
International Comparison of Atypical Employment: Differing Concepts and Realities in Industrialized Countries

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1. Objective and Scope of This Essay

This essay seeks to compare and contrast atypical employment in Japan, the United States and countries in Europe; it does not intend to be an examination of a specific country or specific form of employment. The structure of the labor market and the broader environment determine how typical/atypical employment is conceptualized, and therefore its definition can differ depending on the country, region and approach of the person who is defining it. For the purpose of international comparisons, however, it is not necessary to be overly preoccupied with the definition of “atypical employment” at the onset. Given that “atypical employment” is conceptualized differently in different countries and regions, it is perhaps more productive to approach the question from a reasonably broad angle. The primary subject of this essay therefore is employment forms that are “atypical” (or “non-regular”) in relation to what is generally considered “typical” (or “regular”). Typical (or regular) employment is generally defined as “full-time employment in which the contract term is not limited,” and forms of employment not meeting this criterion are considered part of atypical or non-regular employment.

Diversification of the labor market has affected not only “employment” but also the borderline between “employed” and “self-employed.” Employment forms that contain characteristics of being self-employed — such as home-based and freelance work — should not be excluded from investigation simply because they do not neatly fall under the rubric of “employment,” and ideally this type of work should be covered in this essay as well. Such in-between forms of employment are increasing, and if their growth becomes a labor problem they should be treated as an independent research theme. However, the goal of this essay is to convey the main problems surrounding diversification of employment, focusing

mainly on forms of atypical employment that are most prevalent.

In general, atypical employment can be classified into part-time work, agency work, fixed-term employment (temporary employment, daily employment and contract employment) and others (on-call work, telework, etc.). Of these, cross-country comparisons can only really be made for part-time employment, fixed-term employment and agency work as data about these work types exists. Therefore, only these three are fit for international comparison,¹ and focusing on them is perhaps the only viable way to internationally compare the conditions surrounding atypical employment.

Examining the differing concepts of atypical employment and discussing how it is used today in quantitative terms are the primary goals of this essay. There are commonalities and differences among Japan, the United States and European nations concerning the concept of atypical employment, and the first part of this essay takes up an exploration of these commonalities as well as differences. The second goal is an international comparison of the reality and trends in quantitative terms. This essay focuses on part-time employment, agency work and fixed-term employment, regarded as the most standard units for international comparison. The conclusion sums up issues for future investigation.

2. Concept of Atypical Employment

2.1 Beginning of Atypical Employment and Development of the Debate

The first thing to do is to briefly review the evolution of “atypical employment” since the establishment of capitalism.

According to Cappelli (1999), in the American industrial sector in the early 20th century, most people worked for businesses that contracted out instead of being directly employed by companies, and the job mobility rate among these workers was high. Corporate organization became more complex and sophisticated in the defense industry during World War I, and the need arose for personnel with in-house training. This led

¹ See Suzuki (1998).

companies to gradually adopt the practice of direct employment on a long-term basis.² In other words, the present practice of typical employment, that is full-time employment without a fixed contract term, has been in existence only for less than a century.

Gaudu (1999) discusses the history of atypical employment in France. Fixed-term employment was actually a more stable form of employment in France in the early the 20th century. Upper-level workers in the private-sector were referred to as “clerks (white collar workers),” and companies hired them under fixed-term contracts to prevent them from switching jobs. In contrast, the majority of blue collar workers did not have a fixed contact term and therefore could be fired at anytime. Between 1928 and 1935, legislation and judicial precedent were enacted making it more difficult for companies to fire workers without prior notice, undermining the advantage of non-fixed-term contract for companies. Through labor-management agreements, companies paying dismissal allowances became established practice between 1945 and 1973, the amount of which was determined in proportion to the length of service, and employment stability therefore increased with the length of service. Consequently, employment with a non-fixed-term contract came to be seen as a more stable form of employment around the mid-1960s.³

The situation in Japan was similar to that in France prior to World War I. Sumiya (1964) has described the development of “temporary workers” as follows:

“There were two different categories among those who were employed under a fixed-term contract. Different from the “fixed-term workers” and “temporary workers” during the Showa period (1926-1989), there were “fixed-term workers” and “long-term workers.” The contrast was due to the fundamentally different conditions in the labor market during the two periods. As explained in the book *Shokko Jijo*, labor mobility was very high during the Meiji period (1868-1912). In response, companies improved working conditions

² Cappelli (1999), p.4.

³ Gaudu (1999), pp.7-8.

and offered fixed-term contracts to workers to secure skilled workers for a certain period of time. However, labor market conditions changed after WWI. Labor mobility diminished, and the main issue became dismissals. Under these circumstances, the meaning of a fixed-term worker became its opposite. Fixed-term workers gradually began to be referred to as temporary workers to better reflect their actual situation.”⁴

Sumiya’s discussion shows that the distinction between fixed-term and non-fixed-term employment existed prior to WWI, but the relationship between the two was the exact opposite of what it became during the Showa period and after, and fixed-term employment was a more stable form of employment.

Temporary workers momentarily disappeared in Japan due to labor shortages caused by the shift to war production, but direct employment of temporary workers by companies increased after World War II because of the 1948 Employment Security Law ban on labor brokering businesses. The special procurement boom during the Korean War led to a further increase in temporary workers. It was around this time that Umemura (1957) devised the term “peripheral workers” to describe those workers who responded to business cycles by exiting the labor market during recession and entering it during boom.

The debate on the internal labor market emerged in the United States in the 1960s, and a distinction was drawn between the internal (i.e. inside large corporations) labor market characterized by long-term full-time employment and the external labor market which was subjected to the market principle.⁵ Around the same time, defining long-term stable employment as “core” employment and part-time and temporary employment as “peripheral” employment came into being.⁶

According to the international comparison of atypical employment

⁴ Sumiya (1964), p.89.

⁵ See Doeringer and Piore (1971). Doeringer and Piore (1971), however, employ the primary-secondary labor market concept in addition to the internal-external labor market concept. It is used to describe the division in the labor market between white collar (primary labor market) and non-white collar (secondary labor market) workers.

⁶ Morse (1969).

provided by Mangan (2000), the number of part-time workers mushroomed in the 1970s internationally when companies began downsizing, and agency workers and fixed-term workers increased after the 1980s.⁷

Historically speaking, “typical employment” (i.e. long-term stable employment) — the opposite of what is known as “atypical employment” today — is a relatively new concept. It seemed to have been treated distinctively in Japan and France in the early 20th century under fundamentally different situations. Internationally, long-term stable employment forms began to take root amidst the economic activities and business fluctuations after WWII, and such employment forms as fixed-term employment, part-time employment and agency work emerged accordingly.

2.2 Typical Employment in Japan, the United States and Europe

It is necessary to discuss how the concept of typical employment differs in Japan, the United States and in different countries in Europe before examining the overall concept of typical employment. Suzuki (1999), a leading expert on the subject, has developed a comparative diagram (See Table 1). The diagram shows that the specifics of atypical employment in Europe, the United States and Japan differ, even though “long-term full-time employment” is one of the main features of typical employment for all countries.⁸

In the Anglo-Saxon model, the employment contract is based on the principle of voluntary contract (employment-at-will). The level of employment protection is low, and therefore the work force is fairly mobile. Typical employment entails such benefits as health insurance, pension and paid leave. Since employment contracts are individually concluded, typical employment is never guaranteed by collective bargaining.

The European model has strong employment protection supported by legislation and collective labor agreements, and labor mobility is generally low. Health insurance and pension are part of public social security in some parts of Europe and therefore cannot be discussed as common

⁷ Mangan (2000), p.2.

⁸ See Suzuki (1999).

features of typical employment. Moreover, the working conditions of typical employees (wages, working hours, employment security, etc.) are determined through collective bargaining.

Table 1. Comparison of Typical Employment in Industrialized Countries

	Anglo-saxon model U.K., U.S.A.	European model France	Japanese model Japan
Main features	<ul style="list-style-type: none"> -Long-term employment -Full-time work -Individual employment contract with the employer (employment at-will) -Mutuality of obligations -Little employment protection -High mobility of workers 	<ul style="list-style-type: none"> -Long-term employment -Full-time work -Strong employment protection (collective agreement, legislation) -Emphasis on collective rights (subordination) -Limited mobility of workers 	<ul style="list-style-type: none"> -Long-term employment -Full-time work -Employment protection via social norms (custom and jurisprudence) -Internalized career system -Limited mobility of workers
Basis for employment protection	-Custom	<ul style="list-style-type: none"> -Legislation -Collective agreement 	-Custom and jurisprudence
Main benefits	-Fringe benefits (health/pension/leave)	-Employment security	<ul style="list-style-type: none"> -Career system -Fringe benefits (bonus, housing, etc.)
Industrial relations	-Not related	-Related	-Related in large firms
Exclusions	<ul style="list-style-type: none"> -Minorities -Youth 	-Youth	<ul style="list-style-type: none"> -Women -Aged workers
Problem areas	-Growth of low-paid jobs?	-Unemployment? (demand for deregulation)	-Changing social norms? (major restructuring in large firms)

Source: Suzuki (1999).

In Japan, strong employment protection is supported by jurisprudence and established as a social norm. For this reason, typical employment is secured largely through collective bargaining, especially at large, unionized corporations. The most distinctive feature of Japanese typical employment is its internal career development system in which regular employees develop their careers through OJT after being recruited directly from school.

As noted above, typical employment is not uniform in Japan, Europe and the United States in terms of employment protection, mobility of workers, fringe benefits and the role of collective bargaining. Therefore it

can be assumed that the term atypical employment will also embody a considerable range of differences. The following sections will examine the representative conceptual categories of atypical employment in Japan, European countries and the United States, and discuss their similarities and differences.

2.3 Concept of Atypical Employment in the United States

In the United States, the term “atypical,” which is used mainly in Europe, is rarely used. Instead, “contingent” has been used since the 1980s, and “non-standard,” a more all-embracing term, has been used more widely in recent years. It is said that the term “contingent” came into usage first in 1985 when the labor economist Audrey Freedman used it in Congress (the Employment and Housing Subcommittee). Freedman defined “contingent work” as “conditional and transitory employment arrangements as initiated by a need for labor — usually because a company has an increased demand for a particular service or product or technology, at a particular place, at a specific time.”⁹

Polivka, Cohany and Hipple (2000) of the U.S. Bureau of Labor Statistics have classified non-standard work in the United States into several conceptual categories.¹⁰ Their schematization is more all-embracing than the concept of contingent workers and consists of the following eight categories:

- 1) Agency temporary workers
- 2) On-call workers
- 3) Contract company workers
- 4) Direct-hire temporary workers
- 5) Independent contractors
- 6) Regular self-employed (excluding independent contractors)
- 7) Regular part-time workers
- 8) Regular full-time workers

⁹ Hipple (2001), p.3.

¹⁰ See Polivka, Cohany and Hipple (2000).

The first six categories include both full-time and part-time workers. The first category includes workers employed by worker-dispatching agencies; the second category concerns workers employed directly by companies who work only when they are “called up,” for example, construction workers and substitute teachers. The third category contains workers employed by companies contracted for certain tasks by other companies (advertising agencies, law firms, etc.). The fourth is temporary workers hired directly by companies, while the fifth includes freelancers and consultants. The sixth is very similar to the fifth, but this group is self-employed in the more traditional sense, possessing the characteristics of a business owner. The seventh includes those who do not fall into any of the other categories and work less than 35 hours per week. The eighth category is “standard,” or “typical” workers.

Such schematization is helpful in grasping the present breakdown of atypical employment in the United States. The categories, however, have been created in a mutually exclusive fashion for the purpose of statistical analysis, and the distinction between the fifth and the sixth is rather tenuous. Moreover, home-based workers and multiple jobholders remain unclear in this categorization scheme even though these employment forms exist in the United States as well as in Japan and Europe.

2.4 Concept of Atypical Employment in Europe

In contrast to the term “contingent” in the United State, there is no definitive theory on the origin of the term “atypical” which is regularly used in Japan and Europe. According to Shimada (1991), the Code du travail, the French labor law, stipulates that a “labor contract without fixed contract term is considered typical” (Article L121-5),¹¹ and it is thought that the phrase “atypical labor contract” was first used to refer to fixed-term labor contracts and agency work after the 1980s. (Discussion about these types of workers already existed in the 1970s.) One possibility is that “atypiques,” from the French “Contrats de travail atypiques (atypical labor contract),” was rendered into English as “atypical” and its usage has spread in Europe as well as Japan.

¹¹ Shimada (1991), pp.4-5.

It is difficult to discuss atypical employment in Europe as a whole. To start with, Europe includes many nations. Moreover, labor- management relations play a central role in Britain and Northern Europe whereas legal regulations play the dominant role in shaping employment in countries such as Germany and France, and this creates different aspects of atypical employment within Europe. The scope of this essay is too limited to discuss features of atypical employment in each European nation. This essay therefore will focus on presenting the big picture of conceptual categories of atypical employment in Europe (mostly EU member nations before its enlargement in May 2004) by drawing upon major works on the subject.¹²

1) Part-time Employment

There are essentially two definitions for full-time/part-time employment. One is an institutional definition deriving from laws and labor agreements, and the other is a definition used for statistical purposes. Moreover, not all countries have an institutional definition, and among those countries with such a definition, there may be differences concerning the statistical definition. According to the institutional definition in Austria, France, Germany, Greece, Italy, Luxemburg and Spain, workers who work fewer hours than regular (full-time) workers are considered part-time workers. In France, part-time workers were once considered those whose working hours were “less than four-fifths of a full-time worker,” but, with the introduction of the second Aubry Law in January 2000, the European Commission’s definition stipulated in December 1997 has been adopted (“workers whose working hours are shorter than regular workers”). Accordingly, an increasing number of countries have been adopting the 1997 European Commission directive. Holland also has a collective labor agreement which defines workers with working hours of less than 12 hours per week as “small part-time workers” and those who work more than 12 hours but less than 35 as “large part-time workers.”

There are four main statistical definitions of part-time workers: “workers with weekly working hours of less than 35 hours,” “workers

¹² For example, Meulders, Plasman and Plasman (1994) and Suzuki (1998).

with weekly working hours of less than 30 hours,” “workers who report themselves as such,” and “workers whose working hours are less than regular workers.” Because the OECD changed its definition in 1997 to “workers with weekly working hours of less than 30 hours” from “workers with weekly working hours of less than 35 hours,” it is likely that some countries will change their statistical definitions in accordance with the OECD definition.

2) Fixed-term Employment

Fixed-term employment is literally employment in which the contract term is fixed. Some countries have different regulations concerning fixed-term employment, which can be divided as follows: the nature of fixed-term work must be temporary (Germany, France, Italy, Luxemburg and Spain); there is an ceiling on how long the contract can be (Germany, France, Belgium, Italy, Luxemburg, Portugal and Spain); and there is an ceiling on the length or frequency of contract renewal (Germany, France, Belgium, Italy, Greece, Luxemburg, Portugal and Spain).

3) Agency Work

Agency work refers to employment involving the worker, the dispatching agency which employs the worker, and the client company to which the worker is dispatched.

Although there are differences among the countries concerning agency work regulations, they can be divided into the following three groups according to recent studies on agency work in Europe: countries with no special legislation (Denmark, Finland, Ireland and Britain); countries with basic legislation (Austria, Germany, Luxemburg, Holland, Norway, Spain and Sweden): and countries with basic legislation as well as regulations on the status of agency workers (Belgium, France, Italy and Portugal).¹³

4) Shift Work, Night Work and Holiday Work

Working hours that fall outside the “regular” Monday through Friday, 9:00 a.m. to 5:00 p.m. framework are sometimes considered “atypical

¹³ See EIRO (1999).

work” in Europe. This is due to the idea that shift work, night work and holiday work should be considered “unsocial forms of employment.” The *Labour Force Survey* by Eurostat contains data on such work broken down by country.

5) On-call Work

Italy and Holland, like the United States, have on-call work, an employment form in which workers are registered with companies and only work when they are “called up.”

6) Vocational Trainees and Employment Created by Employment Policy

Those who work at corporations in exchange for being trained and who receive very low pay while receiving vocational as well as regular education in school are considered “atypical workers” as well. This mainly applies to young people. Germany’s Dual System is the most widely known example of such a work-education system, and a relatively large number of countries in Europe have introduced such a system in response to growing numbers of unemployed youth since the 1970s. Moreover, European countries with relatively high unemployment rates, such as France, Belgium, Germany, Ireland, Luxemburg and Holland, have a category of workers that has been created by employment policy and who are treated differently in the wage, tax and social security systems than regular workers. French employment statistics separate those in “subsidized employment in the public sector” and “subsidized employment in the private sector” from regular employees.

7) Home-based Work

Home-based work involves processing orders from specific companies but not directly selling products in the market, and it is therefore treated as “atypical work.” At-home piecework, which has been traditionally done in Japan, telework and SOHO also fall under this category. It is difficult, however, to distinguish these workers from, for example, the self-employed.

8) Self-employed and Family Workers

In Eurostats' *Labour Force Survey*, employers are divided into two groups: those with one or more employees (employers), and those with no employees (the self-employed). The latter are sometimes lumped together with "atypical employment." As in Japan and the United States, family members working for self-employed people are also referred to as family workers in Europe.

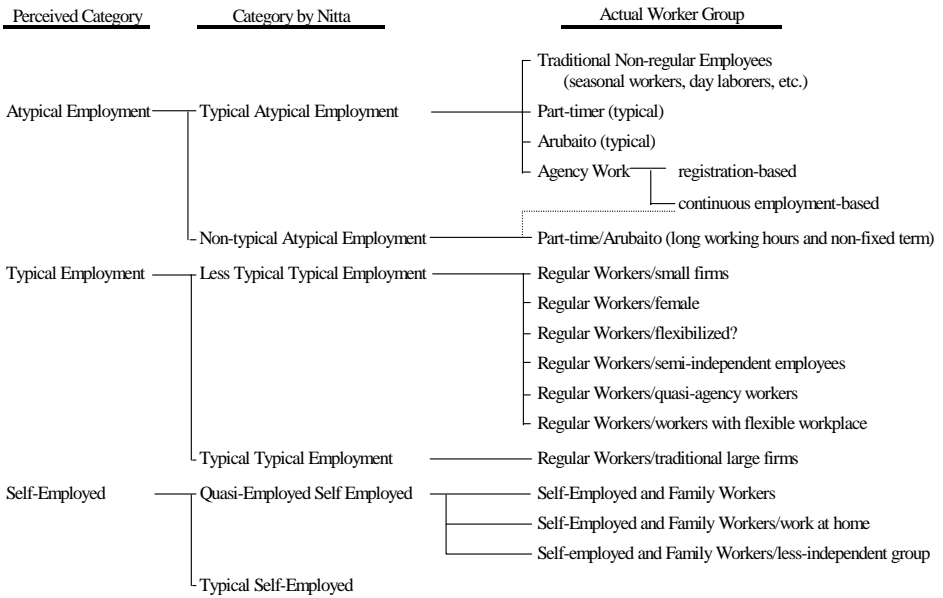
2.5 Concept of Atypical Employment in Japan

Nitta (1999) discusses the distinction between typical and atypical employment in Japan¹⁴ As seen in Figure 1., he posits that regular workers at small firms, who are less likely to resort to litigation when dismissed (and therefore have little employment protection); female regular workers, whose length of service is in general expected to be shorter than those of their male counterparts due to de facto differences in treatment (for example, promotion); and regular workers whose place of work changes frequently (construction workers, etc.) should be considered "less typical, typical workers" even when accepting the general definition of typical employment, that is, "full-time employment without fixed contract term." Furthermore, he places part-time and casual (*arubaito*) workers whose working hours are long and contract terms are not fixed into the subcategory "non-typical, atypical workers."

In addition, his schematization has such unique categories as "quasi-self-employed" and "quasi-employed self-employed." The former includes workers such as sales agents for insurance companies who do not work in the office, and the latter includes "family workers," owners of very small construction firms, and long-haul truck drivers. In analyzing these two categories, it is necessary to approach the question from the perspective of the "work" rather than "employment," while at the same time considering employment, economic and industrial policies.

¹⁴ See Nitta (1999).

Figure 1. Atypical and Typical Employment in Japan



Source: Nitta (1999).

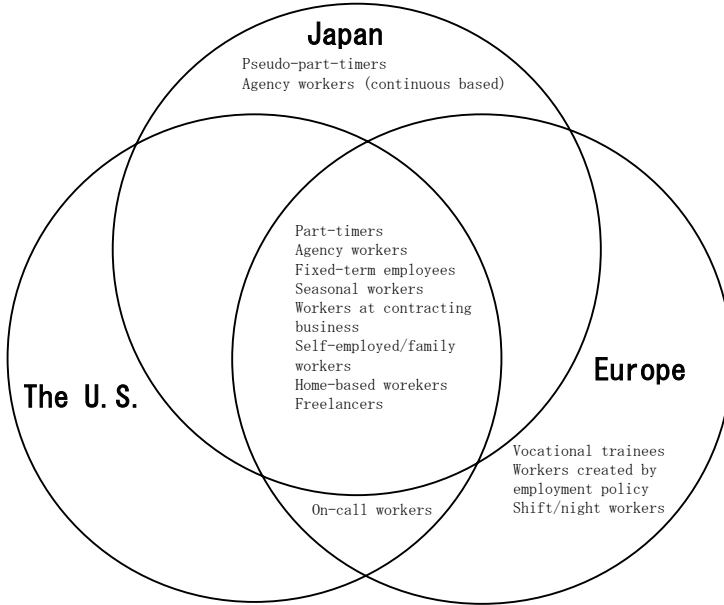
2.6 Concept of Atypical Employment in Japan, the United States and Europe: Similarities and Differences [See Figure-2]

What are the similarities and differences among atypical employment in Japan, the United States and Europe? Based on the various aspects discussed so far, there is one major difference between Europe and the United States. In the United States, there is virtually no legal regulation regarding employment forms and working conditions, and different employment forms emerge out of given labor market environments and become de facto standards. In Europe, in contrast, legal regulations play a dominant role. There are of course variations among the European nations, but many of them place legal regulations on atypical employment forms. Moreover, Europe has categories of atypical employment which do not exist in the United States and Japan, such as vocational trainees and employment created by employment policy. Relatively speaking, institutions and policy greatly influence the shape of atypical employment

in Europe. Europe also has a very distinctive idea about atypical employment as seen by the phrase “unsocial forms of employment.” In the United States and Japan, night work and shift work are regarded as typical employment because they are full-time and long-term. As noted often, there is a form of atypical employment in Japan that can be confusing to European and American observers (pseudo-part-time workers). Even though this type of work is generally referred to as “part-time/causal work,” the number of hours involved are the same as “full-time” work. Moreover, the Japanese category of agency work contains subcategories known as “continuous employment-based” and “registration-based”, with the former being extremely similar to typical employment (agency work generally refers to short-term employment for a period not exceeding a few months in the United States and Europe).

If legal issues and regulations are put aside, employment forms such as part-time employment, agency work, fixed-term employment, contract company work and self-employment are similar in all three regions. These employment forms are by and large products of changes in the labor market environment, and in this respect, there is perhaps more convergence than divergence. Excluding pseudo-part-time workers in Japan, part-time workers are defined as those whose working hours are shorter than typical workers. Japan, the United States and European countries share the definition of agency work as employment arising from the tripartite relationship — worker, dispatching agency and client company. They all define contract company workers as those who do not have employment relations with their actual workplaces. Fixed-term employment is referred to differently, but its main characteristic is the same: employment in which the contract term is limited. Moreover, the categories “self-employed,” “freelancer” (including multiple jobholders) and “home-based worker” exist in all three regions. “On-call workers,” as seen in Europe and the United States, are not common in Japan, but their characteristics seem very similar to the “registration-based” type agency workers in Japan.

Figure 2. The Concept of Atypical Employment: Similarities and Differences



3. Atypical Employment: Current Situation and Trends

Of the different categories that make up atypical employment, this section focuses on part-time employment, agency work and fixed-term employment and evaluates the current situation and trends concerning each. These three are the only categories that can facilitate mutual comparisons taking into consideration the availability of data.

3.1 Part-time Employment

The OECD's *Labour Force Statistics* makes it possible to compare the ratio of part-time workers among member nations. Table 2 shows how the ratio has changed between 1983 and 2002. The Japanese *Labour Force Survey* defines Japanese part-timers as those who work less than 35 hours per week and are for workers in other countries as those who work less than 30 hours per week. Looking at the data over the past 20 years,

Table 2. Ratio of Part-time Workers to Total Number of Employed (Male and Female, %)

	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002
Holland	18.5		19.5		26.4	26.9	27.7	28.2	28.6	27.3	27.9	28.9	29.4	29.3	29.1	30.0	30.4	32.0	33.0	33.9
Japan	16.1	16.4	16.6	16.8	16.6	16.9	17.6	19.2	20.0	20.4	21.1	20.4	20.1	21.8	23.3	23.6	24.1	22.6	24.9	25.1
Britain		19.6	19.7	20.2	20.8	20.5	20.2	20.1	20.7	21.5	22.1	22.4	22.3	22.9	22.9	23.0	22.9	23.0	22.7	23.0
Belgium	9.8	10.8	11.5	11.7	12.5	12.7	13.0	13.5	14.6	14.3	14.7	14.6	14.6	14.8	15.0	15.6	19.9	19.0	17.0	17.2
Ireland	8.0	7.9	8.1	8.3	9.0	9.6	9.4	10.0	10.4	11.3	13.1	13.5	14.3	14.1	15.0	17.6	17.9	18.1	17.9	18.1
Canada	16.9	16.8	17.2	17.0	16.8	17.0	16.8	17.1	18.3	18.7	19.3	19.0	18.9	19.2	19.1	18.9	18.5	18.1	18.1	18.7
Germany	13.4	11.0	11.0	11.2	11.0	11.4	11.6	13.4	11.8	12.3	12.8	13.5	14.2	14.9	15.8	16.6	17.1	17.6	18.3	18.8
Denmark	20.6	21.2	20.3	19.6	19.9	19.0	18.9	19.2	18.7	18.9	19.0	17.3	16.9	16.6	17.2	17.1	15.3	16.1	14.7	16.2
France	10.3	11.2	11.7	12.6	12.5	12.6	12.1	12.2	12.0	12.6	13.2	13.8	14.2	14.0	14.8	14.7	14.6	14.2	13.8	13.7
Sweden					16.8	16.0	15.2	14.5	14.6	15.0	15.4	15.8	15.1	14.8	14.2	13.5	14.5	14.0	13.9	13.8
The U.S.	15.4	14.6	14.4	14.6	14.4	14.2	14.1	13.8	14.4	14.4	14.4	14.3	14.1	14.0	13.6	13.4	13.3	12.9	13.1	13.4
Italy	8.0	7.8	7.9	8.1	8.5	8.6	9.0	8.9	9.0	10.0	10.0	10.0	10.5	10.5	11.3	11.2	11.8	12.2	12.2	11.9
Finland	8.3	8.4	8.3	8.1	8.1	7.4	7.7	7.6	7.9	8.1	8.9	8.9	8.7	8.5	9.3	9.7	9.9	10.4	10.5	11.0
Spain					5.0	5.0	4.5	4.6	4.4	5.3	6.0	6.4	7.0	7.5	7.9	7.7	7.8	7.7	7.8	7.6
South Korea							5.2	4.5	4.5	4.8	4.5	4.5	4.3	4.3	5.0	6.7	7.7	7.0	7.3	7.6

Notes: 1. Part-time workers are defined as employees whose working hours are less than 30 hours per week (35 hours for Japan).

2. The figures for Germany up to 1991 concern only the former West Germany; figures from 1991 are for a unified Germany.

Source: OECD, *Labour Force Statistics 1982-2002* (2003).

differences among the countries can be observed: the ratio of part-time workers is increasing (Holland, Japan, Belgium and Ireland); the ratio is increasing in a relatively modest fashion (Britain, Canada, Germany, France, Italy, Finland, Spain and South Korea); there is a downward trend in the ratio of part-time workers (Denmark, Sweden and the United States). The proportion of female workers to all part-time workers is 83.7 percent in Germany, 79.5 percent in France, 78.8 percent in Britain, 68.2 percent in the United States, 67.0 percent in Japan, and 58.3 percent in South Korea respectively.

3.2 Agency Work

Originating in the United States in the 1920s, legislation regulating agency work was implemented in Germany and France in 1972 and in 1986 in Japan, and the laws regarding this type of work have undergone substantial changes.¹⁵ It is very difficult to make a rigorous cross-national comparison on agency work because, as mentioned above, some countries have legal regulations while others do not. The comparison presented in this section therefore should be viewed as a compilation of various statistical figures based on the different definitions adopted in respective countries.

Table 3 shows the percentage of agency workers as they are defined in each country. Although it is difficult to directly compare these national figures with each other, the ratio of agency workers to the total number of employed is more or less around 1.0 percent, not too high. What is significant though is that the ratio is showing an upward trend in every country and is expected to continue to increase. The figure for Japan is from *The Special Survey of the Labour Force Survey* issued in February 2000, but the same survey from August 2001 shows 0.9 percent, indicating an upward trend in Japan as well.¹⁶

¹⁵ On agency work, see Fujikawa (1998), Japan Institute of Labour (1997), and EIRO (1999).

¹⁶ *The Special Survey on the Labour Force Survey* defines them as “dispatched workers from temporary labor agencies.”

Table 3. Ratio of Agency Workers to Total Number of Employed in 1999 (Male and Female)

	Ratio of Agency Workers to Number of Employed (%)	Pattern of Growth
Austria	1.0	++(since 1993)
Belgium	1.4	++
Denmark	0.2	+
Finland	0.4	++ (15% annual growth rate)
France	1.9*	++ (35.7% in 1997-98)
Germany	0.6	+
Italy	No Data	++ (since 1998)
Holland	2.5	++ (20% average annual growth rate in 1993-97)
Norway	0.5	+
Portugal	0.5	+
Spain	0.6	++ (since 1999)
Sweden	0.4	++ (50% annual growth rate)
Britain	1.0	++
The U.S.	2.4**	++ (rapid increase since the 1980s)
Japan	0.7***	++

Notes: *The French ratio is based on figures that have been recalculated into full-time figures.

**The figure for the United States is for 1998.

***The figure for Japan is for 2000 (0.67% to be exact).

Sources: For Europe, EIRO (1999).

For the United States, Fujikawa (1998).

For Japan, Statistics Bureau, Ministry of Internal Affairs and Communications, *The Special Survey of the Labour Force Survey of Japan*, February 2000.

3.3 Fixed-term Employment

It is also difficult to conduct a cross-national comparison on fixed-term employment in a strict sense. In particular, the United States presents a challenge as its definition of fixed-term employment is different than that used in Europe and Japan. However, with respect to the ratio of contingent workers (shown in Table 4), which is a more narrowly-defined category than fixed-term workers, the ratio really did not change between 1997 and 1999. In Europe, the percent of this type of worker increased only in Holland, with the ratio decreasing in all the other countries in 2002. The ratio was below 10 percent in Belgium, Denmark, Italy and Britain and over 10 percent in the other European countries. In Japan, the ratio is

Table 4. Ratio of Fixed-term Employees to Total Number of Employed (Male and Female)

(Unit: 1,000 people; %)

	1992			1997			2000			2002		
	Number of Fixed-term Employees	Number of Employed	Percentage	Number of Fixed-term Employees	Number of Employed	Percentage	Number of Fixed-term Employees	Number of Employed	Percentage	Number of Fixed-term Employees	Number of Employed	Percentage
Belgium	153	3,097	4.9	199	3,177	6.3	311	3,459	9.0	261	3,427	7.6
Denmark	259	2,353	11.0	269	2,423	11.1	251	2,468	10.2	222	2,497	8.9
Germany	3,401	32,863	10.3	3,652	31,448	11.6	4,088	32,375	12.6	3,854	32,252	11.9
Spain	3,063	9,144	33.5	3,239	9,630	33.6	3,691	11,487	32.1	4,080	13,095	31.2
France	1,941	18,709	10.4	2,518	19,296	13.0	3,002	20,724	14.5	2,994	21,312	14.0
Italy	1,132	14,907	7.6	1,173	14,316	8.2	1,523	15,033	10.1	1,559	15,785	9.9
Holland	570	5,861	9.7	717	6,296	11.4	960	6,959	13.8	1,030	7,220	14.3
Britain	1,194	22,109	5.4	1,683	23,101	7.3	1,629	24,427	6.7	1,508	24,978	6.0
The U.S.	—	—	—	2,385	120,247	2.0	2,444	124,444	2.0	—	—	—
Japan (based on <i>The Employment Status Survey</i>)	5,890	48,605	12.1	6,486	51,147	12.7	—	—	—	7,856	50,836	15.5
Japan (based on <i>The Special Survey on the Labour Force Survey</i>)	5,250	46,640	11.3	5,940	49,630	12.0	6,470	49,030	13.1	—	—	—

Notes: 1. The figures for European countries are those for “temporary employment or employment for a fixed period” including seasonal workers, dispatched workers and contract workers.

2. The figures for the United States are based on the narrowest of the three definitions of fixed-term employment and calculated by excluding the self-employed and individual contractors from workers who both meet the definition of contingent workers (workers “without contract either explicitly or implicitly promising continuous employment”) and “have been in the present position for less than a year and whose employment contract is expected to continue for no more than one year.” The figures are for 1997 and 1998.

3. The figures for Japan are the sum of those working on a “temporary employment” basis (employment period of more than one month but not exceeding one year) and “daily employment” (employment period of less than one month) irrespective of what they are called. Therefore, the figures include those who are called regular employees, part-time workers and agency workers. The number of employed does not include corporate executives.

Sources: For European countries, EUROSTAT, *Labour Force Survey*.

For fixed-term employees in the United States, Hipple, Steven (2001). For the total number of employed, figures for December of each year taken from the Bureau of Labor Statistics website.

For Japan, Statistics Bureau, Ministry of Internal Affairs and Communications, *The Employment Status Survey and the Special Survey of the Labour Force Survey of Japan*.

showing a slight increase. The ratio of agency workers (using the Japanese definition) was a little over 15 percent in 2002, showing an increase.

4. Conclusion and Issues for the Future

This essay has compared, albeit somewhat casually, the concept behind and internationally comparable categories of atypical employment in Japan, the United States and Europe. When looked at individually and rigorously, there are certain differences among nations and regions, but the overall long-term trend seems to be that atypical employment will continue to increase. I would like to conclude by touching upon issues and studies that have not been discussed in this essay.

First, data and studies are available for a more detailed examination of the specific situation in each country and region. For example, in the United States there are surveys on contingent workers, and detailed data about them exists.¹⁷ Moreover, there are studies on the reasons behind the increase in contingent and part-time workers.¹⁸ In Europe, *The Labour Force Survey* by EUROSTAT is extremely important. In the 2002 edition, the latest edition available at the time of this writing, data on fixed-term and part-time workers are compiled and sorted by age group, educational background, industry, occupation and individual reason, along with information on side jobs, holiday work, night work and shift work. Information concerning fixed-term employment and agency work in individual European countries also exists.¹⁹ In Japan, the Ministry of Health, Labour and Welfare compiled *The General Survey on Diversified Types of Employment* for 1987, 1994, 1999 and 2003. By using these surveys together with the Ministry of Public Management, Home Affairs and Telecommunications survey used in this essay, one can draw a more detailed picture of the actual situation surrounding atypical employment.²⁰ Furthermore, the study by Furugori (1997) is very insightful on atypical employment in Japan.

¹⁷ For example, Baker and Christensen ed. (1998), Hipple (2001), Carré, Ferber, Golden and Herzenberg ed. (2000), and Nakakubo and Ikezoe (2001).

¹⁸ For example, Houseman (2001) and Tilly (1991).

¹⁹ Industrial Relations Services (1997b) and (1997c), and EIRO (1999).

²⁰ Sato (1998) and Ogura (1999) are based on recalculations of statistical data in this survey.

Some studies have attempted to do an international comparison of atypical employment forms. For instance, the 1996 edition of *The Employment Outlook* by the OECD contains a comparison of temporary jobs, and a comparison of part-time and full-time employment can be found in the 1999 edition. There is also a comparative study on German and French laws with specific reference to part-time labor regulations.²¹

Mangan (2000) analyzes atypical employment in Europe, Japan, the United States and Australia. The series of works by Suzuki (see Reference) are important. They approach the subject from the same angle as this present essay and offer certain perspectives on the increase of atypical employment and its effects from an international viewpoint. In addition, there is the study by Auer and Cazes ed. (2003), which compares employment flexibility in Japan, the United States and Europe.

In Japan, equal treatment for part-time workers, utilization of regular employees with shorter working hours, and work-sharing schemes to facilitate diverse work styles will be increasingly important policy issues in the future. For this reason, additional research on atypical employment should be conducted. The OECD (1996) compares typical employment and atypical employment in terms of their contribution to employment growth rate.²² It will become important to produce accurate and rigorous international comparisons on issues, including the one addressed by the OECD study. To facilitate such efforts, it is crucial to improve statistical data in addition to comparative studies of legal institutions (labor law, social security system, tax systems, etc.) and labor-management relations concerning atypical employment. It is still difficult to regard statistical data from Japan, Europe and the United State as mutually compatible and comparable (except for among EU member states). International compatibility and accessibility of labor statistics is an acute problem.

This essay is merely one step toward the goal of being able to carry out international comparisons of atypical employment. But, if it contributes to further research on this subject, I would feel very fortunate.

²¹ Mizumachi (1997) is a detailed analysis of French and German part-time labor laws.

²² See OECD (1996). It however limits itself to comparisons within Europe.

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