



Responses to an Ageing Workforce: Germany, Spain, the United Kingdom

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Abstract

Background: An ageing workforce is a challenge for businesses that are increasingly expected to adapt workplaces to enable employees to remain in work longer. Emerging evidence highlights employer practices to attract or retain older workers. This paper explores employers' motivations for introducing measures to accommodate an older workforce in three European case study countries.

Objectives: The objective is to illustrate and understand different approaches to, and stages in, adjusting workplaces to accommodate an ageing workforce.

Methods/Approach: The study combines case studies, including site visits and interviews, with expert consultations. **Results:** The research finds marked between-country differences, with United Kingdom case studies highlighting a strong emphasis on age-neutral practices shaped by legislation; age-confident practices in Germany resulting from collaborative arrangement between employers and trades unions (with legislation permissive towards age discrimination); business in Spain remaining relatively inactive, despite evidence of people expecting to work longer in life.

Conclusions: Diverging employer motivations and responses to the challenge of an ageing workforce risk a multi-speed Europe in age-confident workplace innovation. A concerted effort that draws on the multiple factors that motivate initiative would be required to achieve good working conditions for older workers across Europe.

Keywords: older workers, workplace adaptation, extended working lives, industrial relations, retirement

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Introduction

Policymakers across Europe and beyond have made extending working lives one of their priorities (e.g., European Commission, 2014, 2015a; OECD, 2011; Bussolo et al., 2015; UNECE, 2012). Case studies have assembled examples of business practices intended to accommodate, and to facilitate the retention of, older people in the workforce (e.g., DWP, 2013; Cedefop, 2015; Eurofound, 2011; CIPD, 2016). Notwithstanding policy announcements and initiatives concerned with active aging in the workplace, research continues to highlight a reluctance amongst businesses to recruit older workers or to promote extended working lives through measures such as gradual retirement (cp. Wright, 2015; Cedefop, 2015).

This paper examines businesses' motivations for introducing age-confident working practices with reference to corporate age management in Germany, Spain and the United Kingdom. Its dual objectives are to (a) present case study evidence of practices implemented in a selection of businesses of different size and operating in different industrial sectors in the three countries, and (b) shed light on the factors that encouraged businesses to adopt or promote these measures, using a combination of business site visits, interviews with management and workers at those businesses, and expert interviews to capture and understand the legal and public policy context regulating workplace adaptations and innovation to accommodate older workers.

Our choice of three countries was informed by our understanding of their historically different welfare regimes (Esping-Andersen, 1990): Germany espousing a corporate system of tripartite welfare management involving state, labour and employer representations within a framework of federal state autonomy and responsibility; the United Kingdom exemplifying the liberal welfare system with a centralist, unitary policy-making order that gives elected governments strong legislative power to intervene in labour relations. Spain represents a Mediterranean welfare state model (Gal, 2010) that has retained a strong core of family focused welfare tradition within a set of competing regional policy structures and identities occasionally characterised by clientelism and historically adversarial relations between trades unions and employers (Munduate et al., 2015).

These regime differences impact on state-industry relations, whilst transcending employer-employee relations, including both collective bargaining arrangements and the type and level of employee representation at company board level in each country. Thus, in the United Kingdom, company or establishment level bargaining dominate in a system that provides no statutory right to employee representation at board level (which is also largely absent). The state has no formal involvement in bargaining negotiations but intervenes through legislative regulation and oversight. This is in some contrast to Germany, where collective bargaining, whilst decreasing, remains focussed on sectoral and regional agreements, and where workers are represented through Works Councils and employee representatives on supervisory boards of larger companies. Whereas the state has no formal role in collective bargaining, the federal government and party-political contributions are accepted forms of influence on these processes.

Similar to Germany, collective bargaining in Spain takes place predominantly at the sectoral level and is negotiated between trades unions and employer organisations. Workers have no right to representation at the company board level. Spain's industrial relations models are thus somewhat of a hybrid of the sectoral bargaining, employee representative model of Germany and the company-level bargaining system without legally formalised worker representation in the United

Kingdom. Likewise, Spain's federal state has over time adopted variably interventionist roles, maintaining distance, whilst occasionally acting as bargaining mediator or unilateral decision taker, especially in the wake of the financial crisis in 2007 (Karamessini, 2007; Molina et al., 2013; ETU, 2014).

In all three countries, these conditions have been in flux as alternative models, typically based on company level negotiations, gain greater prominence. This has perhaps been no more so the case than in Spain, which has seen several labour law reforms in recent years (Fernández Rodríguez et al., 2016). Regime characteristics between the three countries have nonetheless remained distinct, and so has the 'voice' of and mechanisms available to workers and worker representatives to influence workplace conditions. Their distinctiveness, it is argued here, explains differences in the motivations of businesses for adopting – or indeed not adopting – measures to assist older workers to remain in work longer and later in life.

The paper continues with a brief account of public policies on retirement and the labour market participation of older workers in the three countries. It then turns to describing this study's methodology. The paper then moves on to summarise workplace practices for older workers identified in the case studies, before discussing the motivations and rationales for age-confident working practices, and risks and opportunities that may be associated with them.

Background

Public policies for extending working lives

The challenge to businesses of accommodating an ageing workforce is one that continues to struggle for public recognition and awareness. To date, public policy and debate present it first of all as a matter of incentivising or penalising workers so that they remain in work at least up to a statutory (state) retirement age.

The political decision to increase retirement ages has, to a large extent, been a reaction to concerns about future proofing pension funds and sustaining living standards in retirement in the future (Pew Research Center, 2014). The primary response has been for public policy to seek to raise the labour participation of older workers and to delay retirement. Principal tools for managing and, effectively, reducing the pool of those drawing a state pension have included welfare activation measures encouraging, sometimes mandating, older unemployed to remain in the labour market (Bauknecht and Cebulla, 2016), foreclosing early retirement options and adjusting the statutory pension age. The latter has been revised upward in all three countries considered here.

Private sector responses to an ageing workforce

Empirical evidence to date suggests that business has been sluggish in its response to the emerging challenges of an ageing workforce. Despite a plethora of good practice guides littering the business management and public policy landscapes (e.g., CIPD, 2012; McNair and Flynn, 2005; and others cited earlier), recent studies of age management in European businesses have found only a minority of businesses adopting policies to assist in the retention or hiring of older workers and few had developed explicit strategies to do so.

In their study of over 6,000 employers in Denmark, France, Germany, Italy, the Netherlands, Poland, Sweden and the United Kingdom, Conen et al. (2011) found that less than one third of the surveyed enterprises had adopted one of a range of measures to accommodate older workers, with flexible working (30 percent of businesses) and ergonomic measures (26 percent) emerging as the most prevalent

across all countries. Strong country variations were also apparent, with Italian businesses standing out as offering least across a range of possible measures, whilst German businesses were most likely to train older workers (35 percent) and offer flexible working hours (45 percent), whereas business in the Netherlands and Denmark were more likely to focus on measures to reduce the workload of older workers or offered extra leave. Businesses in the United Kingdom were most likely to offer older workers reduced working time before retirement (46 percent) or part-time retirement (40 percent). While they were also often offering ergonomic measures to support older workers (31 percent), at almost a quarter of surveyed business (24 percent), United Kingdom employers were more likely than employers elsewhere to report demoting older workers by reducing tasks and salary (next highest prevalence: Denmark: 10 percent).

Businesses generally reported preferring more intensive use of their existing workforce or hiring more people (of any age) to the extension of working lives in response to the threat of a shrinking labour force as a result of ageing and retirement.

Van Dalen et al. (2015) echoed these findings in their more recent study of 3,638 organisations in Denmark, Germany, Italy, the Netherlands, Poland and Sweden, which also concluded that employers' age management approaches were more prone to involve using exit strategies, including early retirement, than development measures, such as training.

Oude Mulders et al.'s (2016) study of European managers suggest that the challenge of a strategic adoption may start at - or extend to - the top echelons of businesses. They found age management approaches meeting normative resistance in the form of managers' 'traditional' expectations as to when workers should be expected to retire. Fuertes et al. (2013) similarly found that age management practices in United Kingdom small and medium size businesses remained shaped by ageist stereotypes, in particular with respect to the perceived economic value of older workers.

Frerichs et al.'s (2011) took the analysis of age management practices a step further as their study also sought to detect pathways leading to the adoption of these practices. Conducting case studies of 90 businesses from Denmark, France, Germany, Italy, the Netherlands, Poland, Sweden and the United Kingdom, the authors were able to identify country clusters, which included a focus on health promotion in the workplace in Germany, the United Kingdom and Denmark; employment exit and transition policies in the United Kingdom, Sweden and Poland; and training, lifelong learning and knowledge transfer measures prominent in France, Poland, and the United Kingdom. The authors were able to identify a number of drivers that encouraged businesses to adopt these measures, including equality and diversity regulation and, most notably, demographic change as well as acute, internal pressures (absenteeism, recruitment and retention problems, business expansion).

Public responses and continued concerns

Even before new public policy on retirement and private practice of age management were put into place, average retirement ages had gradually risen (OECD, 2016) as older people adapted their retirement behaviours and, looking forward, the age at which they would like to retire (Hess, 2017). Thus, between 2003 and 2011, preferred retirement ages rose to around age 61 in Germany, Spain, and the United Kingdom. But while this implied an average increase of just one year in Germany, expectation adjusted upwards by 1.5 years in Spain and 2.5 years in the GB. Effective retirement ages in the three countries had converged to 63 years by 2014 (OECD, 2015).

Arguably accelerated by the Great Recession since 2007 (IMF, 2011; Eurofound, 2013a), labour market participation rates also rose, especially among the older working age population (Table 1). Between 2005 and 2014 participation rates among those aged 55 to 64 increased by 17 percentage points to over 69 percent in Germany, whilst unemployment rates fell by eight percentage points, reflecting positive employment opportunities for older workers. In Spain, participation rates for this age group also increased, by nine percentage points to 55 percent, but the unemployment rate for this age group increased by even more than that as employment opportunities for all ages were limited in Spain. In the United Kingdom, participation rates for older workers were relatively high in 2005 but also increased by five percentage point to 64 percent by 2014. This was also combined with a relatively modest rise in the unemployment rate by two percentage points.

Table 1

Key Labour Market Indicators for Germany, Spain, and the United Kingdom, 2005, 2010, 2014

	2005 (%)	2010 (%)	2014 (%)	Change 2005 – 2014 (% points)
Participation rate (55-64 years old)				
Germany	52.1	62.5	69.1	17.0
Spain	46.0	50.7	55.4	9.4
United Kingdom	58.2	59.7	63.5	5.3
Unemployment rate (55-64 years old)				
Germany	12.7	7.7	5.1	-7.6
Spain	6.3	14.2	20.0	13.7
United Kingdom	2.6	4.8	4.2	1.6
Participation rate (15-64 years old)				
Germany	73.8	76.6	77.7	3.9
Spain	71.1	74.6	75.3	4.2
United Kingdom	76.3	76.3	77.6	1.3
Unemployment rate (15-64 years old)				
Germany	11.3	7.2	5.1	-6.2
Spain	9.2	20.0	24.2	15.0
United Kingdom	4.7	7.9	6.4	1.7

Source: Data available at <https://stats.oecd.org/> (19 Jun 2016)

These diverging trends in labour market participation and unemployment rates mirror, first and foremost, variable economic pressures and national fiscal policy responses to the economic crisis. But they are also indicative of the barriers to (continued) employment and age discrimination that older people face (van den Heuvel et al., 2011) and fear (Age United Kingdom, 2011; European Commission, 2012) in their respective countries.

Recent Eurobarometer data has highlighted the continued public worry about age discrimination in the job market, especially in Germany and Spain, where 61 percent (Germany) and 67 percent of respondents (Spain) agreed that being over 55 years of age would put a job applicant at a disadvantage over younger job applicants (European Commission 2015b). This compared with 42 percent of respondents in the United Kingdom (EU27 average: 56 percent).

Methodology

Case study searches identified applied age management practices in companies in Germany, Spain, and the United Kingdom. The identification included a search of the national and international literature, supported by global web searches and targeted searches of corporate websites. National and international best practice awards for business (e.g., ENI, 2013; Great Place to Work, 2013; AARP, 2011) emerged as useful guides for what was considered to be 'good practice' in different countries, although they were not used as evaluative measures.

The researchers also obtained advice on search strategies and the selection of case studies in interviews with national experts in age management and active ageing policy in the three countries. The experts consulted included representatives from, in Germany, the Confederation of German Trade Unions, the Federal Ministry of Labour and Social Policy, the Confederation of German Employers' Associations, and the Bertelsmann Foundation; in Spain, economists from the Universities of Barcelona and Valencia, BBVA Research; in the United Kingdom, the Government Department for Work and Pensions, academics from the Universities of Edinburgh and Kent, and the United Kingdom manufacturers' organisation (EEF).

The expert interviews explored recent histories and current states of age-confident workplace practices, and informed the focus of our case studies, drawing our attention to areas of particular relevance to understanding the drivers or motivations of age-confident practices. Expert interviews helped to contextualise subsequent business interviews, providing background and understanding to business narratives on the rationale for and drivers of age-confident working practices.

Site visits and interviews were conducted in two case study businesses each in Germany and Spain, and three in the United Kingdom. These businesses included a site management services and a social care services company in Germany, a food processing and a professional services company in Spain, and an education provider, a government agency and a large retailer in the United Kingdom. In addition, researchers visited two metal manufacturer's federations in Spain to learn about their campaigns encouraging regional employers to hire and accommodate (more) older workers. The interviews recorded the content, mapped history and explored the rationale for businesses adopting age-confident initiatives in the workplace, and their take-up by employees. Detailed case studies were thus prepared, which allowed a country-by-country comparison. Our initial approach was to study each national case study in the context of the higher level legal and public policy insights provided by the expert interviews. This subsequently formed the basis for the country comparison.

In total, 22 interviews were conducted with senior management, a small number of employees and, in Germany, Works Council representatives.

These case studies were selected from a broader review of practices, which collected information about 44 initiatives in 40 enterprises (23 in Germany, 7 in Spain and 10 in the United Kingdom) or promoted by two employer federations (in Spain). The enterprises included 15 operating in manufacturing or production sectors, 24 operating in the service sector, and two construction firms (see Appendix Table A.1). They included small enterprises employing around 50 people to large, typically multinational corporations with several thousands of employees in the respective country. Sixteen of the 40 businesses reported more than 10,000 domestic employees. Whilst much information was collected from company literature, including corporate annual or media reports, desk research and fieldwork were conducted in 2014 and 2015.

Results

Businesses accommodating older workers – Country Case Studies

Employers have a key role to play in counteracting perceptions and realities of discrimination, but they have themselves been shown to be prone to biases against older workers (Conen et al., 2012; Riach, 2015). No internationally comparative and harmonised inventory of age-confident workplace practices appears to be available that could potentially yield insight into prevailing working practices (cp. Cedefop, 2015). Our case studies have provided a qualitative snapshot of measures taken by businesses that formed the basis for our exploration of motivators and inhibitors of age confident working practices.

Table 2 brings together the principal initiatives addressing older workers workplace needs identified from direct approaches to businesses, including site visits and interviews in the three countries, and web searches. The table has been arranged in a sequential order starting from the point of 'recruitment' to the point of 'retirement' of a workforce.

In all three countries, businesses' workforce management tools included flexible working practices (especially strongly represented in the United Kingdom); an emphasis on occupational health in general, but also targeted and customised medical checks and supports; and a facilitation of gradual retirement, with a diversity of options, including initiatives seeking to manage financial impacts.

However, there were also differences. First, businesses in the United Kingdom emphasised age-neutral recruitment, which contrasted with examples of experimentation with age-specific recruitment in Spain, typically as a means for targeting older workers in order to reduce existing age biases (some businesses may use the same age specific recruitment for the opposite aim of excluding older workers, but this was not the case in the businesses studied here).

Second, German case study businesses employed planned approaches to workplace integration with a longer-term perspective using a life-cycle adjusted support programme. These programmes were both corporate, intended to cascade throughout the organisation, as well as customised, employee-specific plans. They were frequently embedded in collective agreements between employers or their regional representative bodies and the trade union or unions representing workers at the establishment. At the core of these agreements were variants of flexible working time arrangements, including partial retirement opportunities, and shorter working weeks for older employees, especially those undertaking physically demanding tasks on their jobs. Other initiatives were of a financial nature and included reduced earnings penalties for older workers switching to part-time working as they approached retirement age.

Third, a recognition of the benefit of skills retention and transmission from older (retiring) workers to younger workers encouraged mixed-age (workplace specific) skills-transfer training in Germany and the United Kingdom; and corporate value campaigns in the United Kingdom but had no equivalent in the other countries' business case studies. Schemes assigning older workers mentoring roles to induct younger workers into the workplace were also being trialed in Spain. Their objective was not only to prepare the new employee but also to facilitate the retention of older workers by enhancing their status in the company. Overall, however, the search for age-relevant initiatives in Spain turned out to be more challenging than in the other two countries as enterprises in Spain were less frequently engaged in activities to extend working lives. Instead, trades unions, employer organisations, and

governmental councils ran promotional campaigns and courses to encourage more pro-active age management in businesses.

Table 2
Prominent Workplace Initiatives

	Germany	Spain	United Kingdom
Recruitment	Age-specific recruitment (older employees); age-blind recruitment	Age-specific recruitment (e.g. older women)	Age-neutral recruitment
In-work	Flexible working; temporary work projects for retired workers and ex-employees; re-employment of previously retired older professional workers; extended annual leave	Flexible working	Flexible working opportunities, especially for workers of all ages with caring responsibilities (partners, parents, children)
	Redeployment (internal); task rotation	Redeployment (internal)	Redeployment (internal)
	Life-cycle adjusted support and workplace integration programmes		
Health	Medical check-ups; nutritional advice; joint sporting activities; ergonomics, corporate 'health days,' mental health counseling	Occupational health: ergonomics, sponsored (in-house) medical health checks	Occupational health management; physiotherapy; Wellbeing strategies
Recreation	Organised sporting activities/leagues, provision of sport facilities		On-site recreational facilities (e.g., pool tables, internet)
Training	Mixed-age (and skill) on-the-job training	The campaign to engage older workers as 'workplace leaders'	Intergenerational skills transfer through Mentoring schemes
	Corporate training institutes; dedicated apprenticeship programme for older workers (aged 50 and over)		Training and Lifelong Learning opportunities for employees of all ages, e.g., removing age limit on sponsored apprenticeships
Retirement	Partial/phased retirement; sabbaticals; time banks (accumulated, saved earnings paid out as employees reduce working hours, cushioning earning loss impact)	Partial/gradual retirement (reduced hours compensated for by hire of new staff on a part-time basis)	Partial/phased retirement policy; retirement planning (incl. regularly repeated retirement seminars)
Education			Corporate value campaigns, especially targeted at senior and line management; 'Unconscious Bias' workshops

Source: Authors' analysis

National drivers of corporate age management, and some stallers

What had encouraged businesses, especially those in our case studies, to put into place age-confident practices? To answer these questions, we draw on evidence collected in the case studies, especially the opinions, explanation and post-hoc rationalisations provided by business managers, and also bring in contextual insights from the literature and the consultation of policy experts. The result challenges some of the public policy narratives on the drivers and deterrents of age management practices in the three countries and points to some risks of current trajectories in the development of age-confident working practices.

The United Kingdom

The clearest indication of the drivers of age management programmes emerged from the United Kingdom case studies and interviews. Here, experts and business management argued that anti-discrimination legislation (the 'Equality Act' of 2010) had played a critical role in ensuring equal treatment in the workplace. Whilst this legislation had its most immediate effect on hiring practices, with age-neutral advertising becoming the norm and date of birth/age questions dropped from job application forms, it was also felt in other areas of business practices. Most notably amongst them were seemingly age-neutral activities, including flexible working, but also health and leisure facilities available to workers of all ages. Anti-discrimination legislation thus had the effect of promoting equality of treatment, rather than direct measures to compensate for age-related differentials in the workplace. Compensatory effects were expected to emanate from workers most likely to benefit from these measures choosing to make disproportionate use of them.

Businesses also reported little concern about the prospect of an ageing workforce in light of the fact that the United Kingdom has a comparatively younger population (Eurostat 2015). A relative absence of age specific interventions may thus not surprise, especially since United Kingdom businesses face little pressure from the public and, especially, trades unions to develop age management practices in the workplace (Flynn et al., 2012). Pressure for age-specific measures may more likely emerge from the removal of compulsory retirement age as it may 'nudge' some employers to adapting working practice that extended working lives, in particular when these businesses cannot make a viable legal case for requiring their workforce to retire (Barrett et al., 2015).

Germany

In contrast to the United Kingdom where worker representation in corporate governance is less prevalent (TUC, 2015), it has been argued that a prime mover of workplace innovations in Germany was not national legislation, but collective agreements (Eurofound, 2013b). Our case studies showed that such generalisation needed to be qualified and more nuanced as the present evidence indicating that companies were independently promoting age-confident working practices, even before they became enshrined in collective agreements.

German national legislation is ill-suited for driving policies to extend working lives, as it continues to grant considerable scope for age discrimination in employment or training, including various maximum ages for the recruitment to or retention in public service occupations, and accepts discrimination on the grounds of age, albeit subject to tests of proportionality (Mahlmann, 2015).

At the same time, employers and trades unions are permitted to negotiate their own workforce retirement ages via collective agreements (Mahlmann, 2015). Trades unions in Germany have traditionally advocated policies favouring older workers,

albeit often indirectly, such as via protecting long term employees in case of major redundancy threats, as well as advocating early retirement or subsidised old-age part-time working schemes (see also Bauknecht et al., 2016). As Wright (2015) points out, effectively greater employment protection for older workers in Germany has since contributed to the rise in Germany's older workers' employment rate.

Germany's trades unions had traditionally favoured early retirement schemes as a means for job redistribution (Bispinck et al., 2000), but have recently shifted towards stronger support for subsidised old-age part-time work and greater age equality in the workplace (Flynn et al., 2012). As van Dalen et al. (2015) have shown, these efforts have had mixed results. On balance, Germany's employers continue to promote partial or early retirement rather than using retention strategies to accommodate or train up older workers, motivated by the desire to cut the costs of employing a higher waged older workforce. In doing so, they can rely on the support of trades unions that continue to promote older worker retirement where this option is available.

Spain

For Spain, the evidence also presents a chequered image of older worker-confident programmes. Traditionally, neither trades unions nor employers have shown much concern for promoting the retention, hiring or job quality of older workers (Eurofound, 2013b; Fernández Rodríguez et al., 2016). A weak membership base and a prominence of what has been described as a self-serving "instrumental attitude" of its members (Köhler et al., 2013, p. 4) have undermined unions' capacity to engage with matters related to age management in the workplace and hindered a capacity to pursue innovative policy agendas at a larger scale. At the same time, industrial relations and labour market reforms introduced in the wake of the financial crisis by the Spanish government have fragmented collective bargaining arrangements and further weakened trade unions (Fernández Rodríguez et al., 2016).

The Spanish case studies, including the interviews with representatives of the two employer federations, along with our conversations with experts suggested that employers in Spain, by and large, espoused the view that 'workers want to retire' and that it would be difficult to persuade them to do otherwise. In fact, employers have been found to favour a 'rejuvenated' workforce, with older workers retiring and younger workers taking their places (Riach et al., 2007), as illustrated recently by the Spanish telecommunications group Telefónica, when it enticed workers over 53 years of age to retire on 68 percent of their salary (People Management, 2016). This preference was arguably facilitated by high levels of un- and underemployment (demonstrated by low participation rates, cp. Table 1) across age cohorts in Spain.

The Spanish government has likewise been relatively unconcerned with age management in the economy or, more broadly, the extension of working lives in the country beyond introducing pension age reforms and activation measures for older unemployed people as it seeks to consolidate its public finances (Serra 2013). There are thus no structures in place for a coalition of interest in Spain that could pro-actively further and promote age management policies.

This policy vacuum contradicts the recent evidence that workers in Spain have raised their retirement expectations, aligning them to those held in other countries (Hess, 2017). The validity of any assumption among Spanish business managers that their workers long for retirement is therefore questionable.

Discussion

This study identified varying approaches to accommodating older workers in workplaces in Germany, Spain, and the United Kingdom. In particular, it encountered

different motivations for businesses to consider or not to consider the introduction of age-confident working practices, driven by legislative concerns, and the influences of labour and employer organisations. They also raise different concerns.

In Spain, the absence of policy direction on age management emanating from government and the adversarial nature of the industrial relations system, an absence of trust, and the reported desire of employers to control employee representations at the company level (Munduata et al., 2015) do little to promote workplace innovation, but more likely reduce opportunities to overcome this dissonance.

In Germany, collective agreements between employers and trades unions have presented a framework for the development of age-confident workplaces, but the absence of a national legal framework unequivocally encouraging age-confident policy (rather than, in practice, allowing for exemptions and opt-outs) bears the risk of pepper-potted rather than universal initiatives, replicating existing patterns of age-inequitable employee engagement practices. Moreover, the contested nature of pension and retirement policy in Germany, which has witnessed repeated reform efforts in recent years, have left the country with a lack of continuity and clear policy direction, arguably weakening the development of coherent age management strategies at national or regional, rather than industry sector level.

In the United Kingdom, the country's statutory unitary approach to age discrimination has helped the country's businesses sector to focus on work wellbeing measures for all ages rather than specific measures for older workers. Against this, it must be cautioned that some anti-discrimination policy may, arguably, also be (ab)used to justify the absence of age-confident workplace practice. Without the statutory employee representation in workplaces, as, for instance in Germany, the United Kingdom's legalistic approach to age management relies heavily on businesses voluntarily taking a positive stance towards the building of age-confident workplaces. This raises questions as to the scale and penetration of age-confident working practices that can and is being delivered.

Comparison with previous research

Like our study, earlier research on age management practices had found strong evidence of variation between countries. This is against a backdrop of arguably surprisingly low rates of adoption of strategies to accommodate an older workforce. Our study confirmed diverging approaches to age management in the three country case studies, identifying some conventional and some more experimental measures to age management in these countries.

Like Frerichs et al. (2011), one of our study's foci was on understanding the motivations for businesses adopting or failing to adopt age management strategies. To do so, we selected countries fitting different welfare regimes, in order to examine parallels between motivations and justification for age management, as well as adoption processes, and the socio-political features characteristic for the welfare regimes in these three countries. Like Frerichs et al., we found that demographic changes were important motivators, albeit primarily in Germany. Our United Kingdom case studies most prominently showed the directive role of equality legislation, which counterbalanced any ageist conceptions that employers may have held (cp. Fuertes et al. 2013) by virtue of legislation affording workplace measures to be available to all workers, regardless of their age. As described by Moen et al. (2017, p. 847) for the United States, the adoption of universal practices effectively represented a "deliberate disrupting of established age-graded logics."

In contrast, in the accounts of motivators for age management in businesses in Germany and Spain, legislation, itself 'loop-holed' with exceptions on statutory

retirement and affected by repeated changes to pension policy (Germany) or side-lined by industrial relations conflicts and public finance constraints (Spain), played virtually no role. Instead, in Germany, we find that business internal demographic pressures drove the push for age management in the workplace. In contrast, in Spain, high levels of un- and underemployment among all ages helped business to advocate a 'rejuvenating' of the workforce, whilst retaining out-dated images of older workers' retirement preferences.

Whereas our study was not concerned with a quantitative survey of age management practices in our three case study countries, we know from previous studies (e.g. Conen et al., 2011) that measures supporting older workers in the workplace are far from common. Moreover, employers in different countries have adopted different measures to support (or indeed help to exit) older workers, although data for Spain was reported in none of the recent multi-national comparative studies.

Earlier research has also identified, to use the terminology of Frerichs et al. (2011), "pathways" leading to the adoption of age management approaches. Framing the study of age management in terms of welfare regimes captures some of the complementarity of interventions by different agents, given different policies, perceptions and preferences, and, importantly, pressures for building age confident workplaces.

Most strongly, the evidence suggests that a legislative vacuum without clear, unambiguous policy direction (as in Spain and Germany, where negotiated industrial relations are given stronger emphasis than state level legislation) make the adoption of age management strategies reliant on industry specific needs or corporatist / trade union pressure pushing for business-led initiatives. The latter may be individually deep and innovative, but unless tied to industry bargaining agreements, risk not being broad in the sector, geographical or employee coverage.

Conversely, universal legislative directives typical for liberal welfare regimes and based on equality legislation in the United Kingdom appear to be an effective tool for directing business into age management by default rather than design. However, if we follow Conen et al. (2011), this may not prevent the survival of age-unfriendly measures, such as demoting older workers to lesser tasks and lower salaries. In the absence of statutory employee representation in United Kingdom business, alternative avenues would need to be found to minimise the use of this effective opt-out from positive age management.

Spain's hybrid model of industrial relations, incorporating a mix of sectoral and company-level bargaining without legally formalised worker representation, offers arguably the least mature model of (policy making for) age management in this study, although we do not have comparative data on the statistical prevalence of age management practices in that country. Our evidence nonetheless suggests that the lack of dialogue between employers and employees, alongside an absence of a clear direction on age management policy emanating from the state, has held back the development of age-friendly working practices in Spain.

Conclusion

Summary of research

Age management in this study emerged as motivated by a complex mesh of legal requirement, macro- and micro-economic consideration, modes of industrial relations, and perceptual misconceptions, which align with welfare regime characteristics for the three countries explored in these case studies. They have resulted in some businesses adopting or experimenting with diverse sets of measures intended to facilitate longer working lives, and others refraining. In all three countries, existing arrangements risk gaps and inequalities in older workers' opportunities for accessing age-confident working practices. Legal frameworks, industrial relation systems and corporate practices (in at least one instance: alongside corporate (mis)perceptions of public preferences) risk pulling in opposing directions rather than connect as powerful, complementary tools to form the basis for a strategic (and, one may wish to add: evidence-based) evolution of age-confident working practices in business. We may also be witnessing a multi-speed Europe in age-confident workplace innovation.

Practical implications

Age management is a European policy responsibility as well as a national policy challenge. National policy frameworks will need to be established, where they are not already, to monitor and regulate the implementation of age management strategies if national policies on retirement and extended working lives are to be effective – or indeed feasible in praxis. Thus, may mean developing rules, regulations and, importantly, interventions that counterbalance the slowing effect of countervailing ideological factors, fractional politics or a fragmented practice that relies on business initiative, but could, in both Germany or the United Kingdom, for instance, albeit for different reasons result in inequitable proliferation of (and hence access to) age-confident workplaces.

We suggest there is a potentially positive role in the promotion of age-confident working practices for a legal framework that is explicit in its objective to advance age-confident working practices and leaves little to no room for interpretations that seek a 'lowest-common-denominator', risk inattention, inaction or, worse, a 'dumbing down' of policy.

Second, there are positive effects to be expected from corporate leadership and collective industrial relations on the development of age-confident working practices, in particular, where collaboration allows for experimentation, and the adoption and rejection of tested workplace measures. In fact, this communication of ideas is critical for understanding the type of workplace accommodation that older workers seek – anticipation that should not be taken for granted and the mechanisms and processes that enable employers to provide them.

Finally, legal or institutional frameworks cannot be effective on their own; in fact, they are meaningless, unless supported by evidence that age management and extending working lives have social and economic benefits, even if such benefits vary with business sector and occupation, or depend on the personal circumstances of the older worker. Very little is currently known about the effectiveness of specific retention and workplace accommodation measures for the specific business sector, different occupations or employees with different personal or socio-economic needs.

If Europe and, specifically, the European Commission are serious about extending working lives, they can do more than stimulate supply (by cutting or delaying pension entitlement), but also create conditions conducive for working longer in life, and thus

help countries, member states and regions, to be strong and competent promoters of age-confident policies. This includes making sure that European-wide policies are framed so to make workplaces and working conditions safe, healthy, and age considerate. It can do so by supporting regulation that stipulates expected age management standards, whilst sponsoring national, regional and local innovative initiatives that trial or promote the development of age management practices and test their effectiveness.

Limitations and future research directions.

Our study, whilst covering diverse sectors and business sizes, was not and did not claim to be representative, although it did cover a broad range of sectors and businesses of different size. The case studies identified different lines of arguments and descriptions of processes in the development of age-confident policies, which allow us to draw out some suggestions for policy and further investigation, but much deeper exploration of current practices and their motivations is needed.

This would combine and contextualise the qualitative approach and detail of our case studies and that of Frerichs et al. (2011) with the larger scale and quantitative representativeness of the studies by Conen et al. (2011) and Oude Mulders et al. (2016) noted in the earlier parts of this paper. It would provide a platform for developing a grounded understanding of the barriers to promoting age-friendly workplaces – for all across Europe – and precisely identify the tools for overcoming the current lethargy in the development of age-friendly workplace.

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Appendix

Table A.1

Sector and size of businesses included in review of age-friendly working practices

	Employees							
	11-50	51-100	101-500	501-1000	1001-5000	10,001-100,000	100,001+	unknown
Utilities provider						UK:1	UK:1	
Industrial and precision engineering							DE:1	DE:2
Automotive vehicle manufacture, incl. commercial vehicles						DE:1	DE:1	
Pharmaceuticals							DE:1	
Food processing				DE:1 ES:1				ES:1
Metal processing and manufacture, incl. steel				DE:1	DE:1	DE:1		
Other manufacturing			UK:1		ES:1			
Construction/civil engineering			DE:1	UK:1				
Transport and logistics, incl. postal & mail order services		DE:1	UK:1		DE:1		DE:2	
Banking and Finance					DE:2			
Retail						UK:1	UK:2	
Environmental and site management services	DE:1			DE:1				
Information technology services						DE:1		
Professional services, incl. HR and recruitment		ES:1			ES:1			
Medical and social care services				DE:1	DE:1		ES:1	
Education provider			UK:1					
Government Agency			UK:1			DE:1 UK:1		ES:1

Legend: DE = Germany; ES = Spain, UK = the United Kingdom

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