

### Comparison of English and German Systems.

The English system gives rise to *employers' liability insurance* for the protection of the employer only. The German system compels *accident insurance* to relieve both employer and workman of the risk.

Under the German system the injured workman or the dependents of a workman killed in the course of his employment become pensioners upon a fund; in the English system they become pensioners directly upon the employer unless the latter chooses to commute the periodical payments for a lump sum.

The German system affords facilities for a greater degree of co-operation between employer and workman, with a view to prevention of accidents and minimizing their results. Under the English system it is left entirely to the employer, apart from the Factory Acts to take active measures for prevention of accidents, and the workman is left to his own resources or those of voluntary benefit societies in the matter of treatment of injuries.

The German system *compels* the formation of workmen's benefit societies. The English Act has had the effect of discouraging the formation of such associations.

In the English system in case of accident the employee and employer meet face to face over the question of liability and the amount of damages. In the German system an organized fund intervenes.

The English Act is alleged to have had the effect of inducing a considerable amount of self-inflicted incapacity and malingering. This condition appears to be less prevalent under the German system.

The English Act has given rise to a difficulty in finding employment for aged or partially incapacitated workmen, owing to the effect of such employment upon the rates for employers' liability insurance. Under the German system this condition does not arise.

The German system involves, to a much larger degree than the English the active intervention of the State.