Social Security Provisions for Young Adults in Industrialized Countries

by MAX HORLICK*

The 1965 amendments to the Social Security Act provided for the extension of survivor (orphan's) and dependents' benefits to young people between the ages of 18 and 22 who are full-time students. In early 1971, there were 575,000 student beneficiaries on the social security rolls. The 1967 amendments liberalized the eligibility requirements for disability benefits for young workers. Similar recognition of the income security needs of young adults who are not yet full-time workers, or are just entering the labor force, has resulted in a variety of special social security benefits and other provisions for young workers in most industrialized countries of the world. This article summarizes the available information on such provisions for young adults in the countries of the West.

THE SOCIAL SECURITY status of young people from the end of compulsory education to the beginning of work has taken on greater importance in recent years because (a) a greater proportion of the population is under age 25 and (b) the longer period of education and training needed to acquire the increased skills demanded by industry today tends to postpone entry into the labor force. This postponement can amount to as much as 12 years beyond the minimum working age. A significant number of young persons might thus be left with no social insurance protection against ill health, disability, accidents, and unemployment. Moreover, in countries that relate the amount of pension to the number of years worked, lengthy school attendance might mean a reduction of 25-30 percent in the work lifetime and hence entitlement to smaller benefits. In other words, an increasing percentage of the population might have little or no social security protection under "normal" eligibility requirements unless special measures to protect the youth of the country were provided.

Particularly since World War II, several advanced social security systems have adopted various measures to take account of the special situations affecting youth. The system of family allowances providing cash benefits up to a given age has in some cases been extended to higher ages to allow for career preparation or disability. Concurrently, youths are covered as dependents for health and survivor benefits and sometimes for disability and accident benefits under the provisions applying to the head of the household. After the regular period for coverage as dependents (ending variously at ages 16-18) they may be covered as students or trainees. Subsequently, the graduate may be protected by an extended unemployment insurance program, if he cannot immediately find his first job in the field of qualification.

Over the years, coverage of young people has been broadened from inclusion of only those engaged in direct preparation for work—apprenticeship and practical training connected with a specific trade—to encompass students in higher technical schools and, more recently, in liberal arts institutions. Such extensions have been made on the premise that all these students are acquiring skills for entry into the labor force.

As a prelude to a more detailed discussion of youth programs in foreign countries, several differences between youth patterns here and abroad should be pointed out. A greater percentage of young people in the United States continue schooling, and the labor-force participation rate is therefore lower than it is abroad, especially at

<table>
<thead>
<tr>
<th>Country</th>
<th>1950</th>
<th>1960</th>
<th>1965</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>35</td>
<td>55</td>
<td>63</td>
</tr>
<tr>
<td>Canada</td>
<td>43</td>
<td>72</td>
<td>72</td>
</tr>
<tr>
<td>Denmark</td>
<td>72</td>
<td>72</td>
<td>74</td>
</tr>
<tr>
<td>Finland</td>
<td>40</td>
<td>88</td>
<td></td>
</tr>
<tr>
<td>Germany (Federal Republic)</td>
<td>77</td>
<td>78</td>
<td>76</td>
</tr>
<tr>
<td>Italy</td>
<td>52</td>
<td>72</td>
<td></td>
</tr>
<tr>
<td>Netherlands</td>
<td>62</td>
<td>82</td>
<td>93</td>
</tr>
<tr>
<td>Norway</td>
<td>49</td>
<td>78</td>
<td>83</td>
</tr>
<tr>
<td>Switzerland</td>
<td>30</td>
<td>30</td>
<td>59</td>
</tr>
</tbody>
</table>

the high school age. Traditionally in Western European countries, most young people at ages 14 to 16 have become apprentices or trainees, have attended vocational school, or have gone to work. (The tendency to start work without any training is on the decline, however.) Because of their earlier entry into a work relationship and because of the greater number of social security programs, a larger proportion of European youths come under direct coverage and at a much younger age.

Table 1 illustrates the trend toward longer attendance in secondary education in the industrial countries. The figures roughly show the rising proportion of the group aged 15–19 attending school in 1950, 1960, and 1965. Another way of looking at the picture is presented in table 2, which traces the decline since 1950 in labor-force participation for those aged 15–19 in selected countries. Besides showing notable declines in the period covered, the table also indicates that participation rates for both boys and girls in the United States were the lowest among the developed countries during the entire time.

Comparable statistics for the group aged 20–24 (available only for 1960 or 1961) also show that the percentage of the economically active was lower in the United States than in most other industrial countries: 65 percent, compared with 77 percent in Japan and about 81 percent in Switzerland and Germany.

FAMILY ALLOWANCES

Cash monthly payments to families with children are found in most developed countries. Such allowances usually terminate when the child is aged 15 to 17 (table 3). Originally, this age maximum was linked to the end of compulsory schooling and the minimum working age. With the lengthening of required schooling and the growing custom of pursuing education beyond the required years, most countries have progressively extended the payment of family allowances. Of the countries in table 3, the limit for students is now most commonly from age 21 to age 25, with a maximum of 27 in Austria and the Netherlands. In several countries the age limit is higher for orphans than for children whose parents are living, and there is technically no age limit for the disabled in some countries.

In addition to the regular monthly cash payments for each child, the family allowance system may also pay an education allowance (Germany) or increase the amount of allowances for students aged 16 or over (Sweden). The Canadian youth allowance, which replaces the family allowance after age 15, also provides higher payments for the group aged 16–18.

At the point in their careers when regular family allowances stop, young people who are not disabled face three possible courses of action, each one related somewhat differently to social security in the individual countries. First, they may continue their education through college and graduate school; in that event, family allowances as well as certain other social security benefits may continue. Second, they may enter practical training for a rotation, with somewhat different coverage problems depending on whether or not they are paid. In the United States, apprentices under collective bargaining agreements are considered to be regular members of the labor force and as wage earners have normal social security coverage. In contrast, certain foreign countries traditionally have had unpaid apprentices or their young persons in training have been paid wages less than the minimum for adults. Third, they may enter the labor force and begin to pay regular social security contributions. The first two possibilities are discussed in detail with respect to each type of social insurance protection; the third is omitted from consideration because working youths in that situation generally
Table 3.—School leaving, minimum work, and maximum family allowance ages, selected countries. 1969

<table>
<thead>
<tr>
<th>Country</th>
<th>Official school leaving age</th>
<th>Minimum working age</th>
<th>Maximum family allowance age</th>
</tr>
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<tbody>
<tr>
<td>Austria</td>
<td>15</td>
<td>15</td>
<td>Under 21; 27 if student or full orphan.</td>
</tr>
<tr>
<td>Australia</td>
<td>15</td>
<td>15</td>
<td>Under 21; 27 if student or full orphan.</td>
</tr>
<tr>
<td>Belgium</td>
<td>15</td>
<td>15</td>
<td>Under 16; 21 if student or full orphan.</td>
</tr>
<tr>
<td>Denmark</td>
<td>15</td>
<td>15</td>
<td>Under 18.</td>
</tr>
<tr>
<td>Finland</td>
<td>14</td>
<td>14</td>
<td>Under 18.</td>
</tr>
<tr>
<td>France</td>
<td>16</td>
<td>16</td>
<td>Under 16; 18 if invalid.</td>
</tr>
<tr>
<td>Germany (Federal Republic)</td>
<td></td>
<td></td>
<td>2 or more children under 15; 20 if student, invalid or girl working at home.</td>
</tr>
<tr>
<td>Israel</td>
<td>14</td>
<td>14</td>
<td>Under 18; 25 if invalid.</td>
</tr>
<tr>
<td>Italy</td>
<td>14</td>
<td>14</td>
<td>Under 18; 26 if invalid.</td>
</tr>
<tr>
<td>Japan</td>
<td>15</td>
<td>15</td>
<td>Under 16; 27 if student or invalid.</td>
</tr>
<tr>
<td>Netherlands</td>
<td>14</td>
<td>14</td>
<td>Under 16; 25 if invalid.</td>
</tr>
<tr>
<td>New Zealand</td>
<td>15</td>
<td>15</td>
<td>Under 16; 26 if student.</td>
</tr>
<tr>
<td>Norway</td>
<td>15</td>
<td>15</td>
<td>Under 16; 18 if student.</td>
</tr>
<tr>
<td>Spain</td>
<td>14</td>
<td>14</td>
<td>Under 16; 21 if student.</td>
</tr>
<tr>
<td>Sweden</td>
<td>15</td>
<td>15</td>
<td>Under 16; 21 if student.</td>
</tr>
<tr>
<td>Switzerland</td>
<td>15-16</td>
<td>15</td>
<td>Federal: under 16; 21 if student; Cautal: 15-18 and 21 if student.</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>15</td>
<td>15 or 16</td>
<td>Under 16; 18 if invalid; 19 if student.</td>
</tr>
<tr>
<td>United States</td>
<td>16-18</td>
<td>16</td>
<td>Under 16; 18 if invalid; 19 if student.</td>
</tr>
</tbody>
</table>

1 Apprenticeship required for 2-4 years.
2 Full time, age 15 for part time, but education and training must be continued.


receive the same treatment as other members of the labor force.

HEALTH INSURANCE

In general, young people up to a specific age, and students for the duration of schooling, have health protection in most industrial countries. In countries with universal medical care systems, such as the United Kingdom and the Scandinavian countries, all young people are entitled to comprehensive services along with the rest of the population and no special arrangements are necessary.

In countries with health insurance systems, young people are covered as dependents up to working age or to the end of eligibility for family allowances. Eligibility as a dependent is usually extended during school attendance. The longest extension is to age 27 in Austria and the Netherlands, where family allowances also are payable up to this age for students. Variations occur in such countries as Norway, where children’s allowances stop at age 16 but dependency for health insurance purposes continues up to age 18.

Voluntary insurance of children is often possible after presumed dependency stops and before work begins. Thus, in Denmark coverage on the parents’ account stops at age 15. The children may then be insured voluntarily, even if they are not in gainful employment.

Special arrangements are becoming more prevalent for the health protection of college students who would not otherwise be covered under the country’s general plan. Without such arrangements, exclusion from coverage may stem from the fact that the father is not under the general social security system but in a separate plan (the plan for agriculture, for example). The student may be too old for coverage under the regular provisions. In some countries the insurance might be tied to a specified number of contributions based upon earnings.

France has a special insurance system for students who are not entitled to benefits as dependents. It provides for care for insured students in higher and technical schools and their dependent spouses and children. This program is administered by the general social security system and is compulsory for students under age 26 in recognized institutions who are not otherwise covered. The age limit can, however, be raised from 1 to 4 years if the student engages in studies of long duration or if he has lost time because of military service or incapacity. When the student reaches age 26, he can affiliate voluntarily with the general system for sickness and maternity and death benefits but not for old-age and invalidity. He is, of course, covered for all contingencies when he begins to work. The financing of this program comes from three sources: a contribution from the student himself, individual social security funds (agriculture, nonsalaried workers, and others), and from general revenue.

In Belgium, health insurance was extended to all post-secondary students in 1969. They must, however, contribute for themselves and their dependents. Six months of contributions are normally required in order to receive benefits. If a student is certified as unable to pursue his studies because of invalidity, he continues to receive health insurance benefits without making contributions.

In Spain, students in secondary schools, universities, and graduate schools are covered from age 14 for health and hospitalization benefits as
long as they remain in school. An assistance supplement is provided in case of need and can continue for up to 3 years past the end of studies. These benefits are administered by the social security institute and are paid for through general revenue, through funds of the Ministry of Education, and by student fees paid at the time of registration.

In some countries the coverage may be selective, rather than for all students. In Austria, for example, students are not as a rule covered by sickness insurance, but trainees for professions requiring a university education, student nurses, and student midwives are insured.

Paid apprentices, like any other young persons in insurable employment, are usually covered by health insurance as though they were regular members of the labor force. For the most part they are entitled to both health benefits and cash sickness payments to make up for loss of income during illness. Apprentices who are not paid or who receive only a nominal amount theoretically incur little or no income loss when ill and therefore may be insured only for medical care. This is the case, for example, in Italy and France, where apprentices are insured for medical care only, with the employer for the most part responsible for contributions. In Italy the National Fund for Vocational Training pays the entire contribution for apprentices placed with small tradesmen. In Germany, too, apprentices, even if unpaid, are covered for health insurance. The age limit of health coverage for apprentices may be different than the limit for students. In France, for example, the limit for the former is age 17 and it is 19 for the latter.

SURVIVOR BENEFITS FOR YOUNG PEOPLE

Most national systems provide some form of continuing protection for orphans in addition to the regular family allowance, usually under old-age and survivors insurance and workmen's compensation. The rationale is, of course, to provide a source of income to replace in part what the head of the household had been earning and to assist the surviving parent—generally, the widow—in bringing up the children.

Most often the orphan's benefit stops at age 17. It was assumed when the programs originated that young people would be able to support themselves or at least to contribute adequately to support of the family at that age. For all the countries studied, this cutoff is several years beyond the compulsory schooling and minimum working ages (table 3). Most of the countries, however, extend the age of eligibility to include continued schooling. The upper age for students is commonly 25, but it may be later, as in Italy, or there may be no extension of benefits at all for students, as in Finland and Norway. In most of the countries studied, there is no age limit if the young person is an invalid.

The size of the benefit may vary according to age. In the Netherlands the orphan's benefit is one amount up to age 10 and is then increased for the age groups 10–15 and 16–26. These groups include not only students but all young people.

The pattern of orphan's benefits under workmen's compensation is very similar to that of old-age and survivors insurance. Many countries pay about the same amount under both programs; some pay more or less for workmen's compensation. In addition, some countries—Canada, for example—have regional variations in the amounts paid. The maximum age for receiving orphan's benefits under workmen's compensation is usually the same as for old-age and survivors insurance.

WORKMEN'S COMPENSATION

The national legislation of most countries recognizes that young on-the-job trainees are exposed to the risk of work-connected injuries or illnesses, and protection through workmen's compensation is therefore provided for them. Like many other benefits, this protection has developed considerably in recent years. Many countries have extended coverage to students undergoing vocational education in schools and subsequently in technical institutes. More recently students are regarded as being in training for a career, no matter what the form of preparation. Thus a number of countries have also extended protection to students in general education, although they are not yet in the labor force.

Very broad coverage exists in Norway. There, students in publicly funded schools (including universities and special and technical schools)
and in training programs are covered by accident insurance, which is financed by the national government as part of the workmen's compensation system. In West Germany a national unified system of accident insurance for students has been set up under the general social security program, financed by state and local authorities. The insurance protects against accidents not only in the school building but also on school excursions or domestic or foreign travel and, as in many other countries, accidents occurring on the way to and from school or school events. The need for such insurance is explained in part by the increased amount of commuting due to the centralization of schools. German apprentices and trainees are covered where actual physical work is involved, including vocational schools and training workshops.

In Spain, students are covered for accidents from age 14 through college, as long as they remain in school. For temporary disability the student receives treatment, drugs, and an allowance for up to 1 year or until studies can be resumed. For permanent disability he receives an allowance based on the number of years of study completed. The permanent disability allowance turns into a regular disability pension at age 21. Like other student benefits, these benefits are administered by the social security system and paid from general revenue.

In Italy, the program covers students in career training, those in vocational schools, state technical and professional schools, and those in practical training. Contributions for apprentices are paid by the employer.

The coverage of other countries tends to be linked to practical training only. France, for example, covers students in technical and vocational training or training-in-industry programs, although voluntary arrangements exist for other types of students.

In the United Kingdom, workmen's compensation covers unpaid apprentices and children under school-leaving age who are in part-time employment.

**DISABILITY**

The workmen's compensation programs provide coverage for risks related to work or the training for work, but there are also special provisions to cover young people under general disability systems. These provisions may stipulate that a pension is payable only when the invalidity began before a specified age. This age may coincide with the termination of children's allowances or of dependency upon the parents. No contributions are required. If disability occurs after this time, however, a minimum period of employment is usually required to establish attachment to the labor force and to indicate that there has been an earnings loss. In some countries there is a gap in protection, since the youths in the age group under question may not have the number of months of work required to earn any disability benefits at all. In such a case, they may have to depend upon the family or upon some form of assistance.

Several ways have been developed to alleviate this problem. Spain eliminates the gap in coverage by automatically converting permanent disability allowances for youths into lifetime pensions when they reach age 21. In that country a student who is disabled receives an allowance based upon the amount of studies completed, without taking into account the decrease in capacity to perform professional work. For workers under age 25, Belgium cuts in half the number of months of coverage and of actual work required to qualify for the disability pension. Sweden's universal pension system automatically includes all young people, calling for no contribution or income test at all.

In Canada, apprentices and trainees are protected while they attend specified school classes judged necessary to prepare for employment. In some Provinces, apprentices are covered during their studies in vocational schools. For contribution purposes, the apprentice is either considered the employee of the employer to whom he is apprenticed while he attends school and he is therefore covered, or he is considered an employee of the Provincial Government and compensation is charged to the Provincial Government account.

Particularly for workmen's compensation, determination of the amount of benefit poses considerable problems in the age group under discussion. For young workers in the labor force, workmen's compensation legislation usually provides that the loss in earning capacity be evaluated in terms of the loss or reduction of current earn-
ings. Any relationship of benefit to current earnings would be inequitable, however, for young apprentices or trainees who fall victim to accidents. Pay at that age is unrelated to anticipated career income and thus affords no indication of the degree of loss to the trainee or to his dependents. For unpaid trainees and students there is, of course, no remuneration on which to base calculation.

In order to permit an estimation of equitable benefits, several different approaches have been used by the individual countries in measuring the earnings a student or trainee, whether paid or not, would have had in the course of a normal career. One approach has been to relate the disability pension to the current earnings of a young or an adult worker in the intended occupation. The pension is calculated as though the training had been completed, on the basis of pay earned by workers with equal training. Some of the Canadian Provinces take this approach, basing the pension on the current wages of beginners in the trade or business for which the beneficiary was preparing. In other Provinces individual factors are taken into account by special boards. West Germany, rather than relying on individual calculations for each case, calculates hypothetical earnings tables for each trade and profession. The benefit is then based on the amount that a worker with training equivalent to that of the injured youth would be making annually. The age of the beneficiary is taken into account in the calculations.

In Italy, the amount of the benefit for students is determined on the basis of the amount of disability suffered, the age, and the type of course. Since the Norwegian scheme covers all students it must take into account those who have not been trained for any particular occupation. It solves this problem by fixing a basic amount payable at age 18 and providing annual increments up to a maximum of 6 years.

OLD-AGE PENSION

As discussed earlier, continued school attendance beyond the compulsory period has increasingly come to be regarded as part of career training, whether vocational or in the liberal arts, and a necessity in view of the greater skills required in a technological society. But the longer the period of training, particularly at the university or graduate level, the longer the delay in entering employment and the shorter the period available for obtaining the years of coverage required for an eventual old-age pension. In those countries in which the size of the pension is directly related to the number of years worked, a deferral of 10 or more years because of education could mean a significant reduction in the eventual benefit.

Consideration of these problems has led a number of countries to make special provision for crediting periods spent in education and training. Two approaches are found in Western Europe, one in which the student must contribute after a certain age—as in the United Kingdom—and the other, in which the student makes no payment but is credited with a hypothetical earnings record, as in Germany and Austria. In countries where the length of working life is not the key factor in the formula, as in France, the delay in entering the labor force is less serious from a social security point of view.

In the United Kingdom, all residents become a part of the social security system at age 15, the minimum working age. The youth who goes to work at that time makes contributions and begins to earn eligibility. Students and trainees from age 15 to age 18 do not have to make contributions toward old-age and survivors insurance but are given free credits. These free credits do not actually count toward the required 156 weeks of contributions needed to receive a benefit. They do, however, serve to bring the young person into the social security system and provide the required continuity of membership, as of the minimum working age. Students still under age 18 when the course ends continue to receive credits, for up to 13 weeks, until they start work or reach age 18.

Beginning with age 18, however, students must make contributions in order not to lose continuity. They are warned in special leaflets that failure to keep up continuity could mean an eventual reduced flat-rate retirement pension, an eventual

3 The contribution made by an employee in the United Kingdom consists of a flat rate plus a percentage of weekly earnings between about £10 and £30 for the flat-rate, old-age pension. The earnings-related pension is based on the amount of contributions (rather than earnings) actually made.
reduced widow’s benefit, or none at all in some circumstances, and possible loss of the maternity grant.

The student aged 18 and over makes contributions as a “nonemployed person” (as distinguished from employed and self-employed). This category of contribution does not normally bring entitlement to sickness and unemployment benefits or to maternity allowances. The students can make these payments weekly or they can defer them until the end of study. Generally they may pay within 6 years and benefits cannot usually be collected until after full payment.

In Germany and Austria, those students and trainees who earn no money are not required to make contributions. For the former, for example, unremunerated time spent in education or training after age 15 counts toward the pension. A maximum of 5 years can be credited in regular schools and 4 years in vocational schools, provided the youth begins to work and make contributions within 5 years of completion of his studies.

The amount credited in the absence of contributions is based on hypothetical earnings up to age 21. It is interesting to note that at one time the granting of credit for years of school could actually reduce the eventual pension. Since the German system is based on the number of years of coverage, the recording of years of “earnings” at very basic levels could pull down the lifetime average. This problem was eliminated in 1965, however. The hypothetical earnings record is now based on prospective average income in the chosen occupation, as drawn up in standardized tables.

For apprentices, the employer alone makes contributions if the pay is below a specified amount, which is determined each year. Above this figure, each pays half, as in the case of ordinary workers.

UNEMPLOYMENT INSURANCE

A weakening of the demand for labor tends to affect young workers more than it affects those in the established labor force. Such workers—or potential workers—may be unable to qualify for benefits under the regular unemployment insurance system because they have not contributed for the required period of time.

Special unemployment benefit provisions for persons who have not as yet had regular earnings are made in Austria, Belgium, Canada, Denmark, France, the Federal Republic of Germany, Ireland, New Zealand, Norway, Switzerland, and the United Kingdom.

In Belgium, the unemployment benefit for those seeking the first job is considered a “presalary.” In 1968 it was determined that numbers of young graduates could not find employment in keeping with their qualifications. The decision was then made to help them so that during the difficult transition period preceding their first employment they would not be totally without means. Before that time, unemployment benefits for the young person seeking the first job were limited to those for students completing apprenticeship or vocational studies in an institution approved by the National Employment Office as direct preparation for a paid occupation. General and liberal arts students in secondary school and university students were excluded as well as students in teacher training. Considerable delays were incurred in evaluating the amount of study and training. The 1968 decree eliminated the problems and broadened coverage to include students in secondary education, universities, graduate schools, and normal schools. The only exclusion now is for general students in the lower years of secondary education. The student or trainee must be under age 25 and be registered for work for 75 days. Benefits can be collected for up to one year, and this period can be extended because of military service or special circumstances.

In Denmark, youths who have reached age 18 and who have been participants in training programs are immediately entitled to compensation for loss of income if they cannot find work. The benefits are financed through general revenue. Where work cannot be found for large numbers of young unemployed persons aged 18–25, youth employment projects are set up. Those who have been unemployed for 50 days continuously or for 100 days in the preceding year are eligible for such work and are covered for sickness and disability. Contributions are made by the State and also by the participants in that deductions are made from their pay.

In New Zealand, everyone over age 16 is en-
titled to an unemployment benefit if he is unemployed, is capable and willing to work, and has tried to find a job. Australia has a similar provision. This type of protection would automatically cover students and trainees.

In Germany and the United Kingdom, previous employment is a condition for eligibility for unemployment insurance. Special provisions in England apply to young workers who claim unemployment (or illness) shortly after completing unpaid apprenticeship. At least 26 actual contributions must have been made, however, before the apprenticeship began. One of the qualifying conditions in Germany is at least 10 weeks of remunerated employment, although completion of courses at vocational schools or universities may be considered the equivalent. Apprentices are mandatorily covered.

CONCLUSION

The special attention the various social security systems are paying to the protection of the young men and women preparing themselves for a career is the result of a growing recognition of the special problems of income maintenance for those just entering the paid labor force. The extension of social insurance protection to such young people has been accelerated by the greater concern over recent youth developments in nearly all industrial societies.

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(Continued on page 42)