#### PART I

# Chapter 4

# Helping Older Workers Find and Retain Jobs

The financial incentives in pension systems, explored in Chapter 3, undoubtedly play an important role in retirement decisions. But if there are barriers to working longer on the demand side, pension reforms designed to improve work incentives may be less effective.

This chapter describes various barriers affecting employers and employees and what might be done to tackle them. There are still ageist attitudes among employers, particularly over the ability of older workers to adapt to change. Legislation against age discrimination and public-information campaigns have been effective in some, but by no means all, countries that have adopted these policies. In some countries, older workers cost too much and early retirement provides an all-too convenient way of adjusting the size of the workforce. Strict employment-protection legislation can make it costly to hire older workers.

Employment opportunities of older workers may be limited because their skills have become devalued or they receive little help in finding new jobs. Available employment opportunities may be unattractive because of poor working conditions or unsuitable and inflexible working-time arrangements.

Finally, this chapter discusses the issue of jobs for younger and older workers. It finds that there is no evidence that older workers deprive youths of jobs. In fact, the reverse is true.

he size of the working-age population – aged 20-64 – will reach a peak in OECD countries around 2015. It will then decline by a little over 10% by 2050. This prospect raises the question of where workers will be found to maintain economic growth and finance rising public-pension and healthcare costs. More needs to be done to increase productivity and mobilise all available resources in labour markets, including older workers.

The debate about increasing pension ages – the policies examined in Chapter 1 in Part I on "Pensionable age and life expectancy 1950-2050" – has often revolved around the question of whether there are jobs for older people. A similar concern applies to pension reforms that have improved incentives for older workers: they may be less effective in encouraging later retirement if there are still substantial barriers to work on the demand-side.

On the side of employers, the demand for older workers may be restricted by ageist attitudes, because older workers cost too much or because early retirement provides a convenient way of reducing the size of their workforce. On the side of older workers, their employment opportunities may be limited or unattractive because their skills have become devalued, they receive little help in finding new jobs or they face undesirable working conditions and unsuitable working-time arrangements.

# 4.1. A greyer workforce

The workforce has been getting older for some time. In 1966, half of employees were aged under 35; today, that figure is only just over one-third (Figure 4.1). If current patterns of employment at different ages were to continue, the median age of employees will increase from just over 40 now to 42 in 2050. In the mid-1960s, the median age was 34.

However, the age-pattern of employment is unlikely to remain the same: ageing would mean that the number of employees would decline even more rapidly than the working age population. Simply to maintain the size of the workforce in employment in OECD countries would require employment rates for 50-64 year-olds to increase substantially: to the same level as for 40- to 49-year-olds. And employment rates for 65- to 69-year-olds would need to increase from just over 20% now to 40%. The median age of employees in such a scenario would rise to 45 from just over 40 today.

The rest of this special chapter sets out how this necessarily radical change in the labour market might be achieved. It sets out the barriers that older workers face and assesses the measures that countries have taken to tackle them.

#### 4.2. Ageism

There is no doubt that at least some employers discriminate against older workers. Almost all of the 21 country reviews in the OECD's series on Ageing and Employment Policies found evidence to show that employers often have negative perceptions about older workers, especially about their ability to adapt to technological and organisational change.<sup>2</sup> Around 6% of the adult population in the European Union reported that in the past 12 months they have personally felt discriminated against or harassed as a result of their age. This goes

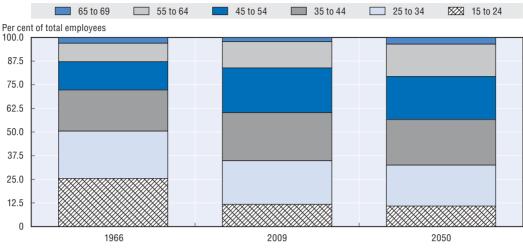


Figure 4.1. Age-structure of employment, 1966, 2009 and 2050

Note: The age structure calculated for 2050 assumes that employment rates by age remain the same as they were in 2009

Source: OECD Employment Database; OECD calculations using United Nations, World Population Prospects - The 2008 Revision

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to 11% in the Czech Republic.<sup>3</sup> However, a detailed examination of these survey data (Table 4.1) reveals a very weak correlation between different aspects of attitudes to ageism. The different measures look at general perceptions of its prevalence, personal experience of seeing or being subject to ageism and efforts to combat age discrimination. Most importantly, attitudes to and perceptions of ageism are, at best, positively rather than negatively correlated with the employment rate of older people.

More direct evidence of age discrimination in employment has been obtained in a number of experimental field studies in which "matched" CVs are sent to employers. The invented candidates' characteristics and qualifications are the same: the only differences are in their stated age or length of work experience. The results of these studies show that, in general, older candidates were less likely to receive offers of a job interview.<sup>4</sup>

Virtually all OECD countries now have in place some form of *legislation* banning age discrimination in employment. Japan is a notable exception: more emphasis there has been placed on administrative guidelines. The United States was one of the earliest to legislate (in 1967). Many European countries took steps much more recently, in many cases prompted by a European Union directive in 2000 requiring them to do so by 2006.

Several countries have had *public-information* campaigns to tackle ageism in the workplace. Examples include Australia, Finland, France, the Netherlands, Norway and the United Kingdom. Employers are not just being told that they cannot discriminate against older workers through the law. They are also provided with tools and information for managing an older workforce. In some instances, there has been a strong emphasis on managing age diversity in the workplace to avoid stigmatising older workers.

The important question is, of course, are these legislative and public-information measures effective? Economic analysis demonstrates that the impact of anti-discrimination legislation need not be positive. It encourages retention of workers in the protected group, because it makes it more costly to fire them. However, there can be unintended consequences: employers might be discouraged from hiring protected employees precisely

Table 4.1. Correlation between subjective measures of age discrimination and employment of older people<sup>1</sup>

	D1	D2	D3	D4	D5	D6	D7	D8	e5064	c5064
Discriminat	ion measures <sup>2</sup>									
D1	1.0000									
D2	0.7930***	1.0000								
D3	0.4701**	0.6858***	1.0000							
D4	0.3633*	0.5500***	0.8891***	1.0000						
D5	0.1841	0.3235*	0.2856	0.3732*	1.0000					
D6	0.2671	0.3396*	0.3572*	0.2647	0.2075	1.0000				
D7	0.4798**	0.5195***	0.3733**	0.4805**	0.6024***	0.104	1.0000			
D8	0.2611	0.161	-0.0573***	0.1003	0.097	0.0625	0.2177	1.0000		
Employmen	t measures <sup>3</sup>									
e5064	0.0533	0.0156	0.2679	0.4165**	0.201	0.0061	0.4722**	-0.0867	1.0000	
c5064	0.0724	0.3359*	0.2837	0.3706*	0.2483	-0.0808	0.4673**	0.0855	0.1349	1.0000

- 1. The value shown in the table refer to Pearson correlation coefficients between measures at the aggregate country level for the EU27 countries. Statistically significant correlations are shown in bold and the level of significance is shown as: \*, \*\*, \*\*\* = significant at 10%, 5% and 1% levels, respectively.
- 2. Each discrimination measure refers to the (weighted) proportion of respondents in each country in a 2009 Eurobarometer survey who reported that:
  - D1. Discrimination on the basis of age is very widespread or fairly widespread.
  - D2. Compared with the situation five years ago, age discrimination is more common.
  - D3. In the past 12 months they have personally felt discriminated against or harassed on the basis of age.
  - D4. In the past 12 months they have witnessed someone being discriminated against or harassed on the basis of age.
  - D5. Age may be a disadvantage for a candidate when a company wants to hire someone and has the choice between two candidates with equal skills and qualifications.
  - D6. Not enough effort is made nationally to fight all forms of discrimination.
  - D7. The economic crisis will contribute to an increase of discrimination on the basis of age in the labour market.
  - D8. Not enough is being done to increase diversity in their workplace as far as age is concerned.
- 3. The employment measures refer to:
  - e50-64 = Employment rate in 2008 for the population aged 50-64 years-old.
  - C50-64 = Change in the employment rate between 2003 and 2008 for the population aged 50-64 years-old.

Source: D'Addio et al. (2010) based on Eurobarometer (2009) for the discrimination measures; and on the European Union Labour Force Survey.

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because of this cost.<sup>5</sup> There is some evidence, most of it from the United States, that this latter effect is significant. The overall impact on employment rates for older people is less clear cut (see, for example, Adams, 2006; Lahey, 2006; and Neumark, 2008).

The prevalence of perceived age discrimination has declined in only around half of the countries for which complete data between 1995 and 2005 are available (Table 4.2). Among the countries that have taken a strong public stance against age discrimination (through legislation or public-information campaigns or both), there were fewer reports of ageism at work in Finland and the United Kingdom in 2005 than earlier, but the Netherlands recorded an increase. Similarly, there have been significant declines in perceived age discrimination in Spain and Portugal despite the fact that government action in the period in question was limited.

#### 4.3. Labour costs and older workers

Negative attitudes may partly explain employer reluctance to hire or retain older workers, a number of more objective factors also drive employer behaviour. One of the most significant is the cost of employing older workers. If this cost rises more steeply with age than productivity does, then both retention and hiring of older workers will be affected negatively.

Table 4.2. Proportion of workers reporting age discrimination over the previous 12 months<sup>1</sup>

Percentage							
	1995	2000	2005				
Austria	6.9	4.3	2.4				
Belgium	1.3	2.5	3.2				
Czech Republic		5.5	5.4				
Denmark	2.4	1.4	2.0				
Finland	4.0	4.3	3.3				
France	4.8	3.4	2.6				
Germany	1.9	3.3	3.0				
Greece	3.6	2.8	4.7				
Hungary		4.8	3.3				
Ireland	2.1	3.2	4.2				
Italy	2.0	2.2	3.8				
Luxembourg	2.1	1.2	4.1				
Netherlands	2.6	3.0	3.7				
Poland		2.1	2.4				
Portugal	3.2	1.1	1.9				
Slovak Republic		5.1	3.8				
Spain	1.9	1.6	0.4				
Sweden	3.0	3.9	4.0				
United Kingdom	4.7	3.9	2.7				
Weighted average	3.1	3.2	3.2				
Unweighted average	3.1	3.2	3.2				

<sup>1.</sup> The data refer to the proportion of all wage and salary earners in each country who reported that over the past 12 months they had been subjected at work to age discrimination.

Source: D'Addio et al. (2010) based on European Working Conditions Survey.

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The most important element in labour costs is, of course, the earnings of the employee. Figure 4.2 shows how earnings vary with age. Of the 12 countries shown, the age-earnings profile is continually increasing in Belgium, France and the Netherlands. In many of the others, the pattern is an inverted U-shape; this is most pronounced in Ireland, Japan and the United Kingdom. Analysis of earlier data for a broader range of countries shows a strong age-earnings link in a few other countries, such as Austria and Germany.<sup>6</sup>

Figure 4.3 explores how such "seniority wages" affect the labour market for older workers. The degree to which earnings are linked with age is measured by the ratio of earnings of 55-59 year-olds to those of 25-29 year-olds. This has the expected negative correlation with the employment rate for 50-64 year-olds. However, the link is weak – the fitted regression line is only mildly downward sloping – and statistically insignificant. However, the relationship between seniority wages and hiring rates of 50-64 year-olds is strongly negative and significant at the 1% level. This finding is confirmed by firm-level data: companies with stronger seniority wages are less likely to hire older workers (Daniel and Heywood, 2007).

Economists have long sought to rationalise the existence of seniority wages. Higher pay for older workers than would be justified on productivity grounds is seen as a way of bonding employees to their jobs. If the firm invests in training workers, by "back-loading" their financial rewards, it can ensure that it reaps the rewards (see Lazear, 1981 for example). However, seniority-pay arrangements probably make less economic sense for employers today than they did in the past. Workers are more mobile and the concept of

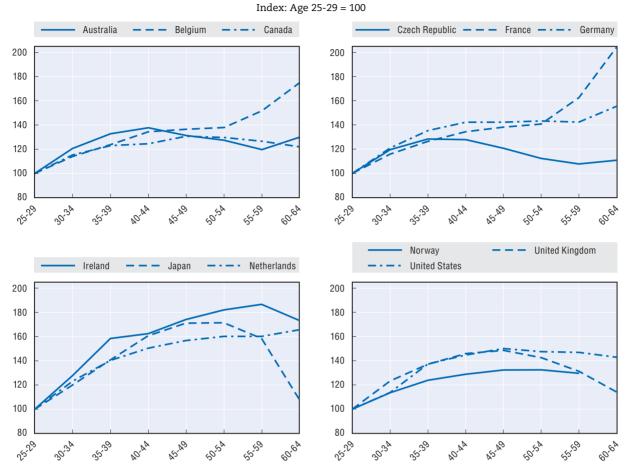


Figure 4.2. Average earnings by age

Note: The data refer to full-time workers. They cover various years over the period 2005-08.

Source: D'Addio et al. (2010) based on OECD Earnings Database.

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lifetime employment with the same employer is increasingly obsolete. Furthermore, an ageing workforce, discussed in Section 4.1 of this chapter, means that seniority wages are increasingly unsustainable. It is not possible for employers to pay a growing number of older workers more than their worth in productivity terms when there is a declining number of younger workers who are paid less than their productivity. And growing competition for the diminishing pool of younger workers is likely to drive their wages up.

There is some evidence that seniority-based wage setting is indeed on the wane. In Sweden, for example, seniority clauses in public-sector pay arrangements have been replaced by performance clauses. Similarly in Japan, there is increasing emphasis in the private sector on performance-related pay, although seniority pay remains well entrenched for male "regular" workers until their mid-50s.

A number of countries have taken direct action to reduce the cost of employing older workers through wage subsidies or a reduction in social security contributions. Some of these schemes are simply targeted on age alone, while others also take account of additional characteristics of older workers. But caution is required in adopting these

Employment rate of men 50-64 (%) Hiring rate of men 50-64 (%) 14 Correlation coefficient: -0.20 Correlation coefficient: -0.62\*\*\* 70 12 AUS SWE ◆ NOR GBR USA 60 10 DNK CAN GBF 50 8 ESP → HIIN **◆**IBI 40 6 SWE M∩R 30 4 20 2 0 10 1.0 1.2 1.3 1.5 1.6 1.7 1.8 1.2 1.5 1.6 11 14 1.0 11 1.3 17 18 Ratio of male earnings 55-59/25-29 Ratio of male earnings 55-59/25-29

Figure 4.3. Seniority wages and labour-market outcomes for older male workers

Note: The employment rate is the ratio of employees to the population in 2004. The hiring rate is the number of employees with less than one year of tenure relative to total employees. The data are from 2004, except for Korea (2000). The earnings data cover full-time workers only for various years over the period 1998-2003.

Source: D'Addio et al. (2010) based on OECD Earnings Database for the earnings data and OECD estimates based on the European Union Labour Force Survey and other national labour force surveys for the other indicators.

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policies. Clearly, not all older workers have low productivity and require wage subsidies to keep their jobs. There is therefore likely to be a large "deadweight" cost to the public finances. There is also a risk of stigmatising older workers more generally.

# 4.4. Labour-market regulation

Employment-protection regulations – like anti-discrimination legislation – can have both positive and negative effects on older workers. On the one hand, strict employment-protection legislation protects incumbent workers – who tend to be older – at the expense of "outsiders", such as women and youths. On the other hand, such protection may encourage employers to use early-retirement pathways to adjust their workforce. Often, this takes place in collusion with trade unions and the government. While this might be the optimum human-resources policy for a particular employer, it is unlikely to be best for the wider economy and society.

Figure 4.4 uses the OECD's index of the strictness of employment-protection legislation, as set out in OECD (2004b). Along the lines of Figure 4.3, it then compares this with labour-market outcomes for men aged 50-64. There is a strong negative relationship between employment protection and both the employment rates of older people and hiring rates for older workers. The correlations are statistically significant at 1% and 5% levels respectively. However, more rigorous empirical studies, controlling for other factors affecting employment rates of older workers, have mixed results, with some showing a much weaker relationship between employment protection and labour-market outcomes for older workers (see, inter alia, OECD, 2006b; and Dorn and Sousa-Poza, 2007).

Employment rate of men 50-64 (%) Hiring rate of men 50-64 (%) 14 Correlation coefficient: -0.50\*\*\* Correlation coefficient: -0.50\*\* 70 12 AUS ◆ NOB ◆ USA CHE ◆ GBR SWE DNK ♦ POL 60 10 CAN ◆ KOR ESP 8 50 ◆ DFII SVK AUT 📥 40 **◆**KOR 6 MEX **◆**GRC NOR FRA 30 4 ITA ◆ POL 20 2 **△**THR

Figure 4.4. Employment protection and labour-market outcomes for older male workers

Note: The employment rate is the ratio of employees to the population in 2004. The hiring rate is the number of employees with less than one year of tenure relative to total employees. The data are from 2004, except for Korea (2000). The strictness of the employment protection legislation (EPL) is an index covering individual and collective dismissals and temporary employment: see OECD (2004b) for details.

4.0

0

0.0

0.5

1.0

1.5

2.0

2.5

3.0

3.5 4.0

EPL strictness

Source: OECD (2004b); OECD calculations based on the European Union Labour Force Survey and other national labour force surveys.

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#### 4.5. Skills and training

0.5

0.0

1.0

1.5

2.0

2.5

3.0

3.5

EPL strictness

The demands for different skills are constantly changing in response to globalisation, and changes in technology, work organisation and consumption patterns. Older workers are especially likely to see their human capital depreciate in the face of such flux. Renewing their human capital requires continued investment: through training, for example.

Unfortunately, older workers are less likely to take part in training than their younger colleagues in the 21 OECD countries for which data are available (Figure 4.5). The age gap in training is particularly large in Austria and the Netherlands in relative terms and in Australia, Finland and the United Kingdom in absolute terms (see Chapter 5 of OECD, 2003). This finding is confirmed by other studies; and the gap remains significant even when other factors are taken into account. However, it should also be noted that there are also large country differences in the overall incidence of training. For instance, whether young or old, a much smaller proportion of workers in Hungary, Italy and Portugal participate in training than is the case in Switzerland and the Nordic countries.<sup>9</sup>

The decline in participation with training in age could arise on the supply-side – employers and public employment services are less likely to offer training to older workers – or on the demand side: older workers are less willing to take up training opportunities. The OECD's (2003) detailed study suggests that the demand-side matters more. Older workers may be less willing to participate in training because the expected pay-back period on their investment in training activities is shorter than for younger workers.

The age gap in training incidence is negative related with both the average age of labour market and the retention of older workers relative to younger workers. <sup>10</sup> There is also evidence of a negative relationship between the training participation of older workers and the implicit tax on continuing to work at older ages. <sup>11</sup> There is a strong, positive link between training and educational attainment (see OECD, 2003; and Bassanini *et al.*, 2007).

50-64 **25-49** 65 60 55 50 45 40 35 30 25 20 15 10 5 0 United Kindom Slovak Republic Czech Republic Belgium reland

Figure 4.5. **Training of older and younger workers**Percentage of employees participating in education or training during the previous 12 months

Note: The data are from 2003, except for Australia (2001).

Source: D'Addio et al. (2010) based on European Union Labour Force Survey lifelong learning module and Australian Survey of Education and Training.

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Since educational attainment of successive cohorts is greater, this should lead to a narrowing of the age gap in training. Furthermore, longer working lives are likely to generate increased investment in training because of the longer pay-back period.

## 4.6. Working conditions

The health of older workers, working conditions and working-time arrangements also play an important role in retirement decisions. Several studies report that blue-collar workers and less-qualified workers are more likely to retire earlier than white-collar workers and more highly-qualified workers. Constraints on reducing working hours may also be "pushing" workers into retirement.

A number of measures have been taken by OECD countries to improve working conditions for older workers. Finland is a leader in the range of programmes to increase the "work ability" of older workers: through rehabilitation, training, improvements in occupational health and raising awareness of the work needs of older workers (OECD, 2004a, 2006). Similarly, Germany's "New Quality of Work Initiative" (INQA) promotes employability at all ages with its campaign "30, 40, 50 plus – Working healthily as you get older" (OECD, 2005).

# 4.7. Help in finding jobs

Long-term unemployment is a greater problem for older than younger workers. Older people find it more difficult to get new jobs. But there is often a lack of both help and pressure for them to seek work. For example, job-search requirements for receipt of benefits are weak or non-existent for the older unemployed in some countries, such as Belgium and France.

Providing employment assistance to older people is often not a priority for private and public employment agencies. But this is changing. Some countries, such as the United Kingdom, have introduced dedicated programmes for older workers. Others, such as Canada, have experimented with pilot projects to determine what works best for older workers and job seekers. Australia has given special incentives for private employment agencies to place older people in jobs.

It will become increasingly important to prepare older workers for greater job mobility at the end of their careers. These transitions will require greater resources for public and private employment agencies to provide career counselling, job-search assistance and help for older people in setting up their own businesses.

#### 4.8. Jobs for younger and older workers

One concern often voiced in the debate about encouraging people to work longer and defer their retirement is that this will deprive youngsters of jobs. Economists call this the "lump-of-labour fallacy". The idea that public policy can re-shuffle a fixed number of jobs between workers of different ages is simply not true. This is clearly demonstrated in Figure 4.6, which compares employment rates of older (aged 55-59) and younger people (aged 20-24). The relationship between the two is positive and highly significant in statistical terms. The lump-of labour hypothesis is indeed a fallacy.

Employment rate, 55-59 year-olds (%) 90 ♦ ISL ◆ SWF 80 ◆NOR GBR DEU 70 ◆ NLD ◆ AUS CAN KOR 4 USA CHI • 60 ◆AUT 50 ◆SVN POI 40 TUR 30 30 35 40 45 Employment rate, 20-24 year-olds (%)

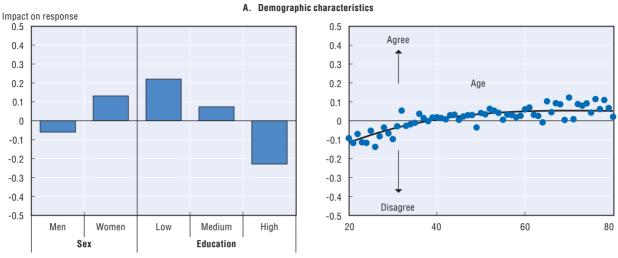
Figure 4.6. **Employment rates: Younger and older workers**Percentage of 55-59 year-olds and 20-24 year-olds in employment, 2009

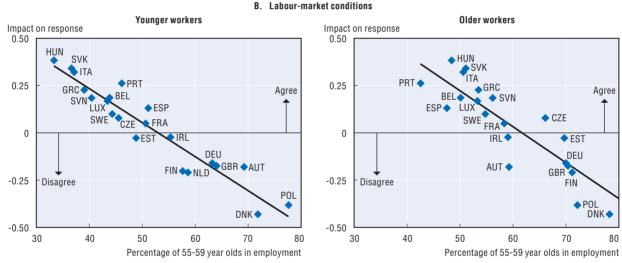
Note: Regression line shown (heteroskedasticity-adjusted standard errors in parentheses) is employment rate of 55-59 year-olds = 36.84 (6.671) + 0.4565 (0.1402) × employment rate of 20-24 years.  $R^2$  of the regression is 0.2381. Source: OECD calculations using Eurostat data.

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However, public perceptions of the trade-off between employment of younger and older workers are significant, especially when these influence the minds of policy makers. Figure 4.7 explores views on the hypothesis: "As older people work until a later age, fewer jobs will be available for younger people". It is based on Eurobarometer data, and so only covers member states of the European Union that are also in the OECD.

Figure 4.7. "As older people work until a later age, fewer jobs will be available for younger people": Impact of different factors on responses





Note: Estimation based on an index with answers of strongly disagree rated as -2, somewhat disagree as -1, somewhat agree as 1 and strongly agree 2. In addition to the variables shown, the analysis controlled for region (metropolitan, other urban and rural) and economic activity (retired, other not working, employed, self-employed). The results shown are predicted values taking all these factors into account at once. All variables included in the econometric model were significant at the 1% level.

Source: OECD analysis of Eurobarometer survey of 27 113 people in the European Union, of which 21 133 are in OECD member countries; OECD Employment Database for employment rates.

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The results are instructive. Women are significantly more likely than men to believe that older workers deny younger people jobs. Older people and those with a shorter time in education are also more likely to agree that as people work longer there will be fewer jobs for youngsters.

However, the most powerful effect on people's perceptions derives from the state of different countries' labour markets, as demonstrated in the lower two charts in Figure 4.7. Citizens of Hungary, Italy and the Slovak Republic are more likely to agree with the lump-of-labour hypothesis, yet these are countries in which employment rate for both

young and older people are low. In contrast, Danes and Poles, for example, are less likely to believe that older workers deny jobs for younger workers. And they have high employment rate for both 20-24 year-olds and 55-59 year-olds.

#### 4.9. Policy conclusions

The potential workforce is significantly older than it was 30 years ago. And it will get older still in the coming decades. Employers, competing for an ever diminishing pool of young workers, will simply have to adjust to a greying workforce. There is, however, an important role for public policy. Ageism remains, despite legislative efforts to combat this form of discrimination. Older workers need help to preserve and augment their human capital to make them more employable. Seniority-based wage structures, which make it expensive to employ older workers, need to be reconsidered. Strict employment-protection regulations can have an unintended consequence: fewer hirings of older workers and the attraction of early retirement.

#### Notes

- 1. Based on the medium variant projections of the United Nations population division.
- For a summary of these findings for different countries, see OECD (2006a). Employers, however also often express positive attitudes about older workers with respect to attributes such as loyalty or punctuality.
- 3. These data are drawn from a 2009 Eurobarometer survey: see Table 4.1 for more details.
- 4. Source: Riach and Rich (2006, 2007a, 2007b). There was one exception to this general pattern: in the case of matched CVs sent for jobs in retail sales in the United Kingdom, employers preferred older applicants.
- 5. Acemoglu and Angrist (2001) and Houtenville and Burkhauser (2004) provide, for example, examine the impact of the Americans with Disabilities Act on employment of the disabled.
- 6. See OECD (2006a), Figure 3.4 for information on 20 countries for the period 1998-2003.
- 7. There has always been a conflict between the interests of the firm and those of the wider economy and society. Lazear (1979, 1981, 1986) argues that the corollary of these pay arrangements is a mandatory retirement age or company-sponsored pension schemes that discourage work beyond a given age. This limits the periods over which workers can take advantage of being paid more than their marginal productivity. But this may lead to older workers retiring earlier than they would otherwise. Even if they find jobs elsewhere, these jobs may be less productive (and lower paying) because of the loss of firm-specific skills.
- 8. For a review of the theory and empirical findings on the impact of labour-market regulations on employment, see Addison and Teixeira (2003).
- 9. The volume, as well as incidence, of training also matters. Training spells in the United Kingdom, for example, tend to be short relative to other European countries. Nevertheless, comparisons of training volume still point to large country differences and a substantial age gap (OECD, 2003, Chapter 5).
- 10. Chapter 2 in Part I on "Trends in retirement and in working at older ages" discusses the measurement of the average age of labour-market exit. The retention rate is the estimated proportion of all employees who were still with the same employer five years later. See OECD (2006a).
- 11. Bassanini *et al.* (2007). The implicit tax on continuing in work is analysed in detail in Chapter 3 of Part I above.

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