

Trade unions' action for individual protection: a cross-country analysis

Carlo Caldarini, c.caldarini@osservatorioinca.org

Paola Cammilli, p.cammilli@osservatorioinca.org

Abstract: this article aims at presenting the first results of a comparative study based on trade unions' action for individual protection in Italy and Europe. The focus of the analysis has been on five European countries: Belgium, France, Germany, United Kingdom and Sweden. The starting point for the comparison is the trade union-based structure of the Italian 'patronato', whose action found no immediate counterparty in any other country observed. Borrowing the most consolidated terminology among welfare systems scientists, the author affirms that the main divide turns out to be the universalistic provision of services of Italian 'patronato' against the selective and mostly occupation-based provision of social services of trade unions in other countries. The comparison allows the creation of a specific 'map of individual protection for each country observed, related to specific cultural, juridical and social features of each country observed.

Key words: Trade union, Individual protection, Welfare

Introduction

This article presents a review of the first results obtained by a comparative research, promoted by Inca Cgil, on the individual protection of workers – or of people, regardless of their working condition – in some European countries. The aim is to verify how and which are the mechanisms through which this form of protection and provision of services is delivered and guaranteed in those countries where no institutes similar to the Italian 'patronato' exist. The countries taken into consideration in this early stage of research are: Belgium, France, Germany, United Kingdom and Sweden. The case studies of Spain and Poland will soon follow.

The core of the study is on how the advocacy and defense of individual rights in front of the national social protection system is organized. We consider social protection as all the measures of security and assistance organized by the State in order to distribute risks more equally and to allow people or families to better face any kind of events related to old-age, sickness, invalidity, unemployment, family dependences. Within this framework of analysis, we want to investigate the role played by workers' organizations directly, or indirectly through dependent organizations or *ad-hoc* bodies. In other terms, we want to find out the existence and the functioning of potential union bodies which have the same function as our 'patronato'.

The 'patronato' is a unique Italian institute and it can't be directly compared to any other body or institute in other countries.

The term 'patronato' itself cannot be easily translated into other languages. It refers to trade union based institutes born in Italy in the aftermath of World War II.

Etymologically, it derives from the Latin term *patronatus*. In Roman law there was the law of the *patronus*, which gave the slave the right to receive certain benefits (*operae*) and public statements of esteem and gratitude (*obsequium*). From this etymological origin comes, for instance, the French sense of *patronat*, which is the set of employers, or the English sense, where the word *patron* itself stands for the one who protects, or "the patron saint". The French *patronage* is a set of associative' initiatives aimed at protecting and helping the poor, initially under the protection of a *patron* saint, or the building where children in need are housed. In English patronage is also the sponsorship, the privilege and the financial aid given to someone by a person or an organization, being legal or ecclesiastical. Nowadays, the Italian term *patronato* stands for care, protection, or even charitable organization for particular categories of people. The activities of the *patronato*, in the current meaning of the term, can be traced back to the mid-nineteenth century. At that time, the various *patronati* were mainly voluntary associations of people, who used to mobilize own resources to provide help to the persons in need. Those associations were neither State-recognized nor State-financed. At the beginning of the twentieth century, some of those started to be promoted or sponsored by local authorities, such as provinces and municipalities (as established for example in the Italian law on compulsory insurance against accidents at work in 1917). The first

trade union *patronato*, the focus of this article, was born immediately after World War II, namely on 11 February 1945, when, in the aftermath of the first Congress of CGIL, Giuseppe Di Vittorio, Achille Grandi and Oreste Lizzardi signed the Charter which gave birth to the National Confederal Assistance Institute (Inca), and thus demand for recognition to the Ministry of Labour¹.

Taking apart its misleading linguistic origin, the main feature of the trade union institutes of *patronato* in Italy is their legal status. In other EU countries, counterpart trade union institutes of individual protection are funded by subscriptions of its members. Their functioning is independent from *ad hoc* State laws. In Italy, from the other side, the State law² recognizes the *patronato* as a legal entity established under private law, and regulates its functioning, which serves the public and general interest³. Their specific role is the protection of individual rights of any person trying to achieve social security benefits, health and social assistance benefits, including those related to migration patterns (art. 7). The *patronato* can offer legal support in front of Courts and support the Italian diplomatic and consular authorities' abroad (art. 11). It has the right to access database of national institutions and agencies which provide social benefits (art. 12). All the *patronato* institutes are publicly financed through social contributions of workers (0,226%) and receive funds by the State proportionally to their activity. Their activity of individual protection is monitored by the Ministry of Labour through its inspectors, in Italy and abroad.

Trade unions' action for individual protection, between universalism and selectivity

In order to compare different countries' organization of trade unions' action for individual protection, we have broken down and clustered in simple functions the different activities of Italian *patronato* [Inca, 2008]. In the second phase, we have thus built patterns of case studies and interviews on the new aggregation of activities, in order to trace our 'functional equivalents'. We have therefore referred to 'life events' for which any person may request support from *patronato*, grouping them into four main areas: social security, health and safety at work, social assistance, and migration (Table 1).

Tabel 1: Italian *patronato's* actions for individual protection

Social security	
<i>Employment</i>	Reconstruction of individual insurance position
<i>Unemployment</i>	Access to benefits
<i>Retirement</i>	Support, submission of application and claims, monitoring of social contributions
<i>Death</i>	Claim and monitoring of benefits
Health and safety at work	
<i>Sickness and accidents at work</i>	Access to compensation for occupational diseases
<i>Sickness absence</i>	Support and advices for sick leaves and benefits
<i>Incapacity for work</i>	Access to compensation for damage
Assistance	
<i>Maternity and paternity</i>	Information and orientation for family leaves and benefits
<i>Economic unease</i>	Information and orientation for family leaves and benefits
<i>Invalidity</i>	Medical and legal assistance
Migration	
<i>Immigration to Italy</i>	Claim for residence permit and family reunifications
<i>Emigration from Italy</i>	Social security and assistance protection at Consulate authorities

Source: Inca, 2008

¹ On the 3rd of April of the same year the Italian Christian workers' unions founded their Patronato Acli. The legal recognition of the Institutes of Patronato and social assistance from the Italian State occurred two years later through the approval of the Decree of the Provisional Head of State of 29 July 1947 n. 804 (OJ 197 of 29 august 1946, n.) and of the Decree of 29 December 1947 (OJ 5 of 5 January 1948). Today there are twenty-six Institutes of Patronato recognized by the Italian law [web].

² Law 152, 30 March 2001.

³ The mission of general interest of Patronato Institutes has been confirmed by the judgment of Constitutional Court n. 42 on the 3rd of February 2000, which declared inadmissible the request for referendum for the repeal of the legal recognition of the Patronati.

For each event, the *patronato* provides the person assisted with advice, submission of application to agencies, assistance during the evaluation of the application, free of charge. Where necessary, it includes in its actions legal and medical assistance for any litigation aimed at recognition of rights. In other countries, trade unions carry out, directly or indirectly, those actions. Nonetheless, there is no equivalent elsewhere of the Italian *patronato*.

There are two fundamental differences between the Italian *patronato* and the various organizations of trade unions' action for social protection in other countries:

- Firstly, the Italian *patronato* provides free of charge assistance to all persons, regardless of their professional status or affiliation to unions. The first contact with the client might come on the workplace through the trade union, but often people freely enter one of the thousands of front offices located everywhere in the country. The social and legal services as organized by unions in other countries follow a completely different approach. They are designed for a specific category of people (workers) and are accessible to affiliated only (with an exception for immigrants claiming determined rights). They are organized over the territory, but the contact point is more often the work place, the company, the delegate, the union.
We can affirm therefore, the importance of the *universal* connotation of the Italian *patronato*, while trade unions action' in other countries might be defined as *selective*⁴, and related to occupation.
- Another important difference lays on the legal and social assistance provided by Italian *patronato* to Italians⁵ abroad. As mentioned, the birth of the *patronato* in the aftermath of World War II has followed Italian migration flows, settling in many countries in the five continents, establishing relationships with unions and local social security institutes⁶.

Taken into account these differences, our comparison could not be confined to trade unions' institutes for individual protection. In all countries, there are actors or mechanisms that perform stably and institutionally complementary actions of protection⁷. Another important difference that occurs in this case falls within the legal service. State and institutional actors in fact offer this service in varying degrees.

In Belgium, for instance, mutual associations of compulsory insurance, offer their affiliates a universal social assistance. The main difference with the Italian *patronato* in this case is the service of legal protection, not foreseen by the mutual associations. Conversely, the French association *Fnath* offers protection and legal assistance against accidents at work and incapacity for work to a selected public of its 200.000 members. Similarly, the *German Sozialverband Deutschland* represents the social interests of over half a million members, mostly pensioners, chronically ill and disabled. Besides offering them advices and on all matters related to health, welfare and assistance, it gives legal support on labour law procedures. The largest institute for assistance of the UK, the *Citizen Advice Bureau* offers helps in the field of general and universal social security, social assistance and immigration. Nevertheless, legal protection is only free for people with insufficient income. In Sweden, the association of pensioners *Pensionärernas Riksorganisation* offers its 400.000 members a general support for enquiries concerning social security, welfare, tax, health and insurance, but it serves mainly as a lobby of a leisure meeting place.

This variety of solutions in Europe produces for each country a different "map of individual protection", which has to be considered in relation to the system's specific cultural, legal and social features. There are no other similar organizations as the Italian *patronato* neither in alike Mediterranean countries (Spain, Greece, Portugal) nor in other Central and Eastern European Countries, which have experienced in the past similar migration paths.

⁴ The use of the terms "selective" and "universalistic" refers to a consolidated terminology used among welfare scholars. Among others, we recall the importance of the work of: Titmuss R., 2000, 'Universalism versus selection', in Pierson C., Castles F.G. (Eds.), *The welfare state reader*, Polity Press, Cambridge, pp. 42-50.

⁵ To everyone who has, or has had, an insurance status within Italy's National social security institute, regardless of nationality constraints.

⁶ The *patronato* Inca Cgil has 84 front offices in 26 countries round the world; the *patronato* Acli is in 23 countries, Ital Uil in 22 and Inas Cisl in 18.

⁷ By stating "stably and institutionally" we leave out deliberately from our analysis all the small organisations and NGOs that in all countries, as in Italy, provide a sort of "voluntary" help, and even legal assistance, to the most vulnerable groups of population.

National case studies

Belgium⁸

The Belgian system of social protection is considered, together with the Dutch and Scandinavian ones, among those that guarantee the highest level of economic and social security [ILO, 2004; Caldarini, 2006]. This is largely the result of a compromise between the two main political cultures of the country: one based on a Catholic inspiration and the other more secular and socialist-inspired. Whilst the former has historically defended the principle of subsidized freedom and institutional pluralism, the latter has always supported the principle of mandatory government intervention [Reman and Pochet, 2006]. The disputes between individuals and social security institutions are infrequent and, in case there are, the outcomes are often in favor of the person concerned. Since 1997 the Ombudsman⁹ has been created in order to act as an intermediary between the citizen and the institutions, and to find a concerted solution. In addition to that, there are in Belgium mediators in specific areas, such the Ombudsman for pensions and insurances (also responsible for accidents at work), who can intervene as well in the event of cross-border litigations or for citizens residing abroad¹⁰.

In the event of a dispute between a worker and a social security institutes, the individual protection is provided by trade unions, through a specific 'legal service' (*Service juridique/Juridische dienst*) which has its offices in all the regional offices of the trade unions as well as in larger companies. It covers all fields of labour law, from industrial relations to relations with the institutions of social protection: social security and pensions, health and safety at work and assistance. In very complex cases or in cases of general interest the union gets involved with forms of collective action, as it was the case for the abolishment of the possibility to combine old-age pensions and pensions for illness or injuries¹¹.

For what that concerns immigration, mostly on practices related to residence permits and work, the trade union ensures the protection of affiliated foreign workers (in the case of insufficient incomes membership is free for foreign workers)¹². Emigration is not, on the other side, a remarkable phenomenon in Belgium, and it's mostly confined to neighboring countries. In principle, workers who move abroad and continue to pay their fee of affiliation don't cease to be protected by their union, particularly for matters related to European regulations or international conventions. The Belgian unions can't dispose, however, of offices abroad, except for the cases of cross-border offices of EURES' advisers. In this latter case, any worker can get information and seek protection for rights related to free movement¹³. Sometimes, where there are well-established relations with the Italian *patronato* offices, Belgian unions can make use of these channels to protect their members.

In all these areas, the legal service is organized independently by the unions, i.e. without any form of subsidy or control by the State. It is found solely through the membership fees of its affiliates. It is based on sectors and accessible only to affiliated employees. It is as well free of charge, even in the case of litigation and legal action.

A peculiarity of the Belgian system concerning social security is that unions operate also as offices for payment of unemployment insurance benefits. The unemployment benefits are among the most generous in Europe, both as regards the amount and as regards their duration [Caldarini, 2006]. This feature helps the union to maintain a high rate of affiliation (53% according to OECD data), as indeed happens in other countries (Sweden, Denmark, Finland), where this system of payment of benefits, also known as the "system of Ghent", operates [de Saintignon et al., 2004b; Faniel, 2007; Vandaele, 2009]. On the other hand, this system may also be a source of weakness for the

⁸ We thank for this paragraph Carlo Briscolini from Belgian Union FGTV (interview of January 15, 2010) and Stefano Tricoli, coordinator of Patronato Inca Cgil in Belgium.

⁹ www.mediateurfederal.be, www.ombudsman.be.

¹⁰ In 2008, the Pensions' Ombudsman has dealt with about 3600 complaints, while the Insurances' Ombudsman with about 1600 (www.mediateurpensions.be; www.ombudsman.as).

¹¹ Referring to the Royal Decree of 13 January 2003 (Government Martens-Gol), declared illegal by the Court of Appeal on 27 February 2006.

¹² Moreover, during specific "regularization campaigns" of immigrants, such as the one launched by the government in July 2009, Belgian trade unions have opened front offices to all irregular workers, regardless of their union's affiliation. However, these initiatives are occasional and limited in their scope. In Bruxelles for example, during the 3 months of campaign; the trade union Fgtb/Abvv has received hundreds of migrants and dealt with 44 formal practices.

¹³ <http://ec.europa.eu/eures>.

trade union, because a union with a high number of affiliates, a third of which benefits from unemployment payments, might incur into a lower political value of representation during collective bargaining¹⁴.

Workers' organizations also participate in the tripartite management of social protection institutes. Belgian trade unions provide their members with the payment of compensations in case of strike. Furthermore, they offer their members a number of fringe benefits as for awards in special events of life (marriage, birth, retirement, etc.), vacations in unions' holiday centers, discounts on the purchase of some goods and services, etcetera.

The trade unions are the sole to offer "legal protection". Other protection mechanisms or organizations have been established and settled, nonetheless, they provide only general social assistance, excluding the legal intervention.

An important landmark on this side are the *mutualité*, social institutions that work as interface between the family and competent institutions for all the matters related to sickness, invalidity, accident at or and occupational disease. The legal and social service of the mutual associations informs and assists the person over his/her rights and duties for anything related to health and care. It may also help to submit a request for disability pension, family benefits, scholarships, home care, domestic help, social housing, rehabilitation of persons with disabilities, etcetera. Before reaching the age for retirement, the *mutualité* can also calculate the amount of benefits the person is entitled to, while it can verify the accuracy of the amounts received for those beneficiaries of a pension.

For what that concerns social assistance, Belgium has a solid system financed by general taxation, whose goal is to ensure minimum living conditions for the whole population. Since 1976, this system is organized mainly on a municipal basis or district basis, through a network of *Public centers for social assistance (Cpas/Ocmw)*. The beneficiaries are usually those who don't have an income from work or claim unemployment benefits, older people whose income is not sufficient to guarantee a minimum subsistence, families with children who are not entitled to ordinary family allowances and people with disabilities who cannot have an adequate income from work due to their disability. Many services can also be offered to the entire population free of charge. Besides being intermediaries between the person and the State for all the matters related to economic performances and social assistance, the Cpas offer a wide range of social services to people: home care for the sick, hot meals at home at social canteens, assistance in finding accommodation, vocational integration for unemployed, debt counseling, social services for children, etcetera.

Municipalities are also required to provide some sort of social service on welfare and assistance to its residents. Town halls can be addressed for information and advice on pensions too. Whilst the application for pension is now launched automatically, it is still their responsibility to collect application for survivors' pensions and for early retirement, and to dispose of assistance measures and administrative supporting measures for the elderly.

Other devices for social assistance located everywhere in the country are clinics for family planning. They offer social counseling, psychological and legal assistance at low prices or free of charge in the field of family law (divorces and separations, access to family benefits, etc.) and debt counseling, social services for children, etcetera.

Table 2: Map of individual protection in Belgium

	LEGAL PROTECTION		GENERAL ASSISTANCE	
	Universal	Selective	Universal	Selective
Social protection	--	Trade union	Municipality Mutual association	Trade union
Health and safety at work	--	Trade union	Mutual association	Trade union

¹⁴ In Sweden, for example, where the system is alike Belgium, after the 2007's reform of unemployment benefits, 12% of unemployed have not renewed their membership to unions, causing an overall decrease in unionisation rate of 5% in one year [Coulet, 2008].

Social assistance	--	<i>Trade union</i>	Mutual association Cpas Municipality Family clinic	Trade union
Immigration	--	<i>Trade union</i>	Cpas Municipality	Trade union
Emigration	--	--	--	--

-- Not emerged from our survey

France¹⁵

In France, the latest pension reform (Law Fillon, 2003) has given the National Retirement Insurance Fund (Cnav, *Caisse National Assurance Vieillesse*) the obligation to provide all people older than 34 years' annual transparent and clear information about their pensions' rights. This notice provides annually all the information needed to the person in order to understand and assess their social security rights, such as the balance of contribution payments, differences with previous years' contributions, calculation of future pension by age of exit from labour market, etcetera, on the model of the so-called *orange envelope*, which was introduced in Sweden in the nineties¹⁶. The same procedure also applies to supplementary pension funds, compulsory in France.

Adding up to this automatic procedure, the applicant may also request at any time the same information, obtaining response within a week. This system of '*advance information*' is the result of negotiations between the government and unions. It has reduced the areas of conflict between workers and pension funds. Nonetheless circumscribed conflicts still remains, usually related to the omission of contributions by the employer or to the lack of recognition of levels of disability. In such cases, the competent body in the area of private social law (paid leave, wages, bonuses and compensations, individual dismissals, notice of termination by employee's social security contribution, etcetera), the *Conseil de prud'hommes* (a sort of labour tribunal) settles in the first place all disputes between workers and employers. This tribunal, established for the first time under the Napoleonic regime in 1806, than generalized, both geographically and on the scope of jurisdiction, in 1979 (Law Boulin), is composed solely of representatives of employees and employers, chosen through social elections. If conciliation fails in the first instance, it is up to this tribunal to make the final decision. About 200-220 thousand disputes are solved each year in this way. On average, 80% of cases are resolved in favour of the workers. The disputing parties are asked to appear personally to the trial, or to be represented either by an employee (or employer) of the same industry, or by a union representative, by a lawyer (an attorney whether possible), or by the spouse, partner or any other person having entered the *Pacs*' (*Pacte civil de solidarité*) regime. In the case of administrative dispute against a pension fund, a friendly settlement is tempted by the *Commission de recours amiable de la sécurité sociale*, in the first instance. This conciliatory body is composed by persons coming from each pension fund and appointed to the board of directors, within which social partners are represented too. Solely on the event of mediation failure, which is rather rare, the jurisdiction shifts to the Social security tribunal (*Tribunal de la sécurité sociale*), which includes two non-professional judges (representing employees and employers) and is chaired by a judge of the *Tribunal de grande instance*¹⁷.

The employee who is also a union member can either profit from the organization's legal service or seek lawyer's defense by himself. The trade union protection service is organized on occupational basis. It is free of charge for the beneficiary and funded through members' fee of affiliation. It covers all fields of labour law: social security, health and safety at work, and assistance.

¹⁵ We thank for this paragraph Henri Lourdelle from the European Trade Union Confederation (interview of January 19, 2010) and Italo Stellon and Luciana Serra, respectively president and coordinator of the Patronato Inca Cgil in France.

¹⁶ An example of the Swedish "orange envelope" can be found on the website of Inca Cgil Observatory for European social policies [[web](#)].

¹⁷ As in Belgium, in France as well there is another institution for conciliation: the Ombudsman of the Republic, whose function is to improve relations between citizens and the administration. The service is provided free of charge in 338 info points throughout the country (www.mediateur-republique.fr).

The trade union also ensures the protection of foreign workers who are affiliated. It deals for example, with practices related to residence permits and work. In the case of moving abroad, the worker maintains the right to information introduced by the reform Fillon for the periods of time spent working in France. However, there are no special service facilities, neither unionist nor otherwise, outside the boundaries of France, with the only exception of EURES advisers. Consulate missions do not have specific social tasks, but may be addressed to by workers who wish to correspond with the national social protection institutes.

French unions do not pay unemployment benefits to their members, or any other benefit. They participate in the management of funds, and their representatives respond to questions addressed by members in local offices of the trade union itself, thus contributing often to a successful outcome of any dispute.

Given the very low union affiliation which has always characterized France (8% approximately according to OECD data) all of these services of individual protection benefice a minimum percentage of workers. In France, there are also grass root associations linked to trade unions, such as associations for consumers' protection or leisure. In all those cases membership is open to persons who are not unionized. All in all, the concept of "trade union of services", alike the Italian and in some respects also the Belgian one, is stranger to French culture. Eventually, the system is rather more based on the certainty of the benefits provided by law than on individual protection.

The action of mutual associations (*mutualité*), unlike the Belgians', is limited to the field of health, and, in some cases, of death. They do not offer special services, except in some companies, where as a result of collective bargaining they can ensure the payment of some supplementary benefits, for example in case of illness (100% of salary instead of 50% as usually required).

The system of municipal social action centers (*Centre d'action social communaux - CCAS*) is rather similar to the one of Belgium. It is managed by the local institutions and provides social assistance required (i.e. social benefits provided by law for persons living in poverty), optional social assistance (managed by municipality with a high degree of autonomy) and, more generally, all kind of social activities. Furthermore, inside municipal offices are located social workers too, who provide assistance and advise on pensions and other social benefits on behalf of the local administration. Eventually, a number of associations provide their members with assistance regarding social protection. As an example, FNATH (*Association des Accidés de la vie*), with its 200.000 members and local offices in 92 cities in France, assists its affiliates in the case of appeals on matters related to accidents at work and protection of people with disabilities.

Table 3: Map of individual protection in France

	LEGAL PROTECTION		GENERAL ASSISTANCE	
	Universal	Selective	Universal	Selective
Social protection	--	Trade union	Ccas Municipality Associations	Trade union Associations
Health and safety at work	--	Trade union	Associations	Trade union Associations
Social assistance	--	Trade union	Ccas Municipality	Trade union
Immigration	--	Trade union	Ccas Municipality	Trade union
Emigration	--	--	--	--

-- Not emerged from our survey

Germany¹⁸

Compared to the Italian, the German judicial system is simpler and procedures are often shorter. The person may initiate a judicial action by itself, upon an oral request, without the intervention of a lawyer before the Local Court (*Amtsgericht*), and also before the Employment Tribunals (*Arbeitsgericht*). Many disputes stemming from social or labour law are resolved by the judge in the early phase of investigation, i.e. without going to trial. Actions before a Labour Court do not requested pre-payment of court costs, attorneys' fee are not due also in case of defeat.

Nonetheless, the union offers its members a widespread service of individual social and legal protection, for what that concerns social security, health and safety at work and taxation. This service is organized on a sectorial basis too. It is free of charge for workers, provided the reasonable foundation of the case by the lawyers of the union and the good standing of the worker with the membership fee for at least 6 months. The trade unions in Germany do not pay social benefits to members, as it is the case in Belgium and Sweden for unemployment benefits, but in some cases they might pay a compensation to strike, with their own funds.

The eight unions affiliated to *Deutscher Gewerkschaftsbund* (Dgb), represent all together over 85% of unionized workers. They have settled a special service company the *Dgb Rechtsschutz GmbH*¹⁹ with 114 local offices and 700 lawyers and legal assistants, both experts in labour disputes (layoffs, interpretation of collective agreements, non-payment of wages, etcetera) and in other administrative proceedings related to the social protection of workers (pensions, sickness, accidents, etcetera). The *Dgb Rechtsschutz GmbH*, in collaboration with local trade unions, gives collective advice and legal support on collective issues to works councils (*Betriebsräten*) or employees' councils (*Personalräten*) or to sectorial federations of Dgb²⁰. A specific European legal office of Dgb, based in Kassel, follows in particular European law issues and causes before the European Court of Justice.

In 2008, *Dgb Rechtsschutz GmbH's* offices have treated almost 140.000 new prosecutions and obtained compensations for over 300 million Euros. Most of the complaints related to non-payment of wages. Recently they are recording an increase in litigations also on matters related to social security, particularly after the changes of the labour market and social safety nets' legislation introduced by the so-called "Hart IV" reform²¹. This reform has recently been declared unconstitutional, having led, among other things, to the increase in inequality between standard and flexible and precarious work relations.

A specific department for immigration heads all the services related to residence permit, free movement²² and anti-discrimination campaigns. The latter topic in particular has become in recent years a cornerstone both in trade union actions for industrial relations and within the migration policies of the federal government, after the implementation of European anti-discrimination directives. However, there is no specific organization for the protection of German workers abroad²³, with the exception of EURES advisers.

As the Dgb, even the other smaller trade union organizations offer similar form of protection to its affiliates. The service union Dbb, for example, has a legal department that assists its members in all matters concerning labour law and Civil Service statute [de Saintignon e al., 2004a]. It has also organized an academy open to non-members: the *Dbb Akademie*²⁴, which provides trainings on social, legal and professional issues, consulting services and other cultural and scientific projects.

The German unions also held training courses through their own institutions, for people looking for a job. These trainings are funded by the Federal Employment Agency (*Arbeitsagentur*) through a system of "education

¹⁸ We thank, for this paragraph, Pino Pappagallo, president of Inca Cgil in Germany (interview January 19, 2010).

¹⁹ www.dgbrechtsschutz.de

²⁰ An agreement dating back in 1986 between the national secretariats of Dgb and Cgil recognises the Patronato Inca Cgil in Germany as a service for individual protection of workers, with the same legal basis and constraints of other structures of the German trade union;

²¹ Andres, 2005; Bundesministerium für Arbeit und Soziales, 2009; Salvatori, 2005; Spattini, 2005

²² In Germany, the foreign worker is threatened with expulsion if he loses the requirements for health insurance or cannot provide proof of a minimum income.

²³ Accordingly, some categories have signed mutual reciprocity agreements, such as the construction sector of Dgb with its counterpart within the Italian confederation Cgil.

²⁴ www.dbbakademie.de

bonuses" (*Bildungsgutschein*). Even if the unions hold just a small part of the "education market", this gives them prestige and visibility [de Saintignon et al., 2004a].

In Germany, since 1917 there is, for inactive people, or for those who do not intend to join a union, a social organization called SoVD (*Sozialverband Deutschland*)²⁵, representing the social interest of its members (about 500.000 affiliated persons), especially retirees, patients and other persons entitled to health insurance, disabled or other dependents. It holds about 3.000 local offices which offer members advice on all social issues, such as mandatory health insurance, compulsory social security, long term care disability rights, etcetera.

The SoVD also intervenes in legal procedures related to labour law and offers its members a range of other insurance, financial and social benefits such as accident insurances, supplementary pensions, health insurances and nursing houses, savings and investment funds, social tourism, accommodation and vocational training for persons with disabilities.

Table 4: Map of individual protection in Germany

	LEGAL PROTECTION		GENERAL ASSISTANCE	
	Universal	Selective	Universal	Selective
Social protection	--	Trade union		Trade union SoVD
Health and safety at work	--	Trade union		Trade union SoVD
Social assistance	--	Trade union		Trade union SoVD
Immigration	--	Trade union		Trade union
Emigration	--	--	--	--

-- Not emerged from our survey

United Kingdom²⁶

The British social system is based on the historical custom of the Anglo-Saxon liberal culture of fundamental fairness and transparency between the government and the citizen. The underlying principle is that the State has to be for the individual actor and guarantor of protection of individual rights, instead of his counterparty. As for taxes, for example, the State administration authority (*Island Revenue*) delivers to each worker, through his/her employer, the P60 form. The form contains a summary of paid fees, the additional security payments, deductions and amounts that still have to be paid²⁷. In the field of social protection is the *Department for Work and Pensions'* duty to inform workers about their pension rights and even to consult them on legislative changes to come, as in the case of the increase in the age of retirement for women²⁸. Indeed, the function of the Ombudsman is highly

²⁵ www.sovd.de

²⁶ We thank, for this paragraph, Marisa Pompei, president of Inca Cgil in the United Kingdom.

²⁷ Example of P60 Form: [\[web\]](#)

²⁸ For example, by the time this paragraph is being written (February 2010), the *Department for Work and Pensions* has launched a public consultation called *Working age to pension age*: [\[web\]](#)

developed, the most important of which being the *Parliamentary and Health Service Ombudsman*. The *Parliamentary Commissioner for Administration (PCA)*²⁹ is the public body competent for investigating on complaints about the decisions of the departments, agencies and other public bodies of UK, including public health. Furthermore, there are for some issues specific services, such as the *Pensions Ombudsman*³⁰, who deals each year with about 3.000-4.000 complaints against public pension institutions [The Pensions Ombudsman, 2009].

This system reduces and prevents possible disputes between the State and the citizens. The individual protection service organized by the trade unions is thus rather directed towards the resolution of disputes with employers (accidents at work and occupational diseases, dismissals, absenteeism, sickness benefits, privacy and respect of human rights in the workplace, etcetera) rather than towards public administrations. The service is granted to affiliates and their family members, it is funded by membership fees, without any kind of State contribution, it is widespread on the territory both at regional level and into the company, according to the organization of the various federations. This service of individual protection also covers not strictly syndical matters such as assistance in case of accidents or drafting of the last will. The most important British trade union (*Unite*)³¹, for example, has a free legal advice service, accessible 24 hours a day, which covers matters related to family law, criminal law, consumer protection, property, etcetera. It also possible for trade union members to enjoy advantages on mortgages, holidays or insurances through services' organizations related to trade unions.

There are no specific services for what that concerns residence or work permits and regularization of foreign workers. Immigrants have access to trade union protection like any other British citizen. Even for workers abroad there is no specific form of protection, apart from EURES network.

The British trade unions do not pay social benefits to their members, as it happens for example in Belgium or Sweden with regards to unemployment benefits. Instead, there is a fund for workers in distress, where the individual affiliate can turn in case of special need. Through the *Union Learning Representatives*³² (ULr), the British trade union play an important role within companies, for the promotion of vocational training (needs analysis, guidance, counseling, consultation with employers, etc.).

Considering the rate of unionization in the United Kingdom (28%, OECD data 2007), we can affirm that the British system leaves without protection over 70% of workers, or 19 million people without considering the unemployed, pensioners, housewives, and other inactive.

For the rest of the population, the main body for individual protection is the *Citizen Advice Bureau*³³. Created in 1939 as a war emergency service³⁴, the *Citizen Advice Bureau* has become the largest British institute for care addressing the needs of the entire population, with a network of over 420 independent offices in England and Wales, and over 20 in Northern Ireland. It is a non-profit organization, funded by the State and voluntary donations, largely based on the British tradition of *charity association*. Its main objective is to inform and advice people in order to solve problems of economic, legal and social entity (debt, social security, home, work, family, consumption, restrictive judicial measures, immigration, etc.). It also lobbies the political bodies to "improve policies and practices that affect people's lives". It has a legal advice service, which is free of charge for persons with insufficient income. According to figures provided by the *Citizen Advice Bureau*, every year about two million people go to its offices, and the "solved case" are nearly 6 million. Besides these two big organizations (trade unions and *Citizen Advice Bureau*) there is a galaxy of private interest associations (for the elderly, consumers, etc.), which also offer various services in terms of individual protection to members. For the rest of the population, there are municipally based social services.

Table 5: Map of social protection in UK

²⁹ www.ombudsman.org.uk

³⁰ www.pensions-ombudsman.org.uk

³¹ www.unitetheunion.org

³² www.unionlearn.org.uk

³³ www.citizensadvice.org.uk

³⁴ Soon after the entry into the war, on the 3rd of September 1939, throughout England there were already more than 200 offices of the *Citizens Advice*.

	LEGAL PROTECTION		GENERAL ASSISTANCE	
	Universal	Selective	Universal	Selective
Social protection	--	Trade union	<i>Citizen Advice Bureau</i>	Trade union
Health and safety at work	--	Trade union	<i>Citizen Advice Bureau</i>	Trade union
Social assistance	--	Trade union	<i>Citizen Advice Bureau</i>	Trade union
Immigration	--		<i>Citizen Advice Bureau</i>	
Emigration	--	--	--	--

-- Not emerged from our survey

Sweden³⁵

The Swedish welfare model has long been the focus of studies and it is often used as a reference in international comparisons. Its system of ‘welfare for all’ represents one of the main reasons why Sweden is often at the top of various international rankings on living conditions. But *the Swedish model was not created overnight* [Tco, 2008]. It has risen slowly, from the labour struggles of the early 1900’s, through many years of social reforms, until today’s equal opportunities and family policies. Nowadays, the model combines flexibility for companies and social security and participation for workers. Clear rules for all and reduced uncertainty have made the Swedish economy competitive. The Swedish model is thus essentially based on four pillars: strong unions, flexible labour law, active labour market and family policies, welfare for all. A high tax burden and an efficient communication system stand on the background [Aa. Vv., 2003; Strobel, 2003; Lefebvre, 2003].

Each resident in Sweden receives every year its *orange envelope*³⁶ which contains a statement of his pension, including an estimate of the future income depending on the age of foreseen retirement (61, 65 or 70 years) and on the performance of the economy (growth between 0% and 2%). Sweden is also the country with the highest percentage of people with Internet access (alongside with Denmark and the Netherlands)³⁷ and a high number of practices with the public administration are carried out remotely. The orange envelope, for example, also contains useful information to access the pension fund’s website and to communicate directly with responsible departments. The figure of the *Ombudsman*, the mediator, is much typical in Sweden. Established from the Parliament in 1809, it had the responsibility of monitoring and verifying the legality of executive acts. Over time it became an institute which guarantees the constitutionality of individual rights. It receives complaints which have not been accepted in the first place by the services’ delivers. Today, the role of the Ombudsman, both as representative and spokesperson, is widespread within the State, associations and interest groups, including the same trade unions.

The individual protection has to be evaluated, therefore, in the context of an already efficient State, automatic performances and effective communication between institutions and citizens. Only rarely disputes between social protection institutes and private citizens emerge. When this happens, in most cases a simple protest or pressure by the trade union or other mediators can be sufficient.

Nevertheless, all the Swedish trade unions offer their members numerous individual legal and general protections’ services. This might explain the high affiliation rate [Lefebvre, 2003; de Saintignon et al., 2004e]. LO, the biggest

³⁵ We thank, for this paragraph, Oscar Ceconi, president and coordinator of Inca Cgil in Sweden (interview February 23, 2010) and Giovanna Iacobucci, Federation of Italian associations in Sweden (interview March 5, 2010).

³⁶ An example of the Swedish “orange envelope” can be found on the website of Inca Cgil Observatory for European social policies [web].

³⁷ In 2009, over 80% of the adult population has used Internet frequently, at least to send and receive e-mails compared to 35-40% in Italy (Eurostat).

confederation had created a legal service for affiliates back in 1971. In 1998, after LO-TCO association, a service company was created: the *Lo-Tco Rättsskydd BA*³⁸ owned by LO for the 90% and by TCO the remaining 10%. The worker or employee who affiliates to one of the two confederations is automatically entitled to rely on their legal advice for any work-related litigation (conflicts with employer, social security, health and safety at work, etcetera).

As in other countries, even in Sweden the service is structured on occupational basis, it is open to affiliates and it is financed through membership fees. It is free of charge for the assisted person, even in the case of failure. The first contact with the worker takes place either at company level through the union representative, or through the local office of the trade union. Alike any law firm, the *Lo-Tco Rättsskydd BA* invoices its services (based on an hourly rate) directly to the union. The trade union takes charge of all charges, having previously assessed the merits of the proceeding and the reasonable likelihood of success.

The total annual cost of the service is over 4 million Euros, while the compensation recovered are estimated to be around 25 million Euros. Almost 50 people are employed within this service, 40 of which being lawyers. Approximately two-thirds of the employees are working in the social security department (accidents at work and other social insurances). The rest of the employees are employed in the department of labour and criminal law. Each of the two sectors takes charge of about 1.000-2.000 cases per year: proceedings are mostly directed against employers and rarely against national social protection institutes. The *Lo-Tco Rättsskydd BA* also works as an internal legal office of LO and TCO or union federations relating thereto, in case of disputes stemming from collective bargaining. It also organizes training courses for union representatives.

As in Belgium, the Swedish trade unions manage unemployment benefits and other insurance services [Coulet, 2008; Jolivet et al. 2000; Jørgensen, 2003; Kjellberg, 2009]. In this case, however, they do not work as a simple office for payments, but they manage also voluntary insurance funds proportional to incomes (*inkomstbortfallsförsäkring*) through 37 autonomous funds funded by the State. The latter eventually manages and fully funds the basic benefits (*grundförsäkring*). Unions' affiliation involves an automatic subscription to the competent insurance fund for unemployment benefits. Adhesion to the insurance scheme is nevertheless open to non-affiliated workers. The result of this practice is that 90% of workers are subscribers of an insurance fund. Furthermore, through collective bargaining, Swedish social partners have created collective or category-based insurances, which usually adheres the majority of workers, and which are complementary to those run by the State. The main actor in this panorama is the insurance company Afa, composed by three companies belonging to trade unions and employers covering illnesses, accidents at work and life insurances [de Saintignon et al., 2004e]. Some unions also offer private complementary insurance against unemployment. Finally, the Swedish unions pay compensations to their members during work stoppages initiated by the union themselves, based on available funds and according to the purpose and duration of strike. In return, employers' organizations are generally insured against losses due to labour unrest.

Unlike other countries previously analyzed, almost all workers in Sweden are unionized (70.8% according to OECD data in 2007) and the services for individual protection offered by trade unions are numerous and quite efficient. Nevertheless, there is still room for other social actors, publicly or privately organized. First, local administrations offer a wide range of services, present over the entire territory, such as communal offices for the rights of consumers. The district councils of large cities are responsible for some services such as the reception of refugees, recreational programs for children and young people, pre-school services, income support for consumers, and various consulting services. The municipal social offices may also intervene in finding amicable solutions in case of inefficiency of public administration. In extreme cases, their legal departments can intervene with legal support. The State, in addition, delegates to municipalities and counties (*Länsstyrelse*) the organization of provisions related to hospitality to foreigners, such as language courses and introduction to Swedish society and labour market free for all, plus an allowance of participation in favour of third country nationals.

The associations of pensioners are also very strong, the most important of which being the *Pro (Pensionärernas Riksorganisation)*³⁹, with over 400.000 members in 27 regional districts. Every beneficiary of Swedish old-age pensions, invalidity (former early-retirement) pensions, or pensions for dependents and survivors, can adhere to the association, here included the spouse or partner of a *Pro* member. *Pro* centers offer their members services for leisure, such as meetings, training courses and travels, reading groups, musical activities and sports. Besides being a meeting point, the *Pro* acts as an interest group in numerous political arenas, as a service for assistance for fiscal

³⁸ www.fackjuridik.com

³⁹ www.pro.se

matters, social and health insurance and pension. All members are informed through the magazine *Pro-pensionären*, also available in audio version for those with reading difficulties. Members are entitled to free IT assistance and receive discounts for public university entrance fees.

Table 6: Map of individual protection in Sweden

	LEGAL PROTECTION		GENERAL ASSISTANCE	
	Universal	Selective	Universal	Selective
Social protection	--	Trade union		Trade union Associations
Health and safety at work	--	Trade union		Trade union
Social assistance	--	Trade union	Municipal social office	Trade union Associations
Immigration	--		District councils Municipalities Counties	Associations
Emigration	--	--	--	--

-- Not emerged from our survey

Another key to understanding: from individual protection to “missions of general interest”

As in other areas, also in the trade union movement, the path to build the European social model has produced a sort of “common sharing” between different countries and national social partners, but not necessarily “similarities” [European Commission, 2009]. The variety in unionization rates in Europe is a first rough reflex of this process (Figures 1 and 2).

Figure 1: Trade unions' membership rate in some European countries in 1999 and 2007

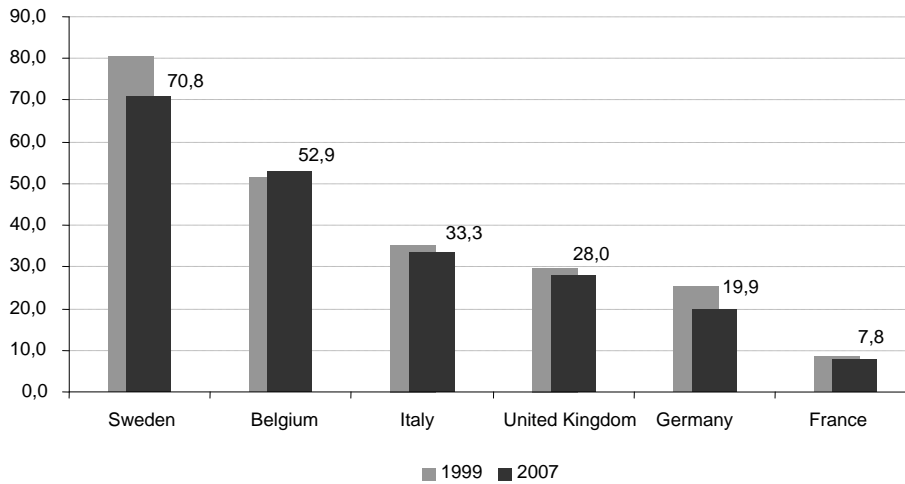
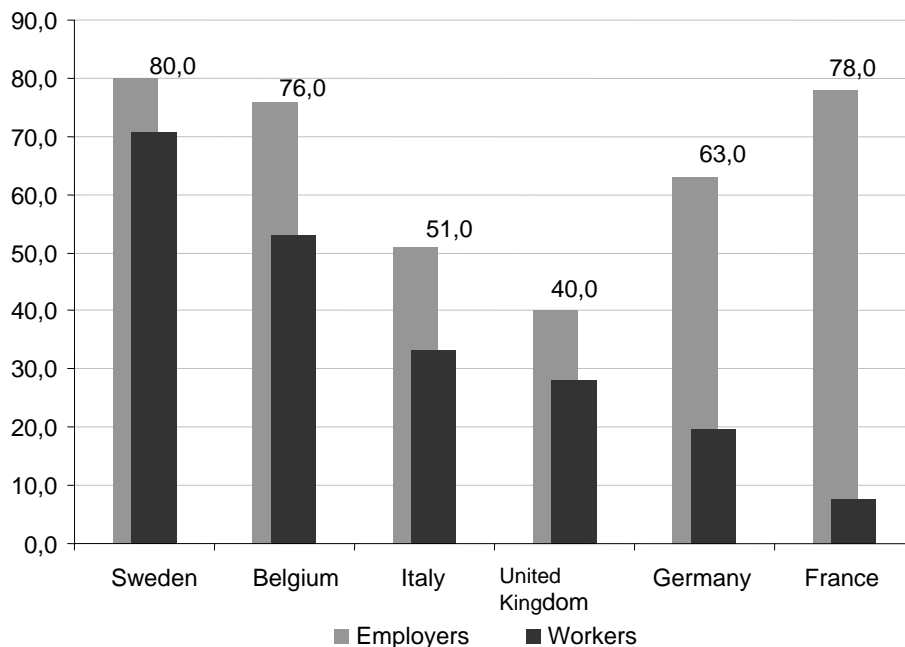


Figure 2: Workers and employers organisations' membership rate



Source: Our elaboration on Ocse (<http://stats.oecd.org/index.aspx>) and Eiro (www.eurofound.europa.eu/eiro) data

In Sweden, although down from highs of the nineties, the unionization rate remains the highest among OECD countries: 70% of the population. About 2,800,000 over a total number of 4 million employees were enrolled in a union (and more than half are women). We must add to these figures 700,000 registered unemployed and pensioners, the latter organized in categories. In Belgium too, the unionization rate is high, and among the most stable of the OECD area: 51.6% of the workforce in 1999, 52.9% in 2007, with peaks of approximately 95% among the blue collars, 59% in the public sector and 44% among private sector employees. There are approximately 3.7 million employed persons; members of the unions are more than three million, of which about one third unemployed (and to a lesser extent, retirees). In the United Kingdom the number of workers who belong to a union has sharply declined in recent decades, especially due to the political choices of the Conservative governments of 1979-1997 periods, certainly not favorable

towards unions⁴⁰: from more than 13 million in 1979, it declined to about 7 million in 1997. With a compliance rate of 28%, British unions represent today approximately 7 million active workers. The rate of unionization in Germany is among the lowest in Europe (approximately 20% of the population), and it has been declining compared to the unionisation's rate of early nineties, when the crisis had not yet hit the traditional stronghold sectors of the unions: manufacturing and public employment. The reunification had allowed German unions to recruit in a very short period of time almost 3 million new affiliates from Eastern Germany. Nevertheless, this rapid effect has not lasted long, and in the early years of 2000 decade the number of affiliates had already dropped to figures close to the ones prior to the reunification. However, given its population and the overall number of employed persons (more than 33 million), the German trade unions can rely on more than 7 million affiliated workers, plus 2 million of pensioners and unemployed. Together with the British unions, it remains one of the strongest and most influential trade unions in Europe. The percentage of workers affiliated to the union is on the other side particularly weak in France: about 8%. This is the lowest rate among all industrialized countries, also lower than that of the United States, Korea and Turkey. The low rate of unionization does not reflect in the absence of union representation, which, on the contrary, is high especially in the public sector and within large firms. Amid so many diversities, it is striking to note how the rate of affiliation to employers' organisations is very high everywhere in Europe, always higher than that of trade unions (Figure 2).

The "selective" connotation of services offered by the unions previously shown sheds light on another aspect of the existent dualism between *insiders* and *outsiders* [Gallie, 2007]. The polarization is not only related to labour market dynamics but also to individual protection. Tipping the data on unions' membership the other way, we may find out that in Belgium, a country with the highest unionisation rate in the world, nearly the 50% of workers is not union member, in France, the 92% of workers is left out from trade union protection, and in Germany, about 27 million out of 33 million workers do not enjoy unions' action for individual protection. The British system leaves without unions' protection over 70% of workers, which means almost 19 million people. In these countries, the *insiders*, workers who can benefit from individual protection, would be the standard workers, especially those working in large manufacturing companies, in civil service and in school and education sectors, those who can get into contact with unions' delegates inside the company, on the workplace, or through the category's organisation, rather than through offices set on the territory. On the other side, the inactive (housewives, unable to work, young people seeking their first job, etcetera) can be considered as the *outsiders* of individual protection, together with workers in call centers or small private companies, and those with fixed-term contracts, agency and temporary workers, irregular or part-time.

It is indeed to be said that the countries analysed in the early stage of research have a strong legal social framework, a historically established rule of law and more efficient welfare safety nets and communication systems than Italy. In Belgium, the social protection system has been lasting for 160 years. Germany has been the first country to set up compulsory social security insurances. In France and Sweden the system of *advanced information* prevents and reduces areas of conflict between workers and pension funds. In the United Kingdom, the underlying principle is that the State must be for the individual actor and guarantor of individual protection, rather than the counterparty. Compared to Italy, all these countries taken into consideration where establishing a solid system of social protection when Italy was facing poverty and large scale emigration.

In this sense a second interpretation might be given. It goes through the recognition of the diverse and unique "ways" that each national trade union was able to experiment or build in its welfare system of reference. In Belgium, for example, there is a high understanding of the notion of "trade union of services of assistance", which is matched by a high rate of unionisation throughout all the categories. This can be explained largely with reference to the direct involvement of trade unions in the management of unemployment benefits, through the so-called "Ghent system" [de Saintignon et al., 2004b]. In Germany, it seems that services offered by the unions are a way to stem the decline in unionisation rate [de Saintignon et al., 2004a]. The solution adopted by the British trade unions facing the same sort of problem has been centered on mergers. In France, where the unionisation rate is among the lowest in the world, the trade unions' action for individual protection move in a particular context, where the extra-judicial conciliation procedures are well developed and involve already directly the social partners [Amossé, 2004]. In Sweden, the rate of unionisation of workers is among the highest in the world, and their system of assistance is very well developed [de Saintignon et al., 2004]. This may be correlated to the direct participation of trade unions in the management and supply of some welfare provisions or to a general system of "welfare for all" based on the historical social pact among workers, employers and the State.

⁴⁰ For example, the Act of 1984 (Trade Union Act), has forced the unions to elect their Secretary General through a postal vote opened to all members, or the Act of 1993, which introduced stricter rules for the fiscal deduction of union membership fees [de Saintignon et al., 2004d].

A third interpretative hypothesis emerges when we take off the Italian case as a rigid element of comparison with other countries. Whilst the *Patronato* is none but a typical Italian institute, in all the countries taken into consideration in the cross-country analysis the unions are engaged in some sort of “missions of general interest”, recognized, delegated and funded by the State [de Saintignon et al., 2005], and this function is often carried out through institutes with own legal entity, separate from that of the trade union as such:

- In Italy, general assistance and individual legal protection in the field of social security carried out by *Patronato*' institutes;
- In Belgium, the payment of unemployment benefits;
- In France, the participation to the management of labour justice, through the *Conseils de prud'hommes*;
- In Germany, the training of persons seeking employment;
- In the United Kingdom, the promotion of vocational training, through the *Union Learning Representatives* (Ulr);
- In Sweden, the management of insurance funds for unemployment.

In conclusion, the notion of general individual protection seems to have no correspondence in the history and culture of other countries but in Italy. This reflects the specificity of a particular and singular experience. Whilst trade unions elsewhere have interpreted in other ways their mission of general interest, Italy has conceived its form of free, general and legal protection through the establishment of the *Patronato*, consistent but distinct from *collective protection*, which is due by the mother organisations: trade unions as such.

DRAFT

Web sources

Citizen Advice Bureau (counseling service for UK citizens)
www.citizensadvice.org.uk

Dgb Rechtsschutz GmbH (service society stemming from German Dgb)
www.dgbrechtsschutz.de

Euro (*European Industrial Relations Observatory*)
www.eurofound.europa.eu/euro

Landsorganisationen i Sverige (Swedish trade union confederation)
www.lo.se

Ocse (*statistics*)
<http://stats.oecd.org/index.aspx>

Osservatorio Inca Cgil per le politiche sociali in Europa
www.osservatorioinca.org

Pensionärernas Riksorganisation (Swedish association of pensioners)
www.pro.se

Sozialverband Deutschland (SoVD)
www.sovd.de

Unite The Union (Portal of the British union Unite)
www.unitetheunion.org

Worker participation in Europe (Etui' portal on workers' participation)
www.worker-participation.eu

Bibliography

Aa. Vv., 2003, "L'État providence nordique. Ajustements, transformations au cours des années quatre-vingt-dix", *Revue française des affaires sociales*, n° 4, octobre-décembre 2003

Aa. Vv., 2005, *Trade Unions of the world*. 6TH ed., John Harper Publishing, London.

Amossé Th., 2004, "Mythes et réalités de la syndicalisation en France", in *Premières Synthèses, Dares*, n° 44/2

Andres G., 2005, "Relazione introduttiva", in *Politica occupazionale attiva e riforme Hartz. Flessibilità, innovazione e qualità*, Atti del Convegno, Roma, 31 gennaio

Botella L., 1999, *Les syndicalismes en Europe*, Le Petit Pavé – Technologia, Brissac.

Bundesministerium für Arbeit und Soziales, 2009, *Sicurezza sociale in sintesi*, Referat Information, Bonn

Caldarini C., 2006, "Dal patto sociale al contratto di solidarietà tra le generazioni. Origini e funzionamento del sistema di protezione sociale in Belgio", in *Rivista Italiana di Politiche Pubbliche*, n° 3, pp. 133-163

Clasen J., "Distribution of responsibility for social security and labour market policy. Country report: United Kingdom", *AIAS Working Papers 07/50*, University of Amsterdam, Amsterdam

- Coulet C., 2008, "Suède. Une chute rapide du taux de syndicalisation induite par la réforme de l'assurance chômage", *Chronique internationale de l'IRES*, n° 112
www.ires-fr.org/IMG/File/C112-6.pdf
- Crisp, 2007, *Les organisations syndicales et patronales*, Centre de recherche et d'information socio-politiques, Bruxelles
- de Deken J., 2007, "Distribution of responsibility for social security and labour market policy. Country report: Belgium", *AIAS Working Paper*, n° 53, University of Amsterdam, Amsterdam
- de Saintignon P., Guedj J., Osterrieder H., Saintoyant V., 2005, *Etude d'administration comparée sur le financement des syndicats (Allemagne, Belgique, Grande Bretagne, Italie, Suède)*, IGAS, Paris
- de Saintignon P., Guedj J., Osterrieder H., Saintoyant V., 2004a, *Le financement des syndicats : étude d'administration comparée. Le cas de l'Allemagne*, IGAS, Paris
- de Saintignon P., Guedj J., Osterrieder H., Saintoyant V., 2004b, *Le financement des syndicats : étude d'administration comparée. Le cas de la Belgique*, IGAS, Paris
- de Saintignon P., Guedj J., Osterrieder H., Saintoyant V., 2004c, *Le financement des syndicats : étude d'administration comparée. Le cas de l'Italie*, IGAS, Paris
- de Saintignon P., Guedj J., Osterrieder H., Saintoyant V., 2004d, *Le financement des syndicats : étude d'administration comparée. Le cas du Royaume-Uni*, IGAS, Paris
- de Saintignon P., Guedj J., Osterrieder H., Saintoyant V., 2004e, *Le financement des syndicats : étude d'administration comparée. Le cas de la Suède*, IGAS, Paris
- European Commission, 2009, *Industrial Relations in Europe 2008*, Luxembourg, Office for Official Publications of the European Communities
- Faniel J., 2004, "Chômeurs en Belgique et en France : des mobilisations différentes", in *Revue Internationale de Politique Comparée*, Vol. 11, n° 4
- Faniel J., 2007, "Belgique. Le système d'assurance-chômage : un particularisme en sursis?", in *Chronique internationale de l'IRES*, n° 108
- Gallie D., 2007, "Production regimes, employment regimes, and the quality of work", in Gallie D. (ed.), *Employment regimes and the quality of work*, Oxford University Press, Oxford
- Ilo, 2004, *Economic Security for a Better World Programme on Socio-economic Security*, Geneva
- Inca, 2008, *Bilancio sociale*
- Jolivet A., 2000, "Suedé. Un syndicalisme fort, confronté à des évolutions déstabilisantes", *Chronique internationale de l'IRES*, n° 66
- Jørgensen H., 2003, "Le rôle des syndicats dans les réformes sociales en Scandinavie dans les années quatre-vingt-dix", in *Revue française des affaires sociales*, n° 4
- Kjellberg A., 2009, "The Swedish Ghent system and trade unions under pressure", in *Transfer*, n° 3-4, pp. 481-504
- Lefebvre A., 2003, *Le Droit social en Suède*, Liaisons sociales Europe, Paris
- Paci M., 2004, "Le ragioni per un nuovo assetto del Welfare in Europa", in *La Rivista delle politiche sociali*, n° 1
- Pochet P., Reman P., 2006, "La sécurité sociale en Belgique. Entre régionalisation et européanisation", in *Lien*

social et politiques, n. 56

Salvatori F., 2005, "Le politiche occupazionali in Germania. La Riforma Hartz", Associazione per gli studi internazionali e comparati sul diritto del lavoro e sulle relazioni industriali, Working paper n° 10 Ter

Spattini S., 2005, "Una valutazione delle riforme Hartz dal punto di vista italiano e europeo", in *Politica occupazionale attiva e riforme Hartz. Flessibilità, innovazione e qualità*, Atti del Convegno, Roma, 31 gennaio

Strobel P., 2003, "Le modèle nordique de protection sociale sous le choc des réformes", *Revue française des affaires sociales*, n. 4

Tco, 2008, *Il modello svedese*, Tco Papers, Stockholm

The Pensions Ombudsman and Pension Protection Fund Ombudsman, 2009, *Annual Report & Accounts 2008/09*, Tso, Belfast

Titmuss R., 2000, "Universalism versus selection", in Pierson C., Castles F.G. (Eds.), *The welfare state reader*, Polity Press, Cambridge, pp. 42- 50

Vandaele K., 2009, "The Ghent system, temporary unemployment and the Belgian trade unions since the economic downturn", in *European Review of Labour and Research*, vol. 15

DRAFT