Chapter 8. The move to abolish mandatory retirement age: The case of the United Kingdom

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INTRODUCTION

The aim of the chapter is to analyse the abolishment of the mandatory retirement age in the United Kingdom (UK). The UK is latest country in the world to completely eliminate mandatory retirement, first having raised the mandatory retirement age to 65 in 2006 and then eliminating it altogether in 2011. This was a significant shift in response to demographic trends and the call to eliminate discriminatory workplace and labour market practices. More and more governments in the UK realised that they have had to meet the costs for the early retirement of employees and provide health and social care to older people, but had limited resources to do so, if workers retired early (Raeside and Khan, 2008). Older workers are also less likely to accept early retirement than they would in the past, in part because of continuing financial commitments such as a mortgage (AVIVA, 2013).

This chapter chronicles the experience of the UK in fully abolishing mandatory retirement and focuses on this specific national case as a possible future direction scenario for other nations. It focusses on three sets of issues as a means to evaluate the impact of introducing legislation to ban contractual mandatory retirement. First, the chapter discusses the ways in which the removal of a pre-determined retirement age was a state response to population ageing. Second, the chapter review the role of labour market discrimination of older workers, and how eliminating mandatory retirement was a means to reduce the ageist stereotypes. In this regard, the chapter examines the role of the European Union as a catalyst in UK policy reforms. Third, it analyses how the policy reform has impact the labour market and older workers. The chapter concludes with a brief discussion of policy lessons from the UK experience.

WHY AGE DISCRIMINATION MATTERS?

While discrimination on grounds of sex and race had been long acknowledged and legislation enacted to prevent or at least minimize it in workplaces in the UK and other Western nations, it is only recently, that discrimination on the grounds of age began to be addressed by policy-
Detrimental treatment of younger and older people has been consistently justified by social values or means. Towards the end of the 20th century, however, this approach was overturned by demographic and market factors, and the convergence of business, macro-economic and social objectives that created a climate for change (Fredman, 2001).

An important aspect of the political, economic and social programmes of the states of the European Union (EU) is full citizenship for all citizens regardless of age, sex, ethnicity, religious beliefs or other potentially discriminatory factors. The effects of chronological age - defined in social terms in relation to an individual’s chosen or forced behaviour on the grounds of age – had been an issue of political, economic and social relevance since the implementation of the First Action Programme on Ageing and culminated with the European Employment Directive 2000/78/EC (European Commission, 2004). Legislation outlawing age discrimination in employment and vocational training in the European Union under that directive came into force by 2006 – and the UK waited until that time to introduce its own legislation in the area. This EU directive prohibits employment discrimination on the grounds of religion or belief, disability, age or sexual orientation. However, the directive did not specifically mandate the elimination of mandatory retirement by individual countries, or indicate a specific age at which mandated retirement would be considered a discriminatory workplace or labour market practice.

In October 2006 that the Employment Equality (Age) Regulations came into place in the United Kingdom, implementing the European directive. Since then, it has been illegal to discriminate against workers under the age of 65 years on the grounds of age. Age 65 was considered to be as the upper limit for protection against age discrimination in the UK, given that many pension plans and other private and public programs had historically used this age as the latest possible retirement age. Thus, it became illegal to make an employee redundant or to prevent employees from participating in training or to deny them promotion on the grounds of age as long as they were than 65 years old. In addition, employers could no longer indicate an ideal age in job vacancy advertisements and nor could they demand specific job experience (which may be time- and therefore age-related). Job application forms were not permitted to ask an applicant’s/employee’s date of birth. Applicants and existing employees who believed that their rights have been infringed on the grounds of their age could take the employer to a tribunal, which could recommend various solutions, including unlimited fines (Leeson 2004a).
Post 2nd World War developments in the European workplaces had seen labour force participation rates of older workers decline along with the withdrawal of workers from the labour market well in advance of the state pension age (SPA). However by the first years of the 21st century, this trend began to gradually reverse as governments, especially in the UK, began to consider the merits of longer working lives (Harper, 2005). Research indicated that age discriminatory practices, particularly in recruitment, retention and retraining of workers, had contributed to this decline in older worker participation (McKay and Middleton, 1998).

THE UK CONTEXT PRIOR TO THE 2006 LEGISLATION

It is important to consider the labour force context in which the Directive was implemented in the UK. Post 2nd World War, the mean male age of retirement in the UK fell from 67.2 in 1950 to 62.7 by 1995. The actual percentage falls were greatest for those aged 50-59 years. Analysis of labour force statistics for the period shows that each successive generation of older men had lower employment rates than the preceding generations. By the beginning of the 21st century, one-third of those aged between 50 and 65 years (65 was the state pension eligibility age for men) were no longer working – and this proportion had doubled in just 20 years.

These labour force participation developments were occurring during a time of increasing male (and female) longevity. Average life expectancy for men aged 65 years had reached 80 years, with disability-free life expectancy reaching 79 years, an increase of almost 3 years in 15 years. Labour force participation for older women is more complex. Indeed, there was also a decline in the mean age of retirement for women in the post war period from 63.9 years in 1950 to 59.7 years by 1995. However, the decrease in retirement age was compounded by the fact that each successive cohort of women over the period contained a larger number of economically employed women as women steadily entered the labour market at all ages over the course of these 50 years.

This steady withdrawal of male workers in particular at increasingly younger ages across the latter part of the 20th century – fuelled from the 1980s by early retirement schemes to combat massive youth unemployment - coupled with a general increase in the number and proportion of the population in these late middle age groups began to raise concerns over predicted dependency ratios in all OECD countries. The ratio was predicted to fall from 4.2 in 2000 to 2.7 by 2030, while the total demographic support ratio (those aged 15-64 years to
those aged 0-14 years plus those aged 65+ years) was predicted to fall from 1.89 to 1.58 over that same period. In the new Member States of the European Union at that time, employment rates of older workers were on average only 30.5 per cent.

Moreover, the UK was entering a transitional period of tension between labour demand and work force practices. Increasing labour shortages – a result of smaller cohorts entering the labour market and older workers locked into a culture of early retirement – could partially be offset by the retention rather than rejection of older workers. So policies, behaviours and attitudes needed to change. The UK government policy, in line with that of other Western countries, started to encourage older people to remain active within the workforce as part of a healthy and productive ageing strategy. This was in part recognition of increasing longevity and the importance of living a healthy active contributory late life, but also to delay the take-up of pensions. Interestingly, the culture of earlier retirement by the early part of the 21st century was beginning to be challenged by older workers themselves, with large proportions indicating that they wished to remain active in the workplace beyond normal retirement age (Leeson & Harper, 2007, 2007a, 2007b, 2008).

In this context, the newly restructured economy had created its own problems for older workers (Arrowsmith and McGoldrick, 1997; Trinder, 1989; Lindley, 1999). The shift from manufacturing to service economy, accompanied by changes in technology, meant that the skills of many older workers had become obsolete (McKay and Middleton, 1998). That is, the cohort of older workers still in the workplace had fewer formal qualifications than younger cohorts, and all evidence was that employers were less likely to train older (over 40) workers than younger ones (Leeson & Harper, 2006). In addition, the entrenched negative attitudes toward older workers, identified in a series of surveys in the immediate post-war period (Harper and Thane, 1989), had altered little in the last half of the 20th century (Leeson, 1993).

There was also a body of evidence which indicated that early withdrawal from the labour market was both directly and indirectly encouraged through age discrimination by employers (McKay and Middleton, 1998; Leeson, 1993, 2001, 2004), and that push factors, such as redundancy or fixed retirement ages, were responsible for a large percentage of early retirements. Analysis of the UK Retirement Survey, for example, indicated that up to 40 percent of early retirements might have fallen into this category (Disney, et al 1997).

Several authors contended that these push factors were stimulated by continued negative perceptions of older workers. Slow work speed, low adaptability, particularly to new technologies, low trainability, low skills uptake, and too cautious, were stereotypes which
appeared consistently in surveys of employers towards the end of the 20\textsuperscript{th} century (Casey, 1992; Taylor and Walker, 1998; Hayward, 1997). In other words, there was a dominant workplace culture of excluding older workers by providing neither training nor flexible working arrangements, both of which would have encouraged and enabled older workers to remain in the workplace.

THE DISCRIMINATORY USE OF AGE

Age discrimination occurs when distinction is made because of a person’s age and used as a basis for prejudice against and unfair treatment of the person (Age Concern, 1998). Discrimination of this kind can be both direct (in the case of a law that states that goods or services are unavailable to particular age groups) or indirect (as when attitudinal behaviour may determine access to various services).

Age discrimination (or at least the existence of the age dimension as a determining factor of access to services or opportunities) may occur in relatively easily definable and identifiable areas such as health and social care, employment, financial services, insurance, volunteering, education and training, but it may also appear in grey areas, which can affect the daily lives of those concerned (for example, increased requirement for the renewal of driving licences once a particular age is reached, regardless of driving safety records). For an individual, age may be only one of a number of potentially discriminatory factors along with sex, religion and race, and it may be difficult to determine which of these factors is the driving discriminatory force in a particular instance (for example, in the workplace). The societal (not to mention individual) costs of age discrimination can be high and at the turn of the 21\textsuperscript{st} century, it was estimated to be over 40 million euros annually in employment in the UK alone (Employers Forum, 2001; Cabinet Office, 2000).

In the context leading up to the EU Directive and the UK legislation, research indicated the discriminatory use of age in the workplace, not only focused on older age groups (Eurolink Age, 1993; Leeson, 1993, 2001, 2004; Department for Work and Pensions, 2001; Hornstein, 2001, Taylor and Walker, 1998). However, paradoxically, other research revealed that employers valued older workers equally or in some cases more than younger workers in a number of key employment and productivity areas such as commitment, punctuality, loyalty, absenteeism and performance (Leeson, 1992). Evidence published by the Department of Trade and Industry (Urwin, 2004), for example, revealed that those aged between 50 years and the state pension age of 65 were likely to be viewed less favourably by
employers when recruiting, retaining and training staff. According to Urwin (2004), data from the 1998 Workplace Employee Relations Survey showed that almost 25 per cent of managers consider age in the recruitment process, and it was suggested that this consideration of age was more likely in workplaces with a younger workforce. Furthermore, only 5 per cent of the surveyed employers had mechanisms to encourage older workers to apply, while on the other hand more than 60 per cent had a formal written policy on equal opportunities. Of these, approximately 40 per cent actually addressed age in this written policy.

Older workers were also less likely to be offered job-related training and education. Age discriminatory practices operated at the younger end of the age spectrum too, in recruiting younger people, for example (Jackson, 2001; Harper et al., 2004). Thus, the evidence was that prior to the Directive and national legislation, age did influence practices in the workplace and employers’ policies and practices in relation to recruitment, promotion, access to training, retirement, and redundancy. These policies and practices were significant in dictating and determining the behaviour of workers aged 45-59 years in the workplace – primarily with regard to plans for withdrawal (Harper and Vlantouchi, 2004; Leeson, 2001, 2004).

The research evidence across Europe from the first few years of the 21st century reached five conclusions. First, that the age dimension in recruitment policies was prevalent for both younger and older workers. Second, that large and increasing numbers of older workers were obliged or persuaded to leave the workplace 5-15 years before the official retirement age. Third, that early exit from the workplace was decided on the grounds of age rather than on performance and abilities and skills needs. Fourth, early exit for persons aged over 50 years was equivalent to permanent exit from the workplace, as these workers faced significant barriers to becoming re-employed. Fifth, that older workers were targeted for job losses.

THE EUROPEAN DIRECTIVE

Against this background, the European Employment Directive can be seen as a first recognition of age-based policies and practices in the workplace as discriminatory. While the central role of (paid) work in the lives of individuals and families, made a legislative focus on employment and vocational training pertinent, research in other fields had already revealed age barriers to participation in numerous other areas (Wegens, 1987; DaneAge, 1993).
The European Union Council Directive 2000/78/EC of 27 (November 2000, OJL303, pp.16-22) established a general framework for equal treatment in employment and occupation; it applied to labour market activities and vocational training, laid down minimum requirements of prohibiting discrimination by member states and did not justify any regression from current levels of protection.

The discriminatory grounds covered by the directive were religion or belief, disability, age, race, gender and sexual orientation, and applied to all persons in employment or seeking employment or training, private and public sector employers, providers of vocational guidance, providers of training, workers and employers’ organisations, professional organisations and public bodies. The types of discrimination to be addressed were direct discrimination (less favourable treatment), indirect discrimination (can be established by any means including statistical evidence), harassment (in accordance with national law/practice), victimisation, dismissal or adverse treatment as a reaction to complaints/legal proceedings, and instructions to discriminate.

The directive aims to provide protection against age discrimination in the labour market with regard to access to employment, self-employment or occupation (including selection criteria, recruitment conditions and promotion at all levels), access to vocational guidance, vocational training and retraining (including practical work experience), employment and working conditions (including dismissal and pay), and membership of and involvement in any organisation of workers or employers or a professional organisation.

No age limits were specified in the Directive and Article 6, paragraphs 1 and 14 of the preamble could in fact be interpreted as allowing mandatory (age-based) retirement as an exemption. In addition to this particular implication of exemption, there were a number of interesting exemptions relating to the armed forces, police, prison and emergency services; in cases where age was a genuine and determining occupational requirement; where the use of age was justified by a legitimate aim (employment policy, labour market and vocational training objectives); positive discrimination to help age-related disadvantaged groups. At the time, a number of EU Member States already had legislation for the different grounds covered by the directive with race tending to be the ground most developed and with the most scope. Although employment seemed to be the area most often addressed, discrimination in relation to goods and services did also feature. Many Member States had experience in addressing discrimination on the grounds of sex, while the other discrimination issues were much less developed as a rule. In addition to legislation to address and combat (age)
discrimination, a key factor in the process was the establishment of (independent) bodies to provide citizens and organisations with information and advice but also to monitor and thereby promote practical adherence to the legislation. Because of already existing widespread legislation in the fields of discrimination on the grounds of sex and race across Europe, many Member States already had such bodies. However, these varied considerably across Member States in their structure and powers.

With regard to age discrimination legislation and bodies to monitor and advise, the EU backdrop to the Directive and subsequent national legislation at the time is summarised in AGE (2004) and (Hornstein, 2001). The picture across the EU was varied – ranging from extensive anti-age discrimination legislation to no legislation whatsoever – and the desire for some form of harmonisation in the field was clear.

THE EQUALITY ACT 2010 IN ENGLAND & WALES

Age discrimination claims

In the first two years of the legislation introduced in the UK in 2006, the number of employment tribunals (court cases) rose by 15 per cent, and around the time of the introduction of this legislation in the UK, it was estimated by various sources including the Employers Forum on Age that the number of age discrimination claims lodged with tribunals would rapidly reach 200 per month, which would make it the most common form of discrimination (The Guardian, November 13th 2007). A survey by business information provider Croner of approximately 2000 people in 2008 revealed that 11 per cent of respondents believed they had been discriminated against on the grounds of age (Personnel Today, January 7th 2008). Findings from the same survey also revealed that around 11 per cent of men and 10 per cent of women felt they had experienced age discrimination in the workplace. In another survey by the Employers Forum on Age in 2007, it was found that almost 60 per cent of respondents had witnessed ageist behaviour in the workplace in the previous 12 months (Personnel Today, October 1st 2007). Interestingly, a survey by Hy-phen of human resource managers and directors in the UK in the early days of the legislation found that less than 50 per cent felt that their own organisation was achieving high standards of compliance with the legislation (Personnel Today, October 1st 2007).

In the early days of the 2006 legislation in the United Kingdom, the case law shows that there was understandably some confusion, and some of the early tribunal cases seemed to
go against the aims of the legislation, while other cases were successful. For example, in 2007, a 20-year old woman won her claim for discrimination when she had been told that she had not been mature enough at 19 years of age to deal with members of the club where she was working as membership secretary (The Guardian, November 13th, 2007). In 2008, a tribunal ruled that a law firm had not discriminated against a former senior partner by forcing him to retire at age 65 years (Personnel Today, January 25th 2008). The firm argued successfully that it was proportionate to force retirement to achieve business aims (for example, to enable workforce planning). The BBC News was also reporting in early 2008 on the continued use of inappropriate questions on application forms, and at the same time the first ever successful case of ageism in Northern Ireland was brought under the legislation in the case of a man turned down for a position at the age of 58 years (BBC News 10th and 14th January 2008). The success of the case lay in the use of the phrase youthful enthusiasm in the recruitment advertisement.

On October 1st 2010, the Equality Act was introduced, replacing the Employment Equality (Age) Regulations from 2006. The new Act absorbed most of the provisions of the 2006 regulations providing protection against age discrimination in employment, training and adult education for people of all ages. It is applicable in England and Wales, while different rules apply in Northern Ireland and Scotland.

The reason for this second reform of retirement ages was three-fold. First, a legal challenge has been mounted by groups representing older workers that argued the recently implemented age 65 continued to be discriminatory. Although the government was not bound by rulings of the courts on what turned out to be a complex legal case, the judicial review did provide the government with an opportunity to begin a second reform of retirement age policy.

Second, the right-wing Conservative government that assumed power in 2010 was keen to reform pension and raise state pension eligibility ages. This was impossible if workers were compelled to retire at age 65. Moreover, the government was more committed to an ideology of reliance on the market, rather than the state, and this made eliminating mandatory retirement a logical policy preference.

Third, there was relatively little opposition from employers to eliminating mandatory retirement. For the most part, employers were of the view that few workers would voluntarily remain employed past 65, given the strong preference for early, rather than later, retirement for the vast majority of employees. Indeed, the setting of age 65 as the default retirement age some years earlier, had not resulted in the need for significant workplace adjustments.
The new legislation meant that the default retirement age of 65 was abolished as of October 2011 so that as of that date no employee can be forcibly retired at the age of 65 years. However, an employer justified retirement age can be included in employment contracts if – as the name implies – the employer can justify this age. There are still confusing case law examples of how cases are being decided. For example, in a recent case, the Court of Appeal decided that the employer had no duty to advise an employee how to make a valid request to remain in employment beyond the traditional retirement age of 65. And in a different case, the Court of Appeal ruled that employers did not have a right to time redundancies to prevent employees from receiving their pension rights – but in that same case it was ruled that costs (to the employer) may be a legitimate justification for discrimination – based on each individual case so that cost may not operate as a carte blanche justification.

Under the Equality Act, both direct and indirect age (and other grounds) discrimination are unlawful. Direct discrimination refers to the less favourable treatment because of their actual age or the age they appear to be. Indirect discrimination refers to having a policy that disadvantages people of a certain age (for example, restricting recruitment to recent graduates). Exemptions do apply, however. Discrimination is permissible if – as cited in the case above – an employer can show it is a proportionate (that is appropriate and necessary) way of achieving a legitimate aim. This could, for example, be in respect of safety and protection of the public in general.

The Equality Act and retirement

It should be emphasised that retirement age is not necessarily the same as the pension eligibility age. In the UK, there is a state pension eligibility age at which an individual can collect a state pension. However, employees since 2011 are no longer obliged to retire at this age. Under the Pensions Act 2011, women’s state pension age (SPA) will increase from 60 to 65 years by November 2018. From December 2018, the state pension age for both men and women will start to increase to reach 66 years by October 2020. In addition, the Government has proposed increasing the state pension age to 67 years between 2026 and 2028. In 2012, the government confirmed that it will extend the state pension age because of rising life expectancy. It is likely that the state pension age rise to 70 years and more. An increase to 68 years had been scheduled for 2046, but this will be brought forward and a rise to 69 years is expected in the late 2040s with a further rise to 70 years predicted for the 2060s. These increases could all be brought forward, if life expectancy increases beyond current
expectations. The new law does not affect voluntary retirement and employers – unless there are exemptions or justifications, as already mentioned – are no longer able to forcibly retire employees at the age of 65 years.

The UK is, therefore, moving into the 21st century with no retirement age and a state pension age linked to increasing life expectancies. Given that life expectancies have for more than 150 years been increasing by approximately 2.5 years per decade (Leeson, 2014), even the proposed future state pension age of 70 years may be outdated before it even comes into force.

*Empirical evidence*

The most recent labour force survey data are used to demonstrate employment activities of older workers in the UK. In the survey, information is collected on the length of time a person is continuously employed (either by their current employer or in their self-employed posts). As can be seen from Figure 1, an increasing number of workers at or beyond the state pension age have remained at work since 1993, increasing from around 750,000 in 1993 to almost 1.5 million in 2010, declining slightly to 1.4 million in 2011, which corresponds to 12 per cent of this group in the UK still employed. The reason behind the drop in 2011 has to be investigated further, however, one explanation may be the effect of 2009 economic recession along with current coalition government’s saving policy.

[Figure 8.1 goes around here]

There are clear regional differences in the employment rate of persons at the state pension age or beyond (Figure 2). In the South East, the employment rate for this group is almost double that in the North East (14.1 vs 8.2 per cent). This is likely because in the southern part of the country, which is more economically developed, there is a greater range of jobs, especially those that are part-time and in the service industry, as well as in self-employment available for older workers. It would also be interesting to look at gender variation among older workers staying in labour market but the data to do so were not made available at the time of the study.

[Figure 8.2 goes around here]
Remaining in work after 65 years of age is still difficult, which may be reflected in the number of age-based tribunal cases. There were 972 age-based claims accepted by employment tribunals in 2006/07, while this had increased dramatically to almost 7,000 cases just four years later in 2010-11 (Tribunal Service, 2014).

Figure 8.3 compares employment type (self-employed vs. employed) among those below and above state pension age respectively. It is clear that a higher proportion of older workers are self-employed compared with the main body of the workforce (approximately 30 vs 10 per cent), which suggests that that older workers remaining in the workforce do not take employment positions from younger workers in organizations.

[Figure 8.3 goes around here]

In addition, older workers are more likely to work part-time than full-time, which may be a question of preference, but it may also be a question of job availability (Figure 8.4). This indicates that continued working after the state pension age creates a substantial demand for part-time job opportunities.

[Figure 8.4 goes around here]

Table 1 shows employment by skills and gender and it can be seen that a majority (64 per cent) of older women are engaged in lower-middle or low skill level jobs whereas 67 per cent of older males are engaged in high or upper-middle skill level jobs.

[Table 8.1 goes around here]

The table illustrates that the gender differences among those 65 and older are pronounced with regard to the occupational patterns. Indeed, the differences are likely greater for the older cohort than for younger cohorts where the level of formal education and training for men and women is more equal.

The Figures and Table provide a profile of workers 65 and over that shows this group to be steadily increasing in numbers, concentrated in the most economically prosperous labour markets of the country, most often found in self-employment and working on a part-time basis. Lastly, there is a clear gender pattern with women, more often than men, in jobs that require lower levels of skills and training.
CONCLUSION

The chapter, using the UK as a case study, developed an understanding of the need to, and implications of, eliminating contractual mandatory retirement via national legislation. The major findings of the chapter include that historically older workers have faced age-based discrimination that limited their employment prospects. Eliminating the option for employers to terminate employment at the age of state pension eligibility has increased the number of older workers in the UK, mainly in self-employment and predominantly engaged in part-time employment. However, gender differences remain beyond the state pension age in respect of the level of skills required in the beyond-pension age jobs available. The two-step process used by the UK government – that is to first set the national contractual mandatory age at 65, with a complete elimination five years later – follows the example of the United States which used a similar approach in the 1970s and 1980s. Like the United States, and Canada, the elimination of a mandatory retirement age was then rapidly followed by reforms to state pensions that increased the age of eligibility beyond age 65.

The UK experience also shows how a national government used the EU directives to further a policy reform that was, in fact, not mandated by the EU. In other words, the UK government was keen to emulate other Anglo-Saxon nations (United States, Canada, Australia and New Zealand) that had also eliminated mandatory retirement, and used the EU directives as a justification for its policy objectives. It remains uncertain at this time if other European nations will follow the lead of the UK, or whether those nations will continue to link the age of state pension eligibility with mandatory retirement. It seems unlikely that in the foreseeable future countries such as France and Italy, with a long history of early retirement and powerful labour unions, will legislate and end to mandatory retirement ages.

Nonetheless, the UK experience demonstrates that governments can, in a relatively short period of time, eliminate contractual mandatory retirement and do so without labour market upheavals or political setbacks. It appears that workers, employers and the labour market have adjusted to the new legislation, and that there has been no political fallout for the government. This perhaps, is the most important lesson that can be drawn the UK’s successful elimination of mandatory retirement ages.

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Figure 8.1. Percentage of older workersii (‘000) in the United Kingdom labour market.

Figure 8.2. Employment rate (percent) for State Pension Age and above by regions in the United Kingdom, September 2011.

Figure 8.3. Distribution of employment status of older workers in the UK, 2011

Figure 8.4. Percentage distribution of older workers by employment status.
Table 8.1. Percentage of older workers by skill level of their job, 4th quarter 2011, United Kingdom

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<tr>
<th>Skills</th>
<th>Male</th>
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<th>All</th>
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<td>Higher</td>
<td>29</td>
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<td>22</td>
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<td>Upper Middle</td>
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