Trade union strategies for developing competence at work: Experience from eight European countries.

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Summary
This paper reports on research into trade union approaches to competence development in four of the ‘old’ EU member states (France, Germany, Sweden and the UK), three of the ‘new’ member states (Latvia, Malta and Slovenia) and one of the ‘candidate’ countries (Turkey). The countries chosen for study capture the diversity of European experience to facilitate an analysis of the extent to which trade union strategies for promoting competence development at work are influenced by national conceptions of competence, systems of vocational training and models of social dialogue. The work confirms that diversity in these three domains presents challenges both for developing coherent policies at EU level and for implementing consistent trade union actions locally. While such conceptual and institutional differences may limit the scope for transfer of good practice, EU initiatives like the European Credit Transfer System for VET, the European Qualifications Framework and the social partners’ Framework of Actions are promoting a degree of convergence, and simultaneously offering opportunities for innovation based on diversity.

INTRODUCTION
The Lisbon European Council in March 2000 (EC, 2000a) marked the origins of a new European policy framework for vocational education and training (VET) and lifelong learning, linking these with the European Employment Strategy, establishing targets and benchmarks against which progress can be assessed and implementing measures to facilitate transnational cooperation. In establishing the objective for the next decade of making Europe ‘the most competitive and knowledge-based economy in the world capable of sustainable growth and better jobs and greater social cohesion’, the Lisbon summit also called for ‘reflection on concrete future objectives of education systems focusing on common concerns and priorities while respecting national diversity’.

The Barcelona summit (March 2002) set the further objective of making European education and training systems a world quality reference by 2010 (EC, 2002a; 2002b) stimulating efforts to promote greater transnational cooperation and mobility in education and training. The European Credit Transfer System (ECTS) in higher education (HE), introduced in 1989, demonstrated the value of a system of credit transfer for enhancing transferability and mobility among students in HE and had been given further impetus by the Bologna Declaration of 19 June 1999 under which the Ministers responsible for HE committed to establish a European-wide system of credit accumulation and transfer (EC, 2003a). Similarly, the Directors-general for VET had agreed at their autumn 2001 Bruges meeting to increase cooperation in VET and at the subsequent meeting in Santiago de Compostela in April 2002, agreed that increased cooperation in VET should be on a voluntary and ‘bottom-up’ basis, actively involving the social partners, EEA countries and the candidate countries.

The priorities defined in Bruges were given further impetus by the Copenhagen Declaration (2002), involving in addition to Member States, the EEA countries, candidate countries and the social partners, which established the objective of developing transparency, transferability and recognition of competences and qualifications throughout Europe including a credit transfer system for vocational education and training (Winterton, 2005). The Technical Working Group on credit transfer in VET was established in November 2002 to address this priority, investigating options for a system of credit transfer in VET at European level (ECVET) and common reference levels for competences and qualifications. The Berlin Communiqué (2003) introduced the idea of seeking comparability of learning
outcomes in HE, rather than simply notional workload, which provided a means of integrating VET with HE and thereby facilitated the parallel development of the European Qualifications Framework (EQF) (EC, 2004b; Winterton, 2006a).

In the run-up to the Laeken summit (December 2001), the social partners issued a joint statement calling for a new independent approach to social dialogue based on voluntary agreements and a joint work programme, to which the Commission responded with a communication recommending such an autonomous bipartite approach (EC, 2002c). The high level group on industrial relations and change in the EU, established by the DG for Employment and Social Affairs, considered lifelong learning and competence building as the key challenges facing the EU. Noting that new occupations replace older ones much faster ‘in a post-industrial society’, the high level group argued that employees therefore must be ‘equipped with the necessary new skills and competencies if they want to reap the benefits of new economic and business models’ and that enhancing opportunities for learning and competence building demands a shared ‘investment between companies, workers and public authorities according to each specific situation’ (EC, 1997; 2002d: 18).

Since the Laeken Declaration EU level social dialogue has been increasingly bipartite and independent from the Commission, dealing with areas defined in the agreed work programme and frameworks of actions followed up with reporting and monitoring mechanisms analogous to the Open Method of Coordination used with member states and the European Employment Strategy. It was under such arrangements that the social partners agreed a Framework of Actions for the Lifelong Development of Competencies and Qualifications on 28 February 2002, which was presented to the European Council in March 2002 (Stringfellow and Winterton, 2005). While sector bargaining has sometimes led to interprofessional framework agreements (as with teleworking in 2002), Goetschy (2005: 418) notes that the reverse has also occurred, citing this Framework of Actions as having influenced several sectoral dialogue committees. In this Framework of Actions, which was explicitly viewed by CEDEFOP as a step towards more autonomous social dialogue in this area (CEDEFOP, 2004), the social partners listed four priorities:

♦ identification and anticipation of competences and qualifications needs;
♦ recognition and validation of competences and qualifications;
♦ information, support and guidance;
♦ resources (ETUC, UNICE/UEAPME and CEEP, 2002).

Against this background of the Framework of Actions, a project was launched by CREER (Centre de Recherche Européen sur l’Emploi et les Ressources Humaines) at Toulouse Business School in January 2006 with the financial support of the trade union SALTSA Programme of the Swedish National Institute for Working Life (Arbetslivsinstitutet) to explore the extent to which the trade unions are engaging effectively with the challenges of competence development.

Part of the need for this study was the relative paucity of comparative studies of trade union involvement in building competence at work, since the early work of the Social Dialogue Support System on Continuing Vocational Training and the subsequent analyses by Heidemann, Kruse, Paul-Kohlhoff and Zeuner (1994). The EC (2002c) and its agencies (Aga, 1998; Halvorsen, 1998) have advocated an enhanced role for the social partners in competence development, although the capacity of the trade unions to take up this opportunity in practice has been questioned (Winterton, 2004). It is vitally important that the trade unions have an informed and comparative analysis of alternative approaches to building

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1 The closure of the Arbetslivsinstitutet was announced in 2006 by the newly elected Swedish Government but the team continued to undertake the work contracted and will publish full results at the end of 2007.
competence at work in order to be better prepared for full and effective engagement in initiatives to achieve the Lisbon objectives.

The research project was designed to meet the needs of the social partners in recognition that in addition to contextual issues that make the study particularly timely, the development of competence and VET are currently in the ascendant on the social partners’ agenda. Because this domain is generally considered potentially consensual, progress in this area can demonstrate the value of social dialogue and reassure reluctant social partners. Moreover, social partner involvement is widely acknowledged to be crucial in developing VET solutions and competence frameworks since the social partners have the specialist experience of the real world of work. While employer involvement has been taken for granted in this respect, it has recently been recognised that the trade unions can add value. The study set out to produce a comprehensive comparative analysis of trade union activity in developing competence at work with a practical objective of making such activity more effective.

The research design, in particular the choice of countries to be studied, was driven by the need to capture the diversity in competence models, VET systems and different traditions of social dialogue. The research explored trade union approaches to competence development in four ‘old’ EU member states (UK, Germany, Sweden and France), three ‘new’ member states (Latvia, Malta and Slovenia) and one of the ‘candidate’ countries (Turkey). The four countries from the ‘EU15’ were paired with the four new and future member states according to their institutional traditions and perceived influences on their approaches to competence development. Thus the UK was paired with Malta; Germany with Slovenia; Sweden with Latvia and France with Turkey.

The CREER team coordinated the project, designing the research protocol and framework of analysis, undertaking the research in France and (jointly) in Turkey, and undertaking the comparative analysis, identifying issues for transfer of good practice and areas for capacity building in the trade unions. In seven countries the research was undertaken by acknowledged national experts2, most of whom had worked with CREER on previous projects relating to social dialogue over the European Employment Strategy.

Three principal research methods were employed in the country studies:

♦ An extensive review of the literature, academic and practitioner, Internet sources, existing surveys and analyses at EU and country levels, and projects under the Leonardo da Vinci Programme dealing with trade union approaches to competence development;

♦ Interviews with the central social partner organisations to establish the forms (degree of formalisation, extent of detail discussed, whether negotiation or consultation etc) and levels (national, sectoral, regional, corporate and workplace) of social dialogue over competence development and vocational training;

♦ Short case studies to illustrate both what is typical and leading edge in each country and to demonstrate what constitutes good practice in the particular country context.

This paper reports on interim findings of the SALTSA study, analysing how far trade union strategies for promoting competence development at work are influenced by national models of competence, systems of vocational training and approaches to social dialogue. Each of these dimensions is explored in turn below before attempting to explain the different effects of these factors and offering conclusions in relation to perceived good practice and priorities for union capacity building in this area.

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2 We acknowledge the role of the collaborators in this project: Tony Huzzard in Sweden; M. Kemal Öke in Turkey; Mark Stuart in the UK; Vera Trappmann in Germany; Martina Trbanc in Slovenia; Charles Woolfson in Latvia; Edward Zammit in Malta; Emma Stringfellow from the CREER team; and Lars Magnusson and Torbjörn Strandberg from the SALTSA Programme. Their contribution has been vital but we alone are responsible for any deficiencies in this interim analysis.
COMPETENCE MODELS
Despite the widespread and fashionable use of ‘competence’ in policy documentation, definitions are rare and often vague, with no universally accepted understanding of the concept, which has come to replace skill (equally ill-defined) as a generic term. Research for CEDEFOP (Centre Européen de Développement de Formation Professionnelle) to develop a typology of ‘knowledge, skills and competence’ (the horizontal dimension for ECVET) traced the origins of the competence movement and different conceptual approaches across Europe (Winterton, Delamare Le Deist and Stringfellow, 2006). First used in the USA by White (1959) and subsequently developed there by McClelland (1973), competence initially referred to the psycho-social attributes or personality factors associated with superior performance. This is still the dominant approach in the USA and the HayMcBer consulting enterprise has exported it to Europe, but European competence models have quite distinct origins. The UK was the first to move to a competence-based VET system and within two decades most of Europe had followed suit, with France and Germany developing parallel and more comprehensive competence-based systems. Most other European countries have broadly followed the UK, French or German models (Delamare Le Deist and Winterton, 2005).

The UK adopted a competence-based approach in the 1980s when the VET system was overhauled to make it more responsive to the needs of employers (Hyman, 1992; Rainbird, 1990; Senker, 1992). The reform was centred on the adoption of a unified national framework of competence-based qualifications (National Vocational Qualifications, NVQs, in England and Wales, Scottish Vocational Qualifications, SVQs, in Scotland, henceforth VQs). These VQs were based on occupational standards of competence, grounded in functional analysis of occupations in a variety of contexts (Mansfield and Mitchell, 1996). Occupational standards identify key roles, broken down into units of competence and further sub-divided into elements of competence. For each element of competence, performance criteria are defined which form the basis of assessment, with range indicators provided for guidance, to aid in assessing individuals through their actual performance in the workplace. The emphasis was on functional competence: the ability to demonstrate job performance to the standards required of employment in a work context, and the Employment Department defined occupational standards as ‘a description of something which a person who works in a given occupational area should be able to do ... [and] able to demonstrate’ (ED and NCVQ, 1991). A government review of vocational qualifications in 1996 (Beaumont, 1996) subsequently expanded the definition of competence as ‘The ability to apply knowledge, understanding and skills in performing to the standards required in employment. This includes solving problems and meeting changing demand.’ While the main approach in the UK remains one of functional competence, hybrid systems became evident at the end of the 1990s and diverse competence models have been introduced in relation to competence-based pay systems (Reilly, 2003).

The competence movement started later in France (Klarsfeld and Oiry, 2003) and became particularly influential from 1993 when the Agence Nationale Pour l’Emploi (National Employment Agency), which had introduced the catalogue of occupations, ROME (Répertoire Opérationnel des Métiers et des Emplois) towards the end of the 1980s, modified this to a competence-based system. In the 1990s, the state introduced a right for individuals to have a bilan de compétences (assessment of competences) undertaken by educational organisations to provide a basis for personal development (Joras, 2002; Vind, Delamare Le Deist, Heidemann and Winterton, 2004). Competence featured increasingly in HRM practice from the mid 1990s, with Gestion Prévisionnelle des Emplois et des Compétences (GPEC) accompanying organizational transformation in which human resources became considered as invisible assets producing competitive advantage (Raoult, 1991). Several key texts
appeared during this period (Le Boterf, 1994; Levy-Leboyer, 1996; Merle, 1996; Minet, Parlier and de Witte, 1994) when a more structured approach to competence was also developed in several enterprises, notably by Sollac in Dunkerque, Propharm and Crédit Mutuel de Bretagne, and later at Renault (Haddadj and Besson, 2000). With this approach, it is argued that HRM began using individual evaluation to replace the logic of qualification with competence (J. P. Durand, 2000; Pochet, 1999). From the management of competence through GPEC evolved Emplois types en dynamique (ETED) as a method that explicitly recognizes the rapidity of changes in competence requirements (Mandon, 1990; 1998; Mandon and Liaroutzos, 1994). Competence featured increasingly in HRM from the mid 1990s, both in research and practice and has been associated with several different normative models and diverse practices (Minet, 1994; Parlier, 1994). Competence also became more focused on HRD (Dousset, 1990) and the instruments for developing and measuring competences began to appear (Deitrich, 2003; Klarsfeld and Roques, 2003; Paraponaris, 2003; Trépo and Ferrary, 1997; 1998). Competence-based pay was also introduced in some heavy industries (Brochier and Oiry, 2003; Klarsfeld and Saint-Onge, 2000).

In 2002, the employers’ association MEDEF (Mouvement des Entreprises de France) launched its initiative Objectif compétences with the support of the European Commission, providing extensive practical information on the use of competence within enterprises. This was accompanied by a further flurry of academic publications (Brochier, 2002; Dupray, Guitton and Monchatre, 2003; Gangloff, 2000; Klarsfeld and Oiry, 2003; Lepron, 2001: Quelin and Arrègle, 2000; Zarifian, 2000), and a more critical-analytical approach from several observers (Arnaud and Lauriol, 2002; Estellat, 2003; Louart, 2003; Martin, 2003; Parlier, Perrien and Thierry, 2000). At the conceptual level, the French competence model makes an analytical distinction between savoir (compétences théoriques, i.e. knowledge), savoir-faire (compétences pratiques, i.e. functional competences) and savoir être (compétences sociales et comportementales, i.e. behavioural competences). In practice, this triptyque is largely confined to HRD (Ca zal and Deitrich, 2003), although it has occasionally appeared in the vocabulary of those concerned with strategy (T. Durand 2000).

In the German dual system competence (Kompetenz) was always implicit but curricula defined learning inputs rather than outcomes and occupational competence is rooted in the concept of Beruf Qualifikation, the mastery of all the tasks specific to an occupation. Within this tradition, modularisation and generic competences are regarded with suspicion since these threaten the integrity of Beruf (usually translated as occupation but literally ‘calling’, and embodying the notion of occupational culture). Generic ‘key qualifications’ (Schlüsselqualifikationen) defined in the 1980s included personal competences, such as ‘ability to act autonomously and to solve problems independently’, ‘flexibility’, ‘ability to cooperate’, ‘practical ethics and moral maturity’. In German, Qualifikation signifies the ability to master concrete professional situation requirements, whereas Kompetenz refers to the capacity of a person to act and is more holistic (Anold, Nolda and Nuissl, 2001). In 1996 the German education system adopted an ‘action competence’ approach, moving from subject (inputs) to competence (outcomes) and specifying curricula in terms of learning fields (Lernfelder) rather than occupational knowledge and skills (Straka, 2005). All new vocational training curricula are now described in terms of vocational action competence (Handlungskompetenz), specifying domain competence (Fachkompetenz), personal competence (Personalkompetenz) and social competence (Sozialekompetenz). Domain competence refers to the ability to apply subject-specific knowledge and skills to undertake tasks, solve problems and judge results. General cognitive competence (Sachkompetenz), the ability to think and act in an insightful and problem-solving way, is a pre-requisite for developing Fachkompetenz. Personal competence includes understanding of professional and ethical values, the needs of family, job and public life, and the ability to develop skills and...
life plans. Social competence describes the willingness and ability to experience and shape relationships, to identify and understand benefits and tensions, and to interact with others in a rational and conscientious way, including the development of social responsibility and solidarity. A balance of subject, personal and social competence is the prerequisite for ‘work process knowledge and learning competence’ (Methodenkompetenz and Lernkompetenz). There are currently 350 occupational profiles in Germany defined to a common format elaborating the competences required in terms of the above.

Sweden has largely adopted the functional approach but alternative interpretative approaches that counter the mechanistic ‘commodification’ of workers’ skills have also been prominent (Ellström, 1997; Sandberg, 1994; 2000). Competence-based approaches have been criticized for neglecting socio-cultural contexts, and are accused of creating abstract, narrow and over-simplified descriptions of competence that fail adequately to reflect the complexity of work performance in different organizational cultures and workplace contexts (Attewell, 1990; Norris, 1991). Competences are centred on the individual, but constructivist and interpretative approaches derived from phenomenology view competence as a function of the context in which it is applied (Dreyfus and Dreyfus, 1986). Interpretive approaches offer the advantage of acknowledging workers’ tacit knowledge and skills (Polanyi, 1967), which are overlooked if competence is treated as context-free. Work practice seldom accords with formal job descriptions and tacit competences, even of so-called ‘unskilled workers’ (Kusterer, 1978), can have a determining impact on the success of an enterprise (Flanagan, McGinn and Thornhill, 1993).

VET SYSTEMS
National VET systems exhibit substantial diversity reflecting socio-economic, political and cultural traditions. Different typologies of systems of skill formation proposed to distinguish the different families of VET systems (Ashton, Sung and Turbin, 2000; Rainbird, 1993) variously distinguish the ‘schooling model’ where VET provision is part of the education system (whether integrated within general education or delivered through separate VET institutions), the consensual ‘dual model’ where the emphasis is on apprenticeship, and voluntarist market-led models, where employers assume responsibility for training. With some simplification, two key dimensions of VET systems allow an adequate typology: the focus (as distinct locus, although these may be the same) of skill formation (workplace or school) and the regulation of the VET system (state or market). Within Europe, four countries illustrate the differences (Winterton, 1998). In terms of its focus, VET is mostly industry-led and centred on the workplace in the UK and Germany, whereas training is education-led and centred on vocational training schools in Italy and France. The German dual system entails instruction in VET schools in parallel with work-based training, but the curricula focus on workplace needs. Whereas VET is regulated by the state in Germany and France, in the UK and Italy arrangements are market-led, with responsibility for training largely devolved to employers (Winterton, 2000).

The predominant VET system in Europe is based on specialised state-regulated vocational training schools. This is the case in Belgium, Finland, France, Iceland, Norway, Portugal, Spain, Sweden and Turkey, for example. While this approach generally guarantees an adequate volume of training, VET predominantly designed within the formal educational system is not necessarily well adapted to labour market needs. The attitudes towards investment stemming from the nature of French Industrial Order also extend to investment in human resources, and the percentage of the workforce in France qualified to the equivalent of VQ level 3 or above (skilled craft worker or technician) is almost as high as in Germany. Unlike Germany, however, in France VET is predominantly designed within the formal educational system, with the bulk of initial VET undertaken in full-time vocational schools
despite the existence of funds for in-company apprenticeships financed through an employer tax (Lane, 1989: 68). Since VET is largely administered by educational institutions rather than enterprises, even though a high proportion of young people are qualified to craft or technician level, they are not guaranteed employment in a skilled job (Méhaut, 1992). With a strongly dirigiste management tradition, the elite (and elitist) grandes écoles supply over 80% of senior managers and others in key positions in the economy, perpetuating the social domination of wealthy families. The education of managers (cadres), whether business school or engineering graduates, is quite divorced from production, and it is virtually impossible for technicians educated for production jobs to become managers.

State-regulated VET systems with a workplace focus are typified by the German dual system; this is widely seen as the ‘gold standard’ for initial vocational training (IVT). The approach has strongly influenced the systems of Austria, Denmark, Netherlands, Slovenia and Switzerland. The long-term perspective typical of German production relations encourages investment not only in technological innovation, but also in human resources, particularly since there is a highly developed national system of VET operating in all sectors, with certification by the Chambers. While IVT is highly regulated, continuing vocational training (CVT) is largely unregulated. The system permits progression from craft worker to technician or even to professional engineer, and management education emphasises expertise relevant to production, so technical skills are valued more highly in Germany. Re-unification presented a challenge to the VET system, but measures were introduced to ensure that training was a high priority on the reunification agenda (Frege, 1999). The dual system of apprenticeship training (duales system) is central to VET in Germany, and is widely regarded as a best practice model for developing a technical elite among the workforce and for reducing the social gap between technicians or non-university engineers and individuals taking the alternative Gymnasium and university route (Marry, 1997). A 3-year apprenticeship with an enterprise is linked with formal education, either in vocational schools (Berufsschulen) run by individual states (Länder), or in one of the 500,000 centres run by training providers approved by the Chambers of Industry and Commerce (Industrie-und Handelskammern) or by the Craft Chambers (Handwerkerkammern), that also oversee and monitor the content of occupational training. Under the dual system, tripartite determination of strategy and training content, with co-investment by workers and enterprises, leads to a nationally recognised certification of skills for two-thirds of young people who become apprentices. In the traditional system, the vast majority of apprentices take a formal qualifying examination, and 90% pass this to become recognised skilled workers (Facharbeiter). With two year’s further experience, workers can enter higher vocational training, ultimately becoming masters of the craft (Meisters), with pedagogical as well as high level technical skills. Although some managers rise from the apprenticeship system, most are initially educated in universities and polytechnics, where the emphasis is on knowledge and functional skills, especially production-related functions; a significant proportion of senior managers have doctorates.

Market-led, workplace-focused VET systems are typified by the UK, which has influenced development in Ireland, Finland and the Netherlands. Leaving VET to the market inevitably creates uneven training provision and such economies are marked by periodic skills shortages and poaching of skilled labour (Finegold and Soskice, 1988) but the workplace focus means that employers are prepared to provide short-term adaptive CVT to support flexibility, even if this rarely results in a portable qualification. The UK VET system is linked to the tendency of British enterprises to focus on short-term return on capital employed, resulting in inadequate investment in both technology and human capital. This in turn promotes a tendency to compete on price rather than quality, which would require sustained training and a general upgrading of skills. Management training is equally
inadequate, with an emphasis on practical experience and generalists rather than qualifications and specialists. The UK apprenticeship system was in long-term decline until the Modern Apprenticeships initiative in the 1980s and even now a relatively low proportion of the UK workforce is qualified to intermediate level.

School-focused VET systems are normally state regulated, but in the case of Italy VET has been left to market forces. The VET system in Italy has been both stimulated by and distorted by two perennial characteristics of the labour market: a generally low level of educational attainment and serious structural unemployment in the South (Mezzogiorno). Education is compulsory up to 14 years of age when the middle school leaving certificate (licenza media) is taken, after which individuals may follow academic, technical or teacher routes for further education, or enter state VET schools (instituto professionale statale, IPS). There are three alternative routes within this system according to the intended destination of trainees (IPS alberghiero, IPS industrielle, IPS artigianale). The VET system has no binding legislative framework and no obligation on employers to provide training. Apprenticeships have disappeared from industrial enterprises, partly as a result of union opposition to the exploitation of young workers. Conflicts between the central and local state, the Ministries of Education and Labour, and between capital and labour also contribute to the ineffectiveness of the VET system. Since 1978, the regions have been responsible for VET (Jobert, 1997), but the training system is inadequate because of the dominance of small firms in the economy, the failure of unions to prioritise VET in place of remedial education and the absence of tax concessions or grants to offset the costs of training. Some industrial enterprises created training centres to cater for both internal and external workers, but external validation of private training centres is a relatively recent innovation arising from state concerns over quality of provision.

Expenditure on education as a percentage of GDP is highest in the Nordic countries because of the school-based educational system and lowest in Germany where apprenticeship is the key route to vocational skill formation. Participation rates for 17 year olds have risen fastest in Nordic countries and in those states lacking a strong apprenticeship tradition (such as France, Ireland and Spain). Participation in continuing vocational training (CVT) is high in the Nordic countries and concentrated in the younger age groups and among those with high educational attainment. State-regulated, workplace focused VET systems like Germany and the Netherlands offer widespread provision well adapted to labour market needs with a consequently high level of skill formation and productivity (Mason and van Ark, 1994). State regulation as in the French VET system guarantees an adequate investment in training but this is less well adapted to labour market needs because vocational schools are divorced from the workplace. Market led systems like the UK appear to support Snower’s (1995) conclusion that training market failure can cause economies to get stuck in a low-skill equilibrium, and even high-wage differentials may prevent significant supply responses because skilled vacancies are scarce. However, the training that is done is well adapted to the needs of industry. When market systems are combined with a focus on educationally-based provision divorced from the workplace, as in Italy, the outcomes are particularly deficient and ill-adapted to meeting the needs of the economy.
SOCIAL DIALOGUE APPROACHES
Diversity in approaches to social dialogue in European countries is evident in terms of social partner organisation, institutional structures, regulatory systems and bargaining processes. In all member states, meetings between employers’ associations and trade unions typically entail consultation and negotiation as part of the established processes of collective bargaining and wider industrial relations. While social dialogue equally involves consultation and negotiation, it differs from these industrial relations processes in its relationship with wider political processes, and where formal tripartite institutions are established, this is normally referred to as ‘concertation’. The distinction between the domains of industrial relations and social dialogue is difficult to discern in countries with traditions of highly-developed social partnership, codetermination or centralised negotiations involving the social partners and government. The influence of European social dialogue on national industrial relations systems may be rendering the distinction irrelevant in practice (Kjærgaard and Westphalen, 2001), but it is not creating a tendency towards convergence. Moreover, weaknesses in European social dialogue processes, as opposed outcomes, are still evident (Kirton-Darling and Clauwaert, 2003).

This persistence of diversity in social dialogue approaches is important because when the role of social partner organisations in the regulation of advanced economies altered from the 1970s, literature on social dialogue and concertation generally assumed convergence towards a model of interest intermediation and policy making that was more efficient because it combined better economic performance with greater social inclusion (Regini, 2003). Such assumptions are grounded in the structural functionalist traditions of industrial relations exemplified by Dunlop’s (1958) influential systems model, which viewed convergence as an inevitable outcome of the universal logic of ‘industrialization’. ‘Globalization’ is the new logic which may also be assumed to promote homogeneity in social dialogue approaches, especially where there is policy coordination as in the EU. In the absence of evidence of such convergence, however, recent literature on varieties of capitalism has sought to explain the persistence of differences in the ways in which economies are organized in terms of economic policy, social welfare, production and labour market regimes and industrial relations systems. Regini (2003: 252) contrasts two approaches to explaining the diversity: the path dependency model, which views different economic organization as a result of pre-existing institutional differences; and the strategic choice model, which explains these as the outcome of decisions taken by the actors involved.

As with national VET systems, different social dialogue approaches are intimately related to specific economic, social, political and cultural contexts and traditions. Different social dialogue approaches are associated with different forms of regulation of the economy or ‘varieties of capitalism’ (Crouch and Streeck, 1997; Hall and Soskice, 2001). Equally the differences reflect sufficiently heavy institutional ‘baggage’ that it is possible to propose typologies of social dialogue approaches and industrial relations systems (Crouch, 1993; Traxler, 1995; Traxler et al, 2001). Traditional typologies distinguished four different models in Europe (Northern, Central, Southern and Western) and a fifth must be added to include countries that were formerly part of the Soviet Union. Whilst any typology inevitably involves not only generalisation but also simplification, the five families are reasonably distinct as the following brief descriptions indicate.

The Northern model, including the Scandinavian countries and Finland, is characterised by strong central social partner organisations, with high trade union density (over 80 per cent of the workforce, apart from Norway where the density is around 57 per cent). Union structure is relatively uncomplicated, with typically three central confederations clearly demarcated in terms of coverage and having constituent sector unions. Employer organization is equally centralized, typically with a major private sector employers’ confederation with
affiliated sector employers’ associations, and separate public sector employers’ associations. Collective bargaining was traditionally highly centralized in these countries and control was maintained at all levels by twin principles prohibiting (a) strikes or lockouts whilst a collective agreement is in force, and (b) negotiating conditions other than those in the agreement. National framework agreements, typically with wage solidarity principles protecting the interests of low-paid workers, were followed by industry-level negotiations between industrial unions and employers’ associations to conclude formal collective agreements, and company-level negotiations between local unions and individual employers on detailed conditions. In the 1980s the model came under strain as labour market restructuring undermined the regulatory framework of centralized negotiations and from the 1990s negotiations became increasingly decentralised. The Northern model can still be characterised as having strong central social partner organisations and a high degree of control of agreements. Social dialogue is the cornerstone of a system in which labour market intervention by the state is determined by the social partners. Codetermination arrangements are highly developed and the legal structure is designed to support collective bargaining; industrial conflict is relatively rare and agreements are universally respected.

The Central model is fundamentally the German approach, also found in Austria and to some degree in the Benelux countries, and has some features in common with the Northern model. Trade union density is lower than in the Northern countries (around 31 per cent in Germany, 43 per cent in Austria, 53 per cent in Belgium and 30 per cent in the Netherlands). Trade unions are logically organised on industrial lines in Germany and Austria, although union structure is more complex in the Benelux countries because of ideological and linguistic divisions. Employers are also well organised in all these countries in sector and regional bodies and membership of Chambers is obligatory, ensuring that they are representative. Collective bargaining is mainly at sector level, with regional negotiations in the private sector and national negotiations in the public sector. Agreements concluded are generalised throughout the constituency, ensuring good coverage. Second tier bargaining at enterprise and workplace level is common, but with the exception of some large employers, local negotiations tend to follow sector agreements quite closely and are largely limited to questions of local implementation rather than establishing enhanced conditions. Unions exert more influence in the labour market than might be assumed from the level of union membership because social dialogue is extensive with codetermination arrangements and a clearly defined representative role for employee representatives in works councils at workplace and enterprise level. This highly-ordered model is normally associated with industrial peace and adherence to agreements although its regulatory capacity is under increasing strain.

The Southern approach is essentially that of the Mediterranean countries (Italy, Spain, Portugal and Greece) and France is more part of this group than the central model, although it also has some characteristics in common with the central approach. Trade unions are typically divided on ideological lines (mainly deriving from the 1920s rupture between the communist and socialist parties) and where, as in Greece, there is a single Greek General Confederation of Labour there are nonetheless significant political rivalries within the unions, persistent political interference and strong adversarial traditions. Trade union density is generally low (from 7 per cent in France to about 40 per cent in Italy) but it is difficult to estimate because of the tradition of supporting union action but not necessarily paying union membership dues. Collective bargaining was under-developed because employers were reluctant to negotiate and trade unions, poorly organised at workplace level, were more inclined towards direct militant action to force political concessions from the government. The Southern model is typified by Italy which was traditionally characterised as ‘poorly institutionalised, conflictual, low-trust industrial relations’ (Ferner and Hyman, 1992: 583).
The last decade, however, involved significant institutionalisation and formalisation of collective bargaining at the same time as generally moving towards decentralised negotiating arrangements (Regini and Regalia, 2000).

The Western approach, comprising the UK and Ireland, is sufficiently distinct from mainland Europe to constitute a separate industrial relations model. Union structure is complex, not because of institutionalised ideological divisions but from the early local craft origins of the unions. There is a single central trade union confederation in each country but these have little authority over constituent unions. Similarly, while there are single central employer confederations, these have much less authority over affiliated organisations than in mainland Europe. Individual unions are often decentralised and workplace focused with a heavy dependence on lay officials (shop stewards or other representatives). Union density has steadily declined since the 1980s, more in the UK (30 per cent) than in Ireland (42 per cent). The structure of collective bargaining was complex in the private sector but multi-tier bargaining at sector, company and plant level has generally been replaced by company negotiation. The defining characteristic of the Western model is voluntarism, the abstention of the state from direct intervention in industrial relations. Although in the UK severe legal restrictions imposed on trade union activities during the Conservative era are still in force, the principle of voluntarism survived and since the return of a Labour Government in 1997 the trade unions’ involvement in macro-economic and social policy formulation has been partly restored. In Ireland there was no legal assault on the unions and they have played a major role in economic regeneration through social pacts since the late 1980s, leading some commentators to suggest that such national agreements mark a departure from voluntarism (O’Kelly, 2000).

The stereotypical Eastern model involves the construction of new institutions of social dialogue on the vestiges of the institutions of the former communist states. Trade unions and employers’ associations, whether reformed or newly created, have struggled to gain legitimacy and institutional effectiveness and in many cases suffered a decline in membership (Gábor, 2000). Employers’ organisations in these countries are estimated to have 30-40 per cent of industrial enterprises and less than 5 per cent of all enterprises affiliated, corresponding to about 15 per cent of employees in Poland (Lado and Vaughan-Whitehead, 2003: 71). In most of the new member states from the former Soviet Union, only a minority of workers (20-30 per cent) are covered by collective agreements (Lado and Vaughan-Whitehead 2003: 73). Slovenia is an exception (over 90 per cent), which is a special case explained by bargaining arrangements based on the Austrian system, where membership of the Chamber of Commerce is obligatory for all enterprises. Similarly in the Slovak Republic, it is estimated that up to half of the workforce is covered by sector collective agreements. In general, however, sectoral bargaining is under-developed in these countries because of structural weaknesses of social partner institutions, especially organisational fragmentation, or because they are not authorised to conclude binding agreements (Ghellab and Vaughan-Whitehead, 2003). Where collective agreements exist at all, these are often weak in content and frequently ignored.

Social dialogue ‘is an idea which is neither politically nor ideologically neutral’ (Rychly and Pritzer, 2003: 1) and in some of the new and future member states governments deliberately obstruct the social dialogue process and only enable a consultative role for the social partners (Draus, 2000; 2001; Sarfati, 2003; Vaughan-Whitehead, 2000; Winterton and Strandberg, 2004). The EC must therefore intervene more forcefully to support social dialogue in these countries (EC, 2004a; Mailand and Due, 2004). Without such a strategy, the major fear is that the weakness of the social dialogue process in some of the new member states could undermine its effectiveness at EU level or create a lowest common denominator approach, where it becomes marginalized.
DISCUSSION
In considering the interim results of the current study, this section briefly compares the findings in the eight countries and explores possible reasons for the similarities and differences identified. The countries are considered in the pairs established in the research design to facilitate pattern matching and to offer an abridged summary of the results.

UK and Malta
Both countries have a predominantly functional approach to competence development, have VET systems centred on workplace needs and have a voluntarist market-led approach to training and development. It is not surprising that the two countries share these characteristics given the historical influence of the UK in Malta, nor that both suffer from a low level of qualifications overall and chronic skills mismatches, features associated with the market model. Equally in both cases approaches to social dialogue are rather contingent, depending upon the strength of local union organisation, although it is worth noting that while union density is higher in Malta than the UK, the Maltese trade unions have a more ‘Mediterranean’ character, being divided along political lines. In both countries the overall level of success of the unions in engaging employers in negotiations over training is still quite limited. However, in the UK even under the conservatives, the role of the unions was acknowledged as invaluable in delivering workforce consent in programmes designed to raise skill levels and facilitate restructuring of work (Winterton and Winterton, 1994). Since the return of Labour in 1997, the unions have become key advocates of learning at work, especially for workers faced with job insecurity (Wallis and Winterton, 2002; Winterton, 2001), providing advice to reluctant learners and participating with employers in establishing workplace learning facilities through specially trained Union Learning Representatives (Rodgers, Wallis and Winterton, 2003). Competence development is important for union renewal in both countries, but the limited statutory underpinning of the social partners’ role (Union Learning Representatives in the UK and the Economic and Social Council in Malta), determines the level at which such negotiation occurs. The paradox is that a low level of qualification necessitates adaptive continuous training at workplace level which creates openings for union initiatives where the workforce is sufficiently well organised.

France and Turkey
These two countries were linked because of the influence of the French political system on the transformation of the Ottoman Empire to the Republic of Turkey under the modernization programme of Mustafa Kemal Atatürk (Tezel, 2005). Turkey has not adopted the French competence model, however, but is more attracted to the UK functional approach. The countries share a state-regulated, school-based VET system and both have a high level of VET provision but while this results in a highly qualified workforce in France, Turkey has a major qualification deficit, especially in VET areas. Employers in both countries complain that the VET curriculum is ill-suited to labour market needs. As Heidemann et al (1994: 50) note, VET in France is characterised by a lack of adaptation and coordination between the education and employment systems, but this criticism is significantly more serious in Turkey, where employers prefer unqualified workers to those who graduate from state-run VET schools (Winterton, 2006b). Therefore, whereas in France the employers seek to reform the system, in Turkey the system is seen as beyond redemption so employers are developing alternative provision to meet their needs. Both countries have a low trade union membership and politically-divided trade union movements that face difficulties in establishing negotiation at enterprise-level. In France the government compensates for this by establishing extensive social dialogue arrangements at national, sector and regional levels whereby the unions are able to have an influence far in excess of their official following. In Turkey, the
government is reluctant to relinquish power to the social partners and appears to favour the most modern (and moderate) of the three major trade union confederations. State sponsored national social dialogue in France resulted in the breakthrough inter-occupational agreement of 20 September 2003, which was brought into legal effect in 2004 and influenced sector negotiations in 2005. The comprehensive agreement, which extends existing training rights and introduces an obligation on employers to negotiate a training plan for the enterprise, represents a model agreement for Europe. The first agreement on VET signed by all the social partner organisations since 1970 appears to be supported by genuine consensus on ends and means not only between the unions (which is a rare event in France) but also with the main employers’ associations. The major impact should be evident in the national statistics for 2006, available in November 2007, but interview evidence suggests that it has been an important catalyst for trade union action in support of competence development.

**Germany and Slovenia**

These countries are naturally linked because they share elements of the Austro-Hungarian model, a state-regulated dual system of vocational training, an emphasis on apprenticeships and a strong role for the Chambers and other social partners. The German VET system is a world class model but it is coming under strain because employers are not prepared to offer sufficient places to meet demand for apprenticeships and the state is no longer able or willing to bear the main burden of finance. In part this reflects a decade of crisis in the German model (Streeck, 1995) arising from the costs of reunification; the incompatibility of German labour and capital market regulation with globalisation; the exhaustion of the potential of diversified quality production; in turn exacerbated by demographic change, an ageing population, changing gender relations, wage competition due to relocation following EU enlargement and the federalist nature of German governance. Slovenia broadly follows the German competence model and VET arrangements are comparable, although with a modified dual system that is now largely school-based. In Slovenia VET does not enjoy the same prestige as in Germany, and training appears to be a marginal concern for the unions compared with the priority it has traditionally been accorded by the German unions. Social dialogue arrangements are less robust in Slovenia, but trade union organisation and the coverage of collective agreements is comparable with Germany. Competence rarely features in trade union discourse in either country; union representatives talk of training, whereas competence is limited to the vocabulary of the educationalists and occasionally HR managers. Despite the strategic importance of skill formation, the unions perceive more urgent priorities in Slovenia and labour market rigidities that formally link pay with certification act as a disincentive to employers to train for recognised qualifications.

**Sweden and Latvia**

The assumption in pairing these countries was that Sweden would have some influence on developments in the Baltic countries, but this effect appears to be quite limited to date in Latvia. Sweden has experimented with different competence models, although the predominant approach is a functional one quite similar to the UK. Latvia is struggling to define an approach to competence and has made less progress in developing a national qualification system in line with the EQF than neighbouring Lithuania. Sweden has an extensive state-regulated school based VET system, where VET is integrated into mainstream education rather than delivered through separate institutions, and a highly-skilled workforce. In Latvia the VET system has deteriorated since the Soviet era when there was an extensive system of adult education; provision is now inadequate to compensate for the outflow of skilled workers to other member states which is creating chronic skills shortages and reducing the average level of qualification. The Swedish workforce is among the most
unionised in Europe and the social partners have historically played a determining role in social and economic policy. The Latvian workforce has a low level of unionisation and the unions suffer from a lack of legitimacy not only for employers and government, but crucially also for the workforce. The Swedish VET system is based on high degree of social partner involvement with extensive social dialogue at all levels. In Latvia and the institutions for social dialogue over VET have already been created, but the unions’ influence is much less evident at sector and enterprise levels than in the formal national body. EU membership and the existence of the trade unions’ Baltic Forum should improve the situation in Latvia but progress is likely to be slow given the structural weaknesses evident.

CONCLUSIONS
Earlier research undertaken for CEDEFOP (Winterton, 2003) demonstrated substantial diversity between European countries in social dialogue over training. Nevertheless, irrespective of the nature of the regulatory system of VET (state or market) and the focus of VET activities (school or work), social partner organisations were involved extensively in VET policy making, VET implementation and in initiatives to encourage take-up of learning opportunities in the workplace. The regulation and focus of VET was found to affect the level and form of involvement of the social partners, with a tightly prescribed role existing in those member states where VET is state-regulated. EU enlargement has since served to increase this diversity, introducing cases where social dialogue is under-developed.

The work to date in the present project confirms that diversity in these three domains presents challenges both for developing coherent policies at EU level and for implementing consistent trade union actions locally. While such conceptual and institutional differences may limit the scope for transfer of good practice, EU initiatives like ECVET and the EQF are promoting a degree of convergence, while the social partners’ Framework of Actions offers opportunities for innovation drawing upon the diversity that represents the richness of Europe.

The challenge for the unions is first to identify leading edge practices and then to develop strategies for transferring those that are susceptible to replication in different contexts. Swedish experiments with different approaches to competence have the potential to augment the already comprehensive competence frameworks that exist in France and Germany with tacit skills that are frequently overlooked, but reconciling these with the narrow functional approach of the UK will require a concerted effort at the EU level. The first task for the unions is to recognise this diversity in competence models and to engage in active debate. The German state-regulated, workplace focused dual system is widely viewed as the best arrangement for IVT but is insufficiently flexible for CVT, where market-led arrangements are more adaptable to labour market needs. Is it possible to combine the two approaches and, if so, what are the implications for the role of the social partners? The French national agreement of 2003 represents a model of excellence for social dialogue over competence development, but can the unions in other countries negotiate similar rights to training, especially where collective bargaining is decentralised? The UK initiative of ULRs is a major innovation for promoting competence development in the enterprise, but can this be replicated only in countries where there is highly developed workplace organisation? Above all, there is a need for greater union engagement with competence development in the context of the Framework of Actions and for a concerted effort to develop strategies at the European level that can be implemented in all countries, particularly those new and future member states where competence development is the key to economic and social progress.
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