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**WOMEN'S PREFERENCES OR DELINEATED POLICIES?
THE DEVELOPMENT OF PART-TIME WORK IN THE NETHERLANDS,
GERMANY AND THE UNITED KINGDOM**

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Women's Preferences or Delineated Policies?

**The development of part-time work in the Netherlands, Germany and the United
kingdom**

ABSTRACT

Within sociological and economic analyses of working time, important questions remain regarding women's ability to combine paid and domestic work. While there is a growing body of research in this area, our knowledge and understanding of the relationship between working, social and private time, often remains limited, in particular regarding the formation of preferences among women with different family statuses. In this paper, we consider the phenomenal growth of part-time work and the emergence of the one-and-a-half earner model in the Netherlands, comparing this to the growth and high levels of part-time work evident in Germany and the United Kingdom. Despite cross-national differences in the development of part-time work, many working mothers, in all three countries, exhibit a preference for part-time work as a second best option for combining paid work and motherhood. This led to a 'normalisation' of part-time work in the Netherlands. We show that despite a similar gendered employment pattern and a strong "breadwinner" welfare state tradition, part-time work in Germany and the UK developed under different conditions, making it more difficult to overcome "marginalisation.

INHOUDSOPGAVE

ABSTRACT	4
1. INTRODUCTION	7
2. GENERAL DEVELOPMENTS	11
3. THE NETHERLANDS	15
4. GERMANY AND THE UK	19
4.1 Germany	19
Women's Part-Time Preferences	21
Role of Government Policy	22
Social Partners	23
4.2 United Kingdom	25
Women's Part-Time Preferences	25
Role of Government Policy	26
Social Partners	27
6. REFERENCES	31
7. APPENDIX I: LIST OF ABBREVIATIONS	35
WORKING PAPERS	37
RESEARCH REPORTS	39

I. INTRODUCTION

In this paper, we consider the phenomenal growth of part-time work and the emergence of the one-and-a-half earner model in the Netherlands, comparing this to the growth and high levels of part-time work evident in Germany and the United Kingdom. Despite cross-national differences in the development of part-time work, many working mothers, in all three countries, seem to accept part-time employment as a way to combine paid work and motherhood. In the Netherlands, part-time work is more widely diffused than elsewhere, both among men and women. This diffusion goes together with a pattern of “normalisation” of part-time work also in terms of employee rights and entitlements, narrowing the differences between part-time and full-time work. Currently, involuntary part-time work is low in the Netherlands, with only a minor gap between women’s preferred and actual working time (Yerkes, 2003). Another indicator is that the incidence of part-time work among Dutch men and women continued to rise in the 1990s, in spite of the large drop in unemployment rates, from 5.7 percent in 1990 to 2.3 per cent in 2002 for men and from 10.9 per cent to 2.9 for women in the same period (OECD, 2004). While the initial rise of part-time employment in the Netherlands may have been shaped by the threat of unemployment, this is much less plausible for the 1990s. Hence, we need to look at institutions and policies. While in a country like Denmark, the welfare state, job growth in public services and labour market and tax regulations initially produced high levels of part-time employment among women, there has been a subsequent fall in the incidence of part-time work among women (Rasmussen, Lind and Visser, 2005). The Dutch situation, even in the 1990s, reflects a different history of women’s work and motherhood, a path dependent development that encouraged families, governments and social partners to see part-time work and shorter working hours as a model for balancing work-family pressures. In any case, social partners and government supported the diffusion and normalisation of part-time jobs towards a standard of “decent work” in terms of choice, rights, earnings and equality (ILO, 2004). Yet, part-time work remains a highly gendered phenomenon. In our comparison, we show that in Germany and the UK, while sharing a highly gendered employment pattern and a strong “breadwinner” welfare state tradition with the Netherlands, part-time work developed under different conditions that make it more difficult to overcome “marginalisation”. Recently governments in both countries, in response to European policies, particularly in the context of the European Employment Strategy, started to address issues related to part-time work, employee rights and reconciling work-family pressures.

Women’s working patterns are not a new topic in sociology. Despite this, women’s labour market participation patterns continue to receive a great deal of attention from scholars and policy-makers alike because many relevant questions regarding women’s work remain insufficiently answered.

Concerns abound regarding the proliferation of part-time work as well as care and leave arrangements within individual welfare states, which have more recently culminated in a body of research regarding women's ability to combine paid and domestic work (See Ackers, 2003; Crompton, 2002; Drew *et al.*, 1998; Fagan, 2004; Hakim, 2000; Hantrais, 2000; Higgins *et al.*, 2000; Kay, 2003; Kirby, 2003; O'Reilly and Fagan, 1998).

Women's participation in paid work varies across Europe. The Scandinavian countries are well known for high levels of female labour market participation, while Southern European countries are often noted for having lower participation rates, with Continental European countries exhibiting a female labour market participation rate generally near the European average. However, female labour force participation rates are only one part of the comparative puzzle. Levels of full-time and part-time work vary greatly across Europe, as do policies maintained by the various welfare states that affect women's working patterns. While most European countries are moving away from the classical male breadwinner model in the last decades, remnants of these policies are still visible and continue to shape women's employment patterns and women's preferences and choices in combining paid and unpaid work.

It is with an eye on these employment patterns and preferences that we consider the dominant one-and-a-half earner model in the Netherlands. Is this model, as evident in the Netherlands, an example of decent work as understood by the ILO? Can it be a model for countries in which women have long remained outside the market for paid work (Visser, 2002)? With rising concerns about work intensity and pressures that make reconciling work and family aspirations difficult (OECD, 2001), can part-time employment offer a solution? What prevents the marginalisation of part-time work? In this paper we show that mothers in the Netherlands, Germany and the UK often prefer part-time work as a way of combining paid and unpaid work. Yet, unlike the Netherlands, no general female preference for part-time work developed. Furthermore, levels of marginal work, associated with short working hours and flexible employment contracts lacking basic rights and entitlements, are higher, especially in the UK. In both the UK and Germany, part-time employment is more often an involuntary choice. Based on the Gender Role Modules in the ISSP¹ 2002, we observe that men and women in the UK experience much higher levels of work-family conflict and stress than in the Netherlands, which in international rankings scores the lowest stress levels. Germany takes a middle position. A plausible explanation for the high stress levels evident in the UK is that these are related to the rising number of people working very long or very short hours, and to the relative lack of control over working time. The low levels of regulation in the UK, even after the application of relevant EU law by the Blair governments, though often at the lowest possible level and with

¹ International Social Survey Programme.

considerable “opt out” possibilities for firms, are less conducive to making part-time into “decent work”.

In this paper we consider the increase of part-time work and the policies surrounding this development with a degree of scepticism. On the one hand, and under conditions of conferring to part-time workers the same rights and pro rata earnings and benefits (sickness, unemployment, disablement, old age pensions) as full-time workers, part-time work can be a promising alternative for staying out of the labour force. And it can be a way to address work-family issues related to having and raising children or caring for others, especially when the decision to work part-time is free and reversible. Finally, part-time work can be a way to enter or leave the labour force, combining education or retirement with paid work. In the Netherlands, since 2001 employees have the right to request changes to their working hours. Similarly, legislation recently became effective in Germany and the UK. While legal disputes show that in the Netherlands employees usually find the law on their side, take up rates have been very low, possibly reflecting that aspirations or preferences will not always be acted upon, as this may damage work relations and careers even in a context of overall low unemployment, as is the case in the Netherlands (Visser, Wilthagen, Beltzer and Van der Putte, 2004). Therefore, worker choice and influence over individual working hours should be questioned. Furthermore, part-time work remains women’s work—while it is often promoted as a way for both mothers *and* fathers to achieve work-family balance, gender inequality in part-time work remains, reflecting differences in access to on the job training and career advantages (Evans, Bertholdt and Marianna, 2001).

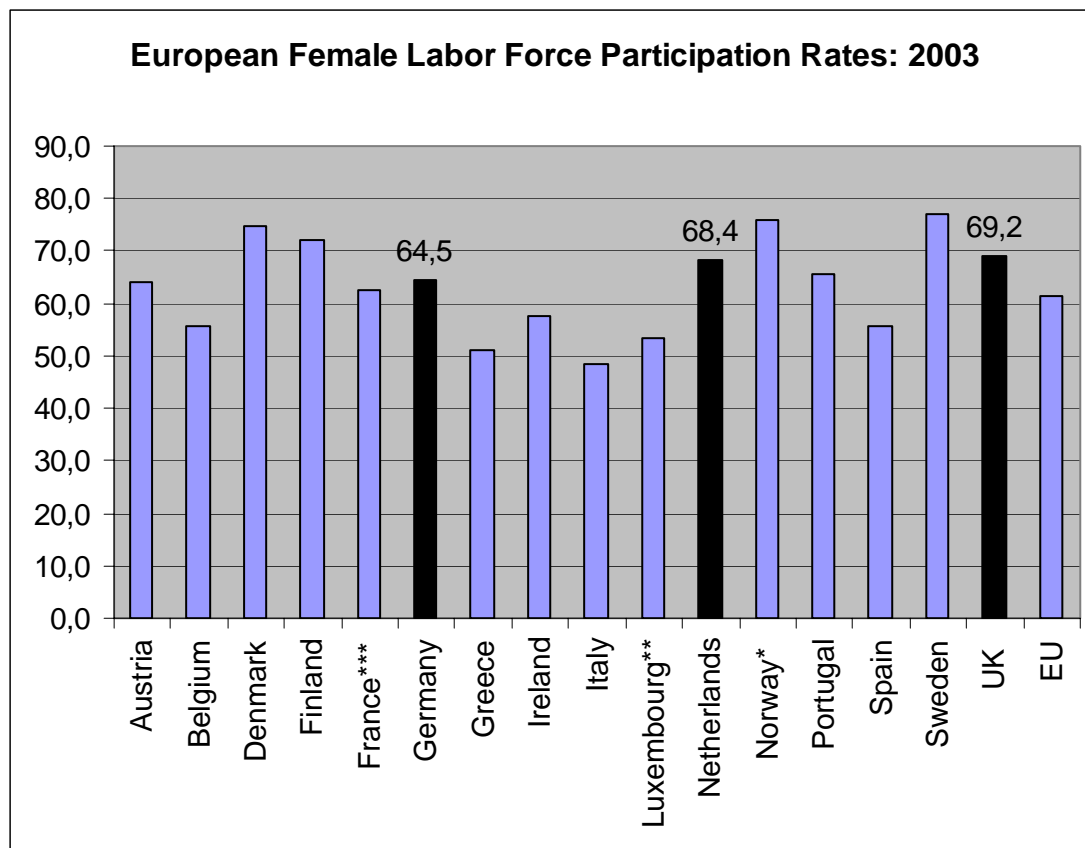
2. GENERAL DEVELOPMENTS

Female labour force participation rates increased throughout the last decades across Europe and there are a number of general explanations for this phenomenon. The introduction of the birth control pill was a foremost factor, as well as changes to household size, a postponement of motherhood, and a lessening of time spent on household chores. Economically, we also know that a number of factors increased the cost of remaining at home, making it more attractive for women to enter the labour market. Women's continued participation in higher education, rising wages and legislative changes in tax systems, employment protection and wage setting, meant to decrease or rule out the discrimination many women faced in the labour market, served to entice women to take part in paid labour. These developments were similar in the Netherlands, Germany and the United Kingdom, although initial levels, the timing and nature of policies varied across countries, as did the resulting increase in female labour market participation.

Female labour market participation was slow to increase in the Netherlands, and it was not until the 1980s that women entered paid labour in large numbers. This development began in the 1960s in the UK and the 1970s in West Germany.² In 2003, women's labour force participation rates are higher than the EU-15 average of 61.3 per cent in all three case countries (see Figure 1). The UK has the highest labour force participation of the three countries at 69.2, followed by the Netherlands at 68.4 and Germany with 64.5 per cent. In the Netherlands female participation rates increased with 16 percentage points since 1990, in Germany with 9 and in the UK with 2 points (OECD, 2004).

² As will be discussed in section 4.1, due to the full employment policy in communist East Germany, levels of female labour market participation were much higher than in West Germany. Even following reunification, the labour market participation rates of East German women remain higher than those of West German women.

Figure 1: Female Labour Force Participation in the EU, in percentage: 2003



* Refers to persons aged 16 to 64.

** Refers to data from 2002.

*** Provisional estimates based on changes between 2002 and 2003 in the ratios derived from the European Labour Force Survey.

Source: OECD, 2004.

The differences in female labour market participation across these three countries become more apparent when we consider selected age groups. As Figure 2 shows, all three countries have a relatively similar female activity level for women aged 25-54, yet Germany has a drastically lower participation rate for young women, and both Germany and the Netherlands have considerably lower participation rates for women over the age of 55.

Figure 2: Female Labour Force Participation Rates by Age Groups: 2003

	15-24	25-54	55-64
Germany	44.9	78.9	34.3
Netherlands	72.7	76.5	32.9
United Kingdom*	63.9	76.6	47.3

Source: OECD, 2004.

*Age group 15-24 refers to 16-24.

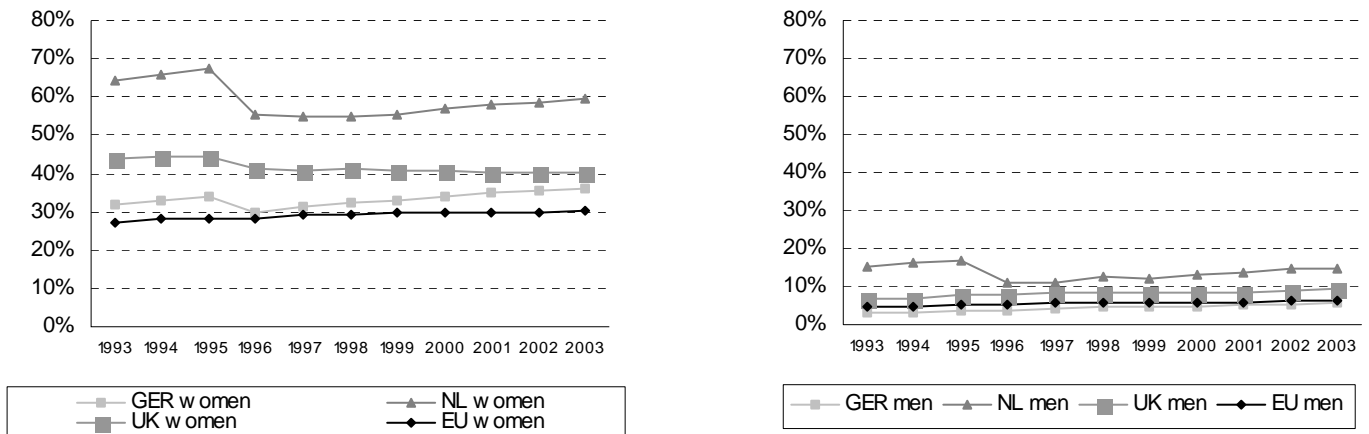
Higher levels of labour market participation in the Netherlands and the UK among the young reflect the (increasing) cost of higher education. School enrolment rates are not very different, but students in the Netherlands and the UK are more likely to take part-time jobs to subsidize their study. The cost of higher education is lower in Germany, making it often unnecessary for students to have a job on the side. The lower rates of participation for women over age 55 in all three countries are relatively common (also for men), given early retirement tendencies across Western Europe, though this is more pronounced in the Netherlands and Germany than in Britain. Lower participation rates among women in older age cohorts also reflect lower participation rates in the past in both the Netherlands and Germany.

We should “correct” these patterns and trends with data on working hours and the division between full-time and part-time employment. All three countries exhibit high levels of part-time work, with the Netherlands in a record position (see Figure 3). 59.6 per cent of all jobs held by women in the Netherlands are part-time jobs. The UK follows with 40.1 per cent, and Germany with 36.3 per cent, the highest in the EU15 (compared to 23.6 per cent for Italy, 22.8 per cent for France, 21.9 per cent for Denmark, 20.6 per cent for Sweden and 16.5 per cent in Spain) (OECD, 2004).³ Although the incidence of part-time work is (slowly) rising among (younger and older) men, in combination with study and flexible retirement, part-time employment remains highly feminised. Three out of four part-time jobs are held by women in the UK and the Netherlands, in Germany women’s share in part-time employment is even 83.3 per cent (OECD, 2004). Labour markets are far from gender neutral (See Beechey, 1988; Daly, 2000; Lewis, 1992; O’Reilly and Fagan, 1998; Pfau-Effinger, 1998; Tijdens, van Doorne-Huiskes and Willemsen, 1997; Tijdens, 1998; Tijdens, 2002). The Netherlands is an interesting case study, as it exhibits the highest level of part-time work among these three countries, as well as a seemingly strong female preference for this work form, shaped

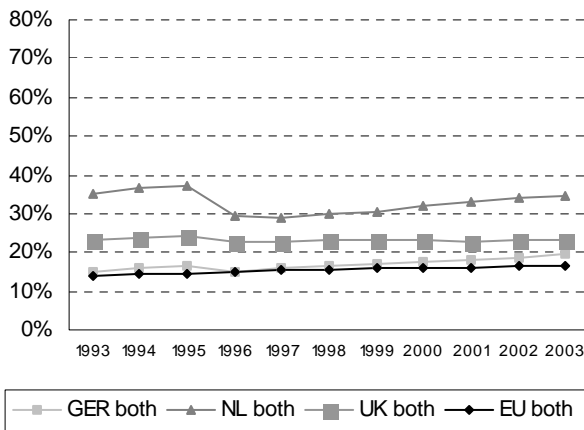
³ We define part-time jobs as those below 30 hours per week. See Lemaitre, Marianna and Van Bastelaer, 1997

however in the context of a history of a strong breadwinner model. The next section outlines how this development occurred.

Figure 3: Part-time Employment in the Netherlands, the UK, Germany and the EU average (as percentage of total employment in group): 1993-2003



Source: OECD, 2004.



Note: The decrease in part-time work in the Netherlands from 1995-1996 reflects a measurement error.

3. THE NETHERLANDS

As indicated in the introduction, the Netherlands is an outlier in Europe with regard to part-time employment, but it was not until the 1980s that the Netherlands took over the first place occupied at that time by Sweden, Denmark and the UK. During the 1980s the growth of part-time employment accelerated in tandem with the rise in female and service employment. The initial diffusion of part-time employment was mostly the unintended consequence of the late entry of women into the labour force, following the rise in education and a shift in values, at a time of fewer employment opportunities, wage moderation and policy pressures towards the redistribution of work (Visser and Hemerijck, 1997; Visser, 2002). The absence of facilities and support for childcare made part-time employment the dominant *coping* solution for mothers. The part-time option was reinforced by the labour market adversity and by wage moderation of the 1980s, stimulating the need for extra earnings to the household. Employers saw part-time employment as a flexible, reversible and individual solution for work sharing and an alternative to collective working time reduction wanted by the trade unions. Public sector employers saw it as a way to save money without having to dismiss employees. Young women wanting or raising children, especially those working in the public sector, saw it as a way to hold on to their jobs and continue their career rather than retiring temporarily from the labour market as had been common for their mothers. Politicians, both left and right, saw it as a method of work sharing in times of high (youth) unemployment and as an alternative to expensive public facilities for childcare. After initial resistance against part-time work, associated with inferior working conditions, the Dutch trade unions came around in support, often under pressure of their female members. Towards the end of the 1980s, with collective working time reduction on the back burner, Dutch trade unions began to encourage the “normalisation” of part-time work, working towards equal rights and pay compared to full-time workers, the right of choice of employees, and similar levels of protection. They also pressed for better leave facilities for parents with young children and for public subsidies and employer investment in childcare. Several central agreements with employers in the 1990s tried to put these issues on the agenda of lower-level bargainers in sectors and firms.

The Netherlands comes from a deeply, socially and culturally embedded model of housewifery (Knijn, 1994; Pfau-Effinger, 1998). In 1965, 84 percent of the adult Dutch population expressed reservations concerning working mothers of school-going children. In 1970, disapproval suddenly dropped to 44 percent, decreasing to a mere 18 percent in 1997 (SCP, 1998). It is useful to point out that the change in opinion preceded the improvement in services and conditions facilitating the combination of work and childcare. The same goes for institutional factors. Relative wages and returns from labour are influenced by institutional factors such as government and union wage policies, taxation, and employment bans. All this changed, often under pressure of relevant EU law.

Until the early 1990s, minimum wage legislation excluded those working in mini-jobs (under 15 hours per week) who were mostly women. The exclusion of part-time employees, again mostly women, from pension funds, became illegal in 1994. Various smaller discriminations, existing in collective agreements, were successively removed in the 1990s.

In the 1990s, part-time jobs have become common. Part-time jobs exist in two out of three firms with ten or more employees (StAr, 1997) and they can now be found in all sectors of the economy, in all occupations, even at managerial level (CBS-statline). However, small part-time jobs remain an issue in retail, hotel and catering, in cleaning, nursing and teaching, and in personal services (in the latter branch, there would also seem to be an issue of informal and undeclared work). In the 1990s, the Dutch labour market combined a *high incidence* of part-time work with a comparatively *small divergence* in occupational profiles between full-timers and part-timers (Fagan *et al.*, 2000), which can be taken as one indicator of “acceptance” and “normalisation” of part-time work. As noted in the introduction, levels of involuntary part-time work are low in the Netherlands, and part-time jobs are, on the whole, not marginal, meaning that they are covered by the same rights and entitlements as full-time workers. Legislation regarding the equal treatment of part-time workers became effective in 1996 (*Wet Gelijke Behandeling*), and the quality of part-time jobs in the Netherlands is comparatively high. Furthermore, the Working Hours Adjustment Act of 2000 (*Wet Aanpassing Arbeidsduur*) guarantees individual workers the right to request either an increase or decrease in their working hours. The reversibility of lengthening or shortening the individual workweek is a step towards part-time work as decent work. Yet part-time work is not gender neutral in the Netherlands, and despite policy efforts to increase men’s participation in caring and household tasks (SZW, 2002), women are still more likely to perform caring and domestic duties. Also, part-time work does carry disadvantages – some in earnings (especially in the private sector and mostly in fringe benefits), more in lower participation in job training, and also in careers. And only the very long hours part-time jobs or those with higher earnings would seem to guarantee individual subsistence, outside a household with additional income from earnings, benefits or rents. Yet, panel data suggests that even among younger generations, mothers who have chosen to work part-time when raising young children do not return to working full-time when their children grow older. It is also relevant to note that the persistence of the part-time pattern continued when unemployment rates among women dropped significantly in recent years. All this points to part-time work as a choice above full-time work, in spite of some significant disadvantages but with the advantage of more disposable time for rest, care, education, travel or leisure. It goes without saying that such choices are made under constraints, such as individual and household earnings, the decisions and preferences of partners, a particular gendered division of household tasks, and job opportunities.

Concluding this section, we observe that part-time jobs in the Netherlands are *neither atypical nor flexible*, though the diffusion of part-time jobs is likely to have increased the aggregate flexibility of the Dutch labour market, bringing in more diversity in working time patterns. The ‘normalisation’ of part-time is supported by the current process of ‘negotiated flexibility’ in working-time regimes, encouraged by various central, sectoral and company-level agreements. In recent times, these agreements offer a “choice” or “à la carte” menu to individual workers – supporting the possibilities of “working time” accounts or banks, the exchange of money for time, or time for money. Yet, limited childcare facilities remain a crucial factor. Demand for childcare grew steadily, but it took until 1987 before unions, under pressure of their female members, began to negotiate childcare facilities in collective agreements (Tijdens *et al.*, 2000). By its own admission, the Dutch welfare state does rather poor, in comparison with other countries, in supporting young families (SZW, 2000). According to the Central Planning Bureau, the official Dutch economic forecasting institute, the lack of and cost of childcare facilities can become a constraint, limiting labour supply and putting pressure on wages (CPB, 1998). There is also the issue of falling birth rates and the high average age at which women give birth. Finally, although the Netherlands implemented relevant EU legislation on parental leave, in the private sector such leave is often unpaid. Like the absence of full-day schooling in some (rural) parts of the country, this structures the choice towards part-time rather than continuing in a full-time job after a labour market interruption.

4. GERMANY AND THE UK

A high level of part-time work is not solely a Dutch phenomenon (O'Reilly and Fagan, 1998). While the Netherlands exerts extreme levels of part-time work, part-time work is also high in Germany and the United Kingdom in comparison to other EU countries (Fagan and Rubery, 1997; Killmann and Klein, 1997; OECD, 2004; Pfau-Effinger, 1998). Furthermore, part-time employment as a proportion of total employment continues to increase in Germany. Part-time employment remained relatively stable in the UK over the last few years, although as a proportion of total employment, current levels reflect a growth of nearly seven percent in part-time work over the last three decades in both countries.

Germany presents an interesting research case because of the division between East and West. Despite unification in 1990, many differences still exist between East and West when considering levels of part-time work. In unified Germany, part-time work levels are currently 19.6 per cent (OECD, 2004). This reflects a steady increase of half a percent per year since 1990 (OECD, 2004). The United Kingdom also has a tradition of high levels of part-time work. The current level of part-time work is 23.3 per cent, which is the second highest in the EU (after the Netherlands) and relatively stable since the early 1990s (OECD, 2004).

Part-time work remains a gendered phenomenon in Europe (Drew *et al.*, 1998; O'Reilly and Fagan, 1998; Tijdens, 2002). Despite increases in male part-time working, women work decidedly more in part-time positions, and this is reflected in women's share in part-time employment, as well as the proportion of part-time employment in women's employment. Again, both Germany and the UK have lower levels of part-time work among women than in the Netherlands, but still higher than the EU-15 average of 30.1 per cent. Part-time levels among women are 36.3 per cent and 40.1 per cent in Germany and the UK in 2003 (OECD, 2004). Since 1990, these levels of part-time work among women have been constant in the UK and rising slightly in Germany. In both countries, the incidence of part-time work among males is increasing, albeit from very low levels. Male part-time work is most frequent in the Netherlands (14.8 per cent), followed by Denmark (10.5) and the UK (9.6 per cent), whereas it is below the EU-15 average (of 6.3 per cent) in Germany (5.9 per cent) (OECD, 2004). The share of women in part-time work is very high but slowly falling in both countries.

4.1 GERMANY

Taking a closer look at the development of part-time work in Germany, we see that part-time work evolved as more of a West German phenomenon. This is not surprising given the communist past of East Germany, where full employment, and hence full-time employment for both men and women

was the norm. Due to these differences, West Germany tends to have a lower female labour force participation rate. In East Germany, the activity rate for women is 14 percentage points higher, and this difference increases to 18 percentage points when married women are taken into account (Garhammer, 2000). However, while the level of labour market participation is higher in East Germany, these levels have been decreasing since reunification in 1990, whereas the level of West German women entering and staying in the labour market continues to rise. This variation is also reflected in annual average working hours per person. Annual average working hours for both sexes have declined in the last twelve years in both East and West Germany, but annual average working hours continue to decline at a faster rate in East Germany than in West Germany (OECD, 2003)⁴. However, while Western Germany had a higher average of annual working hours at the time of reunification, the Western Bundesländer have since maintained lower annual average working hours over the last five years in comparison to Eastern Germany (see Figure 4).

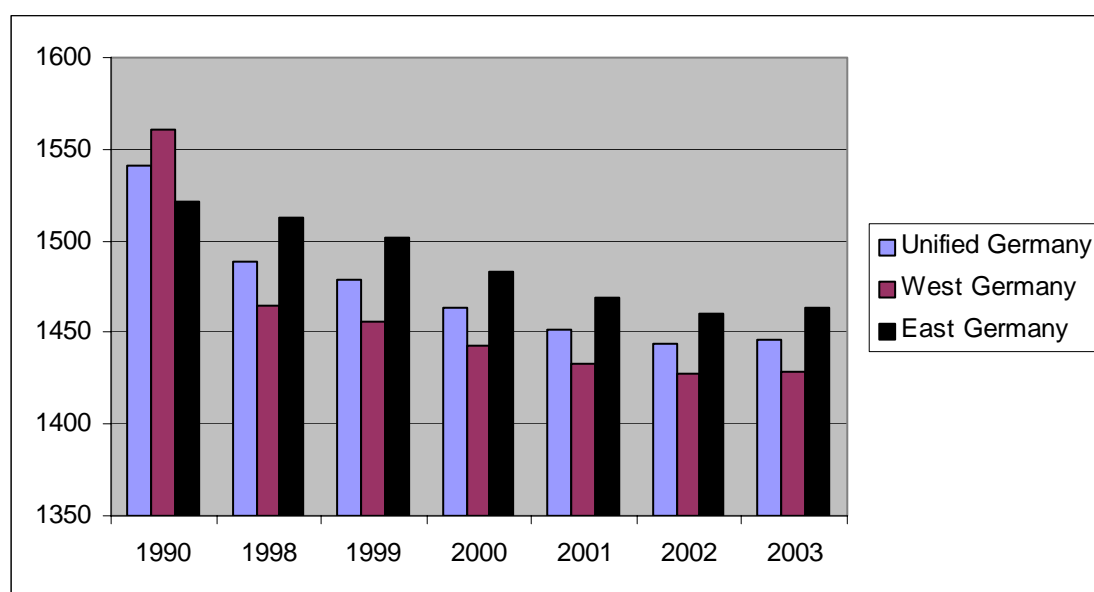


Figure 4: Annual Average Working Hours per Person: Germany 1990-2003

Source: OECD, 2004.

Whether the differences in annual average working hours between the old and the new German states will dissipate over the next few years remains to be seen. Figures from EIRO suggest that average annual working hours are declining at similar rates in both parts of the country. The dramatic decline in annual average working hours per person in West Germany in the early 1990s reflects reduced contractual working hours for full-time employees. In the east, unions pressed in the same direction, but with considerable less success.

⁴ Figures reflect annual average hours worked per person, both sexes. Figures on average annual hours worked in Eastern Germany calculated by the authors, based on OECD figures for unified and Western Germany.

WOMEN'S PART-TIME PREFERENCES

The development of part-time work in both East and West Germany cannot be attributed to a dominant preference among women. The male breadwinner model was a dominant factor in Germany during the development of high levels of part-time work among women; West Germany was a 'strong' breadwinner state (Lewis, 1992). The 'strong' male breadwinner model places an emphasis on the private responsibility of families for childcare and makes the employment of a second earner disadvantageous. In Germany, while the male breadwinner state actually created facilities and services for women with children, these policies served to push women out of the labour market. Opening times of schools and kindergartens, and poor availability of childcare also discouraged the active participation of mothers, especially with young children (Killmann and Klein, 1997; Pfau-Effinger, 1998). Furthermore, the spouse-based splitting joint tax system provided one of the highest levels of sole earner relief, thereby supporting the male breadwinner model (Dingleday, 2001). In West Germany, part-time work provided an inroad into the labour market for many women, and in East Germany, part-time work is often involuntary as full-time work is the norm. Due to these limited options, as well as social norms regarding childcare, part-time work developed as a coping solution for many women looking to combine work and family life, rather similar to the Netherlands. However, this only holds true for West Germany. Part-time work has been forced onto many East German women after reunification, given fewer jobs and difficulties in maintaining their position in the labour market.

Remnants of this male breadwinner model still exist in Germany, allowing part-time work to remain an especially attractive option for mothers looking to combine paid and unpaid work. Although it is slowly disappearing, the male breadwinner model still predominates policies as well as social and cultural norms. As Pfau-Effinger argues, the male breadwinner model in Germany is being updated or as she calls it 'modernized' (1998). This is particularly true in West Germany, whereas in East Germany, part-time work is considered to be less prestigious with lower incomes, resulting in fewer preferences for this form of working time (Garhammer, 2000). We see the effects of this development reflected in German women's working preferences today. Part-time work is now preferred by many West German mothers looking to combine work and family life, although many mothers of young children prefer to remain outside the labour market until their child is older (Garhammer, 2000; Killmann and Klein, 1997). This cannot be said of East German women, who continue to prefer full-time work.

ROLE OF GOVERNMENT POLICY

The preferences of West German women for part-time work only played an indirect role in the strong development of part-time work in Germany, yet the initial growth and development of part-time work in Germany is not directly attributable to government policy either. Part-time work was not directly supported by the government until late into the tenure of the centre-right Kohl governments (1982-1998), later continued by the centre-left coalition under Schroeder (1998-). With rising unemployment and in an apparent move to counter collective work-sharing options of the German unions, the Kohl government, and German employers, began to discover and praise the part-time job expansion of its small Western neighbour. However, there were very few concrete policy proposals. In the mid 1990s there were only some job creation schemes, including some measures to reduce working hours to 80 per cent of the normal working time in the public sector (Killman and Klein, 1997). Under the first Schroeder government in 1998, support of part-time work, in the form of mini jobs (with lower levels of wage costs and social protection), and legislation regarding employees' ability to work part-time became more important. Some of the more recent efforts to support part-time work during the second Schroeder government include the attempt to re-regulate 'mini-jobs' and address work-family balance issues, also in response to European legislation and policies.

In 2001, the new law on part-time and fixed-term work came into effect, which gives employees the right to request a reduction in working time in companies with more than 15 employees and places restrictions on the use of fixed-term contracts (EIRO, 2002a). While long-term effects of this legislation are not yet visible, initial reports suggest that only a minority of employees is exercising their right to reduce working hours, less than one percent in the year the new legislation came into force. Four out of five employees requesting a reduction in working hours are women (EIRO, 2003a). It is difficult to say whether greater numbers of employees will make use of this legislation, yet it theoretically provides many employees with the opportunity to have more influence on their individual working time.

The new focus on work-family balance could work to increase the popularity of reduced working hours, mostly in the form of part-time. Legislation introduced in 2002 to promote a work-family balance (EIRO, 2003a) intended to promote women's employment and increase equal employment opportunities for men and women. This legislation prompted mixed responses from the social partners and women's organizations. Social partners herald the legislation as much needed, yet employers' organizations remain sceptical about increased costs. Women's organizations feel the legislation is not far-reaching enough to create significant change. The current work-family balance campaign by the Ministry for Family, Seniors, Women and Youth, while recognizing problems such as a lack of childcare and the unwillingness of employers to address work-family issues, mainly recommends voluntary solutions, to be found in the context of collective bargaining (BFSFJ, 2003).

German collective bargainers seem to have been less prominent in their attempt to raise the profile of part-time work and create a more sustainable balance of work and family life in comparison to their Dutch colleagues, possibly reflecting lower levels of cooperation between the social partners, and less coordination across sectors, using central agreements to recommend particular solutions or norms.

Furthermore, new regulations allowing employees to earn up to 400 euros monthly, exempt from payroll taxes and social security, serves to increase the number of 'mini-jobs' present in the German labour market. These jobs are mostly found in the service sector, typically performed by women and hardly satisfy conditions of "decent work" in terms of earnings, protection and rights (EIRO, 2003a). This development is likely to reinforce the negative qualities of part-time work and does contribute to a "marginalisation" rather than a "normalisation" of part-time work. By actively supporting the growth of short-hours jobs, the government allows marginal part-time work to grow, part-time jobs that are often precarious and poorly paid. And while new legislation allows employees to request a reduction in working hours, complementary legislation is necessary that secures the rights and position of people choosing to reduce their working hours.

SOCIAL PARTNERS

The growth of part-time work is not attributable to the policies of the social partners either. German trade unions responded similarly to Dutch unions, fighting the growth of part-time jobs, and unlike their Dutch counterparts, German unions were less in need of developing a part-time strategy. German unions were much stronger and more successful in pressing the collective solution to work sharing by means of a reduction of working hours for all, and with fewer concessions on flexible working time. Before unification in 1990 and the economic crisis that followed, the economy performed better and unemployment was lower. Consequently, there was less pressure to create part-time jobs (for young people and women) as a "second best" solution (compared to full-time work) but always better than unemployment. Other typical pressures, like wage moderation or an early central agreement in which employers adopted part-time work as a possible work-sharing solution in times of high unemployment, like the 1982 Wassenaar agreement in the Netherlands, were absent in Germany. Part-time work did not become a strategy for entry into the market for paid labour by women, but rather it became a tool for flexibility in the service sector for employers (Pfau-Effinger, 1998). This difference –whether part-time jobs result from the character of the labour supply or derive from the flexibility needs of employers, tends to have a big influence on the rights and conditions of part-time work, and on its image in society. Trade unions are slowly changing their perspective and have become supportive of government legislation allowing employees to request a reduction in working hours. Without specifically promoting part-time work,

the German Federation of Trade Unions encourages a continued reduction of the working week as a means to achieve full employment (DGB, 2003). The reduction of the working week is seen primarily as a means of reducing the very high levels of unemployment, but also as a means of creating a better work-family balance.

Employers continue to resist the reduction in weekly working hours and have instead pressed for longer working hours as a means to raise competitiveness levels (EIRO, 2003a). Due to employer resistance, there have been relatively no changes to the collectively agreed workweek in the last two years of collective bargaining and in 2003 the German unions in metal engineering lost a major strike on the issue. Many developments – both towards longer and shorter working hours, - take now place in the context of special company arrangements, using hardship and opening clauses in sectoral agreements. Some of these, for instance at Volkswagen, Bayer and Deutsche Bahn (railways) do address work-family balance issues, but it is impossible to say how general this trend is (BFSFJ, 2003).

Summing up, we see that the development of part-time work in Germany shares some parallels with the Netherlands, yet women's preferences for "soft" labour markets appears to be much less widely diffused and defended. The growth of the service sector, and with it part-time jobs, contributed significantly to the development of part-time work in Germany, although the pace of service sector growth was admittedly slower in Germany than in the Netherlands. Together with the development of mini-jobs, this may have trapped part-time jobs in a pattern of marginalisation, rather differently from developments in the Netherlands. Social and cultural attitudes regarding working mothers reinforced women's acceptance of part-time work as a coping solution in West Germany and the labour market difficulties following reunification limited East German women's labour market options. These developments were reinforced by job-creation schemes throughout the 1990s and today, and current legislation strives to increase employees' flexibility in working hours. While employers' organizations are hesitant to support these measures, some individual employers and trade unions are slowly coming around to the government's call for promoting work-family balance. In the Netherlands, this change came earlier and, complemented by strong advocacy of women's groups in the unions and central agreements with employers, support for the 'normalisation' strategy was stronger. If this normalisation process is to continue, allowing part-time work to develop into a 'decent' working form, the negative qualities of part-time work in Germany, such as the promotion of short-hours mini-jobs must be addressed, as well as attempts to increase the gender neutrality of current individual adjustments to working hours.

4.2 UNITED KINGDOM

The development of part-time work in the United Kingdom differs from both Germany and the Netherlands mainly because it is shaped in a much less regulated labour market. The similarity lies in the heritage of a strong male breadwinner model (Lewis, 1992). Hence, in the UK, part-time work also developed mostly as a means for women wishing to combine paid labour and motherhood (Bruegel and Perrons, 1998). Nearly all of the post-war growth in married women's employment can be explained by the growth in part-time work (Lewis, 1992). However, there are two distinct differences in the way in which part-time work developed in the UK. Firstly, while part-time work among women differs between East and West in Germany, in the UK part-time work among women is divided along ethnic lines. Full-time, not part-time work seems to be the norm for minority ethnic women in the UK and ethnic minority women are more likely than white women to be working full-time. This full-time pattern varies little based on occupation or the presence of children in the household (Dale and Holdsworth, 1998). Secondly, working hours are polarized in the UK, and part-time work often consists of marginal or short hours, which serves to increase levels of involuntary part-time work among women. Due to the short hours nature of part-time work in Britain, workers are often excluded from benefits, making their labour market position even more precarious (Bruegel and Perrons, 1998; Fagan and Rubery, 1997).

WOMEN'S PART-TIME PREFERENCES

The growth in female part-time work in the UK is not reflective of female preferences for part-time work, but stems from necessary practicalities of household and family organization and deeply entrenched social attitudes, a trend we see in Germany and the Netherlands as well (Fagan and Rubery, 1997). The largest preference for part-time work can once again be found by mothers looking to combine paid work with family responsibilities and childcare. Even with a slight increase in full-time jobs, most married mothers continue to work part-time (Dale and Holdsworth, 1998). As noted previously, it is more common for women of ethnic minorities to remain in full-time employment after having children. This is also true for highly educated women (Fagan and Rubery, 1997). Yet even this group of women is significantly smaller in comparison to other European countries due to long-held social beliefs regarding motherhood and paid work in the UK, a trend also visible in the Netherlands and Germany (Fagan and Rubery, 1997; Pfau-Effinger, 1998). However, the difficulty of combining paid work with motherhood does not deter all women from participating in the labour market. Despite a lack of childcare, young women with children have the highest increasing rate in labour market participation (Fagan and Rubery, 1997).

The largest inconsistency between the development of part-time work and women's working preferences lies in the issue of hours. The precariousness of small part-time jobs in the UK is

reflected in these preferences; very short working hours remain unpopular in the UK and longer hours are preferred by nearly one in five part-time workers (Fagan, 2000). In households where aggregate working hours are long, women do have a preference for shorter hours though. The development of part-time work in the UK was not driven by women's preferences and their current preferences reflect the problem of undesirable hours in part-time work, creating serious obstacles to "decent" part-time work. This is in contrast to the Netherlands, where part-time work is more the outcome of what women want – admittedly conditioned by various constraints, but nonetheless much less under direct influence of employers' need for flexibility. As is argued by Berg and colleagues (2003), in countries with little labour market regulation and low coverage of collective bargaining, as is the case in the UK (and the US), employers have more power to shape when and how long people work, and employee autonomy is usually very low. This is, in the case of the UK, also reflected in higher levels of conflict and stress over work-family issues among both men and women, compared to Germany and, especially, the Netherlands (according to ISSP data of 2002). Fagan (2004) concurs that it is – apart from the length of working hours – the control of workers over their individual working hours that is crucial.

ROLE OF GOVERNMENT POLICY

This situation of extreme working hours in the UK stems partly from the laissez-faire government policies present until the Blair administration. In contrast to Germany and the Netherlands, there was no explicit government policy concerning long working hours or promoting part-time work. Relevant EU legislation did not apply before 1997 and when it did, after the change in government, legislation was applied in a minimalistic way. The expansion of part-time employment that did take place was market-driven and hardly constrained by legal norms (Fagan, 2000; Rubery and Fagan, 2000). Many part-time jobs were marginal, without employment protection, and based on very short weekly hours (less than 16). While countries sometimes promote part-time work or reduced working hours to combat unemployment, this was not the case in the UK. The British government maintained a policy of allowing firms to choose their own working time arrangements, both very long and very short hours.

Since the Blair government took office in 1997, several changes to labour regulations have been made, including the introduction of a minimum wage in 1999, changes to maternity leave and the introduction of paternity leave arrangements in 2002, and, similar to Germany, a new effort has been launched to help employees reconcile work and family life (EIRO, 2003d). In 2000, the government started a new campaign on the reconciliation of work and family life, asking employers to consider more family-friendly policies. This campaign culminated in the new Employment Act of 2002, which included the changes to maternity pay and maternity leave as well as introduced a

paternal leave arrangement. However, the new legislation on Flexible Working Regulations, which allow working parents to reduce working hours under certain conditions, remains controversial (EIRO, 2003c). The change in legislation allows parents with children under the age of six (or a disabled child up to 18 years of age) to ask for changes in working hours and times and request being able to work at home. These requests can only be applied for after 26 weeks of employment with one employer, and are restricted to those persons bearing responsibility for the raising of the child (EIRO, 2003c).

The new emphasis on family-friendly working policies is popular among employees, but unions and employers responded with less enthusiasm. A recent government survey shows that nearly half of the respondents find flexible working hours more important than other company benefits. One third of those employees surveyed would rather have flexible working hours than a moderate increase in annual earnings of one thousand pound sterling (EIRO, 2003b). Currently, the government is focused on three goals within the work-family balance campaign. These include focusing on sectors where the work-family balance is most critical, addressing the long-hours culture, as well as providing assistance and guidance as employers and employees adjust to new policies and regulations. In the UK, about one-third of all men and close to 10 per cent of all women in employment work 48 hours (the EU maximum) or more; in Germany the percentages drop to 15 and 5 per cent, in the Netherlands to 10 and below 5 per cent respectively (data taken from the European Labour Force Survey of 2001, Eurostat). While a considerable part of the long hours culture is associated with self-employment, it affects a very large number of the dependently employed as well. The current struggle between unions, employers and the government, and with the European Commission, over the continuation of an “opt out” for individual firms and employees, allowing longer working hours than those provided by relevant EU legislation, is directly related. It is the flipside of the unregulated development of part-time work as a special marginal segment of the British labour market. This certainly does not help to shape part-time work as a form of decent work, even though with its disadvantages part-time work has the benefit of allowing a reconciliation of work-family pressures during a particular phase in one’s life.

SOCIAL PARTNERS

Just as there was no explicit government policy to promote the development of part-time work, the social partners did not actively endorse this work form either. The role of the British social partners varies from the Netherlands and Germany. During the 1990s in the UK, collective bargaining no longer took place on the national or sectoral level, and coverage of employees dropped to half the levels in Germany and the Netherlands (EC, 2004). Only a minority of 35 per cent of all employees is covered by collective agreements in the UK. In terms of content, company-level collective

agreements in the UK regulate matters of part-time rights distinctively less than even those in Germany, let alone the Netherlands. The lack of statutory or voluntary regulation combined with the growth of the service sector allowed UK employers to cater to consumer-oriented services, contributing to the growth of part-time work, small hours and very long hours, as well as unsocial hours, leaving employees with little control over their working times. Employers also often created low-skilled positions to restrict training costs, thereby increasing the number of low-skilled part-time jobs. British trade unions did little to halt these developments, and often remained supportive of overtime and unsocial hours working, with rendered extra pay (Fagan and Rubery, 1997). In the context of the recent activities of the government to promote a better work-family balance, the social partners have been more vocal. The Trades' Union Congress (TUC), the main spokesman for labour representing 71 British unions, now focuses on work-family issues, with an entire section of its website dedicated to 'changing times,' (www.tuc.org.uk) and it is seeking "partnership" on this issue with employers. While TUC is enthusiastic about the new working time legislation, they are concerned that the legislation is not tough enough, providing employers with the means to reject employee requests.

The reaction of employers' organizations is mixed. While the Confederation of British Industry (CBI) responded favourably to the new working time legislation, the Institute of Directors (IoD) condemned the legislation as harmful to businesses, claiming that it will cause conflicts in the workplace (EIRO, 2003d). The CBI also expressed some concerns regarding the costs and consequences of such legislation for the preferences of employees without children who will now want to create flexible working times as well.

Despite current similar campaigns to promote work-family balance, the development of part-time work differs from both Germany and the Netherlands in many respects. Precisely because of a lack of government labour market regulation, part-time work was allowed to expand and grow. Employers made use of the liberal labour market to promote consumer-oriented part-time jobs in the service sector and low-skilled part-time jobs. British part-time jobs lack the rights and quality often found in part-time jobs in the Netherlands. A working hours culture of extremes developed in the UK and consequently, part-time jobs are often short-hours positions with lower pay and poor benefits. All this means that most part-time jobs are far from the aspirations and standards of "decent work". The gendered nature of part-time work reinforces that conclusion, although that is an issue in all three countries. However, in the UK, the issue of entrapment into low skilled, low-paid and unprotected part-time jobs is mainly an issue for women, and is much more pervasive than in the other two countries. This is reinforced by the short supply of accessible and affordable childcare facilities and the very minimalistic application of relevant EU regulations on maximum working hours, paternal leave, irregular work and part-time employment.

5. CONCLUSION

This paper attempts to explain the growth and high levels of part-time work in Germany and the United Kingdom by looking at which factors account for the phenomenal growth of part-time work and the existence of the one-and-a-half earner model in the Netherlands. We show that while the growth in Dutch part-time work is attributable to women's preferences for 'soft' labour markets, policies of the government and the social partners followed, rather than preceded this development. However, the effect of such supportive policies was much stronger in the Netherlands than in the other two countries.

A number of similarities in the growth of part-time work are evident among the Netherlands, Germany and the UK. Firstly, all three were strong breadwinner states, yet the effect of this on women's working times was differentiated within these countries. In Germany, there is a divergence between East and West, with marked differences in labour market participation and part-time work levels both before and after reunification. The male breadwinner model present in West Germany discouraged the active participation of mothers of young children, making part-time work a more attractive solution. In contrast, until reunification in 1990, full-time work was the norm for women in East Germany, and the growth of part-time work under East German women often remains involuntary. The presence of a strong breadwinner state also affected the growth of female part-time work in the UK, but here the effects of this model on working times differentiate themselves along ethnic lines. Part-time work developed as a norm for white women, whereas ethnic minority women are more likely to work full-time. In the Netherlands, it seems as if levels of part-time work are homogenous across all groups of women. Given the difference in size between the Netherlands and countries like Germany and the UK, this lack of variation in part-time work might be expected. However, despite the seemingly homogeneous nature of part-time work in the Netherlands, further research is needed to determine whether part-time working differences might exist along ethnic lines.

Within the Netherlands, but also in Germany and the UK, part-time work developed as a "second best" option for many women, particularly working mothers. Part-time work was preferred to staying out of the labour market, or being unemployed (with little rights or benefits) but not to a full-time job, with full rights, earnings and benefits. Therefore, a danger of marginalisation was present in all three countries, certainly in the initial stages of the growth of part-time work. We show that in the Netherlands this risk was reduced by an early and relatively effective strategy of "normalisation" of part-time work, narrowing the differences in rights, benefits and earnings with full-time work, a strategy in which both unions, employers and governments played a role. The successful diffusion of part-time work through all sectors and occupations suggests some success of this development, although the heavily gendered nature of part-time work, and the lower training

and career opportunities, signify various obstacles and shortcomings on the road to defining part-time work as decent work. In Germany there are conditions for a similar strategy, though there appears to be more reluctance to accept this strategy, especially among the social partners, but perhaps also among German employees, both male and female. In the UK, however, part-time work developed in a far less regulated context and has, as a consequence, become heavily associated with marginal employment, low pay and little skill training. A qualitative strategy of normalisation, upgrading the rights and attractions of part-time work, would require a much greater and most likely joint effort of the government, unions and employers.

We conclude with some remaining questions regarding the growth of part-time work among women that are not answered in this paper. Why did Dutch women continue to work in part-time jobs, despite more opportunities for full-time work and rapidly falling unemployment rates? Why did they not follow the road of Danish women? How decisive or important are leave rights in such developments and how do unemployment benefits rights figure in? Is the higher full-time job rate among Danish compared to Dutch women also reflective of higher divorce rates and more Danish women living on their own? How are norms concerning working hours and leisure, and full-time and part-time work, shaped and changed? Why is the take-up rate of leave rights among men so low and why do only few women use their right to change working hours in all three countries? How do relative wage differences, education and training rights influence the gender structure of part-time and leave decisions? Finally, the issue of choice and control over when and how long one works – in a lifetime perspective – should be an issue high on the agenda of research and in the search for decent work.

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7. APPENDIX I: LIST OF ABBREVIATIONS

BSFSJ:	Bundesministerium für Familie, Senioren, Frauen und Jugend (Ministry of Family, Seniors, Women and Youth)
CBI:	Confederation of British Industry
CBS:	Centraal Bureau voor de Statistiek (Statistics Netherlands)
CPB:	Centraal Planbureau (Netherlands Bureau for Economic Policy Analysis)
DGB:	Deutscher Gewerkschaftsbund (German Federation of Trade Unions)
EIRO:	European Industrial Relations Observatory
EC:	European Commission
EU:	European Union (original 15 member states)
ILO:	International Labor Organization
IoD:	Institute of Directors
ISSP:	International Social Survey Programme
MINSZW:	Ministerie van Sociale Zaken en Werkgelegenheid (Ministry of Social Affairs and Employment)
OECD:	Organization of Economic Cooperation and Development
SCP:	Sociaal Cultureel Planbureau (Social and Cultural Planning Office)
StAr:	Stichting van de Arbeid (Labor Foundation)
TUC:	Trade Union Congress
UK:	United Kingdom

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