skilled-worker-visa-shortage-occupations/skilled-worker-visa-shortage-occupations
- Verick, S., Schmidt-Klau, D., & Lee, S. (2022). Is this time really different? How the impact of the COVID-19 crisis on labour markets contrasts with that of the global financial crisis of 2008–09. *International Labour Review*, *161*(1), 125–148. https://doi.org/10.1111/ilr.12230
- World Employment Confederation. (2021). Labour force and skills shortages: how to tackle them? In World Employment Confederation.

  https://www.businesseurope.eu/sites/buseur/files/media/position\_papers/social/2022-06-21\_policy\_orientation\_note\_labour\_skills\_shortages\_final\_june\_2022.pdf

## Appendix A

## **The United Kingdom**

Source	Recorded units	Codes
UK 2022	In their recent procurement for framework contracts for digital	A3
	specialists and programme suppliers, Crown Commercial Service	
	asked potential suppliers to demonstrate how they will enact their	

Department	social value and corporate social responsibility priorities within the	
for Work &	complex IT development and operations environment.	
Pensions 12-2022	This includes: • Promotion of diversity in terms of developing staff and motivating teams. • Considering the needs of digitally excluded end-customers. • Creating employment and training opportunities particularly for those who face barriers to employment and/or who are in deprived areas, and for people in industries with known skills	B2
	shortages or in high growth sectors. • Ensuring their staff are aware of their contribution to these responsibilities. For digital programmes suppliers, the weighting for these social value and corporate social responsibility indicators was 20% and for Digital Specialists it was 60%. (p. 24)	
	Commission recommendations	C5
	The Government should increase the minimum weighting of social	
	value in public procurement to 20% over time. The Cabinet Offce	
	should develop a mechanism for sharing good practice in assessing social value between public procurement teams in local, national and devolved authorities. (p. 23)	
UK 2021	Where there are skilled jobs with an identified national shortage, we	A6
HM	have introduced flexibilities to recruit from overseas into these	Α0
Government	sectors through the Shortage Occupation List. This both supports our	
05-2021	economy and society, whilst also ensuring that the development of	
	the domestic UK workforce is not undermined. For example, changes	
	to the Immigration Rules announced in March 2021 will give workers	
	in key health and care roles greater opportunity to come to the UK.	
	Pharmacists, laboratory technicians, senior care workers and	
	nursing assistants are among roles that were added to the Shortage	
	Occupation List. (p. 6)	
	The new immigration system supports our Build Back Stronger agenda, by supporting the UK's domestic labour market and	B1
	attracting the best and brightest global talent to contribute to the	
	UK's economy. We want employers to focus on training and	
	investing in our domestic workforce. But we also want to ensure that	
	employers have access to the global talent that can complement the	
	skills we already have in the UK. The points-based system does that;	
	welcoming people from around the world based on the skills they have to offer and how they will contribute to the UK. (p. 5)	
	Supporting the UK's economic and labour strategy	C2
	Throughout the Covid-19 pandemic, HM Government has	
	implemented an unprecedented package of measures to support	
	workers and businesses right across the UK. <b>The points based system</b> supports a wider package of interventions that make up our long-	
	term approach to the labour market and our strategy to rebuild our	
	economy, support businesses to grow and get people back to work, including HM Government's Plan for Growth. (p. 5)	
111/ 2225		
UK 2020	Underpinning the new system will be simplified rules and guidance.  Over the years, <b>the Immigration Rules</b> , which set out the	B3

HM government 07-2020	requirements a migrant must meet to come to or stay in the UK, have become long, complex and repetitive. The Law Commission's recent review of the Rules identified principles under which they can be redrafted to make them simpler and more accessible and fit for the future. (p. 11)  Additionally, industry will continue to work with the government to further enhance our understanding of the specific actions needed to mitigate against workforce shortages - in terms of roles, skills and	
	locations. In this way in-work training programmes will be more targeted and the percentage of the workforce receiving training rises to 80 per cent by 20219. An annual survey will be created to understand sector workforce needs in more detail and to monitor progress. (pp. 24-25).	
	As a first step towards reducing the burdens on employers and streamlining the sponsorship system, we will suspend the current cap on Tier 2 (General) visas (the current route for skilled workers), which will result in there being no limit on the numbers of skilled workers who can come to the UK. This change alone will reduce the end-to-end process for sponsoring skilled workers by up to four weeks, demonstrating the Government's commitment to simplifying the immigration system for employers. (p. 13)	C2
	New qualifications To support this ambitious programme, the UK government will continue to work closely with industry to develop vocational qualifications, including the two new T levels which will cover Catering, and Cultural and Heritage Visitor Attractions. These new technical learning opportunities will offer students a mixture of classroom learning and 'on-the-job' experience during an industry placement of at least 45 days. This is another avenue to ensuring future talent has a better expectation of hospitality and tourism roles - as well as the undeniable rewards of working in one of the most flexible, lively and convivial sectors in the country. (p. 25)	A6
UK 2018a HM Government	Invest an additional £406m in maths, digital and technical education, helping to address the shortage of science, technology, engineering and maths (STEM) skills (p. 5)	A6
07-2018	Establish a technical <b>education system</b> that rivals the best in the world to stand alongside our worldclass higher education system. (p. 5)	B2
	Create a new National Retraining Scheme that supports people to reskill, beginning with a £64m investment for <b>digital and construction training</b> . (p. 5)	C1
UK 2018b HM Government 12-2018	These challenges are broader than just rail. They affect the whole of the <b>engineering sector</b> and are set against a backdrop of people and skills trends that include: -Growing skills gap and demand -Ageing workforce and changing skills requirements - Difficulties in attracting talent and poor gender diversity - Limited training resources and shortage of trainers and lecturers - Uncoordinated range of skills initiatives fragmenting effort - Lack of a joined-up approach across sub-sectors.	A3

	There is a <b>skills shortage</b> in rail if we are to sustain the existing network and take on board and reap the benefits of the digital technology. This means working with the industry to not only develop and introduce new skills but also to accelerate efforts to increase the skills in the existing workforce. (p. 22)	B2
	To be able to offer the growing number of passengers the service they deserve and to make the most of the period of unprecedented investment in the railway, we need wide ranging investment in people. This is needed to ensure the continued successful operation of the railway at the same time as delivering new, transformative infrastructure projects such as HS2 and the Digital Railway. These will require new and additional skills, with skills profiles that are yet to be defined. They will need to be identified and developed alongside the continuous development of critical existing roles, such as signal designers, project managers, systems engineers and commercial managers. (p. 22)  However, while the resources to meet the challenges of attracting and training people are limited and face significant competition from other sectors and within the rail supply chain itself, the potential gains are substantial. The Fast Track to the Future paper also found that just a 10 per cent reduction in skills gaps and shortages in the industry could reduce costs to the business base by £60m and to the government by £67m17. (p. 23)	C1
UK 2018c HM government 3-2018	The BBC's investment in developing <b>the creative industries</b> workforce includes 65,000 unique training sessions for staff in 2017, increasing its number of apprenticeships more than five-fold over the past five years and offering 400 by the end of 2018. (p. 21)	A5
	BBC initiatives to support workforce diversity include their recent £1m scheme <b>recruiting and training journalists</b> with disabilities and the Make it Digital Traineeships. (p. 21)	C1
	Between 2012 and 2017 the government invested over £580m in a diverse portfolio of music and arts education programmes. To improve diversity and tackle <b>skills shortages</b> , the BFI has launched its £20m Lottery-funded Future Film Skills Programme and we provide over £2m a year to the National Film and Television School to increase the supply of film, TV and video games production graduates with cutting-edge skills. (p. 21)	B2
UK 2017 Department for Transport 11-2017	We will work with the rail industry leadership to ensure it develops long-term stable and constructive relationships with its workforce and their representatives. <b>Rail sector</b> staff lead on the relationship with passengers and are critical to the delivery of our vision for rail. Positive relationships with staff are important to support not only the rail businesses themselves, but also staff wellbeing and morale. (p. 40)	A5

	Through the use of our <b>franchising programme</b> and via the industry's [rail] formal bodies, we will introduce a range of measures aimed at putting long-term industrial relations onto a sustainable footing and laying the basis for <b>better staff engagement</b> , including Staff rewards and incentives: we recognise how critical the industry's workforce is for the success of the railways. In future competitions, we will challenge bidders to identify mechanisms to enable staff to share in the success of the business, whilst ensuring value for money. (p. 40)	B2
	Diversity and skills: we will use our franchise competitions to support our ambitions to improve the diversity of the workforce, encourage the development of new and transferable skills, and promote flexible working. High quality jobs in the longer term: we recognise that people employed in rail want continued good quality work in future. We will work with the industry and its stakeholders to ensure alignment between future roles and the necessary skills development of people at all levels. (p. 40)  Full staffing: we will look for bidders for future franchise competitions to set out plans to ensure that key roles upon which the delivery of the train service depends are resourced to a level that enables the resilient operation of the railway, without the need for extensive overtime or rest day working. We want to promote both employee wellbeing and optimise performance and reliability. •  Leadership: we will introduce obligations into new franchise agreements that promote effective, modern leadership, to improve staff engagement. (p. 40)	C1
UK 2013 HM Government 1-2013	We will continue to encourage the brightest and best experts, scientists, artists and performers from around the world to come to the UK through the Exceptional Talent route (p. 36)	A6
1-2015	We will continue to <b>reduce net migration</b> while welcoming those with the skills we need, great business ideas or investments to make. (p. 36)	B1
	We will keep the shortage occupation list under review with a view to ensuring that employers do not become over-reliant on foreign workers but instead invest in training the resident workforce. (p. 36)	C2
UK 2008 HM Government 11-2008	It is not something that can be addressed by Communities and Local Government in isolation; success will only come about as a result of combined and co-ordinated efforts with local government, the profession, the private sector and academia – all of whom have a responsibility to addressing the issue and a role to play [public service sector]. (p.4)	A5
	Addressing the identified shortages, in both numbers and skills, is a major challenge. The programmes which are either already underway or proposed are long-term measures and their impact will be seen over a period of years rather than instantly. (p. 4)	B3

The Government has put significant <b>funding</b> into Planning Delivery	C1
Grant to local authorities. Given the skills shortages across the	
planning sector, there may be a case for tying some of that funding	
to raising skills levels by requiring increased training and	
development opportunities among those authorities who receive it.	
(p. 15)	

# Appendix B

The Netherland	ds	
Source	Recorded units	Code
NL 2022 Staatscourant 29-7-2022	De onderhavige regeling strekt tot wijziging van de <b>Subsidieregeling</b> stagefonds zorg II (hierna: de Subsidieregeling). Met deze wijzigingsregeling is de werkingsduur van de Subsidieregeling verlengd met de maximaal toegestane periode van vijf jaar, conform artikel 24a, tweede lid, van de Comptabiliteitswet 2016. Dit betekent dat de Subsidieregeling per 1 augustus 2027 komt te vervallen. Daarnaast worden een aantal inhoudelijke aanpassingen gedaan die de doelmatigheid en effectiviteit van de regeling moeten bevorderen. (p. 3)	C4
	De Subsidieregeling voorziet in een tegemoetkoming in de kosten van het aanbieden van stages en de bijbehorende stagebegeleiding voor opleidingen in de <b>zorg- en welzijnssector</b> . De Subsidieregeling beoogt het beschikbaar komen van voldoende stageplaatsen via een relatief stabiel en op toekomstige zorgbehoeften gebaseerd stageaanbod te ondersteunen. (p. 3)	A1
	In de evaluatie wordt tevens geconcludeerd dat het voor de toekomst van de Subsidieregeling belangrijk is dat geobjectiveerd en gemotiveerd bepaald kan worden of een opleiding wordt toegevoegd of juist geschrapt wordt uit de Subsidieregeling. In de komende periode wordt een afwegingskader voor het toevoegen of schrappen van opleidingen verder uitgewerkt, waarna de Subsidieregeling nog gerichter ingezet kan worden als een instrument om te sturen naar opleidingen in de zorg- en welzijnssector waar een arbeidsmarkttekort is of wordt verwacht. (p. 3)	B2
NL 2020 Staatcourant 14-5-2020	Doel van het NWA-programma Economische veerkracht van vrouwen is om door middel <b>van living labs</b> inzicht te krijgen in de mogelijkheden voor het positief beïnvloeden van Economische veerkracht van vrouwen (p. 2)	C1

	Building a state of the state o	1.6
	Denk daarnaast aan de match van vraag en aanbod in sectoren met	A6
	grote arbeidstekorten (bijvoorbeeld zorg en onderwijs) of waar nog	
	veel vrouwelijk arbeidspotentieel is in te zetten, zoals techniek en	
	ICT. (p. 6).	
	Beleidsgroep 1: vrouwen met een uitkering	B1
	Welke handelingsperspectieven zijn er te ontwikkelen om	DI
	belemmeringen weg te nemen om vanuit een uitkeringssituatie (weer) te gaan werken? Welke incentives spelen hierin een rol?	
	Hoe effectief zijn de handelingsperspectieven in de praktijk? Onder	
	welke voorwaarden? En voor welke partijen (bijvoorbeeld	
	gemeenten, uitvoeringsorganisaties, werkgevers, vrouwen zelf)?	
	Beleidsgroep 2: vrouwen met een kleine deeltijdbaan/onvoldoende inkomsten uit betaald werk	
	Welke handelingsperspectieven zijn er te ontwikkelen om vrouwen	
	met een deeltijdbaan of onvoldoende uren betaald werk <b>meer te</b>	
	laten werken? Welke incentives spelen hierin een rol? Hoe effectief	
	zijn deze handelingsperspectieven in de praktijk? Onder welke	
	voorwaarden? En voor welke partijen (bijvoorbeeld werkgevers,	
	beroepsorganisaties, maatschappelijke partners, vrouwen zelf)?	
	Beleidsgroep 3: vrouwen zonder uitkering en zonder betaald werk	
	Welke handelingsperspectieven zijn er te ontwikkelen om vrouwen	
	te prikkelen (weer) te gaan werken? Welke incentives spelen hierin	
	een rol? Het gaat hier met name om vrouwen die een afstand	
	hebben tot de arbeidsmarkt en door een ingrijpende	
	levensgebeurtenis zoals het overlijden van een partner of een	
	scheiding in economische nood terecht (zullen) komen. Ook gaat	
	het om vrouwen die een beroep doen op gemeenten bij het vinden	
	van betaald werk vanwege een ervaren afstand tot de arbeidsmarkt.	
	Hoe effectief zijn de handelingsperspectieven in de praktijk? Onder	
	welke voorwaarden? En voor welke partijen (bijvoorbeeld	
	gemeenten, werkgevers, maatschappelijke organisaties, vrouwen	
	zelf)? (p. 5)	
NL 2018	Verordening (EU) 2016/589 inzake een Europees netwerk van	A6
Staatscourant	diensten voor arbeidsvoorziening (EURES)1 is een herziening van	
4-6-2018	de eerdere EURES verordening No 492/2011 en het	
	Uitvoeringsbesluit 2012/733/EU. Dit regelgevend kader heeft als	
	doel de arbeidsmobiliteit binnen de EU te bevorderen. (p. 3)	
	Dit regelgevend kader heeft als doel de arbeidsmobiliteit binnen	B1
	de EU te bevorderen. (p. 3)	
	Het Uitvoeringsinstituut werknemersverzekeringen (UWV) is	C2
	aangewezen als het nationale coördinatiebureau. Tevens is een	
	coördinatiegroep ingesteld die coördinerend optreedt voor wat	
	betreft de activiteiten en het functioneren van het EURES-netwerk,	
	en die dienst doet als platform voor de uitwisseling van informatie	
	en het delen van beste praktijken. Artikel 11 van de verordening	
	bevat de verplichting om een <b>toelatingssysteem</b> in te richten voor	
	de uitbreiding van het EURES-netwerk. (p. 3)	
NL 2013	De volgende experimenten worden ingericht: a. het experiment	B2
Staatsblad	houdende de <b>vakmanschaproute</b> , waarbij de leerling vanaf het	
7-10-2013	derde leerjaar van het vmbo in de basisberoepsgerichte leerweg of	

	de kaderberoepsgerichte leerweg, een leerroute volgt die opleidt tot een diploma basisberoepsopleiding. b. het experiment houdende de <b>technologieroute</b> , waarbij de leerling vanaf het derde leerjaar van het vmbo in de gemengde leerweg of de theoretische leerweg, een leerroute volgt die opleidt tot een diploma middenkaderopleiding. []7°. voor de technologieroute: een bijdrage wordt geleverd aan het tekort aan technisch opgeleide mensen op de arbeidsmarkt in de technieksector. (p. 2)	
	De regering is verantwoordelijk voor goed onderwijs en werkt aan een goed opgeleide beroepsbevolking. In verschillende arbeidsmarktsectoren wordt schaarste verwacht. Dit geldt specifiek voor vakmensen in de techniek, de verzorging, gezondheidszorg, paramedisch en medisch. Als uitwerking van het Actieplan mbo «Focus op vakmanschap» en de beleidsbrief vmbo (Kamerstuknummer II 2010/11, 30 079, nr. 29) zijn in de brief «Aanpak arbeidsmarkttekorten techniek» van 16 april 2012 (Kamerstukken II 2011/12, 32 637 en 31 289, nr. 33) al maatregelen aangekondigd voor beter en aantrekkelijker techniekonderwijs. Het gaat om inhoudelijke vernieuwing van het techniekonderwijs en een betere, ook inhoudelijke aansluiting van het beroepsonderwijs op het bedrijfsleven, mede om de keuze voor «techniek» – in brede zin – te bevorderen. (p. 8)  Nederland heeft behoefte aan vakmensen op alle niveaus. Het Researchcentrum Onderwijs – Arbeidsmarkt (ROA) typeert de verwachte knelpunten in de personeelsvoorziening als groot voor de sector Techniek op alle niveaus en voor de sector Groen op mbo-niveau. (p. 9)	A6
	De experimenten maken het de scholen en instellingen mogelijk om te onderzoeken hoe de beroepskolom aantrekkelijker kan worden gemaakt, en het aanbod in de regio doelmatiger ingericht kan worden. Dat kan bijvoorbeeld door faciliteiten zoals technieklokalen gezamenlijk in te zetten of door aanbod vmbo en mbo binnen de doorlopende leerlijn op locaties te concentreren. (p. 11)	C1
NL 2011 Staatscourant 28-6-2011	Het doel is om een cultuuromslag te bewerkstelligen om werknemers, waaronder ouderen, laagopgeleiden en mensen met een arbeidsbeperking, gezond, vitaal en productief te houden, tot aan hun pensionering. De werknemer heeft groot belang om aan de slag te gaan met zijn eigen duurzame inzetbaarheid, door zijn eigen ontwikkeling en loopbaan vorm te geven en als zodanig aantrekkelijk te blijven op de arbeidsmarkt. De werkgever heeft een kans om de productiviteit en concurrentiekracht van het bedrijf te verbeteren. (p. 4)	A6
	Duurzame inzetbaarheid is van belang om de overheidsfinanciën betaalbaar te houden en een verhoging van de arbeidsparticipatie te bereiken. Door vergrijzing en ontgroening stabiliseert op dit moment de omvang van de beroepsbevolking en zal de groei vanaf 2021 structureel negatief zijn. Een krimpend arbeidsaanbod leidt tot	B1

tekorten op de arbeidsmarkt. Om te kunnen voorzien in toekomstige arbeidstekorten, is verhoging van de arbeidsproductiviteit én arbeidsparticipatie noodzakelijk. De inzet is dat iedereen zoveel mogelijk naar vermogen deelneemt in de samenleving. Om meer mensen bij de samenleving te betrekken acht het kabinet deelname aan de arbeidsmarkt van cruciaal belang. Het verbeteren van duurzame inzetbaarheid van werknemers is de sleutel om zoveel mogelijk mensen een leven lang voor de arbeidsmarkt te behouden en de productiviteit te vergroten. In veel bedrijven maken werkgevers en werknemers al afspraken om het personeelsbeleid te richten op duurzame inzetbaarheid. Daar staat tegenover dat veel werknemers en werkgevers nog onvoldoende ervaren dat de arbeidsmarkt krapper wordt. De urgentie wordt nog onvoldoende gevoeld. Hier ligt een maatschappelijke uitdaging die om een brede aanpak vraagt. De onderhavige regeling is hier onderdeel van. (p. 4) In het kader van Actie E kan zodoende uitsluitend subsidie worden C4 aangevraagd voor een project op het terrein van sociale innovatie, dat gericht is op het opstellen van een diagnose of advies of het uittesten of het implementeren van de aanpak gericht op ten minste een van onderstaande thema's: a. Procesverbetering: het binnen de arbeidsorganisatie(s) verbeteren, herschikken en innoveren van bedrijfsprocessen. b. Duurzame inzetbaarheid: het creëren van een cultuuromslag gericht op gezond, vitaal en productief werken van indiensttreding tot aan pensionering, door: het stimuleren van regionale en intersectorale arbeidsmobiliteit van werknemers, – arbeidstijdenmanagement, – het bevorderen van gezond, vitaal en veilig werken, of - het bevorderen van zelfredzaamheid op de werkvloer. (p. 5) Een voorbeeld van een dergelijke sociale innovatie kan 'jobcarving' zijn. Het gaat daarbij om het samenvoegen van specifieke taken (ondersteunende, arbeidsintensieve of handmatige activiteiten) binnen verschillende functies tot een nieuwe baan. De nieuw gecreëerde banen kunnen worden uitgevoerd door werknemers met een arbeidsbeperking. Vice versa kunnen zware taken binnen een functie worden verdeeld over meer functies, waardoor de arbeidsbelasting over een grotere groep werkenden wordt verdeeld NL 2009 Uitgangspunt bij de aanpak van de arbeidsmarktproblematiek is dat В3 Staatscourant behoud van werkgelegenheid waar geen werk is geen perspectief 2-4-2009 biedt. Dat laat onverlet dat veel bedrijven thans zonder dat er duidelijk 'licht is aan het einde van de tunnel' voor de keuze komen te staan om vakkrachten die van wezenlijk belang zijn voor het productievermogen te ontslaan bij gebrek aan voldoende opdrachten, of om ze in dienst te houden, in welk geval de reserves die nodig zijn om deze tijd door te komen snel uitgeput raken. Het gaat om situaties waarbij aanpassingen van het personeelsbestand zouden leiden tot een ongewenste vernietiging van investeringen die in vakkrachten zijn gedaan. In dergelijke gevallen zouden vakkrachten verloren gaan op korte termijn, terwijl zij binnen een afzienbare termijn juist nodig zijn. (p. 3)

	De werknemer is op basis van goed werknemerschap gehouden tot het volgen van door de werkgever opgedragen scholing tot behoud of verbetering van zijn inzetbaarheid voor zover dat redelijkerwijs van hem kan worden gevergd; b. de werknemers te detacheren bij een ander bedrijf. Daarbij kan de werkgever gebruik maken van de diensten van het UWV en de mobiliteitscentra. <b>Op die wijze worden arbeidsoverschotten in het ene bedrijf ingezet om arbeidstekorten bij andere bedrijven op te vangen</b> . (p. 5)	
	In overleg met sociale partners is geconcludeerd dat het gewenst is bedrijven in de bedoelde situatie in staat te stellen vakkrachten te behouden, terwijl zij voor ten hoogste 50% van de werktijd ten laste komen van de WW-regeling. Hiermee wordt beoogd op korte termijn kapitaalvernietiging te voorkomen en lange termijn aanpassingen niet te belemmeren. Deze mogelijkheid wordt door middel van de onderhavige tijdelijke algemene ontheffing op grond van artikel 8, derde lid, van het Buitengewoon Besluit Arbeidsverhoudingen 1945 gerealiseerd. (p. 3)	A6
	Artikel 1. Ontheffing Op grond van dit artikel kan de werkgever eenmalig voor een of meer van zijn werknemers het aantal te werken uren met ten hoogste 50% verminderen. In het eerste lid wordt geregeld onder welke voorwaarden dat kan. Als eerste voorwaarde geldt het vereiste van instemming door de belanghebbende verenigingen van werknemers, en als die er niet zijn een andere vertegenwoordiging van werknemers, met de vermindering respectievelijk – als het minder dan 20 werknemers betreft – instemming door een vertegenwoordiging van werknemers. Als tweede voorwaarde geldt dat de werkgever met die vertegenwoordiging van werknemers afspreekt het loon door te betalen voor de uren waarmee de werktijd is verkort doch waarover de betrokken werknemers op grond van de criteria van de WW geen recht hebben op een uitkering op grond van die wet. Als derde voorwaarde geldt dat de werkgever afspraken maakt met de vertegenwoordiging van werknemers om: de werknemer scholing te laten volgen voor het behoud of de verbetering van de inzetbaarheid van de werknemer voor het verrichten van arbeid in zijn bedrijf en eventueel voor het verrichten van arbeid in het bedrijf van een andere werkgever. (p. 5)	C1
NL 2008	Op grond van artikel 8 van het Buitengewoon Besluit	
Staatscourant 28-11-2008	Arbeidsverhoudingen (BBA) 1945 is het de werkgever verboden eenzijdig de werktijd van de werknemers te verminderen. Deze	
Gaat over	verbodsbepaling beoogt onder meer te voorkomen dat het	
hetzelfde als	algemene opzegverbod van artikel 6 BBA 1945 kan worden omzeild	
2009	door de werktijd van de werknemers structureel op 0 uren te stellen	
	en gesteld te houden. De Minister van Sociale Zaken en	
	Werkgelegenheid kan van deze verbodsbepaling ontheffing verlenen voor bepaalde werknemers of groepen van werknemers.	
	Het gaat hier om een discretionaire bevoegdheid. Hoe de Minister	
	van Sociale Zaken en Werkgelegenheid met deze bevoegdheid	
	omgaat, is vastgelegd in de Beleidsregels ontheffing verbod op	

werktijdverkorting 2004 (Stcrt. 2004, 199). Op grond van deze beleidsregels geldt als algemeen toetsingscriterium dat de ontheffing wordt verleend als er sprake is van buitengewone omstandigheden, die niet tot het normale ondernemersrisico behoren. (p. 4)

Artikel 3 De werkgever heeft een aantal inspanningsverplichtingen jegens de werknemer waarvoor ontheffing wordt gezocht. Dit vloeit voort uit de afspraken die werkgevers- en werknemersorganisaties op centraal niveau hebben gemaakt. Deze inspanningsverplichtingen hebben betrekking op scholing, detachering, loondoorbetaling en het ten minste vier weken volledig in stand te houden van de arbeidsverhouding van de werknemers na afloop van ontheffingsperiode. Uit de bij de aanvraag gevoegde verklaring moet blijken, dat de werkgever met de werknemers afspraken heeft gemaakt over het volgende: a. de werkgever maakt afspraken over het volgen van scholing voor het behoud of de verbetering van de inzetbaarheid van de werknemer voor het verrichten van arbeid in zijn bedrijf en eventueel voor het verrichten van arbeid in het bedrijf van een andere werkgever arbeid. De werknemer is op basis van goed werknemerschap gehouden tot het volgen van door de werkgever opgedragen scholing tot behoud of verbetering van zijn inzetbaarheid voor zover dat redelijkerwijs van hem kan worden gevergd. b. de werkgever spant zich in om de werknemers te detacheren bij een ander bedrijf. Daarbij kan de werkgever gebruik maken van de diensten van het Centrum voor Werk en Inkomen en de mobiliteitscentra. Op die wijze worden arbeidsoverschotten in het ene bedrijf ingezet om arbeidstekorten bij andere bedrijven op te vangen. Voor het aantal uren dat de werknemers gedetacheerd zijn, kan geen ontheffing worden verleend. Zij verrichten immers arbeid waarvoor zij loon ontvangen. c. de werkgever spreekt met de werknemers af het loon door te betalen voor zover de betrokken werknemers op grond van de criteria van de Werkloosheidswet geen aanspraak kunnen maken op een uitkering op grond van die wet.