

European Policy Models of Employment of People with Disabilities

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Abstract

The article presents three different systems of professional activation for people with disabilities and promotion of their employment such as: the quota system, motivating employers and a system based on civil rights. The purpose of the quota system is to force the employers to employ people with disabilities in the open labor market. However, the system is bi-directional. On one hand, the law obliges employers to hire these people in a certain proportion. Then employers are trying to achieve suitable employment rate to avoid paying insurance contribution. On the other hand, employers are encouraged to maintain this index to continuously receive grants from public funds. A system based on civil rights is different in its essence. Its purpose, as in the quota system, is to enable people with disabilities to gain and maintain jobs. It does not, however, oblige employers to hire these people, only enforces the rights guaranteed under the Constitution. The last model is based on motivating employees. It is associated with the flexicurity approach. It is also referred to as the "golden triangle" because it consists of three components: a flexible labor market, social security and active labor market policy. This model operates on a gentlemen's agreement between the government and the participants in the labor market. Acceptance by all stakeholders is an essential condition of its operation.

Keywords: People with Disabilities; Employment; Labor Market; Employment Policy; Market Instruments.

Introduction

In European countries there are many different systems of professional activation of people with disabilities as well as those supporting their employment – from the most extreme ones, i.e. quota system and system based on different rights – to hybrid solutions that combine elements of both.. However, despite legal, formal and substantive differences, as well as those concerning principals of operation and financing, the aim of all currently active systems is basically the same: assistance in the employment, activation and professional rehabilitation of persons with disabilities. The integration (or reintegration) of persons with disabilities on the labor market faces many problems. So far there is little evidence of the fact that the diverse political activities taken in this direction have given satisfactory results.

Employment policy

The legislative approach regarding the promotion of employment of persons with disabilities is probably subject to the most intense discussions in the policy context concerning disability. During the '90's, along with the introduction of anti-discrimination legislation in many countries, this discussion had been even stormier. It seems that there is a significant difference between the approach based on civil rights and the approach that is based on the employment of people with disabilities based on indicators of the amount. The third way is based on incentives for employers to employ persons with disabilities. At the same time recent economic events (the economic crisis of

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2009) suggest that a different approach may be less contradictory than it is usually maintained.

Employment policy based on the quota system

The purpose of the quota system is to force the employers to employ people with disabilities in the open labor market. However, the system has a two-way function. On one hand, the law obliges employers to employ such people in a certain proportion. In this way, in the model solution, the main objective of the employer is not to maximize profit, but to create new as well as maintain already existing jobs for people with disabilities.

In most European countries the policy is based on compulsory norms of the employment, determined in a special Act of Employment or Employment Promotion of Persons with Disabilities. In accordance with such provisions, employers are bound to employ a certain percent of employees with disability: in Greece – 8%, in Italy – 7%, in France and in Poland – 6%, in Germany – 5% (see Table 1 in Annex). This norm includes only persons with disabilities, who are registered in special registers and who meet the appropriate criteria (in case of Poland such register is kept by PFRON). In all countries, these norms apply to both state and private sector; however, they are applicable only to employers, who employ a certain number of employees (e.g. 100 employees in Russia, 50 in Spain and Turkey, 15-25 in other countries). Some countries even allow reducing the numbers in case of the employment of persons with disabilities with the significant degree or specific disability groups (NDA, 2013; ILO, 2013).

Employment policy based on civil rights

The system based on civil rights is different in its essence. Its aim, as for the quota system, is to enable persons with disabilities to obtain and maintain jobs. It doesn't, however, force employers to employ such persons, but it enforces their constitutionally guaranteed rights. It is based on the right to work and the non-discrimination principle. It needs to be recognized by the society, and above all by employers; persons with disabilities have the right to work and to have the same chances on the employment market as fully efficient ones. This system operates mostly in economically rich and highly developed countries, where the economy can easily absorb the labor force of people with disabilities (Garbat, 2005, p. 92).

In Great Britain and Ireland the policy is shaped by anti-discrimination legislation introduced in the mid-90's twentieth century. These legal acts have special chapters prohibiting discrimination against persons with disabilities in all aspects of the employment or employment processes. Such legislation requires employers to provide appropriate conditions for employees with disability to perform their duties in the workplace, if they do not entail an excessive effort or expense (Table 2).

Table 2: *Employment systems of persons with disabilities based on civil rights*

Country	Detailed act concerning anti-discrimination	Year of publication
Estonia	The Equal Treatment Act	2006
Finland	Employment Contracts Act	2006
Netherlands	The Equal Treatment Act due to a disability or chronic illness	2003
Ireland	Equality Act	1995
Lichtenstein	Law on Equal Opportunities for People with Disabilities	2006
San Marino	Administrative Act on the Protection of Human Rights and Social Inclusion of People with Disabilities	1990
Switzerland	Federal Law on the Equalization of Opportunities for Persons with Disabilities	2002
Great Britain	Equality Act	2010
Sweden	Equal Opportunities Act The Law on Anti-discrimination in Working Life of People with Disabilities	1990

Source: Own study based on legal acts of employment of persons with disabilities in European countries; OECD (2009a), ILO (2013)

In the last few years, several European countries have also introduced more general anti-discrimination acts (e.g. Sweden in 1999, Norway in 2001, and Germany in 2002), however they were only to supplement existing rules, rather than establishing new bases of the policy on the

employment of persons with disabilities (Hartman, 2011, p.10). Other countries have introduced a general anti-discrimination clause in their constitutions (e.g. Austria in 1997, Switzerland in 1999), although the significance of these changes is mainly symbolic. Spain has gone in a different direction – and has adopted anti-discrimination regulations in other legal acts (Idström, Stenroos & Uimonen, 2013, p. 6).

Accounting for the different duties of employers is fundamental. This has a much greater impact than quota systems-based approach to anti-discrimination legislation. Sanctions and other instruments for their implementation were never the main problem. Therefore, it seems that the most effective are systems such as the Swedish one with certain normative acts in a variety of specific obligations of employers towards both current employees and applicants for employment and the relatively strict compliance with these obligations (NDA, 2013).

Employment policy based on the motivation of employers

General legislation on work or the working environment is important especially in Norway and Denmark. This legislation regulates the obligations of the employer, but without going into detail (Table 3). This may include, for example, the exclusion of discrimination in recruitment or include an obligation of adapting the workplace to suitor lead to rehabilitation of workers with disabilities (OECD, 2009a; ILO, 2013). However, there is no indicator of employment, quotas and quota statutory and legal sanctions for the fact that the employer does not employ a certain number of employees with disabilities. Ultimately, this policy is based largely on voluntary activities and information. Apparently, this can be seen in Denmark, where the action can take many forms, from regular awareness campaigns on good practices by employers, along with the stigma of bad practices, to strive towards greater use of incentive instruments (e.g. subsidies to adapt jobs). Denmark has highlighted its trend by introducing two basic principles, which are also a response to the anti-discrimination: the principle of compensation, according to which society must make compensation to persons with disabilities in order to compensate for the lost opportunity of earning being a derivative of lower productivity and to enable the use of their abilities, and the principle of sectorial responsibility, which requires every public sector to hold responsibility for its own affairs (Idström, Stenroos & Uimonen, 2013, p. 66).

Table 3: *Systems of employment of persons with disabilities based on the motivation of employers*

Country	Detailed act	Year of publication
Andorra	The Law on the Rights of Persons with Disabilities	2002
Denmark	The Law on the Prohibition of Unfair Treatment in the Workplace	1996
Cyprus	The Law on Persons with Disabilities	2004
Iceland	Act on Issues of People with Disabilities	1992
Latvia	The Law on Persons with Disabilities	1998
Malta	Law on Equal Opportunities for People with Disabilities	2000
Monaco	Law on Social Activities for People with Disabilities	2001
Norway	The Working Environment Act	2007

Source: Own study; OECD (2009a), ILO (2013)

Political methods based on the voluntary fulfilment of the requirements of the employers are not aimed at imposing obligations. Such a policy must guarantee high funding and technical support to adapt the workplace properly, although support is also useful in combination with other methods of promoting employment.

Instruments supporting employment of persons with disabilities

The instruments of employment policy are generally undertakings shaping this policy, which are established, implemented and controlled by the public authorities. Generally, the instruments at the time of their application in practice are the means of this policy. Many of the instruments used in the context of professional activation policies that exist in European countries can be divided according

to the criterion of a supply and a demand. Instruments focused on labor supply, supporting job seekers are primarily training and professional development and career counselling and partly employment agency. It should be emphasized that the promotion of training and professional development is at the core of employment policy. Their main task is to adjust the training of employees to changes in the economy. Using the training instrumentation it is possible to facilitate professional integration for unemployed persons and graduates of schools with inappropriate qualifications. Among demand oriented instruments one can include all forms of subsidized employment. We can specify the particular instruments such as: measures to maintain and create jobs for people with disabilities, wage subsidies for companies that employ people with disabilities, the direct creation of jobs in the public sector and non-governmental organizations and the promotion for taking up business (European Commission, 2009).

Employers oriented labor market instruments

Political methods based on the quota system may compel the employer to a wider (e.g. Italy and Germany) or more narrow set of obligations (Turkey and to some extent Austria). Special provisions relating to anti-discrimination employment laws intend to impose additional obligations on the employer, which usually involve adapting the workplaces, equipment, facilitating access to devices as well as modification of plans and working hours.

Two crucial elements are needed to determine the real scope of the obligations of the employer: the penalties imposed on employers who do not comply and the statutory obligations and instruments to implement these sanctions. These exact elements guarantee that anti-discrimination measures or compulsory labor standards will force employers to take responsibility and employ persons with disabilities.

The final scope of the employer's obligations in anti-discrimination legislation depends entirely on the interpretation of the concepts of excessive effort or reasonable adaptation of the working environment - which in turn depends on the size and the economic situation of the company and on a number of penalties and sanctions. Applicable penalties usually include: increased taxes, fines or penalties, but may also include non-financial elements as the adaptation of workplaces or reinstatement. In practice, the main problem results from the fact that in most countries the prosecution of employer or potential employer for discriminatory practices is associated with overcoming major administrative barriers. Even in Great Britain, the number of cases brought to court is relatively low.

When it comes to compulsory employment norms, the implementation of this provision depends on the size of norms and penalties to be imposed on the employer. As for the penalties, it is known from experience that in Spain and Portugal, such sanctions do not actually exist, but in most countries they are small and rely on the deduction of additional payroll tax of about 0.5%. When establishing the contribution rate ("working tax contributions" or penalties for not employing persons with disabilities) legislators take into consideration several important factors. Above all, they try to assess the financial capacity of employers, the impact of the contribution rate to the operation of their employment policy and the policy of hiring those people, with both the task of providing them with equal opportunities on the labor market, and to compensate for increased costs incurred by employers who have achieved the required rate (Garbat, 2005, p. 84). The contribution rate in different countries can be differentiated according to criteria such as the size of the employer or its financial condition. When establishing this rate the legislators try to take into account the fact that the main purpose of collecting contributions should not be to maximize state revenue, but to create the most favorable conditions for creating new workplaces for persons with disabilities by employers themselves. The means collected from employers are usually transferred to a special fund or separate account in the state budget, and are used in many different ways – depending on the social policy objectives conducted in the country. Most of this money is directed to the professional rehabilitation and support of the protected employment. This solution is of special interest for those employers who have met the requirements for the number of employees with disabilities.

The relatively high sanctions are applied only in three countries: Italy, France and Poland. In comparison to other countries, these penalties are several times higher, and even greater for not taking the declaration, although the situation is eased by the rule according to which only the "right candidate" is not to be rejected. The fines in Poland are about four times higher than in other countries with the applicable standard (Garbat & Paszkowicz, 2003, p. 408). Without real

enforcement measure, implementing the quota system is an incentive to hire registered people with disabilities or to maintain the position of those employees who acquire a disability within the company. However, it does not automatically impose any obligations on the employer (NDA, 2013). The contributions paid to the Fund in France can be up to 600 times the working hours at minimum wage for every missing employee with a disability. After three years, if the employer does not take care about the appropriate employment structure, payment to the Fund can be up to 1500 times the hours at minimum wage (Jovilet, 2004).

In general, the amount of contribution for every unemployed person with a disability under the required employment rate is defined by a multiple of minimum or average wage. However, other solutions are also used, e.g. in Slovakia, the contribution is defined by The Ministry of Minister, taking into account the costs needed to create new place of employment for the disabled (NAPSI, 2006, p. 36), and in Hungary the parliament defines the amount range, which determines the size of contribution to the Rehabilitation Fund (NOAS, 2010, pp. 18-24).

Employers receive the money collected by the Fund in a form of grants which help to maintain existing jobs and to create new jobs for people with disabilities, to finance their salaries, to carry out programs, training and professional courses. The money can also be sent directly to persons with disabilities to help them to start a new business, to partially cover transport costs to work, to purchase their own car or for scientific purposes. Grants may also be made directly to institutions and companies involved in career counselling for persons with disabilities, further education and training, or conducting the information campaign among employers and the population.

In some countries, one can find derogation from the principle of directing funds received as a result of the quota system exclusively for professional rehabilitation. Exceptions, however, are rare and happen mainly in countries in which the Fund, apart from collecting contributions, is also supplied from other sources. For example, in Cyprus, among others, the Fund uses of the budget subvention, profit from some charity events, sport and cultural activities as well as income from a special lottery. In Malta, the Fund can conduct business activities. The funds collected in this way are allocated in the first place for the professional rehabilitation, and then also for the social rehabilitation: support for sport and tourism, or elimination of architectural barriers in urban infrastructure (NSRSPSI, 2008, pp. 40-42).

Persons with disabilities oriented labor market instruments

In order to determine activities and instruments applied in European countries the Opti-Work project results were used. The project is co-ordination of activities financed by the European Commission under the 6th Framework Programme, objective 8.1.B.2.4 – Quality of life and problems of the handicapped and persons with disabilities. A system tool has been used in the Opti-Work project to present the role of legislation, services, benefits, support systems and approaches in the decision-making process of persons with disabilities searching for work and the employers decision concerning recruitment present in 13 legal systems (Austria, Denmark, Finland, France, Netherlands, Ireland, Malta, Germany, Norway, Portugal, Slovakia, Slovenia and Great Britain). In order to show a review of current approaches to the issue in question in selected countries, a summary of the important elements from a careers counselling services point of view has been presented (Eurofound, 2006, p. 31).

In the development of profiles of national systems, researchers from the Opti-Work plan cooperated with specialists from each country in order to gather the views of stakeholders on the approach used in the policy to implement the system, the system design and elements focused on promoting the participation of persons with disabilities in the labor market. It should be noted that target group of the Opti-Work project were all persons with disabilities of working age and not just those with work experience, as in the present study. However, the nature of services to a wider group of audience and the target group coincides to a large extent. For this report, particularly important are the views of stakeholders on the effectiveness of the availability of these components, which are significant in terms of career counselling (Eurofound, 2006, p. 23).

When developing a system profile, the respondents were asked to:

- indicate elements existing in their country or region as well as determine the extent to which they consider them effective

- evaluate effectiveness of each elements as a mechanism for introducing the beneficiary on the labor market on a scale of 1 to 5 (1 – very inefficient, 5 – very effective)
- evaluate universal availability components within the legal system on a scale of 1 to 5 (1 – unavailable, 5 – widely available)
- evaluate ease to make use of the elements on a scale of 1 to 5 (1 – very difficult, 5 – very easily).

The review included the following services: assessment of professional skills, matching the right job, career counselling, assistance in obtaining grants, performing for the good of the beneficiary, information and advice provision, case management, specialized professional training, professional rehabilitation, pre-professional training, psychological support and care in the workplace.

Domestic correspondents in most countries pointed to the existence of all the elements in one form or another in their national or regional jurisdiction. The main differences concerned the extent to which elements of the service were available, accessible and perceived as effective in leading the beneficiary to employment. Listing in Table 4 (see Annex) summarizes data collected from different countries.

Although one should not forget about the limitations resulting from the data source of the above analysis, it can be clearly stated that the majority of national systems include service elements that make up the theory of a comprehensive and effective system of the career counselling services. However, in many countries correspondents reported that the accessibility of services is limited and that they are not always effective. There may be problems associated with both the accessibility and coordination/integration of services, which results in reduced efficiency of the services. Comprehensive analysis of services is shown in Table 5 (see Annex).

It is highly probable that evaluations captured in system profiles reflect flattering opinions of the systems and components of services. One would therefore expect to be able to find common features that are considered to be particularly effective in different jurisdictions. One would also expect that in a well-designed system, particularly effective components of it are also readily available and relatively easy to access. However, looking at systems profiles, one does not have such impression, since none of the respondents valued the counselling services to be very effective in bringing the beneficiary on the labor market. Moreover, the provision of information services was recognized as very effective only in three countries, but generally achievable only in one of them. Also services associated with performing for the good of the beneficiary were recognized as very effective in one legal system only; however the ease of access in this country was low. Case management was evaluated as very effective by two respondents, but in no case it was easily to access (Eurofound, 2006).

The above mentioned regularities show the need to use more systematic approach to describe services of career guidance and other employment-related services for people with disabilities. It is necessary to remember, that services for people with disabilities in the labor market, especially career counselling, are very important and more usual elements of the functioning of work or employment offices, as well as non-governmental organizations. Their aim is to help unemployed persons with disabilities and those seeking jobs to choose the right profession, to change qualifications as well as examining their interests and professional talents. Career counselling is also associated with the provision of information on various professions, labor market and training opportunities and education. A career advisor can also help the employer to find the appropriate employee, if special professional skills are required (Bondaruk, 2009, p. 55).

Professional trainings, as well as counselling, are quite important instruments. In many cases professional training may result in finding a job. A person who became disabled can be incapable to continue working on the previous position, even soon after the completion of the medical rehabilitation process. The person may require the assessments of needs and possibilities, further advice and professional training, possibly several year of training (e.g. full university curriculum) (Pietrzak, 2010, p. 23). Countries use very different methods to meet these needs, but there are very large variations of the frequency, phase and financial expenditures associated with such interventions. Training services are provided by state authorities, such as specialized rehabilitation centers of professional training in France or special institute of the professional adaptation in Sweden. In other countries such services are offered by competing private rehabilitation units (Netherlands, Luxembourg and Great Britain). Yet another group of countries, including Austria, Germany, Portugal and Spain, uses training services offered by private and public rehabilitation

centers. In such countries, the authorities responsible for the labor market services have their own rehabilitation and trainings centers, but when the need arises, they use the outside provided services.

Special conditions of employment of persons with disabilities

When discussing the labor market one must remember the fact that persons with disabilities belong to a specific category of employees. They are subject by labor law to specific legal care and support throughout the process of employment and professional activation. A professional rehabilitation is also included in the whole support process. In case of EU member states the regulation of the European Commission from 12 December 2002 on the application of Art. 87 and 88 European Community Treaty to state aid in the employment is most applicable. It regulates, among others, rules of assistance from public funds for the creation of new jobs for the disabled. According to the EU's definition the protected employment accounts for the employment of at least 50% of persons with disabilities. The rules determining disability are defined by the law of the country. This regulation is an important instrument of employment policy for persons with disabilities (Eurofound, 2006).

Employment and sickness benefits

Imposition of partial obligation to pay compensation in case of sickness absence on employers is associated with the hope that they will invest in preventive measures. Major responsibilities for the payment of sickness benefits are in the Netherlands (for one year), the UK (for a period of 28 days, the reimbursement in the event of exceptional costs) and Switzerland. It should be noted that employers in these countries insure themselves against such risks. Significant responsibilities in this regard were also imposed in Austria (up to 12 weeks), Germany (up to 6 weeks) and Belgium (one month). In other countries (Scandinavia and Spain), the salary is paid only for a short period of sick leave, covering a period of about two weeks. In other countries, sickness benefit is paid from the sickness insurance from day one.

Employment and disability benefits

The source of income for a large part of people with disability comes from the social security system: social insurance, social assistance and professional activity. Such assistance is designed to meet the necessary needs of people with disabilities and their families, as well as to enable them to live in conditions appropriate for human dignity. The purpose of this system is also providing benefits to ensure the human body sense of social security in many different circumstances in life. In the 90s Twentieth century the new trends in social policy transferring the focus from the social rights of the individual to its obligations appeared. In labor market policy it was reflected in the concept of linking the promotion of readiness to take up employment with increasing of compulsory labor. The following reforms have been carried out in this spirit: Welfare to work in the UK, Work, work, work in the Netherlands and the Active line in Denmark. They included numerous restrictions and cuts in the benefits system for people with disabilities (Oorschot, 2010, p. 38).

In most countries, getting disability benefits is subject to the fulfilment of the essential criteria for the loss of health (above some medical-social level), the degree of independence or age. However, the difference between countries in the acquisition and loss of the right to such benefits is fundamental. One can observe three general schemes for the granting of disability benefits. The first is very liberal and enables to receive and maintain benefits despite taking up employment (the Netherlands, Russia, Ukraine and Switzerland). The second, in which the benefit depends on the size of ones income from employment (Poland, Germany and Austria). The third scheme is the one in which the benefit is suspended or revoked at the time of employment (Sweden, Finland). In most countries, disability benefits are granted at certain point of life, mostly for people aged 16-65 years. After this period persons with disabilities are included in the group of retirees (Idström, Stenroos & Uimonen, 2013, p. 26).

Currently, it is intended to combat social exclusion of people with disabilities through work, contrasting this approach to combat exclusion by social services. One should remember that support of persons with disabilities requires more and more redistribution of income in their favor, which reduces the competitiveness of the economy. It is clear that in many countries the essential task of the system of social protection for this social group provides income for the period of treatment,

rehabilitation and active search for work, as well as creating conditions for the professional activation. The scope of services is also not the motivation for becoming unemployed. It reveals more and more a close combination of active programs combating unemployment of people with disabilities with the help of money, but conditions the obligation to participate in these programs and active job search. However, this requires a change of approach of the state to the labor market and development of new strategy, which is commonly called the state work philosophy (workfare state).

Employment and rehabilitation

In a few countries the involvement of employers in the rehabilitation process is mandatory. In the Netherlands, Sweden, Russia and Ukraine the employer must theoretically present the individual rehabilitation plan to the pension agency/authority. In some other countries, employees with disability are entitled to special rehabilitation or sickness absences (Germany, Poland and Great Britain) (ILO, 2013).

The differences between countries in the field of rehabilitation during employment is significant. In some countries, the request for disability pension is automatically treated as a need of professional rehabilitation. This principle of “rehabilitation before the benefit” is applicable in Austria, Denmark, Spain, Sweden and Switzerland. A similar approach is in Germany, Norway and Poland, although the degree of an obligation is a bit milder. Professional rehabilitation is the law in Austria (in relation to employment of persons with disabilities), as well as in France, Germany and Poland, while in Great Britain, Slovenia and Bulgaria it is limited to the right of application (NDA, 2013).

In all countries, eligibility for professional rehabilitation is related to potential benefits to be gained through a rehabilitation program, usually referred to as opportunities to obtain other professions. In compulsory rehabilitation programs, opportunities may be limited to occupations commensurable with the qualifications of the person (as in Austria, Spain and to some extent in Switzerland), or may include other activities (Scandinavia) (OECD, 2009a, OECD, 2009b).

Granting the right to rehabilitation may be limited to authorized persons or potentially eligible for disability benefits (e.g. in Austria) or may include a separate assessment process, independent of the process qualifying for disability grant, and thus may be available to everyone (Denmark, France, Portugal, Switzerland). In some countries, it is assumed that persons with mild to moderate degree of disability do not need professional rehabilitation.

There are three ways of financing the undertaken rehabilitation activities (European Commission, 2009). In many countries, costs of professional rehabilitation are partly covered by social insurance and partly by labor market institutions, in relation to those that are not covered by insurance against incapacity for work (Austria, Germany, Spain and Portugal). In another group of countries, such costs are paid in full to the income state funds. Most countries with quota system have such funds. Some of the funds have legal personality and can create the independent policy in this area, while others which do not have such a personality – constitutes separate fund for some office or agency whose mission is to conduct and finance activities connected with professional rehabilitation and employment of persons with disabilities. The third group includes countries where the sole duty to cover professional rehabilitation rests on the authority issuing pension decisions (local government in Denmark and Switzerland).

Employment and adjudication the ability to work or disability

The first important information for person who makes decision about employment is information about work contraindications, i.e. activities which the person with disability cannot do, due to the medical reasons or conditions of working environment. One can call it a negative adjudication. The medical contraindications should be determined by a doctor specializing in medicine of work. Persons with disabilities as a result of damage do not lose all the possibilities. On the contrary – they retain the ability to perform many tasks and some of their surviving skills that are identified and improved can be a foundation for further training, education and employment. These opportunities must be identified, targeted and then tracked in the progress of rehabilitation (Vogler, 2009, p. 53).

In many countries, the employment of person with disability is conditioned on developing crucial professional qualifications and occupations appropriate for the given disease or disability. This regards

especially persons, who are incapable to work in a significant degree and who should work in protected conditions. All countries in Europe have a protected market in which persons with specific diseases (people with disabilities of sight, hearing, movement, mental illness or mental retardation), or persons with severe disability can be hired and paid to do the work. Several countries make employment of people with disabilities conditional of the degree of disability. For example, in Denmark and Finland, a significant degree of disability (or disability) means prohibition of employment in the open labor market or not-working at all. However, these persons are not left alone. As a compensation for lost earning possibilities, they are supported financially by the system of social rehabilitation or social assistance. In some countries, special jobs in the so-called therapeutic workshops, labs, workrooms or day care centers are organized for people with severe disabilities (Prinz & Tompson, 2009, p. 43).

Conclusions

Many participants in the social and economic life agreed on the fact that in spite of frequent occurrence of contradictions as well as contrasts between achieving economic and social objectives, there is a need to examine and take into account the correlations existing between people. When the lack of compatibility between the performance of the economy and the achievement of social objectives, in terms of obtaining the required level to meet a variety of needs, including those relating to the employment of people with disabilities, inconvenient social issues appear, and if they are not solved in due time they cause problems in situation. Finding common ground for determining the economic and social objectives in terms of socially important needs leads to a harmonious social and economic development. Generally speaking, it is not possible to separate the policy to disability from the policy to world poverty and social, economic, political and cultural inequalities as well as from cultural transformations that are the result of globalization. Particularly important is the recognition that development in these areas is likely to have great importance for all people – whether disabled or fully efficient – irrespective of the country they live in. A characteristic feature of the labor market policy in many European countries is to treat problems of incomplete efficiency in terms of civil rights and to recognize the consequences of their failure due to the presence of social and physical barriers.

The involvement of employers is a fundamental issue for the reintegration of persons with disabilities. However, there is no consensus on the best way to achieve this. There are different approaches to this matter, ranging from the conviction on the basis of moral and anti-discrimination legislation to mandatory employment quota. The effectiveness of these measures depends primarily on the willingness of employers to assist people with disabilities in keeping the work or taking it in the first place, but also on the ability to evade the rules or to avoid paying fines for not obeying the legal regulations. Establishment of appropriate balance between the employment amount and imposition of excessive penalties on employers is a major challenge in the field of politics, especially because the safety regulations may lead to further discrimination of persons with disabilities in the recruitment process. A strong involvement of non-profit organizations in representing the interests of persons with disabilities is helpful in achieving the success of policy of implementation in some countries. Success in the field of disability policy also depends on many other factors. In particular, the programs in the field of disability must solve the broader problems in the labor market, such as high unemployment and generally low overall demand for employees over 50 years.

It is not decided yet, what will be the evolution of labor market policies, in the face of rising numbers of people with disability, especially because of the unfavourable demographic situation as well as forecast in Europe (ageing of the society and demographic decline). Currently, largely amorphous model of national policies will certainly be subject to essential transformations in the coming years. However, it would be difficult to state today whether these changes will bring permanent social solutions to one of Europe's leading and the world's patterns of social policy, or will we have to deal with progressive "hybridization" systems, i.e. borrowing different detailed experience from various, in a sense, competing against one another concepts: continental, Anglo-Saxon, Scandinavian or Mediterranean. The latter scenario would resemble the path of

development, which was chosen in recent employment policy and the labor market in countries such as the Netherlands, Ireland and Denmark.

References

1. Bondaruk, A. (2009). Career counseling in the biography of man. In Kukla, D. (Eds.) *Multidimensionality of counseling in the human life. Selected areas* (pp. 55-73), Publishing Company UKSW, PL: Warsaw.
2. European Commission (2009). Joint Report on Social Protection and Social Inclusion 2009 - SUMMARY Social inclusion, pensions, healthcare and long-term care, European Commission - Directorate-General for Employment, Social Affairs and Equal Opportunities. Retrieved April 16, 2011, from https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&ved=0CDAQFjAB&url=http%3A%2F%2Fec.europa.eu%2Fsocial%2FBlobServlet%3FdocId%3D3754%26langId%3Den&ei=ccmxUr2ECYy54wSOxYCYBw&usg=AFQjCNEUEoBYmyXb0I-zrU4419_WB11-1Q&sig2=Hu9NUN-8MGgvA5nYWxN7Cg
3. Eurofound (2006). Employment guidance services for people with disabilities. European Foundation for the Improvement of Living and Working Conditions. VIII(51). Luxembourg: Office for Official Publications of the European Communities. Retrieved April 16, 2011, from <http://www.eurofound.europa.eu/pubdocs/2006/33/en/1/ef0633en.pdf>.
4. Garbat, M. (2005). Breaking barriers of people with disability in employment on the example of undertaken activities in new member states of the European Union. *Aktywizacja zawodowa osób niepełnosprawnych [Professional activation of people with disability]*, 4(4), pp. 84-92, ISSN 1734-0713.
5. Garbat, M., & Paszkowicz, M. A. (2003). Polski system zabezpieczenia społecznego osób niepełnosprawnych [Polish system of social protection of disabled]. *Nierówności społeczne a wzrost gospodarczy [Social inequality and economic growth]*, 4(4), pp. 403-413. http://www.ur.edu.pl/pliki/Zeszyt4/34_garbat_paszkowicz.pdf.
6. Hartman, L. (2011, November 14-15). *Swedish Policies for the Disabled: What Do We Know About the Effects?* Paper present at the National OECD Conference, Paris. Retrieved December 1, 2012, from: http://umdcipe.org/conferences/LaborActivationParis/Papers/Laura%20Heartmans%20draft%20paper_11_1108.pdf.
7. Idström, A., Stenroos, M., & Uimonen, M. (Eds.) (2013). *Decent Work. Promising Practices in the Employment of People with Disabilities from Sweden, Denmark, Estonia, and Finland*. Helsinki: Asumispalvelusäätö ASPA. Retrieved June 26, 2013, from: http://www.aspasaatio.fi/sites/default/files/Decent_Work_book_net_ENG.pdf.
8. ILO (International Labor Organization) (2013). Disabled Workers. Retrieved April 16, 2011, from http://www.ilo.org/dyn/natlex/natlex_browse.subject?p_lang=en&p_classification=08.01.
9. Jovilet, A. (2004), Réformes en cours en faveur des personnes handicapées [Current reforms for disabled persons]. *European Industrial Relations Observatory (EIRO)*, 4. Retrieved June 26, 2013, from: <http://www.eurofound.europa.eu/eiro/2004/03/feature/fr0403106f.htm>.
10. NAPSİ (National Action Plan on Social Inclusion 2007-2013) (2006). Government of the Republic of Slovakia. Retrieved April 16, 2011, from: http://ec.europa.eu/justice/discrimination/files/roma_slovakia_strategy_en.pdf.

11. NDA (National Disability Authority) (2013). International practice in quota monitoring. Retrieved April 16, 2011, from [http://www.nda.ie/centmgmtnew.nsf/0/84AA79B029E870AE8025729D0046CAED/\\$file/people_with_disabilities_in_public_sector_04.htm](http://www.nda.ie/centmgmtnew.nsf/0/84AA79B029E870AE8025729D0046CAED/$file/people_with_disabilities_in_public_sector_04.htm).
12. NOAS (National Old Age Strategy 2010-2034) (2010). Ministry of Labor and Social Insurance Republic of Hungary. Retrieved April 16, 2011, from: <http://www.monitoringris.org/index.php?id=231>.
13. NSRSPSI (National Strategy Report on Social Protection and Social Inclusion 2008-2010) (2008). Ministry of Labor and Social Insurance Republic of Cyprus. (pp. 40-42). Retrieved April 16, 2011, from: <http://ec.europa.eu/social/keyDocuments.jsp?type=3&policyArea=0&subCategory=0&country=0&year=0&advSearchKey=nsr+spsi&mode=advancedSubmit&langId=en>.
14. OECD (Organisation for Economic Co-operation and Development) (2009a). *Sickness, Disability and Work: Breaking the Barriers – Sweden. Will the Recent Reforms make it?*, OECD. Retrieved April 16, 2011 from <http://www.oecd.org/social/soc/42265699.pdf>.
15. OECD (Organisation for Economic Co-operation and Development) (2009b). *Sickness, Disability and Work: Keeping on track in the economic downturn. Background paper*. Retrieved April 16, 2011 <http://www.oecd.org/dataoecd/42/15/42699911.pdf>.
16. OECD (2011). *Sickness, Disability and Work: Key figures and data on low employment rates of people with disability and high disability benefit percipiency rates in many countries OECD countries*. Retrieved April 16, 2011, from: www.oecd.org/dataoecd/21/22/42654215.xls.
17. Oorschot, W. van (2010). Disability benefit reforms in the Netherlands 1980-2006: Retrenchment and reconstruction. In M. Kautto & J. Bach-Othman (Eds.). *Disability and employment – lessons from reforms. Finnish Centre for Pensions, Reports 2010:4* (pp. 35-52). Helsinki: Finnish Centre for Pensions. Retrieved June 26, 2013, from: http://www.google.pl/url?sa=t&rct=j&q=&esrc=s&source=web&cd=7&cad=rja&ved=0CGEQFjAG&url=http%3A%2F%2Fwww.sopol.at%2Fget_file.php%3Fid%3D1056&ei=52SxUvaODsuVhQepioCQBw&usq=AFQjCNG_pRAQncPR5IbhxTeMsNrnixTBzA&bvm=bv.58187178,d.ZG4
18. Pietrzak, D. (2010). Professional and social activation of persons with disability. In D. Kukla & L. Bednarczyk (Eds.), *Career counselling for persons from the specific risk group. Selected aspects* (pp. 23-37). Publishing Company Difin, PL; Warsaw.
19. Prinz, Ch. & Tompson, W. (2009). Sickness and disability benefit programmes: What is driving policy convergence? *International Social Security Review*, 4(62) (Special issue on Policy Learning and Social Protection), pp. 41-61.
20. Vogler, L. (2009). *Monitoring the duration of active working life in the European Union. Final Report*. European Commission. Employment, Social Affairs and Equal Opportunities DG. Retrieved April 16, 2011, from: https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&ved=0CC0QFjAA&url=http%3A%2F%2Fec.europa.eu%2Fsocial%2FBlobServlet%3FdocId%3D4279%26langId%3Den&ei=RdexUrHQA9CVhQeAm4CwBA&usq=AFQjCNHhkUwmtOYLfiidLq9oJ5_BQ0TX2w&sig2=zeKaa_Rfdqet67gquaZTw

Annex

Table 1: Quota based systems of employment of people with disabilities in European countries

Country	Indicator in the sector		The size of entities covered by the indicator	Amount/form of the payment	Fund – source of funding for rehabilitation
	Public	Private			
Albania	—	4%	Above 25 employees	The equivalent of the minimum wage	The National Employment Fund
Austria	—	4%	Above 25 employees	Tax determined annually by the government	Surtax Fund
Belgium	2% (Flandria, Brussels)	—	Above 20 employees	Tax determined by the local government	Flemish Fund for the Social Integration of Persons with Disabilities (Flandria) Professional Activation Fund (Walonia and Brussels)
	2.5% (Walonia)				
Belarus	—	3%	Above 20 employees	Fine determined by Minister of Labor	The state budget
Bosnia and Herzegovina	—	1 employee (Federation)	Above 16 employees	Insurance contribution determined annually by the government	Found for the Social Integration
		5% (Region Brčko)	Above 20 employees		
Bulgaria	—	4%	Above 50 employees	Insurance contribution determined annually by the government	Agency for Persons with Disabilities
Croatia	1 employee	—	Above 20 employees	Administrative fee	Rehabilitation and Employment Fund for Persons with Disabilities
Montenegro	—	1 employee	Above 50 employees	Insurance contribution determined annually by the government	Professional Training and Rehabilitation
Cyprus	5%*		All schools	No sanctions	Rehabilitation fund
Czech Republic	4%		Above 20 employees	Monthly equivalent of 1.5 hour of average daily wage	Employment Office
France	6%		Above 20 employees	The equivalent of 600 times of working hour at the minimum wage	Fund for Professional Integration of Persons with Disabilities in the Public Sector FIPHFP, Professional Integration Fund of Persons with Disabilities AGEFIPH
Greece	5%	8%	Above 50 employees	No sanctions	The state budget
Spain	5%	2%	Above 50 employees	No sanctions	The state budget, budgets of local governments
Ireland	3%	—	Above 25 employees	No sanctions	The state budget
Lithuania	5%		Above 20 employees	Tax determined annually by the government	The state budget, budgets of local governments
Luxembourg	5%	1 employee	Above 25 employees	Half of the lowest monthly salary	Labor Fund
		2%	Above 50 employees		
		4%	Above 300 employees		

Moldavia	—	5%	All private employers	A fine in the amount of average annual wages	Costs of Unemployment Fund
Germany	5%		Above 20 employees	Tax amount determined by law	45% - Compensation Fund 55% - Social Assistance Funds in the Federal Lands
Poland	6%		Above 25 employees	40.65% of the average wage	State Fund for Rehabilitation of Persons with Disabilities
Portugal	5%	2%	All entities	No sanctions	The state budget
Russia	—	3-5 % **	Above 100 employees	The equivalent of the average wage of fully efficient persons	Federal trust fund
Romania	4%		Above 50 employees	A fine equal to 150% of the minimum wage	Employment Office
Serbia	2%	—	Below 20 employees	The equivalent of three average salaries	The state budget
		1 employee	20-49 employees		
		2 employees	Above 50 employees		
		3 employees	Above 100 employees		
Slovakia	—	3% (including 0.2% with the significant degree of disability)	Above 20 employees	The fine in the amount of 0.9% of labor cost based on the average salary	Public Fund for the Financing of Technical Adjustments of Jobs and Protected Jobs
Slovenia	2%	2-6 % ***	Above 20 employees	A fine equal to 70% of the minimum wage	Fund for Supporting Employment of Persons with Disabilities
Turkey	4%	3%	Above 50 employees	The equivalent of full social security contribution paid by the employer and the employee	The state budget
Ukraine	1 employee		8-25 employees	Half of the average annual salary	Fund for Social Protection of Persons with Disabilities
	4%		Above 25 employees		
Hungary	5%		Above 20 employees	A fine determined by Ministerial Order	Fund for Rehabilitation of Persons with Disabilities which is a part of the Labor Market Fund
Italy	1 employee		15-35 employees	The administrative fee determined locally	Budgets of local governments
	2 employees		36-50 employees		
	7%		Above 50 employees		

Source: Own study based on legal acts of employment of persons with disabilities in European countries: ILO (2013)

* Amount indicator applies exclusively to the education sector (public and private schools).

** Indicator height and entity size considered are determined by authorities of the autonomous areas.

*** Indicator height depends on the sector of the economy.

Table 4: *Services in the field of career counselling in selected European countries*

Country	Type of support
Austria	There are all kinds of services, except for services related to performing for the good of the beneficiary. Counselling and services of information and advice provision are commonly provided as well as easily available. The most effective elements of the system include skills assessment, case management, pre-professional trainings and psychological support. Very effective elements of the system are specialist professional training and professional rehabilitation. However, none of these services are generally provided or widely available.
Denmark	All kinds of services are available with the exception of case management. They are commonly provided apart from services associated with performing for the good of the beneficiary and psychological support. With regards to directing people to the open labor market, appropriate job selection, employment support, evaluation of professional skills, specialist professional/education trainings and care in the workplace are considered to be very effective.
Finland	All kinds of services are present in the system. Top services are: evaluation of professional skills, consulting, and assistance in obtaining grants, information and advice provision, specialist professional training, pre-professional trainings and psychological support. Services matching the right job, performing for the good of the beneficiary, case management and care in the workplace are only sometimes provided. However, access to services, such as: the evaluation of professional skills, appropriate work selection, case management and care in the workplace is not easy. All other services are regarded to be effective in the management of persons with disabilities in the open labor market with the exception of pre-professional trainings.
France	Four types of services are not available: selection of the appropriate work, performing for the good of the beneficiary, case management and care in the workplace. The universality of the provision of many services is not highly appreciated and consulting and assistance in obtaining grants, information and advice provisions as well as psychological support are considered to be relatively inaccessible. Most services are not easily accessible. When it comes to directing persons with disabilities to the opened labor market the most effective are: evaluation of professional skills, consulting, education and professional training, professional rehabilitation and pre-professional trainings.
Netherlands	All discussed elements are present. Provision of all elements received relatively high evaluation; majority of them are commonly provided. The most popular services include: selection of the appropriate work, consulting as well as information and advice provision. Most of the elements of the system elements are considered to be effective, with the exception of assistance in obtaining grants and case management.
Malta	Most of the elements of the system are present in Malta (with the exception of evaluation of professional skills, professional rehabilitation and pre-professional trainings). However, the universality of provision of these services was evaluated as relatively low. The most easily to access services include: selection of the appropriate work, consulting, information and advice provision, performing for the good of the beneficiary and case management. Majority of the elements – apart from assistance in obtaining grants, performing for the good of the beneficiary and pre-professional trainings – were assessed as very effective or effective.

Germany	All elements are present. However, only the case management is commonly provided, although it is not easily to access. Service rarely provided include: selection of appropriate work, consulting, performing for the good of the beneficiary, professional specialist/education training, professional rehabilitation and pre-professional trainings. The appropriate work selection is regarded to be the most effective. Other highly ranked services include: evaluation of professional skills, assistance in obtaining grants, professional specialist/education training, professional rehabilitation and pre-professional trainings.
Norway	All kinds of services are present. Most commonly provided ones include: assistance in obtaining grants, performing for the good of the beneficiary and care in the workplace. Professional skills, consulting, information and advice provision, case management, pre-professional trainings and psychological support were assessed as effective.
Portugal	All kinds of services are available except for: assistance in obtaining grants, performing for the good of the beneficiary and case management. The universality of the provision is assessed as relatively low; only evaluation of professional skills, specialist professional education/trainings, professional rehabilitation, pre-professional trainings and psychological support are sometimes provided and accessible. The elements of the system were not assessed as effective, except for: case management (however, this service is not widely provided).
Slovakia	Most of the elements are available, apart from professional skills evaluation and case management. Existing elements are said to be provided occasionally, and only information and advice provision was assessed as easily available. Only performing for the good of the beneficiary and professional specialist/education trainings were assessed as effective.
Slovenia	All the elements are present, except for the psychological support. The most commonly provided services include: selection of the appropriate work, performing for the good of the beneficiary and professional specialist/education trainings. The least common ones are: evaluation of professional skills, professional rehabilitation, pre-professional trainings, psychological support and care in the workplace. Selection of the appropriate work, professional specialist/education trainings and psychological support, are assessed as effective. However, the most effective are: evaluation of professional skills, performing for the good of the beneficiary, information and advice provision as well as case management.
Great Britain	All the elements are present. The least common services are: case management, psychological support and performing for the good of the beneficiary. All other services are commonly provided and easily accessible. Information and advice provision was recognized as the most effective one. Other effective services include: evaluation of professional skills, selection of the appropriate work, consulting, assistance in obtaining grants as well as care in the workplace.
Italy	All the elements are present. Selection of the appropriate work and consulting are the only commonly provided services. Evaluation of professional skills, services associated with performing for the good of the beneficiary, information and advice provision and care in the workplace are only sometimes provided. Majority of them are available for customers. Except for assistance with obtaining grants, professional specialist/education trainings, pre-professional trainings and psychological support, all other services are assessed as effective or very effective.

Source: Eurofound, 2006.

Table 5: *Evaluation of services in the field of careers counselling in selected European countries*

Advisory services	
Universality	There are available in all countries. Commonly provided in 6 and sometimes in 4 countries. The lowest provision frequency in France and Germany.
Availability	Easily to access in Denmark only. In Austria, Ireland, Norway, Portugal, Slovakia and Slovenia it is difficult to obtain them at all.
Effectiveness	They were assessed as effective in 9 countries. The lowest evaluation - in Austria, Denmark, Germany, Portugal and Slovakia.
Services providing information and advice	
Universality	Provision frequency was assessed as high or very high in the majority of countries, with exception of France, Malta and Portugal.
Availability	Evaluated relatively high everywhere except from France, Germany, Portugal and Slovenia.
Effectiveness	These services are recognized as very effective in Malta, Slovenia and Great Britain. As relatively effective - in Finland, the Netherlands, Ireland, Norway and Italy. The highest effectiveness assessed in Austria, Denmark, France, Germany, Portugal and Slovakia.
Services related to performing for the good of the beneficiary	
Universality	Commonly provided only in France and Slovenia. Quite often provided in Finland, the Netherlands, Great Britain, Italy and Slovakia.
Availability	Relatively low ease of access was assessed in the majority of countries, with exception of Finland, France, Malta and Italy.
Effectiveness	They were recognized as very effective only in Slovenia and as relatively effective in Finland, the Netherlands, Slovakia and Italy.
Case management	
Universality	Does not appear in the legal system of four countries: Denmark, Ireland, Portugal and Slovenia. As for other countries it is commonly provided only in Germany. Service provision frequency was highly evaluated in Finland, the Netherlands and Slovenia.
Availability	Services are very easily to access only in Malta and Norway.
Effectiveness	Recognized as effective or very effective everywhere, except in the Netherlands, Germany and Great Britain.
Psychological support	
Universality	This service does not exist in Slovenia only. It is commonly provided in Finland and the Netherlands. Other legal systems in which these services are provided quite often are Austrian, Irish, Portuguese, Slovak and Norwegian.
Availability	The ease of access was evaluated as very high in none of the countries. Relatively high in Finland, Germany, Norway and Portugal.
Effectiveness	In none of the countries the psychological support was recognized as effective, although in many it was evaluated as relatively effective.
Evaluation of professional skills	
Universality	Service does not exist in Malta and Slovakia. It was assessed to be provided quite often or commonly in most of the countries, except from Austria and Slovenia.
Availability	It was not assessed as very easily available in any country, but was regarded as easily available in Austria, Denmark, Norway, Portugal and Great Britain.
Effectiveness	Service turns out to be effective in the majority of countries, except from Ireland and Portugal. It is recognized as very effective in Slovenia.

Job selection	
Universality	Does not exist in France. The service is sometimes or commonly provided in the majority of countries, except from Austria, Malta, Germany and Portugal.
Availability	Denmark was the only country in which the ease of access was evaluated as very high. Service was assessed as relatively highly in the Netherlands, Malta, Norway, Great Britain and Italy.
Effectiveness	Service gained an effective or very effective evaluation in 7 countries. The lowest evaluation appeared in Austria, Ireland, Norway, Portugal, Slovenia and Slovakia.
Care in the workplace	
Universality	Does not exist in France. Universality was evaluated very high in Denmark, the Netherlands and Great Britain, low in Finland, Ireland, Italy and Slovakia, as well as very low in Austria, Germany, Norway, Portugal, Slovenia and Malta.
Availability	In none of the countries it was assessed to be very easily available. Quite available in Denmark, Norway, Great Britain and Italy.
Effectiveness	This service was recognized as effective or very effective in 8 countries. The highest evaluation in Ireland, and relatively high in Denmark, Finland, the Netherlands, Slovakia and in Great Britain. The lowest in Austria, Germany, Norway, Portugal and Slovakia.
Pre-professional trainings	
Universality	Service does not exist in Malta. It is commonly provided in Denmark, Finland and Great Britain, and quite often in the remaining countries, with exception of Slovenia and Italy.
Availability	Highly evaluated in Denmark, Finland, Norway, Portugal and Great Britain.
Effectiveness	Recognized as relatively effective in 6 countries.
Professional rehabilitation	
Universality	Does not exist in Malta. These services are provided commonly everywhere, except from Slovenia and Italy.
Availability	Access to services is relatively easy in Denmark, Finland, Ireland, Norway, Portugal and Great Britain.
Effectiveness	Service is considered as very effective in Austria, and relatively effective in 8 remaining countries. Low assessments of effectiveness predominated in Norway, Portugal, Slovenia and Great Britain.
Specialist professional/education trainings	
Universality	It is commonly provided in Denmark, Finland, the Netherlands and Great Britain. Sometimes provided in Austria, Ireland, Germany, Slovenia and Slovakia. Quite often provided in France, Germany, Norway, Portugal and Slovakia.
Availability	Service available in all countries.
Effectiveness	Effectiveness was evaluated very highly only in Austria, and relatively high in 8 countries. Low assessments of effectiveness predominated in Norway, Portugal, Slovenia and Great Britain.
Assistance in obtaining grants	
Universality	This assistance does not appear in the Portuguese system. It is commonly provided in Denmark, Finland, the Netherlands and Great Britain. Sometimes provided in Austria, Ireland, Germany, Slovakia and Slovenia.
Availability	In none of the countries the service is readily available. Relatively available in Denmark, Finland and Great Britain.
Effectiveness	In none of the countries this system element was regarded as effective. Only 4 countries determined the provided assistance in obtaining grants as relatively effective – Finland, Germany, Slovenia and Great Britain.

Source: Eurofound, 2006.