

노동시장 변화에 따른 고용보험제도 비교연구

2021년 6월

고용노동부
손재형

국외훈련개요

1. 훈련국 : 영국
2. 훈련기관명 : 리즈대학교 (University of Leeds)
3. 훈련분야 : 고용노동
4. 훈련기간 : 2019.7.1. - 2021.6.30.

훈련기관 개요

훈련기관	○ University of Leeds		
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홈페이지	○ www.leeds.ac.uk		
설립 및 역할	<ul style="list-style-type: none"> ○ 리즈의학교(1831년) 및 요크셔과학대학(1874년)이 1887년 통합 후 빅토리아 대학으로 편입, 1904년 에드워드 7세의 칙허를 받아 리즈대학으로 설립 ○ 사회과학, 법학, 공학, 의학 등 다양한 분야에서 활발한 연구수행 		
조직(과)	<ul style="list-style-type: none"> ○ School of Sociology and Social Policy (사회정책대학원) ○ 50여 명의 Core Faculty와 14명의 행정직원으로 구성 ○ 사회학, 사회정책, 인종차별, 성(gender) 등 다양한 사회적 이슈에 관한 교과 프로그램 편성 및 각종 세미나 개최 등 ○ Leeds Social Science Institute, N8 Policy Research Partnership 등 동 대학원 내 공공행정 각 분야 전문 연구소 운영 		
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< 훈련결과보고서 요약서 >

성 명	손 재 형	소 속	고용노동부
훈 련 국	영국	훈련기간	2019.7.1..-2021.6.30.
훈련기관	University of Leeds in U.K.	보고서매수	101 매
훈련과제	노동시장 변화에 따른 고용보험제도 비교연구		
보고서제목	Comparative unemployment benefit between the UK and South Korea		
내용요약	<p>< 1. 논의 배경 ></p> <ul style="list-style-type: none"> ○ 고용보험제도와 사회안전망 의제는 노동시장에 적지 않은 영향을 미치고 있으며, 영국의 사회안전망과 적극적 노동정책의 역사적 흐름과 정책 평가에서 많은 시사점 도출 가능 - 영국의 사회보장제도의 가장 큰 변화는 제2차 세계대전 직후 베버리지 보고서에 근거해서 국민보험(National Insurance)가 형성되면서 진행됨. 특히, 서구 국가 중에서도 가장 먼저 보편적 복지제도를 확립한 국가로 평가받음 - 영국의 노동시장 정책은 1911년 실업보험법 제정을 통해 시작했으며, 1970년대 들어서야 취업이 어려운 집단의 실업을 줄이기 위한 목적으로 적극적 노동시장 정책이 도입되었음. 1998년부터 전국적으로 실시된 뉴딜 프로그램을 중심으로 실업자를 위한 적극적 노동시장정책 프로그램이 통합적으로 운영되는 추세를 보임. - 최근에는 유니버설크레딧(Universal Credit) 시스템으로 전환을 추진하고 있어 노동시장 변화에 따른 제도 개선 방안으로 시사하는 바가 있음. 		

○ 고용보험제도는 나라별로 다양한 모습을 띄고 있지만, 일반적으로 △지원대상 (coverage ; 사회안전망을 지원하는 대상), △자금조달(finance; 재원 마련 방법과 지출), △benefit generosity (i.e. in terms of both benefit level and duration), 그리고 △integration of active measures within Unemployment Insurance systems (i.e. activations, job search requirements, etc) 등 네가지 (Asenjo and Pignatti, 2019)의 내용으로 중심으로 고용보험제도를 비교분석함.

- 본 연구는 영국의 사회안전망 구축의 역사와 고용보험제도의 개혁 과정을 분석하고 남한의 고용보험제도 개선을 위한 효과적인 대안을 제시하는 것을 목적으로 함. 이 보고서는 영국의 실업급여 역사와 교훈을 소개하고, 고용보험제도의 특징과 장점 (financial system, operational system, delivery system을 통해)을 분석한다. 마지막으로 영국과 한국의 실업급여의 수준을 비교하고, 마지막으로 가장 최근에 도입된 유니버설 크레딧에 대한 주요 내용과 평가를 통해 정책에 시사하는 바가 무엇인지 분석할 예정이다.

< 2. 영국 실업급여의 역사와 진행과정 >

○ 영국의 실업급여제도의 현대적 골격은 베버리지 보고서(Beveridge, 1942) 이후 1946년의 국민보험법으로 완성되었으며, 구체적으로 베버리지 보고서에 나타난 몇가지 원칙들은 ①보편성(comprehensiveness), ②정액급여(flat-rate benefit) 및 정액기여(flat-rate contribution) 원칙과 ③통일된 행정(unified administration) 원칙으로 설명할 수 있음

- 전반적으로 영국의 국민보험 변화의 기저에는 국민연금이 그 중심에 있었고 기본방향은 국가연금의 재정적 부담을 줄이는 한편 노인 빈곤문제 해결과 재분배 효과를 고려하는 것이었기 때문에 사회보장정책적 측면의 조화와 균형을 강조하고 있다는 점에서 긍정적으로 평가되고 있음.

○ 영국의 구직자수당(JSA)은 1994년 10월 보수당 정부가 발간한 백서를 통해 처음 제안되었으며, 이후 1994년 구직자 의안(Jobseeker's Bill), 1995년 6월에는 구직자법(Jobseeker's Act)으로 이어짐. 구직자수당은 기존의 실업보험 급여와 실업자에 대한 자산조사형 지원(소득 지원) 양자 모두를 대체함.

- 즉 종래의 실업급여에 해당하는 것(contribution based JSA)과 기여와 관계없는 구직자수당(실업부조)에 해당하는 것의 제도가 정비되었다 (Manning, 2009). 구직자 수당의 도입은 두 가지 급여의 행정체계가 최초로 통일하는 계기가 되었음.
- 이념적으로, 과거 복지국가(welfare state)의 이념이 풍미하던 1960년대에는 실업급여의 요건을 완화하고 실업급여 수준을 인상하여 실직자의 생활보전에 충실하려는 것이 영국을 포함한 선진국의 움직임이었음.
- 하지만, 1990년대 중반 WTO(세계무역기구)의 출범으로 세계각국간의 경제환경이 완전개방이라는 대전제하에서 움직이게 되었고, 경쟁력이 약한 기업이나 생산물은 바로 도태할 수 밖에 없는 상황에 내몰리게 됨. 이러한 무한경쟁에서 살아남기 위해 각 기업들은 생산원가를 낮추기 위해 과감한 구조조정을 단행하게 되었고 이는 각 개인의 고용불안의 일상화로 귀결됨. 이러한 노동시장 여건의 변화에 대응하기 위해 고용보험제도의 적극적인 대처와 역할이 대두됨 (Clasen and Clegg, 2003).
- 1990년대 초반 이후의 흐름을 이어서 근로연령대 인구의 급여를 통합적으로 관리하는 잡센터 플러스의 전국망을 확보하고 고용 프로그램을 강화해 나가고 있음 (Clegg, 2010). 2012년에는 JSA-IB(Income based)와 근로연계급여를 포함한 6개 자산조사 프로그램을 하나로 통합한 Universal Credit을 점진적으로 도입하겠다는 계획을 수립하기에 이르름.

< 3. 영국 실업급여제도의 특징과 교훈 >

(1) 재정의 적립 및 지출

- 우리나라의 경우 사회적 위험의 유형에 따라 사회보험 운영을 별개의 법률로 나누어 산재보험, 고용보험, 국민건강보험, 국민연금으로 나누어 개별화하고 있고 특히, 고용보험 가입대상은 근로자로 한정하고 있으며, 고용보험료를 납부하는 주체는 사용자와 근로자가 부담함.

- 하지만, 영국은 다른 나라와 다르게 실업급여가 실업보험료를 통해 독자적인 재원이 마련된 것이 아니라 출산수당(maternity allowance), 퇴직연금(retired pension) 등 다른 사회보험과 함께 국민보험료로 징수되어 국민보험기금(National Insurance Fund)으로 조성되는 독특한 재원조달 방식을 취하고 있음. 이런 재원조달방식은 베버리지 보고서(Beveridge Report)에 근거하여 제정된 국민보험법(1946)에 의해 확립된 것으로 애초에 실업보험이 도입되었을 때는 실업보험만을 위한 기금이 따로 있어 비용의 70%를 노사 절반씩 내는 보험료로, 나머지 30%는 정부 지원금으로 운영함. 실제 저소득 실업자에게 지급되는 실업보조는 일반회계로부터 지원받고 있음.

○ 영국의 국민보험기여금 징수와 관련하여, 1999년 이전까지는 (구)사회보장부(Department of Social Security) 산하의 기여금징수청(Contributions Agency)에서 징수업무를 담당하였으나 1999년 4월 기여금징수청이 내국세청(Inland Revenue)으로 통합되어 국민보험기여금 징수 업무는 내국세청으로 이양되기 시작했고, 2001년 정부조직 변경에 의하여 사회보장부가 노동연금부로 개편됨에 따라 국민보험기여금 징수 업무는 내국세청이 완전히 담당하게 되었다. 이로써 세금과 국민보험기여금의 연계를 강화하였고, 이후 조직개편이 다시 이루어져 2005년 4월 내국세청과 관세청(Her Majesty's Customs and Excise)이 통합되어 국세·관세청(HM Revenue & Customs)으로 출범하게 되어 현재까지 이르고 있음.

- 이처럼 조세와 국민보험기여금 징수 주체를 단일화한 것은, 조세와 국민보험을 중심으로 한 사회보장은 그 목적에 있어서 차이가 있지만, 부과기준 및 대상에 있어서 동일성을 갖기 때문에 효율적인 징수 체계를 위해서는 양자를 통합하는 것이 적절하다는 판단에 따른 것임.

※ 1997년 노동당 정부 집권 후 활동하였던 '납세와 시민권에 관한 위원회(Commission on Taxation and Citizenship)에서는 근로소득세와 사회보장급여의 공정 징수와 징수체계의 효율성을 추구하기 위해서 징수 기준을 통일함과 동시에 양자를 통합하는 것이 적절하다는 의견을 제시하였다 (Ogus and Wikeley, 2002).

(2) 운영방식 (뉴딜 프로그램 등 적극적 노동시장정책)

- 영국은 1996년부터 ①노동시장의 효율성 증진을 통하여 노동시장이 경제환경변화에 신속히 대응해 갈 수 있는 적응력을 높이고, ②노동자의 숙련향상을 통해 경쟁력을 높이고 국가의 경제성장을 도모함 그리고 ③적극적인 노동시장정책을 통하여 실업자가 본인 스스로 직업을 찾을 수 있도록 도와주고 취업을 촉진하기 위해 위 3가지를 노동시장 개혁의 세부 목표로 삼고 실업자의 재취직 촉진을 위한 프로그램을 대폭 강화한 고용보험제도로 전환함 (Finn and Schulte, 2007).
- 영국정부는 Jobcentre Plus가 제공하는 구직지원 서비스와 뉴딜프로그램은 빈틈없이 연계하는 것을 목표로 하였다 (UK Department for Work and Pensions, 2002). 뉴딜프로그램은 영국의 active한 고용전략의 핵심 요소 가운데 한 가지로 장기 구직자들이 기술 및 경험을 습득하거나 취업하도록 지원하여 급여로부터 탈출하도록 설계됨.

(3) 행정 전달 방식의 변화 (delivery system)와 시사점

- 영국의 Jobcentre Plus는 기존의 수동적 급여 시스템을 보다 취업을 장려하고 고용주의 필요에 더욱 초점을 맞춘 '적극적 복지국가'로 탈바꿈시키는 결정적 계기가 되었고 (UK DWP, 2002; Karagiannaki, 2006), 이것은 정부정책의 큰 변화로 설명됨.(welfare society → active society, Dwyer (2004)).
- 영국의 Jobcentre Plus의 전반적 운영은 기관과 고용연금부 간에 체결되는 'performance and resources agreement'에 따르도록 되어 있다. 이 합의서는 매년 각 기관이 달성해야 할 목표를 제시하고 있는데 목표항목은 취업성공(job entry), 부정수급 및 왜곡 수급의 화폐가치, 이용자 서비스 편의(customer service), 고용주 산출, 업무 전달 등 수행.
- 영국의 실업급여 수준은 전반적으로 낮음에도 불구하고 1997년 이후 집권 노동당 정부는 'unemployment trap' (실업자에 대한 급여 수준이 노동으로 인한 순 소득에 가깝거나 혹은 그 이상이 되는 경우 실업자로 하여금 급여에서 탈피해 취업을 하도록 하는 동기를 감소시키게 되는 현상을 의미)을 줄이기 위해 상당한 노력을 기울임 (Newman, 2011).

- 영국 정부는 실업함정(unemployment traps)을 줄이는 것은 무적이면서 적극적인 구직 노력을 하지 않는 사람들에게 취업을 장려하는 것으로 실질적인 노동력 공급의 증가로 귀결될 것이다'라고 밝혔으며 (DWP, 2002), 그리고 정책의 효과를 높이기 위해 다양한 정책 결합(Job search activity obligations and the benefit, tax and tax credit system)을 시도하였다는 점에서 시사하는 바가 큼 (Clegg, 2010).
- 예를 들어, 영국에서 세계 최초로 전국적인 법정 최저임금 제도를 실시함으로써 총 근로소득을 증가시키려는 노력(McQuaid and Lindsay, 2005)과 저소득 근로가구에 대한 세액공제 제도 신설, 그리고 저임금 노동자들에 대한 근로소득세율 및 국민보험 기여를 인하하는 방식으로 다양한 인센티브를 제공함.
- 영국의 실업자 지원체계에 대한 전반적인 평가 중 첫 번째는 benefit 수령에 대한 노동시장 규정을 강화한 것은 취업이 빈곤과 급여의존(benefit dependency)에서 탈피하는 가장 최선의 길임을 강조하도록 만들었고 또한 실업급여 제도의 허점에 대한 국민의 비판적 견해를 해소하는 데 일조함. 강제적인 근로연계복지 방식은 전반적으로 장기 실업과 청년실업을 감소시키는 데 성공적이라 평가하기도 함 (Karagiannaki, 2006).
- 두 번째는 제도 운영 및 전달시스템으로서 Jobcentre Plus의 네트워크에 의한 실업자 서비스의 긴밀한 통합으로 인해 청구자의 상황을 전체적으로 고려하여 초기 구직단계(job entry rates)에 긍정적인 영향을 주었다 (McQuaid and Lindsay, 2005). 하나의 예로 개별 전문상담원 제도의 도입은 청구자들에 의해 환영받았는데, 특히 청구자의 개별적인 상황과 이로 인해 발생하는 욕구에 초점을 맞추고 있다는 점을 높이 평가 받고 있음 (McVicar, 2008).

< 4. 최근의 정책 및 제도 변화 >

(1) 다양한 정책변화 요구

- 남한의 실업급여는 선진국과 비교하여 상대적으로 낮은 수준으로 평가된다. 실업급여는 저소득계층을 위한 사회안전망의 역할을 제대로 하는지와 연결되며, 이를 실업급여의 관대성이라고 함 (Venn, 2012). 더 나아가, 실업급여의 지급수준과 지급기간은 전체 실업률과 지출비용에 직접적인 영향을 미치기 때문에 나라마다 다를 수 있고, 고용보험 이외에 다른 지원 제도에 따라서도 달라질 수 있으므로 한 국가의 실업급여 관대성은 복잡한 함수관계를 가지고 국가간에서도 단편적으로 비교할 수 없음 (Kim, 2010).
- 일반적으로 실직자가 실업급여를 지급받기 위해서는 ①실업급여 신청자격(qualifying requirements)을 충족시킬 것, ②실직 후에도 노동시장에 지속적으로 참여하고 있을 것, ③실업급여 미지급 요건(disqualification)에 해당하지 않을 것 등 세가지 요건을 동시에 충족시켜야 한다 (Standing, 2000).
- 첫 번째 요건은 실직자가 실업발생 전 일정기간 동안 고용보험 적용사업장에 취업하여 보험료를 성실히 납부했는가를 파악하기 위한 것이며, 두 번째 요건은 실직자가 실직 후에도 일할 의사와 능력을 갖고 구직활동을 함으로써 노동시장에 계속 참여하고 있는가를 확인하는 절차이고, 세 번째 요건은 보험에서 필연적으로 발생하는 도덕적 해이(moral hazard)를 최소화하고 실업급여의 남용을 방지하기 위한 것으로 볼 수 있음.
- 이러한 실업급여 요건을 규정하는 목적은 노동시장에 참여하여 열심히 일하는 근로자가 불가피한 사유로 실업을 당한 경우에만 충실히 보호하고 고의적으로 실업급여를 받기 위해 실업상태에 있으려는 경향을 방지하기 위한 것임 (Finn and Schulte, 2007).

- 영국은 1980년대까지는 적극적인 구직활동을 실업급여의 요건으로 하지 않았으나, 1989년부터 실업급여 수급요건으로서 적극적인 구직활동을 추가하며 2주마다 공공직업안정기관에 가서 지난 2주동안 적극적으로 구직활동을 위해 노력했음을 입증하여야 함. 실업급여 신청자가 이를 입증하지 못하면 그 시점부터 최고 6개월간 실업급여의 지급을 중단하고 있음 (McKnight et al., 2000).
- 우리나라의 구직급여는 실업급여 중에서 가장 기본적이고 핵심적인 급여로서 실업기간 중 실업자의 생활안정을 도모하고 재취업을 촉진하기 위하여 지급되는 급여임. 고용보험 적용사업장에서 근무하는 피보험자가 경영상 해고, 권고사직, 계약기간 만료 등의 사유로 이직한 경우로서 이직일 이전 18개월간 180일 이상의 피보험단위기간을 충족하는 경우에 이직 전 평균임금의 50%를 피보험기간 및 연령에 따라 차등하여 지급함. 구직급여를 지급받기 위해서는 재취업의 노력을 하였음을 인정받아야 하고 1-4주에 1회씩 직업안정기관에 출석하여 증명하여야 함. 구직급여 수준은 수급자의 3개월간의 평균임금을 기초일액으로 하고 구직급여일액은 기초일액의 50%로 한다고 규정하고 있음. 지급기간은 단계적으로 연장되어 현재 남한의 고용보험법으로 90일-240일임 (고용보험법 45조, 50조).
- 우리나라의 실업급여 지급수준의 적정성에 관한 상반된 의견을 보면, 구직자 입장 (labour union)에서는 실업자의 생활안정을 위해 현재의 수준 보다 높여야 한다는 주장하는 반면에 경영계 입장은 구직급여 하한액을 하향조정하여 도덕적 해이 없이 일 자리를 찾도록 해야 한다고 주장함 (Jones, 2004). 외국의 경우, 대부분의 나라가 실직전 임금의 일정비율로 지급하는 정률방식을 채택하고 있고 지급하는 일정비율의 수준은 평균임금의 10-37%수준에서 지급하는 국가도 있지만(영국, 아일랜드 등), 평균임금의 50%를 지급하는 국가도 있으며 (이탈리아, 한국, 터키 등), 50%를 상회하여 평균임금의 80-90%까지 지급하는 국가 (덴마크, 룩셈부르크, 스웨덴 등)도 있어 지급수준은 매우 다양한 모습을 띠고 있음 (Esser et al., 2013).
- 이처럼 실업급여 지급수준에 관해서는 의견이 분분하다. 관대한 실업급여는 실업자의 근로의욕을 줄이고 복지에 의존하게 만들어 결과적으로 실업을 양산하고 지속시킨다는 점에서 1970년대 이래로 줄곧 비판을 받음 (Shaikh, 2003). 실업급여가 근로의욕을 줄인다는 주장은 ‘실업함정’, ‘비경활함정’ 등으로 표현되기도 하는데(Jeon et a., 2014), 이는 두가지 논리로 설명된다. 첫째 노동수요측면에서 보면, 관대한 실업급여는 임금결정 과정을 통해 실업에 영향을 미친다. 실업급여가 안전망의 기능을 하기 때문임.

- 이처럼 임금인상 유인이 커지면 노동비용이 증가하고 이것이 결국 실업을 증가시킨다는 것임. 둘째 노동공급 측면에서도 관대한 실업급여는 낮은 임금과 좋지 않은 근로조건을 받아들이게 하는 인센티브를 감소시킬 수 있음.
- 다른 한편, 실업급여가 실업을 양산한다는 주장에 대한 반론도 존재함. 첫째, 실업의 자격요건을 충족하기 위해 취업을 연장하고 유지하는 효과가 존재한다는 것임. 이를 자격효과(entitlement effect)라고 부른다. 왜냐하면 일반적으로, 사회보험으로 운영되는 실업급여는 급여수급을 위한 일정한 자격요건인 고용기간 및 기여기록을 요구하기 때문이다. 특히 이러한 유인은 실업급여 수준이 높고 경기가 불안정할수록 더 커지는 것으로 나타나기 때문임 (Gregg et al., 1999).
- 둘째는 실업의 심리적 효과를 고려하면 실업급여를 받기 위해 실업을 유지하거나 실업상태에 빠지는 효과는 그리 크지 않을 거라는 주장이 존재함. 일자리를 갖는다는 것은 단지 물질적 소득만을 의미하는 것이 아니라 노동과 관련된 사회적 규범 그리고 자아존중감과 같은 심리적 요인, 인간관계의 기초와도 관련이 있다는 것임. 특히, 고용소득과 실업급여의 크기를 비교해 순 이득이 클 경우 취업을 한다는 논리는 고용을 단지 소득으로만 치환한 것이라고 비판받을 수 있다고 주장함 (Jang et al., 2011).
- 1998년 진행된 영국 사회의 태도(British Social Attitudes)에 대한 서베이 조사에 근거하여 사회보장 이슈에 대한 대중의 반응을 연구한 결과에 따르면 영국에서 실업자에 대한 급여는 상대적으로 대중적 인기가 떨어지는 것으로 나타남.
- 하지만, 서베이의 결과는 1990년대 말의 상대적으로 낮은 실업률에 영향을 받았을 수도 있음. 이를 뒷받침하기 위해 다른 연구결과에 따르면 기여 원칙 그 자체는 여전히 대중적 지지를 얻고 있는 것으로 나타났다. 즉 사람들은 기여에 따른 급여의 수준이 지나치게 낮다고 생각한다는 것임 (Fabian Society, 1998).
- Stovicek and Turrini (2012)는 EU 회원국을 대상으로 실업급여의 generosity를 비교하였는데, 그 결과에서도 유럽 전체의 평균에 비해 영국의 실업급여는 다소 엄격한 조건과 적은 실업급여 지급수준을 가진다고 분석함.

- 실업급여는 한편으로는 한 가정의 유동성 제약의 문제를 완화하는 효과가 있지만, 다른 한편으로는 moral hazard를 불러올 수도 있음 (Stovicek and Turrini, 2012). 따라서 실업급여 지급액과 지급기간을 어떻게 조정하여 도덕적 해이를 예방하고 유동성 제약의 문제를 완화함과 동시에 실업 중 충분한 생활보장을 담보하도록 할 것인지에 대해서는 다양한 측면을 고려하여 정책을 설계할 필요가 있음 (Sjoberg, 2006).
- 영국의 경우, 국민보험(National Insurance)이라는 단일한 사회보험 시스템을 갖추어 통합형 사회보험을 구축하고 있음. 그리고 이에 따라 실업자 소득보장제도에 해당하는 구직자수당(JSA)의 수급대상 범위가 매우 넓으며 부분실업에 대하여 개방적 태도를 취하고 있다는 점이 특징임.
- 하지만, 2010년 영국정부는 정부재정의 안정화를 모색하기 위해 세수증대를 도모하는 한편, 방만하게 운영한 정부지출에 대한 대대적인 수술 작업에 들어갔음 (Newman, 2011). 복지지출이 정부 총지출의 7분의 1을 차지하는 비중을 고려하면, 2011년 2월 17일에 발표된 Universal Credit으로 대표되는 ‘Welfare Reform Bill 2011’은 이처럼 정부지출의 효율성 강화라는 정부 구조조정의 결과물로 볼 수 있음.

(2) 유니버설 크레딧 제도의 도입과 평가

- 2012년, Cameron 정부 주도로 Universal Credit 제도가 도입되었다. Universal Credit은 근로연령층(16세-64세)을 대상으로 하는 주요 사회부조 제도들을 하나의 체계로 묶는 시도라 할 수 있음. 당초 계획은 2013년 10월부터 2017년까지 단계적으로 영국 전역에 확대 적용할 예정이었으나 시기가 조금씩 늦어지고 있음.
- 2010년 선거 이후 구성된 연립정부는 영국 활성화정책 개혁을 진행하였음 (Hamnett, 2014). 복지개혁의 일환으로 정부·관료들은 복지의존도와 공공지출을 낮추는 개혁을 제안하게 되었음. 이 단계에서 정책적 강조점은 활성화정책의 확장과 함께 복지수급권의 과감한 축소, 최일선 고용서비스의 합리화, 그리고 유니버설 크레딧의 도입 등임 (DWP, 2010a).

- 복지개혁법(Welfare Reform Act 2012)의 주된 내용은 근로인센티브를 향상시키기 위한 Universal Credit 도입, 급여 지급시 부정수급 및 오류 발생 감소를 위한 처벌 강화, 19-24세 연령층에 대한 주택보조금 폐지, 장기 실업자에 대한 복지급여액 점진적 축소 등이었음.
 - 실업급여와 관련한 주요 내용을 소개하자면, 기존 구직자수당은 근로능력이 있는 실업자에게 지급되는 소득대체 공공부조제도로 소득기반 구직자수당(Income-based JSA) 지급을 위해서는 재산기준과 근로시간 상한을 충족하여야 한다 (DWP, 2010b). 지급을 위해서는 Jobcentre Plus를 2주일에 한번 방문하여 구직자수당 인터뷰에 참여하여야 하며, 적극적으로 구직활동을 하고 있다는 것을 증명하면 급여를 받을 수 있도록 하였음.
- 주요특징으로 첫째, Universal Credit의 도입으로 6개의 주요 기초보장 제도(Income Support, income-based Jobseeker's Allowance, income-related Employment and Support Allowance, Housing Benefit, and Child Tax Credit and Working Tax Credit)를 하나의 제도로 통합하여 단일화하고 한계공제율을 낮추었음 (DWP, 2010a).
 - 즉 6개의 기존 제도를 통합한 Universal Credit은 각 제도에서 지원받는 급여의 합이 일정 수준을 넘을 수 없도록 하였음. 예를 들어 성인 2인으로 구성된 가구는 주당 500파운드, 그리고 성인 1인으로 구성된 가구는 주당 350파운드가 급여 상한임. 2011/12년 영국 중위소득이 23,200파운드, 주당 소득으로 환산하면 약 429파운드 이므로 성인 1인 가구의 급여상한을 볼 때 그 수준이 중위소득과 비슷하거나 다소 낮은 수준으로 볼 수 있음.
 - 둘째는 실업자들을 대상으로 한 기존 활성화정책을 더욱 강화시킨 형태임. 낮은 임금의 수급자들에게 일정 수준 이상의 임금을 받을 때 까지 근로시간을 늘리고, 계속 더 나은 직업을 찾도록 요구하는 최초의 제도로써 총 급여가 근로자 중위소득을 초과하지 않도록 설계하여 전적으로 복지급여에 의존하는 것보다 노동시장 참여 시 더 큰 보상을 받을 수 있도록 설계하려 노력하였음.

- 셋째는 기존에는 자산조사 기반의 여러 다양한 지원들이 상이한 부처들에 의하여 관리되며 운영되고 있는데, 여러 급여는 노동연금부와 Jobcentre Plus에 의해서 통합적으로 운영될 것으로 계획하고 있음. 즉, 지원 전달체계의 효율성을 강조했다고 볼 수 있음.
- 최근의 평가는 Universal Credit으로 모든 시스템이 전환된다면, 1,100만 명의 성인이 Universal Credit을 신청할 것이며, 이 중 약 5백만 명이 저임금 또는 시간제 근로자일 것이고, 1백만명 정도는 임금 상승을 기대하는 근로자일 것으로 추정하고 있음. 영국 근로자의 6명 중 한 명은 Universal Credit을 수급할 것이라는 예측이며 (OECD, 2014), 이러한 추정을 보더라도 Universal Credit의 파급력은 매우 클 것으로 예상됨.
- 하지만, 영국 정부의 장밋빛 발표와 달리 이 개혁에 대한 비판은 매우 강함. 최근 영국의 복지 개혁을 '위험한 삭감', 거의 '복지국가의 재구조화'로 해석되기도 함
- Taylor-Gooby (2014)는 영국정부는 공공주택, 아동보호, 지방정부의 서비스 등 연금을 제외한 거의 모든 급여의 삭감을 시도하고 있으며 보건과 교육에서도 지속적인 압박이 가해지고 있다고 비판하고 있음. 이와 관련하여, 영국에서 정부 정책에 대한 싱크탱크의 역할을 하는 연구기관을 중심으로 정책 설계상의 문제점 제기가 점차 늘어나고 있다.
- 라운트리재단(Joseph Rowntree Foundation)에서 발간된 보고서에서는 Universal Credit으로 급여감소가 발생하는 점을 지적하였고 (Padley and Hirsch, 2017), 근로동기와 소득수준 측면에서 일부의 가구는 혜택을 보지만 일부 가구는 혜택을 보지 못한다고 설명하고 있음. 특히, 자녀가 있는 가구의 경우 근로소득 증가분의 혜택이 상쇄될 뿐만 아니라 아동보육비의 증가를 야기하는 약점이 있다고 진단함.
- 물론, 제도적 변화의 양상은 속단하기는 이르다. 하지만 그 영향의 예측은 생활형편이 어려운 가구가 더 어려움을 겪게 될 것임을 시사함 (Guardian News, 11/March/2011). 이유는 근로를 하는 가구에게 더 많은 편익이 제공하는 제도적 설계에서 비롯된 것이기도 함.

(3) 결론 및 시사점

- 유니버설크레딧은 영국 사회안전망의 내용을 큰 폭으로 변화시키는 개혁이지만 정치적 지향과 맞물려 매우 빠른 속도의 기획과 추진이 이루어지면서 여러 가지 이슈와 문제들이 제기되고 있음.
- 유니버설크레딧의 정책 지향이 근로에 대한 강조, 제재의 강화 등으로 이어져 있지만 그럼에도 불구하고 고용불안정이 심화되는 노동환경에서 근로연령층을 대상으로 하는 지원제도를 단일체제로 묶어 취업과 비취업 사이의 경계를 넘은 융통성이 있는 제도로 전환을 시도한 점에서 배울점이 있음.
- 한국의 경우에도 사회보장제도에 연결된 제도들이 적지 않은 상황에서 실업급여제도의 개편에서는 반드시 연관제도의 개편방안도 사전 검토되어야 할 것임. 이는 정책 효과를 보장하고 정책 개편과정의 혼란을 줄이기 위해서 필요함.

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Comparative unemployment benefit between the UK and South Korea

1. Introduction

It is not hard to find news articles on the spike of the applications for unemployment benefits in the wake of the recent global crisis caused by the Corona virus.

The social safety net has gained its importance as this crisis has been deepened. Unemployment today has been emerged as a social risk that can befall anyone. Moreover, unemployment causes unbearable economic hardship to an individual while, at the same time, losing the opportunity of exercising his/her ability, which in turn degrades the quality of life. Furthermore, the nation also faces losses in production resources and purchasing power, resulting in reduced real consumption demand and social unrest due to unemployment. Therefore, unemployment is a serious issue needed to be protected institutionally through national-level policy.

In Korea, the era of IMF bailout, sparked by a lack of foreign reserves in November 1997, was called for massive restructuring of ailing companies and financial institutions in return for bailouts, which led to unprecedented massive laid-off and high unemployment rates.

Fortunately, employment insurance scheme, which was implemented

in 1995, served as the only social safety net for mass unemployment and provided unemployment benefits to the unemployed, helping them to stabilize the lives of the unemployed themselves and their families, which made them aware of the importance of the unemployment benefit system.

The employment insurance system and social safety net agenda still have a significant impact on the Korean labour market. Korea, a latecomer, could draw many implications from the historical trends and policy evaluations in terms of Britain's social safety net and active labour policy. The biggest change in Britain's social security system came as a nation-level insurance system, called national insurance, which was formed based on a Beverage report shortly after the World War II. In particular, in the early 20th century, the unemployment benefit system was introduced for the first time in the world and the UK has been considered as the first Western country in establishing a universal welfare system.

The UK labour market policy roughly began in 1911 in line with the enactment of the Unemployment Insurance Act, and only in the 1970s, the labour market policy was positively activated under the aim of reducing the number of vulnerable groups such as the youth and disabled who are difficult to find employment opportunities in the labour market. Since then, employment subsidy schemes have been created in various forms, and there has been a trend in which active labour market policy programs for the unemployed have been operated in an integrated manner, focusing on the New Deal program, which has been implemented nationwide since 1998.

In addition, the efforts of switching this program into Universal Credit has recently push forward. This endeavour of improving history and policy might have many implications for South Korea to evolve its system. Although the employment insurance system varies from country to country, it generally compares and analyzes the employment insurance system with four main contents: Δ coverage (benefit targets), Δ funding (financing and expenditure), Δ benefit generosity (i.e. in terms of both benefit level and duration), and Δ integration of active measures within Unemployment Insurance systems (i.e. activations, job search requirements, etc) (Asenjo and Pignatti, 2019).

This study aims to analyse the history of establishing the social safety net in the UK and the process of reforming the employment insurance system as well as of presenting effective alternatives to improve the employment insurance system in South Korea. In other words, this paper introduces the history and lessons of unemployment benefit system in the UK, and analyzes the characteristics and advantages of the employment insurance system considering the financial system, operational system and delivery system.

After that, it will compare the level of unemployment benefits in the UK with South Korea, and then finally analyse the implications for South Korean policies through the main content and evaluation of the most recently introduced universal credit.

2. How did the UK develop and evolve in unemployment benefit system?

(1) Drivers for changes focusing on introduction of unemployment benefit system

The 1942 Beverage Report had a great influence on the formation of modern ideas regarding social security in Britain. The report had laid a foundation for the basic framework of the social security system and it was maintained from 1979-1997 when the Conservative Party came to power. The National Insurance Act of 1946 began with the provision of benefits for disasters and industry-related diseases during work, and absence of similar causes. And under the National Insurance Act as amended in 1966, supplementary benefits linked to unemployment benefits and other income began to be provided (Jones, 2004).

This process could explain how Britain's social security system has changed through a series of reform measures: There have been various on-going attempts to reform the system since 1948. However, these attempts are assessed to be making modifications that can be combined with the current plan or incorporated into existing plans (Holmlund, 1998).

Specifically, the first attempt to provide legal protection for the unemployed traced back to the early 20th century (Hellwig, 2005). Under the National Insurance Act of 1911, the first unemployment insurance system was formed (Finn and Schulte, 2007). Initially, unemployment was limited to some industries that frequently occur. The Unemployment Insurance Act of 1920 expanded the scope, resulting in the inclusion of most workers with annual incomes below a certain level in the scheme, with more than 12 million workers benefiting from the scheme (Jones, 2004).

As such, the modern framework of the UK's unemployment benefit system was completed by the National Insurance Act 1946 after the Beveridge Report (1942) (Newman, 2011). The representative principles of Beveridge's proposals for social security can be summed up in terms of comprehensiveness, universalism and finance by contributory insurance. In detail, some of the principles in the Beveridge report can be summarized as follows:

First is about universality. It is hard to say that an insurance is perfectly universal given the fact that someone cannot pay enough contributions. Beveridge also said in his report that 'no matter how universal insurance is, someone cannot pay any contributions due to physical weakness and someone will be left out of the insurance system (Beveridge, 1942). It is not necessary to exclude all of them from the insurance coverage area, even though the excluded tends to be those who cannot work, because the insurance system itself recognizes eligibility for those who make contributions through labour while being operated on this basis, leaving the problem of those

who cannot work at all.

Second, it is about class. Beveridge's insurance classes include pensioners and children. However, they were excluded from National Insurance in 1975. However, the credit system for children continued to be recognized. And the special class contribution system for married women has gradually disappeared since 1977 (Jones, 2004).

Third, it concerns the flat-rate benefit and the flat-rate contribution system. Since Beveridge believed that benefits and contributions would have to be interwoven if the plan envisaged was carried out purely in the form of insurance. It insists flat-rate benefit even when there was a problem with paying insurance premiums for low-wage workers. For this reason, the national insurance benefit was bound to be significantly lower than that of continental European countries, which offered as much as possible in conjunction with income (Hwang and Lee, 2004).

Finally, it relates to unified administration. Although the national scheme was completed, its inequality and low coverage requested supplementation by other benefits. The current national insurance application and collection system can be said to be a condensation of the process of change and reflection on the national insurance under the Beveridge initiative. Overall, the National Pension Service was at the core of the UK's changes and the basic direction was to lift financial burdens of the national pension while considering how to resolve poverty issue for the elderly and the effects of redistribution. Accordingly, it has been evaluated positively under the aspect that it highlighted balance and harmony in terms of social security policy (Oh, 2017).

The unemployment insurance system under the National Insurance Act in the UK has required everyone to pay 20-25 pence per week as a contribution to national insurance. The amount accounted for about 5 percent of the average worker's wage at that time. The government argued that this was 'the best and cheapest insurance policy presented to the British people beyond any other social insurance system.' Payments were limited to 180 days per year, but 130 days could be added to those with good records of contribution (Deacon, 1981).

Unemployment benefits at that time were paid only to those who were able to work. Striking workers were not paid, and those who quit their jobs without "reasonable reasons" were either suspended for six weeks or deprived of their benefit qualifications due to their insincere attitude. This was not much different from the current general unemployment benefit system.

Likewise, the Employment Insurance scheme with compulsory enrolment is enforced in South Korea. That is, a person within a certain scope of the Act becomes an insured and insured of employment insurance regardless of his or her intention, and an insurance relationship is automatically established (Article 13 of the Employment Security Law in South Korea). The compelling reason for this is to prevent the harmful effects of reverse selection (Park, 2005) in which only high-risk individuals subscribe, and, second, to ensure the number of insured persons and secure a stable

insurance budget to disperse all risks, and third, to prevent them from being excluded from insurance benefits if they are unable to pay insurance premiums due to low incomes (Sung, 2018).

The UK's Job-seekers Allowance (JSA) was first proposed in a white paper published by the Conservative Government in October 1994. Subsequently, the Jobseeker's Bill was followed up in December 1994, and the Jobseeker's Act was passed in June 1995.

Allowances for job seekers have come into force since October 1996. Job-seekers Allowance (JSA) have replaced both existing unemployment insurance benefits and means test support (income support) for the unemployed. In other words, a system of existing unemployment benefits and job-seekers allowances (unemployment assistance) that are not related to contributions has been reorganized (Manning, 2009). The introduction of Job-seekers Allowances marked the first time that the administrative system of the two pay-checks was unified. Greater brevity was one of the main issues that the Government at the time claimed (British Department of Social Security, 1995).

According to the British Government (DSS), 'the Jobseekers Act 1995 makes the benefit system more concise as it replaces the two benefits for the unemployed with a single benefit. Job-seekers allowances provides financial aid to both those who have paid National Insurance contributions and those who will be eligible based on income. There are two ways to enter a Job-seeker's allowance, but the benefit rate is determined by what regulations apply.

Job seeker's allowance is a clearer and more targeted benefit system. And with the effect that can be gained from the introduction of Job-seekers Allowance, the government can improve Δ the functioning of the labour market by helping recipients understand and abide by the conditions of their benefits, Δ improve services to the unemployed through a simpler and more consistent pay structure and a more efficient benefit agency, and Δ work activities designed to minimize the "trap of unemployment".

However, while the simplification of the administrative system was clearly targeting one goal, work-seeker benefits also resulted in substantially reducing the level of contribution-based benefit for the unemployed (McKnight et al., 2000).

In this regard, Manning (2009) argued that the introduction of the JSA has strengthened the activities for the unemployed, but there is no evidence that job search activity has increased as expected. Specific changes can be found at:

First, the maximum period of receiving unemployment benefits was shortened from 12 months to 6 months.

Second, unemployment benefits paid to young people aged 25 or older were also reduced.

Finally, the government itself acknowledged that the transition to Jobseekers Allowance (JSA) would further deteriorate the welfare status against approximately 250,000 people (Petrongolo, 2008).

(2) Ideological differences of opinion – Social consensus

In the 1940s, in preparation for the severe unemployment expected at the end of World War II, many countries drew up a plan for unemployment insurance and implemented it after the end of the war. Ideologically, In the 1940s, in the wake of World War II, social consensus emerged in "political, administrative, and popular levels" and the result was reflected on the 1947 National Assistance Act (Lowe, 1990). As a result, the government policies has begun to aim at a 'welfare state' that redistributes economic and social resources into income and wealth.

The most important feature that emerged after World War II was the transition from 'Unemployment Insurance' to 'Employment insurance'. Early unemployment insurance was a post-relief measure that it contributed to the livelihood of unemployed workers and their families by paying unemployment benefits to the unemployed, but there was a perception that unemployment benefits alone for the unemployed were insufficient to prevent unemployment in advance and maintained practical employment stability as employment adjustments had been made rapidly in line with technological progress and the upgrading of the industrial structure (Asenzo and Pignatti, 2019).

Accordingly, the trend has begun to shift to "employment insurance" that seeks full employment in terms of quality or quantity by linking unemployment benefits to active employment policies, such as vocational ability training projects to prevent unemployment and fundamentally guarantee job security at the same time as unemployment benefits the unemployed.

Since the 1940s, the ideological homogeneity of converging on the social democratic welfare state proposition had been maintained in Britain. Social democracy has promised to end chaos in the least of the world, if not in the earthly paradise. In this respect, National Insurance was the product of social consensus (Disney, 1981). It was believed that the state-led economic management and collective welfare supply not only stabilize the market, but also lead to the expansion of equality and social justice, and the growth of civic consciousness beyond the interests of individuals and classes.

However, the economic boom, which had maintained social democracy, slowly began to decline after the late 1960s. Currency instability, multinational production, and competition with developing countries due to the trend of opening up the world trade are the key to finding fundamental and structural flaws in the UK economy and policy decisions, and face a welfare state crisis (Jones, 2004).

As such, Britain's "historically unusual degree of agreement" had begun with the Churchill's coalition government and became effective until the election of Mrs Thatcher or the advent of the Callaghan's

renunciation of the commitment to full employment (Lowe, 1990).

In the 1960s, when the ideology of the welfare state was abundant in the past, it was the movement of advanced countries to ease the requirements for unemployment benefits and raise the level of unemployment benefits to remain faithful to the livelihood of the unemployed.

However, after a couple of oil crises in the 1970s, the industrial structure and employment adjustment were accelerated while soaring the unemployment rate, which leads to an increase in the number of countries that lowered unemployment benefits levels and payment periods. Knotz (2018) compared and studied the overall conditionality (average strictness of conditions and sanctions) of unemployment benefits of OECD countries, and analyzed that in the 1980s, more countries were paying unemployment benefits only when proving the status of the unemployed by him/herself and actively seeking for a job (The unemployment benefit conditions and sanctions became stricter).

This change was observed in Britain as well. According to Hamnett (2014), since the election of the coalition government in 1997, it has claimed that it can observe the most radical reshaping of welfare policy. With the launch of the WTO (World Trade Organization) in the mid-1990s, the economic environment among countries around the world was moved under the premise of full opening, and companies and products with weak competitiveness were forced to

disappear immediately.

To survive this limitless competition, each company underwent drastic restructuring to lower production costs, which resulted in the generalization of job insecurity of an individual. In order to cope with these changes in labour market conditions, the active response and role of the employment insurance system were required (Clasen and Clegg, 2003).

In the 1990s, British had made strenuous efforts to be shifted from a 'passive' benefit payment to participating in the 'active' programmes of labour market integration and attempted to reform the overall unemployment support structure (Clasen and Clegg, 2003). In this regard, Esping-Andersen et al. (2001) assessed that the distinction between the spheres of social protection and the labour market policies in Europe has become blurred. At that time, the goal of the Labour Government, "Make Work Pay", included two strategies (Finn and Schulte, 2007).

One is to eliminate the factor of diminishing work motivation, and the other is to tighten sanctions on those who fail to take advantage of job opportunities and improve their employability (McQuaid and Lindsay, 2005).

The latter of these is linked to the achievement of a more universal political purpose of securing public support for the social security

system by alleviating people's doubts about the inefficiency and abuse of the social security system (HM Treasury and Department for Work and Pension, 2001).

Indeed, the UK is credited with harmonizing labour market flexibility with the social rights of unemployment at the same time despite the neo-liberalistic trend in the 1990s (Clasen and Clegg, 2003).

However, in the 1980s and 1990s, the old basic unemployment benefit was followed by repeated cuts and more restrictive entitlement conditions, which resulted in Jobseekers Allowance (JSA) in 1996 (Clasen, 2001a).

In the case of South Korea, the inevitable situation of labour market flexibility under the influence of globalization, which has been going on since the late 1980s, along with the progress of industrialization, has turned individual unemployment into an unavoidable social phenomenon. In addition, the 1997 foreign exchange crisis and the 2008 financial crisis further worsened the employment environment in the labour market (Jones, 2004).

Today, most countries that generally implement unemployment insurance schemes have differences in degree, but are also operating employment insurance schemes that include active labour market policy (ALMP; switching emphasis from passive benefit payment to active programmes of labour market integration)

measures in the traditional framework of unemployment insurance or strengthen interconnection (Asenjo and Pignatti, 2019).

South Korea was no exception to this trend. The Employment Insurance Act of South Korea takes the form of an employment security policy legislation that actively deals with the social risk of unemployment by linking and operating various employment policy-related projects, namely employment stability and vocational ability development (Park et al., 2012).

In 1988, the unemployment benefit restriction period was extended from 13 weeks to 26 weeks for persons who voluntarily transferred without justifiable reasons (McKnight et al., 2000).

In order to gradually induce active job search activities for recipients of unemployment benefits, the recipients of unemployment benefits (the 'carrot'; job search assistance) attended the public job security agency every two weeks to prove that they have been actively seeking jobs, thus strengthening requirement conditions (the 'stick'; job search requirements and monitoring) (McVicar, 2008).

Following the trend since the early 1990s, the UK has secured a nationwide network of Jobcenter Plus, which collectively manages the benefits of the working-age population, and is strengthening its employment program (Clegg, 2010).

In 2012, it established a plan to gradually introduce Universal Credit scheme, which integrates six means test programs, including the JSA-IB (Income based) and working-linked benefits, into one. This will be explained at the Universal Credit section in detail later.

3. What are the lessons through the UK's history?

South Korea also enacted the Employment Insurance Act in 1993 as a legislation to address unemployment issues. South Korea's employment insurance system plays a pivotal role in reducing unemployment by providing unemployment benefits to unemployed workers and implementing various policy measures, including employment stabilization projects and vocational ability development projects (Hwang and Lee, 2004; South Korean Ministry of Employment and Labour, 2015).

In particular, the significance of the employment insurance has grown further during the mass unemployment crisis caused by the global economic crisis in November 1997.

In South Korea, unemployment insurance exists only without unemployment assistance, but in most European countries unemployment insurance and unemployment assistance is closely linked each other, allowing it to receive unemployment assistance through means test at the end of the unemployment benefit period (Eom, 2010; Hamermesh, 1992). As such, it is difficult to compare

the level and duration of unemployment benefits in countries that do not implement unemployment assistance as in Korea and the United Kingdom.

In this part, the UK's employment insurance system will be evaluated to predict the future labour market and environment, and discuss what kinds of system improvements could be learnt from the history of the UK to explore the direction of the employment insurance system for further developments in South Korea.

(1) Financial system : Contribution and Expenditure

In South Korea, social insurance management is divided into separate laws in line with the type of social risks, so it is categorized into industrial insurance, employment insurance, national health insurance and national pension. Moreover, employment insurance coverage is limited to workers, and employers and employees are responsible for paying employment insurance premiums (South Korean Ministry of Employment and Labour, 2017).

South Korea's employment insurance has continued to expand its coverage, but there are still blind spots. Under the Korean Employment Insurance Act, ultra-short-term workers or self-employed workers, and platform workers and zero-contract walkers are not subject to employment insurance. However, with the advancement of the industrial structure, the size of the employment group, that is in

the mid-range that is hard to be incorporated into each area between workers and self-employed, has begun to expand (Sung, 2018).

However, considering the recent surge in the proportion of similar workers, such as the gig economy or zero-hour contract, it is necessary to provide an appropriate social safety net for them (Oh et al. 2017).

This is because expanding coverage can lead to increased contributions in insurance principles (Park, 2005). Here in the UK, all citizens over the age of 16 living in the country are eligible for National Insurance, which has the advantage of dramatically reducing blind spots.

Unlike other countries, the UK has a unique way of financing unemployment benefits, which is not independently funded through unemployment insurance premiums, but is collected as national insurance premiums along with other social insurance policies, such as property allowances and retirement pensions (Hwang and Lee, 2014).

In the event of a deficit, it is in the form of receiving subsidies from the Government General Accounting. This method of financing was established under the National Insurance Act (1946) established on the basis of the Beveridge Report and, when unemployment insurance was first introduced, a single fund for unemployment insurance alone was separated, with 70% of the cost being paid in

half by employers and workers, and the remaining 30% being government-funded (Sung, 2000). In fact, unemployment assistance paid to low-income unemployed people has been supported by general accounts.

This can be explained by the type of social security system under Schulte (1991). There are two main types, Bismarck model and Beverage model.

First, the core social insurance system introduced by German Prime Minister Bismarck is the workers, and the equivalence principle of balance between personal financial burdens and future benefit is emphasized. Therefore, the main financial resources of social insurance are social insurance premiums paid fifty-fifty by labour and management respectively, and the salary level is relatively high. The operating institutions are divided into insurance policies that are classified by social risk. This is similar to the case in South Korea.

The second is the Beverage type, which aims to ensure the lowest social level of basic living for the whole nation. Therefore, the principle of equality is emphasized in this type of social security system (Clasen, 2001b). Benefits are based on a flat rate, or fixed rate pay, so the benefit level is lower than the Bismarck model, and the financial resources needed are mainly covered by taxation. Since it covers the entire nation, the institution is mainly operated at a nation level, and the UK and Australia can be mentioned as representative countries. The models discussed earlier are illustrated in <Table 1>.

<Table 1> Features by types of social security system

	Bismarck model	Beverage model
Coverage	Labour	Whole public
Principal	Equivalence	Equality
Income level	High	Low
Financial source	Premium	Taxation
Operated by	Social Insurance Corporation	Nation
Exemplary countries	Germany, France	UK, Australia

Source: Schulte, B. 1991. Die Folgen der EG-Integration für die wohlfahrtsstaatlichen Regimes. in Weitschrift für Sozialreform 37. pp. 548-579.

In the case of the financing mechanism, South Korea's social insurance policies are set aside and managed separately by three agencies. The National Pension Service manages the National Pension Service, the National Health Insurance Service manages the national health insurance, and the Korea Workers' Compensation and Welfare Service manages the employment insurance and industrial insurance. Social insurance management includes qualification,

collection, payroll and financial management, which have been carried out by the National Health Insurance Corporation since 2011 (Sung, 2018).

However, the collection of national pension returns, collection of fines, and some collection of industrial insurance are excluded from the NHIS consignment, and the subject and qualification management methods are operated separately (Eom, 2010).

However, given the trend of converging many systems, including all social insurance coverage and imposition standards, into one institution, it is required to review the methods of operating social insurance in South Korea (Oh et al., 2017).

In relation to the collection of national insurance contributions in the UK, the Contributions Agency under the Department of Social Security was in charge of the collection until 1999, but in April 1999, the Contribution Collection Agency was integrated into the Inland Revenue and the collection of National Insurance contributions began to be transferred to the Internal Revenue Service, and the collection of National Insurance contributions began to be transferred to the Inland Revenue Service in 2001.

This strengthened the link between tax and national insurance contributions, and the reorganization has since been carried out, and in April 2005, Her Majesty's Customs and Excise merged and launched as HM Revenue & Customs (Oh and Lee, 2017).

The unification of tax and national insurance contributions was based on the judgment that it was appropriate to integrate the two parties for an efficient collection system because the social security centered on tax and national insurance differed for their purposes, but they were identical in terms of imposition standards and subjects.

In this regard, the Commission on Taxation and Citizenship, which has been active since the inauguration of the Labour Government in 1997, suggested that it is appropriate to unify the collection criteria and consolidate the two in order to pursue the efficiency of the process collection and collection system of earned income taxes and social security benefits (Ogus and Wikeley, 2002). These opinions served as a basic theoretical background for an efficient collection system in the course of the Labour Government's reorganization of the National Insurance Contribution collection system (Heslop, 1998).

As such, the UK not only integrates the social insurance system into one social insurance system, but also operates the management institution as a single operating institution rather than multiple operating institutions that are classified by insurance. If the National Tax Service, the competent department in charge of integrating social insurance application and collection and confirming income, plays a major role, it will be able to confirm the actual expansion of social insurance coverage and the accurate income of individuals. And it is necessary to take a closer look at the British case in that it helps to enhance the efficiency and equity of administration (Nam and Baek, 2011).

(2) Operational system : New Deal Programs as ALMP (since 1997)

Since 1996, the UK has increased the (a) adaptability of the labour market to respond swiftly to changes in the economic environment by enhancing the efficiency of the labour market, and promoted the competitiveness of the country by (b) improving the skills of workers. And through (c) active labour market policies, the three main objectives were to help the unemployed find jobs on their own and to shift to an employment insurance system that significantly strengthened programmes to promote the reemployment of the unemployed (Finn and Schulte, 2007).

A typical policy case is the New Deal program. The formal declaration of the New Deal program was made in July 1997 when the Labour government first announced its budget plan (House of Commons Hansard, 1997). In the speech, the finance minister made the government's official position clear that the social security benefit system could no longer achieve its original purpose.

The main rationale for this position is the increase in the size of unemployed households (households where all members of the household are unemployed), and at the same time the number of people who believe that paid labour is no longer valuable or who cannot find employment opportunities has increased. The British government aimed to closely link the job support services offered by Jobcentre Plus with the New Deal program (UK Department for Work and Pensions, 2002).

The New Deal program is one of the key elements of the UK's active employment strategy (Dwyer, 2004). The UK's primary employment program is designed to help long-term job seekers acquire skills and experiences or get a job, thus escaping from benefits. The program also encourages the exploration of job opportunities for economically inactive populations, which are in line with the policy direction to increase labour supply (Stovicek and Turrini 2012).

The most representatives are the Youth New Deal and the New Deal program for those aged 25 and older.

First, the Youth New Deal made its first pledge in 1997 by the Labour Party government to help 250,000 young people get jobs away from their benefits. The Youth New Deal targets unemployed young people aged 18-24 who have been seeking Job-seeker allowance for more than six months. Participation is compulsory and there are benefit sanctions. Young unemployed people classified as having more than one special need could enter the Youth New Deal program in advance. Specifically, the youth New Deal's participation consists of three main stages (Reenen, 2004). The first 'gateway' phase lasts four months. Intensive counseling and guidance are provided during this period, which is designed to increase the employment potential of as many people as possible and to provide general employment without wage assistance.

The second step involves the claimant in one of the four New Deal options. The options are as follows: (a) employment option-a job subsidized to the employer for at least 26 weeks; (b) partial employment of the employer; (c) environmental-related business; and (d) full-day education and training for up to 52 weeks. At this stage, participants may receive training allowances in addition to Job seekers allowances or wages by employment.

The final third step is to enter the job-seeking allowance again if participants fail to get a job after six months and enter the 'follow-through' phase. This phase provides additional support and guidance, as well as employment services, to help them find employment (Venn, 2012).

On the other hand, the New Deal for the Long Term Unemployed was introduced in 1998 (DWP, 2003). The background of emerging this program is that the UK's operation of unemployment insurance policies which were centred on unemployment benefits has resulted in a number of political and economic problems caused by long-term unemployed people who were subsidized by unemployment assistance without a limitation (Reenen, 2004).

For example, the proportion of unemployed people receiving income assistance was 60 percent of the total unemployed as of 1994, which was very high against about 30 percent of the recipients of unemployment benefits, putting a heavy burden on the nation's finances. In particular, the unemployed who received income

assistance was more problematic as most of them were those whose unemployment benefits had expired or who were not eligible for unemployment benefits and who had remained in the status of being unemployed for more than a year.

The New Deal program was renamed "New Deal 25 Plus (ND25+)" in April 2001 after undergoing several structural revisions. The New Deal program, aged 25 and older, aims to increase employment or employment opportunities for people who have passed 18 months after receiving Job-seeker's allowances within the last three years (Blundell and Meghir, 2002). People aged 25-49 are forced to participate in the program and are subject to benefit sanctions if they are absent.

The program consists of job-recommendation interviews, employer subsidies and links to other programs, such as period training. Action plans are modified through work recommendation interviews, and intensive job support services are provided. Employment subsidies are paid up to 75 pounds per week for up to six months.

As for the performance assessment of the Youth New Deal, White and Riley (2002) announced that the New Deal program had the effect of reducing the long-term unemployment of young people. In the first two years of the program's implementation, about 60,000 to 80,000 young people were employed, and it was estimated that without the youth New Deal, they would have been degraded to benefit recipients.

Another private research report (Blundell and Meghir, 2002; Reenen, 2001) drew similar conclusions. Young unemployed people see an increase of about 20 percent in their chances of getting a job thanks to the New Deal policy, and most of the effects are attributed to employers' wage subsidies, but it is expected that at least 20% are coming from the efforts of strengthening the job searching activities.

※ <Analysis of South Korean Youth unemployment problem and work-based learning(apprenticeships) program as a responding intervention>

1 What is youth unemployment and why is a social problem?

The employment problem in youth holds a significant meaning. In general, youth is a transition period from school education to labour market, a period in which an independent economic life begins with employment while forming social relationships with work life or marriage (Baltes and Carstensen, 1999).

Therefore, the employment of young people not only provides livelihood resources but also serves as a basic foundation for social role-playing and relationships. O'Higgins (1997) analyses the youth unemployment problem in European countries and sees it as a social challenge that cannot be resolved in a short period of

time. Below, the negative effects of youth unemployment will be analysed by dividing them into individual and social aspects.

First, a young man who has lost his employment opportunities on a personal level is deprived of his opportunities for self-development. Employment is a vital means of creating individual's economic base (O'Reilly et al., 2015) given labour and jobs serve as an opportunity for individuals to develop their personalities. With the generalization of employment society, unemployment is the most important cause for the loss of the economic foundation of life for individuals. In this respect, unemployment has commonalities with diseases, disabilities, old age, industrial accidents, etc. (Yeon et al., 1988).

The second is the family dimension which is operated on the basis of wages acquired as a result of employment, and unemployment not only has the effect of depriving the current economic foundation but also affects future livelihoods (Gallie et al., 2003). Furthermore, less opportunities for the vulnerable to participate in the labour market could increase the possibility of turning them into poor people who cannot maintain a minimum living in addition to an average life (O'Reilly et al., 2015; Lee, 2009).

Third, at the social level, youth unemployment adds to social unrest, deepening a gap between the rich and the poor and the polarization of workers in the long run, and in the end, social integration can be undermined. Carmichael and Ward (2010)

elaborated that youth unemployment has a direct impact on social relationships, social deviance as well as economic shocks. In addition, Mortimer (1994) explained that participation in the labour market itself determines the role and identity of an individual, so that social relationships are fragmented ("social exclusion") as they do not maintain friendship or family relationships and feel isolated personally.

Finally, long-term unemployment may result in exclusion of young individuals from social participation and alienation from reality (Kieselbach, 2003). This alienation is the cause of a psychological crisis and may also lead to a political crisis in a society as a whole due to its alienation from the centre of society (Gallie et al., 2003): participation in the labour market means more than just a means of income acquisition when the core of the factors that enable individuals to integrate into society is called participation. Involving with the labour market is a key activity in which individuals are integrated into society, along with participation in social activities and political engagement, and is often the basis for two forms of participation. The reality of excluding young people from the labour market expresses social resistance and opposition. (Lee, 2009).

2] Analysis of youth unemployment status and causes in South Korea

Reviewing the causes of unemployment from the South Korea's youth unemployment status and theoretical perspective, it first reduces the total number of job opportunities caused by slowing

economic growth and changes in industrial structure in job demand aspects.

Second, in terms of supply, the number of young people supplied to the labour market and the labour shortage demanded by the labour market are the reasons, and finally, besides the labour market perspective, the NEET (Not in Employment, Education and Training) concept can explain the cause of youth unemployment.

Above all, the youth unemployment rate in South Korea is always high compared to the overall unemployment rate, as shown in <Table 1>, and has remained in the 9 percent range since 2014.

According to the South Korean National Statistical Office and the OECD (2018), the average youth unemployment rate(15 years to 24 years old) of OECD member countries fell from 15.1 percent in 2014 to 11 percent in 2018, but the youth unemployment rate in South Korea rose 0.5 percentage point from 15 percent in 2014 to 10.5 percent in 2018.

<Table 1> Comparison on the rate of the whole unemployed to the youth unemployment

	2010	2011	2012	2013	2014	2015
No. of the unemployed	920,000	855,000	820,000	807,000	937,000	976,000
No. of youth unemployment	340,000	320,000	313,000	331,000	385,000	397,000
Unemployment Rate	3.7%	3.4%	3.2%	3.1%	3.5%	3.6%
Youth unemployment rate	8.0%	7.6%	7.5%	8.0%	9.0%	9.2%

Source: South Korean National Statistical Office <Census on Economically Active Population>, Youth aged 15 to 29 years old

First, in terms of job supply, there is a shortage of jobs as companies are passive in increasing the size of employment, seeing the future economic outlook uncertain despite the economic recovery since the economic crisis in the late 1990s and the financial crisis in the early 2000s. In particular, low-skilled young people are more seriously affected by economic or market changes in the labour market than other age groups (Hwang, 2016).

The second is a mismatch of school education and technical qualifications separated from the field. South Korea's college/university entrance rate was in the 30 percent range in the 1980s, but it has continued to rise to 80 percent by the late

2000s (Jeon et al., 2014). According to the South Korean Ministry of Education (2019), South Korea's college/University entrance rate (49.0 percent) as of 2018 is higher than the OECD average (38.6 percent), especially among young people (25-34 years old), which is very high compared to the OECD average of 44.3 percent, and has maintained the top position among OECD member countries since 2008.

Such sharp rise in the college and university entrance rate results in an oversupply of highly educated job seekers who do not have the sufficient vocational skills required by the labour market, causing unemployment due to quantitative and qualitative discrepancies in manpower supply (O'Reilly et al., 2015) and also increasing the seriousness of the problem, such as productivity degradation due to dissatisfaction with downward employment and personal loss of human capital (Choi, 2012). There are also reasons why academical education at universities cannot keep up with the pace of changes in industry and technology.

Third, NEET (Not in Employment, Education, and Training) also finds the reason for the growing number of young people who cannot even enter the labour market, in addition to microeconomic perspectives such as individual characteristics and labour market's supply-demand mismatches. Unlike young unemployed people who are looking for jobs, the NEET is a heterogeneous group that has lost hope and left the labour market, so there is a fundamental difference from youth unemployment (Tamesberger and Bacher, 2014).

However, the number is increasing and should be considered as a policy target. Youth NEET causes more serious social problems and conflicts than youth unemployment because it means future human capital losses that voluntarily deviate from the labour market. Moreover, youth NEET has no intention of labour, making it difficult to secure continuous tax revenue in terms of the national economy (OECD, 2013). The new indicator, NEET ratios under 30, averaged 15.8% in the OECD in 2010 (ILO, 2013), are steadily increasing (Eurofound, 2014). And in South Korea, there is a difference in statistical analysis, but as of 2010, the number is approaching 1 million and the rate continues to rise (Nam, 2011).

③ vocational training programs as a policy to ease youth unemployment.

The need for policy intervention

It requires social or policy intervention, given that unemployment is the key cause of poverty in the working-age population. Policy intervention occurs because the poverty of the unemployed causes the individuals to suffer from reduced consumption capacity and the economic recession as a whole can deepen the recession by reducing the effective demand (Park, 2017) and the establishment of a social safety net against the risk of unemployment considers

a government responsibility (Na, 2012). The nation's response to unemployment can be largely divided into two policy directions. One is to preserve the income of the unemployed as passive policies, such as unemployment insurance and income support.

And the other is that so-called active labour market policies (ALMP), such as employment maintenance support programs and vocational ability development, are also being implemented (O'Higgins et al., 1997).

Recently, vocational education and training (VET) systems have been recognized as a crucial way to increase the employment potential of young people beyond simply providing income supports to the young unemployed.

Many countries are pushing for various forms of work-based learning to strengthen the human capacity of young people because entering the labour market at an appropriate time will have a significant impact on career development over their life (Na, 2012).

In addition, the recent policy direction of many developed countries has emerged as the most important policy task for solving social problems to help improve vocational skills through the provision of quality education and training programs rather than simply getting young people employed (Clement, 2012)

Introducing South Korea's Vocational Competency Development Program

South Korea's vocational ability development scheme supports education and training so that employers and workers can actively cope with the emergence of new social risks and structural changes in the labour market: the government supports companies to voluntarily conduct training their employees to suit their circumstances, and also provides support to individuals who participate in the development of capabilities on their own (Na, 2012).

South Korea's Work-Based Learning Program and Evaluation

In recent years, On-the Job-Training(OJT) is emphasized in an effective way to acquire the skills needed to perform tasks. Work-based learning is introduced by many countries in that it not only provides effective means of teaching the knowledge and skills needed in a job (Honer & Wehrley, 1995), but also provides opportunities for participants to enter the labour market smoothly, and South Korea is no exception.

The reason is that if quality training is provided during the initial vocational education and training phase, the job-related ability

(hard skill), and soft skill, the attitude required in organizational life, can be learned, thus providing training that meets the needs of the labour market (OECD, 2010).

In 2013, the South Korean government introduced a Korean-style dual system, a method of work-based training. This system is based on the dual system in Germany, which combines vocational training and school education. The program features companies hiring young job seekers as apprentices and providing them with vocational training.

The apprentice's training course is a workplace-based learning system in which the company trains the actual work directly for three to four days a week, and the remaining 1-2 days are taught at school.

Through the project, the government supports participating companies to build training infrastructure, develop and operate training programs. According to the Ministry of Employment and Labour, as of 2017, more than 35,000 learning workers from 16 colleges, 32 four-year universities and about 9,000 companies participated in the work-learning parallel system (Human Resources Development Service of Korea, 2017).

However, opinions have been raised that the assessment on the OJT, which is the core of the Korean dual system is insufficient (HRD KOREA, 2017). This is because the government's current

method of verifying the results of field trips is still focused on post-satisfaction surveys for project participants, which are difficult to measure program effectiveness and improve insufficient parts (Jeon et al, 2014).

4] What are the main actors involved in these policies?

Groups who can effect or be effected by the policy or an organization's proposal will be stakeholders (Freeman, 2010). Based on this definition, when looking at the stakeholder associated with the VET program (Korean dual system) to reduce youth unemployment, the stakeholder consists largely of the government and participants who pursue policies. Again, participants can be divided into a trainer, business owners and industries, and young people who are direct beneficiaries of the program.

In South Korea, a kind of work-based training program similar to modern apprenticeship in major advanced countries was implemented in earnest in 2014, but the role of related participants is still unclear and the training is carried out in a school-oriented vocational education way, causing problems that fail to keep up with on-site technological development.

Moreover, South Korea is promoting the apprenticeship system under the leadership of the central government, but young people and parents still favours college/university diplomas over field training (Jeon et al., 2014).

5 Possible alternatives to learn from overseas cases

British Post-16 Apprenticeships program

The stakeholder's position analysed above is likely to be considered as it can be applied generally in other countries. Britain and Germany have also operated work-based education and training programs so it could be referred.

The UK has developed training with active labour market policies, establishing a legal and institutional environment for effective work-based learning operations (O'Higgins, 1997), and has shown some results in terms of employment entry for young people (O'Higgins, 1997).

The UK's youth unemployment rate was much higher than that of other OECD countries due to the recession in the 1980s and 1990s, but the British government expanded apprenticeship by focusing on developing vocational skills for young people as an alternative to solve youth unemployment problems (OECD, 2009; Korea Labor Institute, 2012). Training was reported to be effective in reducing the youth unemployment rate, with more than 85% of apprentices who participated in the 16-apprenticeship system still employed after the end of the program (National Apprenticeship Service; NAS, 2012) and 80% of those who participated in the apprenticeship system (British Department for Education; DfE, 2016) showing significant results.

The first reason for this achievement was to expand the scope of the apprenticeship system. The British government allowed low-skilled young people, who are unable to enter the labour market due to the economic downturn, to have a trained workforce through apprenticeship scheme(1995) (Hong, 2018). Furthermore, the training system(1997) was prepared for young people who could not be included in the apprenticeship system due to their poor academic ability or lack of work experience.

Second, customized work-based learning was provided by subdivisions of education and training programs according to their academic level and work experiences. In conjunction with education and training programs and National Vocational Qualification (NVQ), participants were provided with standardized

education and training, specifying what skills and capabilities are needed.

Third, it is a rigorous evaluation system for institutions to ensure the quality of education and training provided to training institutions. The financial support was provided in line with the training performance and the job goals of the training institution (Choi, 2014). For example, the National Apprenticeship Service (NAS) was established under the initiative of the British government, and specialized roles such as program operation supervision, training institution management, curriculum composition, and qualification were divided among agencies to support effective support systems.

Dual Systems in Germany

Germany holds a long history and tradition in apprenticeship. The combination of corporate and vocational school training has resulted in effective outcomes between vocational education and training and job creation through a dual system in which vocational education and training are conducted in parallel at two locations (Hockel, 2012).

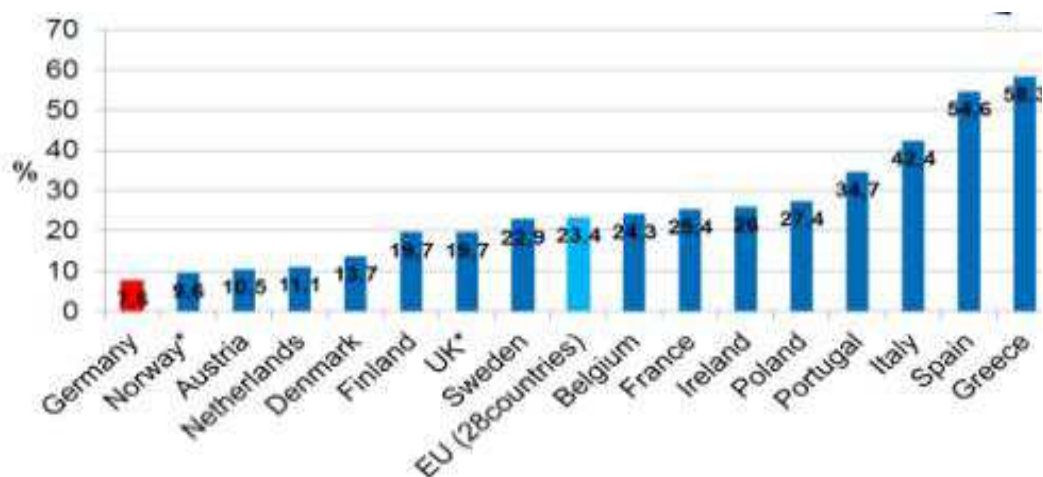
Germany's dualization system is operated under the principle of the enterprise programs for practice and school for theory. In the meantime, the dualization system is recognized as a better

vocational education system than apprenticeship training in other countries for its advantages such as systematic law on vocational training, active participation of employers and labour unions, and high interest from young people and parents (Lee, 2017).

In the 1990s, most of the young people who participated in the dual system and passed the test were employed, and their unemployment rate was significantly low as shown in the <table2> below.

As Eurostat (2013) suggests, it is estimated that this achievement is the reason why Germany had the lowest unemployment rate of 7.6% among young people (15 to 24 years old) in Europe.

<Table 2> Comparison on the ratio of unemployed to the youth unemployment in EU



Source: Eurostat (2013). Unemployment ratio people between 15 and 24 years in EU countries.

Regarding youth NEETs, the dual system of education and vocational training is directly and efficiently linked to the labour market, drawing attention as an alternative to youth unemployment difficulties. The reason for the low youth unemployment rate and NEET ratio in German-speaking countries such as Germany, Austria, and Switzerland is the dualization system of vocational education, and many empirical analyses have also shown that the dual system could make youth NEET ratio low (Breen, 2005; Eurofound, 2012).

Possible alternatives to reduce youth unemployment in South Korea

These exemplary models can transform Korea's current education and training system and design incentives to participate in education and training quality improvement programs. This is expected to be feasible in Korea as well.

Whereas the programs of work-based learning policies that are specifically taken according to historical backgrounds and practical conditions of each country are different, the OECD (2010) estimated that countries which indicate employment performance

through workplace-based learning are operated systematically at the national level and have common characteristics such as active participation of industries and quality control of training courses (O'Reilly et al., 2015).

According to Na (2012), the vocational education and training system in South Korea has traditionally been a government-led training system that focuses on fostering beginner-level functional and technical personnel. Therefore, with the introduction of Korean apprenticeship training, it is necessary for companies and industries to prepare their own education and training courses and improve the system to recognize their qualifications by evaluating their capabilities in order to cultivate practical talents required by industries.

The second is the active role of industries and companies. Hockel (2012) explained that the responsibilities and roles of the industry and enterprises hold significance for the success of apprenticeship training.

In particular, there must be involvement with industries to link education and training programs with qualifications. Work-based learning is aimed at fostering human resources that can be injected directly into the labour market, so curriculum that reflects the knowledge and skills required by industries is essential (OECD, 2010), especially to respond more flexible to changes in knowledge-based industry and rapidly changing industrial structure or demand for world with new jobs (Steedman, 2005).

The last is continuous quality control of education and training. When conducting training at workplaces, ongoing management and monitoring of the company's training courses as well as financial and facility support for the work-based learning will determine the success of the educational training (OECD, 2013).

The assessment of work-based learning programs provided by the enterprise plays a role in providing information and feedback on educational performance and leading the improvement of the quality of the program so evaluation on the training contents provided by the enterprise is also the important factor to manage the quality.

(3) Delivery system : Jobcentre Plus (since 2001) evaluation

Employment and welfare services have been considered as key policy measures of the government as the public demand for an economically and socially sustainable welfare state grows. In the case of South Korea, the government also sought to improve the organic link between the Employment Service and the Benefits Agency and to establish an administrative service delivery system in a way that increases the link between the employment sphere and welfare areas (Dwyer, 2004).

Since the late 1990s, the Korean Employment and Welfare Plus Center was introduced in 2018 by transforming the employment-welfare one-stop centre that was introduced after revising various countries with advanced welfare system to suit the situation in South Korea. It seems to be benchmarking the case of Jobcentre Plus in the UK. According to the UK Government Report (UK DSS, 1998), published in 1998, a new 'employment first' strategy was proposed for social security and employment. It also proposed a pilot project to provide 'single work-focused gateway services (after which they are named 'ONE') (Karagiannaki, 2006). The project calls for providing integrated pay and job services to benefit claimants of the working age group. This is designed to reduce confusion arising from the need for benefiting claimants to work on different government agencies, while also helping recipients get away from their payrolls (Finn and Schulte, 2007).

The overall operation of the Jobcentre Plus in the UK is subject to the 'performance and resources agreement' signed between the agency and the UK Department for Work and Pensions (DWP). The agreement sets out goals that each agency must achieve each year, including job success, the currency value of fraudulent and distorted benefit amount, the convenience of user services, the output of employers, and the delivery of tasks (UK Jobcentre Plus, 2003). The importance of the Jobcentre Plus was once again emphasized by the ruling Labour Party in 2002.

In other words, Jobcentre Plus was a decisive opportunity to transform the existing passive pay system into an "active welfare state" that encouraged more employment and focused more on employers' needs (UK DWP, 2002; Karagiannaki, 2006).

Dwyer (2004) described this change in circumstances as the government policies have been shifted from a 'welfare society' to an 'active society'.

Despite the overall low level of unemployment benefits in the UK, the ruling Labour government has made significant efforts since 1997 to reduce the 'unemployment trap' (which means that if the level of benefits for the unemployed is closer to or greater than those of their net income from labour, it will reduce the incentive to get the unemployed out of their payrolls and let them be employed) (Newman, 2011).

The government said that "Reducing unemployment traps will result in an increase in the supply of real labour by encouraging unemployed and inactive job seekers to get jobs." (DWP, 2002). It is also significant in that various policy combinations (Job search activities obligations and the benefit, tax and tax credit system) have been attempted to enhance the effectiveness of the policy (Clegg, 2010).

For example, Britain's effort to increase gross earned income by implementing the world's first nationwide statutory minimum wage system (McQuaid and Lindsay, 2005), the creation of a tax credit scheme for low-income working households, and various incentives were provided by reducing the contribution of earned income tax rates and national insurance premiums for low-income workers (Finn and Schulte, 2007). Blundell and Meghir (2002) analysed a loads of welfare-to-work programs in Europe and North America, revealing that the two alternative policies, ALMP (active labour market policies) and tax policies, are combined to utilize wage subsidies as well as earned income tax credits. Especially, it was evaluated that the combination of Britain's New Deal program and tax policy has improved the labour supply.

The overall assessment of the UK's unemployment support system can confirm some of the following strengths: The first was the strengthening of the labour market rules for benefit receipts, which led to the emphasis that employment was the best way out of poverty and benefit dependency, and also helped to address the people's pessimistic view of loopholes in the unemployment benefit system. Compulsory work-linked welfare methods are generally assessed to be successful in reducing long-term unemployment and youth unemployment (Karagiannaki, 2006).

The second was the close integration of unemployment services with the Jobcentre Plus's network, which had a positive impact on job entry rates in full consideration of the claimant's situation (McQuaid and Lindsay, 2005). As an example, the introduction of an individual

professional counselor system was welcomed by the claimants, particularly focusing on the individual circumstances of the claimant and the needs that have occurred correspondently (McVicar, 2008).

On the other hand, there are cases that question the effectiveness of Britain's social security system. The visible success of the labour-linked welfare program, which was implemented from the late 1990s, was achieved with high unit cost investments amid a very favorable economic background of low unemployment rate. This has failed to bring any changes to the problem-solving process for the vulnerable group that is difficult to access (Manning, 2009).

Moreover, despite the benefits of the integrated Jobcentre Plus organization, no evidence has been revealed to date that the shift from benefits to work has brought a significant difference (Petrongolo, 2008; Hwang and Lee, 2004).

4. Recent challenges or changes?

(1) Differences of opinions

South Korea's unemployment benefits are considered relatively low compared to developed countries (ILO; International Labour Office, 2019). Unemployment benefits are linked to the proper functioning of the social safety net for the low-income class, which is called the generosity of unemployment benefits (Venn, 2012). Furthermore, the level and duration of unemployment benefits may vary from country to country because they have a direct impact on overall unemployment rate and national expenditure, and can vary depending on support schemes other than employment insurance, so a country's unemployment benefit's generosity has a complex functional relationship. Therefore, it is not possible to compare it piece by piece (Kim, 2010).

Specifically, the generosity of unemployment benefits can be assessed through the degree of severity of eligibility for receiving, whether there are job-searching activities to acknowledge unemployment or not. However, the most direct representation of generosity at the benefit level can be compared with the level and duration of unemployment benefits and the rate of the income replacement.

Stovicek and Turrini (2012) noted that the overall generosity of the unemployment benefit system should consider "the level of replacement rates of both unemployment insurance and unemployment assistance, their duration, and their structure throughout the unemployment spell". What's more, it may be difficult to apply a single-generosity parameter to compare the generosity of employment insurance. This is because employment insurance has various purposes (unemployment insurance policies have multidimensional objects), and, additionally, labour market conditions (i.e. likelihood and duration of unemployment matter) are varied from country to country (Zimmermann et al., 2008).

In order for the unemployed to receive unemployment benefits, the applicant generally must meet the following three requirements at the same time: the applicant must (a) satisfy the requirements when applying for unemployment benefits, (b) continuously participate in the labour market even after being laid-off, and (c) not be subject to disqualification for unemployment benefits (Standing, 2000).

The first requirement is to determine whether an unemployed person has been employed in an employment insurance business for a certain period of time and paid the premiums faithfully before losing his/her job whereas the second is to ensure that the unemployed continue to participate in the labour market to seek a job with the strong willingness and ability to work after losing their jobs. The third requirement can be translated as an attempt to minimize moral hazard that may inevitably arise in insurance system and to prevent abuse of unemployment benefits.

The purpose of adopting this unemployment benefit requirements is to faithfully protect hard-working workers who diligently participate in the labour market but being unemployed due to unavoidable reasons and to prevent their tendency to remain unemployed intentionally to receive unemployment benefits (Finn and Schulte, 2007).

The UK did not make active job-searching requirement for unemployment benefits until the 1980s, but since 1989 the UK has added active job-seeking activities as a requirement for unemployment benefits. So, the beneficiary of the unemployment benefits should visit a public job security agency every two weeks to prove that the beneficiary has concentrated all efforts for the past two weeks to get a job. If the applicant fails to demonstrate this, the payment of unemployment benefits could be suspended for up to six months from that point (McKnight et al., 2000).

Job-seeking benefits (Korean Jobseeker's allowance) in South Korea are the most basic and core of unemployment benefits, which are paid to promote the stabilization of the livelihood of the unemployed and to promote reemployment during the unemployment period. In the case of an insured working at an employment insurance-applied business place moving due to management dismissal, recommended resignation, expiration of the contract period, etc., 50% of the average wage before the transfer should be differently paid in line with pre-set proportions in accordance with the period and age of the insurance unit for 18 months prior to the date of transfer. In order to receive job-seeking benefits, the efforts of seizing re-employment opportunities should be recognized, and the

beneficiary should attend a job security institution once every four weeks to prove it. The level of job-seeking benefits stipulates that the average wage of the beneficiary for three months is the base date and that the job-seeking benefit date is 50 percent of the base date. The payment period has been extended step by step and is now 90-240 days under the Employment Insurance Act of South Korea (Article 45 and Article 50 of the Employment Insurance Act).

In the past, it was common for unemployment benefits to be paid both in the same period only when the applicant meets the requirements for unemployment benefits, regardless of the length of time during which they were paid as insured employment.

However, more and more countries are introducing strict conditions and criteria of the unemployment benefits as the insured employment period increases due to the frequent abuse of unemployment benefits by deliberately losing their jobs and receiving unemployment benefits if they meet the requirements for a certain amount of unemployment benefits (Newman, 2011).

This was no exception for Korea. In consideration of the difficulties against the recipients of the unemployment benefits who try to be re-employed, the unemployment benefits are paid in consideration of the age of eligible recipients and their participation in vocational training (South Korean Ministry of Employment and Labour, 2015).

In a view of conflicting opinions on the adequacy of unemployment benefit payment levels in South Korea, the labour union side argues

that the level should be higher than the current level to stabilize the livelihood of the unemployed.

On the other hand, the employers position insists that the limit on unemployment benefits should be lowered to ensure the genuine job seeking activities without moral hazard (Jones, 2004). In foreign countries, most countries adopt a fixed rate system that pays a certain percentage of their wages before they lose their jobs. In addition, some countries such as Britain and Ireland pay at 10-37% of the average wage whereas others including Italy, South Korea and Turkey pay 50% of the average wage and Denmark, Luxembourg and Sweden compensate up to 50% of the average wage so it is fair to say that the unemployment benefit levels are diverse by countries (Esser et al., 2013).

As such, opinions are divided on the level of unemployment benefits. Generous unemployment benefits have been criticized since the 1970s citing the reduction of willingness of the unemployed to work and excessive reliance on welfare eventually create and raise unemployment rates (Shaikh, 2003). The argument that unemployment benefits reduce the desire to work is sometimes expressed as "unemployment trap" or "non-economic activity trap" (Jeon et al., 2014), which is explained by two logic.

First, in terms of labour demand, generous unemployment benefits affect unemployment through the wage-setting process. This is because unemployment benefits function as a safety net. Such a large incentive to raise wages increases labour costs, which in turn raise the unemployment rate.

Second, in terms of labour supply, generous unemployment benefits can reduce incentives to accept low wages and aggravate working conditions. Howell and Rehm (2009) explains that generous unemployment benefits enable them to search for jobs that are suitable for them by lowering the marginal costs of job search and easing liquidity constraints, which, on the contrary, brings a result of adversely continuing the unemployment period (Krueger and Meyer, 2002).

On the other hand, there are scholars who set forth a counterargument regarding the point that unemployment benefits produce unemployment. First, the effect of extending and maintaining employment to meet the requirements of unemployment is clearly existed, which is called as the entitlement effect. This is because unemployment benefits, which are generally managed under social insurance system, require employment periods and premium contribution records that are a certain qualification for the benefit. In particular, the higher the unemployment benefits level and the more unstable economic situation, the greater the incentive (Gregg et al., 1999).

Second, considering the psychological effects of unemployment, there is an argument that the effect of maintaining unemployment or falling into unemployment to receive unemployment benefits will not be so great. Having a job does not just mean material income, but it also relates to psychological factors such as labour-related social norms and self-respect, and to the foundations of human relationships.

Moreover, if conditions are created not to accommodate unfair jobs resulting from unemployment benefits and more job searches are possible, this may rather reduce unemployment by improving the quality of subsequent job matching and thus may not be the only moral hazard factor (Card et al., 2007). Especially, the logic that people tend to get a job only when the net income outweighs the other by simply comparing the amount of employment income and unemployment benefits is criticized due to the point that it just substitutes employment for income (Jang et al., 2011)

According to the study on the public response to the social security issues which is based on a survey on British Social Attitudes conducted in 1998, the benefits for unemployed people in Britain were relatively unpopular. Fifty percent of the respondents said that people's willingness to protect themselves is fading today because of the welfare state, and 40 percent of the respondents said that people would be willing to stand on their own feet if welfare benefits were not generous (Hills and Leikes, 1999).

However, the results of Survey might have been affected by the relatively low unemployment rate in the late 1990s. To support this, other studies have shown that the principle of contribution itself is still gaining public support. In other words, people think the benefit level is too low compared to their contributions. (Fabian Society, 1998).

Unemployment benefits may, on the one hand, alleviate the problem of liquidity constraints in one household, but on the other, may lead to moral hazard (Stovicek and Turrini, 2012).

Therefore, it is necessary to design policies in consideration of various aspects as to how to adjust the amount and duration of unemployment benefits to prevent unemployment traps and benefit dependence and mitigate the problem of liquidity constraints while ensuring adequate living security during the period of unemployment (Sjoberg, 2006).

In summary, in the case of the UK, integrated social insurance is being built with a single social insurance system called National Insurance. It is characterized by a wide range of job-seekers allowance (JSA) that are subject to the unemployment benefits with an open attitude toward partial unemployment.

However, in 2010, the coalition government sought to increase tax revenues in an effort to stabilize government finances, while conducting extensive operations on government spending (Newman, 2011). Considering the proportion of welfare spending to a seventh of the total government expenditure, the "Welfare Reform Bill 2011," represented by the Universal Credit, released on February 17, 2011, can be seen as the result of such government restructuring of strengthening the efficiency of government spending.

(2) Institutional changes focusing on 'universal credit' reform

In 2012, the Universal Credit system was introduced under the leadership of the Cameron government. Universal Credit is an attempt to combine major social assistance systems for working-age people (16 to 64 years old) into one system.

The original plan was to be gradually expanded throughout the UK from October 2013 to 2017, but the timing is being delayed little by little. Universal Credit is also considered to be the most radical scheme among Britain's social security reform in the last few decades. From now on, the background of the appearance, main contents, problems, and considerations will be discussed.

What is important in policy changes is that a social atmosphere has been created in which the burden of welfare spending is often cited as a serious problem (Hamnett, 2014). Public social welfare spending against GDP in the UK was 23.8% in 2013. According to changes in public social welfare spending, it increased from 16.7% in 1990 to 20.5% in 1993, then decreased again to 18.5% in 1999.

However, it has been on a steady rise since then, but has remained almost the same since 2009 when it rose to 24.1 percent. In addition, there was a growing public opinion that the systems supporting the low-income vulnerable groups were complicated, resulting in errors in the selection of targets, fraudulent payments,

and excessive administrative costs (BBC poll, 2012).

The coalition government, formed after the 2010 election, has carried out a reform of the UK's revitalization policy (Hamnett, 2014). Government officials have proposed reforms that lower welfare dependence and public spending.

At this stage, policy emphasis was placed on the expansion of the activation policy, as well as the drastic reduction of welfare benefits, the rationalization of employment service agencies, and the introduction of universal credit (DWP, 2010a).

The main contents of the Welfare Reform Act 2012 were the introduction of Universal Credit to improve working incentives, the strengthening of penalties to reduce fraud and error in receiving benefits, the abolition of housing subsidies for people aged 19-24 and the gradual reduction of welfare benefits for long-term unemployed.

To introduce the main points relating to unemployment benefits, existing Job-seekers allowance must meet the upper limit of property standards and working hours (DWP, 2010b) for the provision of income-based JSA as an income-replacement public assistance schemes paid to unemployed people with working capacity. For receiving benefits, they must visit Jobcentre Plus every two weeks to participate in the job interview and then, they can get benefits after proving that they are actively searching jobs.

First, with the introduction of Universal Credit, the six major basic security systems (Income Support, income-based Jobseeker's Allowance, income-related Employment and Support Allowance, Housing Benefit, and Child Tax Credit and Working Tax Credit) are integrated into one single road. In other words, the Universal Credit, which incorporates six existing schemes, ensures that the sum of the benefits received from each scheme cannot exceed a certain level.

For example, a household consisting of two adults has a benefit cap of GBP 500 per week, and a household consisting of one adult, GBP 350 per week. The UK median income in 2011/12, calculated as GBP 23,200 per share, is approximately GBP 429, so that level can be seen as similar to or somewhat lower than median income in terms of the upper benefit limit for single adult households.

<Table 2> Income reduction rate before/after adopting Universal Credit

Welfare Allowance	Withdrawal Rate	
	Before Universal Credit	After Universal Credit
Income Subsidy	100%	65%
Job seeking allowance	100%	
Housing Allowance	65%	
Earned Income Tax Credit	41%	
Child Tax Credit	41%	

Source: Income subsidy, JSA, Housing Allowance (As of 2009).

Brewer, M. 2009. How Do Income-Support Systems in the UK Affect Labour Force Participation?. IFAU Working Paper 2009: 27.

HM Revenue & Customs. 2010. Budget 22 Jun 2010: Benefits and Tax Credits.

Second, the existing revitalization policy for the unemployed has been further strengthened. It is the first system that requires low-wage recipients to increase their working hours until they receive wages above a certain level and continue to find better jobs. The plan was designed while considering the following premise that the total benefits will not exceed the median income of workers so that they can receive greater compensation for participation in the labour market than relying entirely on welfare benefits.

Third, a variety of supports based on an asset investigation had previously been managed and operated by different ministries (or agencies) but it was planned to comprehensively operate and manage several benefits by Department for Work and pensions (DWP) and the Jobcentre Plus. In other words, the efficiency of the support delivery system was emphasized.

If all systems are switched to Universal Credit, 11 million adults will apply for Universal Credit, of which about 5 million will be low-wage or part-time workers, and about 1 million will be workers expecting a rise in wages. One in six British workers is expected to receive Universal Credit (OECD, 2014).

Even with these estimates, the ripple effect of Universal Credit is expected to be massive. However, unlike the rosy announcement made by the British government, criticism of the reform is intensively fierce. The recent reform of Britain's welfare system is interpreted as a "dangerous cut" and almost "reconstructing a welfare state."

Taylor-Gooby (2012) criticized the British government for trying to cut almost all but pensions, including public housing, child protection and local government services, and for continuing pressure on health and education. In this regard, research institutes that serve as think tanks for government policy in the UK are raising the number of policy design problems.

A report published by the Joseph Rowntree Foundation pointed out that there is a reduction in benefit level due to Universal Credit explained that some households benefit in terms of work motivation and income, but some do not. In particular, households with children were diagnosed with weaknesses that not only offset the benefits of increased earned income but also caused an increase in childcare costs (Padley and Hirsch, 2017). Of course, it is too early to jump to conclusions about the aspect of institutional change. However, forecasts of the impact suggest that households with difficult living conditions will face more difficulties (Guardian News, 11/March/2011).

The reason also stems from the institutional design that provides more benefits to working households. And besides financial problems, mental problems are also pointed out.

It is worth noting that Universal Credit has had a negative impact on the mental health of many people (BBC, 07/02/2019). According to the media, some of those who lost their jobs and applied for the universal credit have reported that psychological stress is on the rise, as well as evidence to support it (Guardian, 27/Feb/2020).

The analysis showed that the mental health issues of recipients increased 6.6 percentage points compared to the previous period, as the introduction of the Universal Credit required them to meet the strict conditions include five-week wait, etc. It also warned that the number could continue to increase as more than 5 million people will have to switch to universal credit over the next four years due

to the drastic 'welfare policy change and cuts' (Wickham et al., 2020).

As such, Universal Credit is a reform that greatly changes the contents of the British social safety net. However, a number of issues and problems are being raised as the planning and implementation are being rapidly carried out in line with the political orientation. Although the direction of the Universal Credit has led to the emphasis on work and tougher sanctions, it has something to learn from its attempt to shift from a labour environment where job insecurity is deepening to a flexible system that combines the support system for working-age people into a single system that goes beyond the boundaries between employment and non-employment.

In Korea, with many programs linked to social security, the reform of the unemployment benefit system must also be reviewed in advance. This is necessary to ensure policy effectiveness and to reduce confusion in the process of policy reform.

5. Conclusion

In a view of the political support for the British Social Security system, until the 1950s-60s, the UK's national welfare state paradigm was sustained by an agreement between the Labour Party and the Conservative Party. However, in the 1970s, the IMF provided financial support due to high unemployment, inflation, and the deterioration of international balance of payments in 1976, leading to neo-liberalistic structural reforms.

Through a series of processes, the recent introduction of Universal Credit scheme can be considered as a representative example of a reform. For most of the post-war periods, Britain's broad political consensus that form a welfare policy are now witnessing significant changes (Hamnett, 2014).

As a policy, the UK's labour market policy was initiated through the enactment of the Unemployment Insurance Act in 1911, and only in the 1970s, the active labour market policy was activated with the aim of reducing the unemployment groups that are difficult to find employment in the labour market such as youth. Since then, various forms of employment subsidies have been created, and the representative public employment creation program had been activated as a community program in the 1980s and then abolished.

Currently, active labour market policy programs for the unemployed are being operated in an integrated manner, focusing on the New Deal program, which has been conducted nationwide since 1998. Likewise, Britain's efforts to innovate its system have been a competitive benchmark for other countries, from the Conservative Government to the Labour Blair government, which was launched in 1979. These relatively powerful innovations in the British government continue today (Finn and Schulte, 2007).

However, the company's flexibility of employment strategy based on neo-liberalistic economic flows is turning the labour market into an unstable employment structure by producing irregular workers and unemployed people with low quality of jobs.

Furthermore, the spread of low-wage irregular workers due to unstable employment and the increase in the number of workers who repeat unemployment and reemployment are feared to sharply deteriorate the quality of people's lives.

Unlike Britain, it may be premature to integrate public support and unemployment benefit systems and examine eligibility in South Korea, where welfare policies are recently expanding, but it is necessary to make strenuous efforts to link integrated administration operations and employment-welfare connection by reflecting the changing trend of the social security system in the UK.

In the case of South Korea, like most countries, the government is preparing for labour-related salaries and providing active job-linked services to reduce the increase in government spending on social welfare due to the low birth rate and aging population.

Under this circumstance, the South Korean government could benchmark attempts to simplify the system by replacing some of the Social Security benefits and public assistance allowances and applying a single means test standard in the gradual introduction of the Universal Credit System in the UK during the process of redesigning the system for areas where employment insurance system and public assistance allowances are mixed.

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