

# **Existential Field 3:**

# **Major Trends of State Family Policies in Europe**

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## **Working Reports**

Funded by the European Commission's Seventh Framework Programme and co-ordinated by Technical University Dortmund, FAMILYPLATFORM gathers a consortium of 12 organisations working together to articulate key questions about the family for the *European Social Science and Humanities Research Agenda 2012-2013*.

There are four key stages to the project. The first is to chart and review the major trends of comparative family research in the EU in 8 'Existential Fields' (EF). The second is to critically review existing research on the family, and the third is to build on our understanding of existing issues affecting families and predict future conditions and challenges facing them. The final stage is to bring the results and findings of the previous three stages together, and propose key scientific research questions about families to be tackled with future EU research funding.

This *Working Report* has been produced for the first stage of the project, and is part of a series of reports, as follows:

- **EF1.** Family Structures & Family Forms
- EF2. a) Family Developmental Processes
  - b) Transition into Parenthood
- **EF3.** Major Trends of State Family Policies in Europe
- **EF4.** a) Family and Living Environment
  - b) Local Politics Programmes and Best Practice Models
- **EF5.** Patterns and Trends of Family Management in the European Union
- **EF6.** a) Social Care and Social Services
  - b) Development of Standards for Social Work and Social Care Services
- **EF7.** Social Inequality and Diversity of Families
- EF8. Media, Communication and Information Technologies in the European Family
- **CSO** Civil Society Perspective: Three Case Studies

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# **Summary of the Report**

#### 1. Introduction

In many European countries, family policies have gained tremendous importance in recent years. Part of the explanation certainly is an increased awareness of challenges, whose impacts are already perceivable today and will intensify in the future: population ageing, decreasing birth rates, diversification of family forms, or reconciliation needs. Yet not only are EU welfare systems affected very differently by these processes; even to common challenges national reactions vary substantially. This report summarises and analyses research results regarding the major trends of state family policies in Europe.

Family policy is integrated within the welfare system<sup>1</sup> (e.g. pensions often showing family components), but post-war welfare states "did not absorb the family caring burden" (Esping-Andersen 1999: 54). As state family policies developed later and more hesitantly than most other social policies, they are characterised by a belated and small degree of institutionalisation. Traditionally, they have been considerably normative, sometimes hindering adequate policy reforms. Furthermore, family policies, as dealing with 'new social risks'<sup>2</sup>, are currently one of the few expansionary welfare areas. Gauthier (1999) defines them as an "amalgam of policies directed at families with children and aimed at increasing their level of well-being". This definition acknowledges the fact that family policies are like hardly any other policy a cross-cutting issue. Yet the requirements deriving from this are almost nowhere conformed in the organisational structures (Gerlach 2010), indicating a lack of 'family mainstreaming'. When family-affecting policies are not (non-intended) by-product of other policies (e.g. pensions), but explicitly launched, their underlying motives<sup>3</sup> differ substantially between countries.

Particularly fitting for this report is an approach from the political science's subdiscipline of *policy analysis*, which tries to find out: What governments do, why they do it, and what difference it makes. (Dye 1972: 1) Chapter 2 examines the literatures on welfare state/family policy typologies and conceptualises family policy change. Chapter 3 describes

<sup>1</sup> Schubert et al. (2009b) argue to use the wider category of welfare *systems* and not *states*, which e.g. also encompass areas as education policy and other welfare participants than the state (e.g. the family, NGOs).

<sup>&</sup>lt;sup>2</sup> New social risks policies are run to protect from the consequences of post-industrial socio-economic trends in the family field or labour market, as opposed to industrial risks as old age (Bonoli 2007: 508).

One can differ between *institutional, demographic, economic, socio-political, gender equality* and *children's* welfare family policy motives (cf. Kaufmann 2000: 426-428).

major trends of state family policies in Europe along the following issues: institutional settings and regulatory framework (3.1), leave policies (3.2), care services (3.3), cash and tax benefits (3.4). Chapter 3.5 summarises the results of a survey we conducted in November 2009, in which welfare state researchers from the EU-27 informed about current trends in their countries.

## 2. Family Policy Systems

Into the 1980s, welfare state research developed its basic concepts and differentiated, e.g. by Marshall's (1950) work on social rights or Wilensky's (1975) quantitative comparisons. Esping-Andersen's (1990) "Three Worlds of Welfare Capitalism" made the clustering of welfare states, to facilitate systematic comparisons, predominant. The innovation of this seminal work was to overcome the prevalent approach of comparing welfare states by their aggregate social spending: Esping-Andersen argued that it is not enough to know *how much* welfare states spend, but for *what* and *why*. He analysed social policies in 18 countries and used the indicators de-commodification, social stratification and interplay of state, market and family in social provision<sup>4</sup>. The result is a threefold typology: the liberal, conservative, and social-democratic welfare regime (Table 1). Liberal welfare states (e.g. UK) show low levels of de-commodification, individual responsibility, means-testing and primacy of the market. Conservative welfare states (e.g. Germany) have medium de-commodification, status-preserving social security systems and promote the traditional family. Social-democratic welfare states (e.g. Sweden) show high de-commodification, generous universal benefits and a focus on gender equality.

Albeit its milestone-character, there have been numerous criticisms of Esping-Andersen's typology; esp.<sup>5</sup> regarding 1) space, 2) time and 3) indicators (cf. Schubert et al. 2009b). 1) It was argued for the existence of additional regimes, e.g. a Southern (Ferrera 1996). More generally speaking, Esping-Andersen analysed 18 countries, eleven of them EU member states today; thus esp. since the Eastern enlargement there remain a lot of white spots on the map of European welfare systems (Figure 1). 2) The mid 1970s are delineated as the end of the so called 'golden age of the welfare state' and from then on fundamental

<sup>4</sup> De-commodification is the extent to which individuals can maintain a normal standard of living regardless of their market performance (Esping-Andersen 1990: 86), e.g. by old-age benefits. Social stratification measures in how far the welfare state itself actively orders social relations, e.g. by income-related benefits.

<sup>&</sup>lt;sup>5</sup> Further criticisms e.g. were that Esping-Andersen mixes up 'ideal types' and 'real types' (Kohl 1993), sees things through 'social-democratic glasses' (Manow 2002) or does not use publicly available data.

changes, i.e. retrenchment, re-commodification and recalibration (Pierson 2001b) are identified. 'Systemic changes' in individual countries and 'convergence' of different welfare systems are diagnosed – typologies, however, as being static concepts, do not allow for these dynamics. 3) Regarding indicators, the important 'feminist criticism' is that gender-specific problems and the family's role in welfare provision are neglected. Alternative typologies as the one of strong, moderate and weak male breadwinner models (Lewis/Ostner 1994) were developed. Furthermore, in the first comparative study of all EU-27 welfare systems edited by Schubert et al. (2009a), the main result was 'diversity': It was neither possible to ratify any of the existing typologies, nor to identify clear-cut new clusters (Bazant/Schubert 2009: 533).

Against the background of these criticisms and the discovered diversity, it seems not feasible to develop typologies valid for welfare systems in general; but it is still possible to identify country groups for different fields, as family policy. Numerous family policy typologies have been developed, using different indicators and countries. A first view depicts the functional expenditure for families as a per cent of total social spending (Figure 8): Family policy expenditure range from only 4.2% in Italy to 16.5% in Luxembourg. More comprehensive, Kamerman/Kahn (1978) in an early typology differed between explicit and comprehensive (e.g. Hungary), sectoral (Germany) and implicit and reluctant (UK) family policy-making styles. Gauthier (1996), analysing family policy traditions, identified four models: proegalitarian (e.g. Denmark), pro-family/pro-natalist (France), pro-traditional (Germany) and pro-family but not interventionist (UK). Thus, well-founded typologies for family policy systems exist, but country groupings differ<sup>6</sup> and the problem of not all EU-27 being covered always remains. What is more, esp. the older typologies as being static models most likely do no show a realistic picture of European family policy systems today, after the Eastern enlargement and the observed far-reaching policy changes. Prospectively, there is need for a more encompassing and up-to-date typology. This report takes a 'geographical typology' (Figure 3) as a structural category, but watches out for changes in countries and/or clusters.

To do so, a conceptualisation of 'family policy change' and to measure its *direction* is needed. Esping-Andersen, in reaction to the 'feminist criticism', introduced the distinction between familialistic and de-familialising welfare states. De-familialisation is "the degree to which households' welfare and caring responsibilities are relaxed either via welfare state

<sup>6</sup> Nordic countries "make the strongest case" (Hiilamo 2002: 143) and as a rule end up in the same cluster, while the post-socialist countries are rarely included and, when they are, tend to spread over all groups.

provision or via market provision" (1999: 51). Ostner (2003) added the fruitful distinction between positive and negative de- or (re-)familialisation (Table 3). While negative measures constrain the spectrum of possible ways of living (e.g. reduction of care services, abolition of survivor's pensions), positive measures increase parent's choice and reconciliation (e.g. expansion of care services, introduction of care allowances) (Leitner et al. 2004: 17). On this basis, family policy change can be "charted as shifts from familialisation to de-familialisation and vice versa" (Ostner 2009).

### 3. Major Family Policy Trends

### 3.1 Institutional Settings and Regulatory Frameworks

Polities – institutions, norms and regulatory frameworks – according to institutionalist theories and path-dependency, substantially limit the scope of action for policy-makers and shape future policies. Regulatory frameworks or family law are often not included into comparative family policy analyses. Important studies reviewed in this chapter are<sup>7</sup>: Hantrais (2004), Cizek/Richter (2004), Ostner/Schmitt (2008), Appleton/Byrne (2003), Saxonberg/Sirovátka (2006), Boele-Wölki (2007), Council of Europe (2009).

To sum up results, the Nordic and Anglo-American countries have less explicit family policies than the conservative, Mediterranean and post-socialist ones and unlike them don't protect the family with their constitutions. While in the Nordic countries this is due to "promoting the interests of individuals rather than of families as units" (Hantrais 2004: 133), in Anglo-American countries it's rather a result of family relationships not being strictly regulated, and neither being duties of the state<sup>8</sup>. Post-socialist countries repeatedly implemented dramatic institutional shifts: Following the employment-centred socialist welfare states, *all* of them took re-familialising paths in the 1990s; some of them leaving these again in the 2000s. While traditionally few countries adopted an explicit and comprehensive family policy, conservative countries did comparatively often, e.g. Austria or Germany have long-standing family ministries and many continental countries' constitutions prescribe a state protection of the family. Hantrais (2004: 143) assumes that the latter might restrain progressive reforms. In 2009, only ten of 27 EU countries had designated family ministries (MISSOC), the trend, however, going slightly upwards (with newly created ministries in Denmark, Netherlands, Latvia).

 $^{\rm 7}$  See the corresponding chapters in the full report for a detailed discussion of reviewed studies.

<sup>&</sup>lt;sup>8</sup> Ireland prescribes family protection in its constitution and has stronger familalist traditions than the UK.

The Nordic countries are particularly advanced in putting unmarried and same-sex couples on a par with marriage, while post-socialist countries lag behind. 13 of 27 countries had introduced a statutory registration scheme for same-sex partnerships in 2007, with rising tendency (Boele-Wölki 2007). The Nordic countries have strong governmental-NGO cooperation, while in the continental countries it is often ambivalent, i.e. strong in implementation, but weak in family policy formulation (Appleton/Byrne 2003). Governmental-NGO cooperation has recently increased in the UK, and is rather low in the Mediterranean and esp. the post-socialist countries, following NGO's being outlawed under Communism and the Catholic church often holding a monopoly after its collapse.

#### 3.2 Leave Policies

Policies to support parents with care responsibilities originated in the late 19<sup>th</sup> Century, when some European countries developed maternity leaves to protect the health of mother and infant, which were often short and low-paid. Substantial improvements in maternity leaves were made during the 1960s/1970s, with Nordic countries implementing genderneutral leaves and many other countries expanding leave periods and payments. Since the 1970s/1980s, there has been significant growth and diversification in leave policies across Europe. The trend of increasing periods was accompanied by the expansion of part-time work. Again with Nordic countries as pioneers, working parents gained rights to reduce working time in many countries (Morgan 2008: 3). In this chapter, the four most common types leave types within Europe (maternity leave, paternity leave, parental leave, leave for sick children) are described comparatively. Table 6 gives an overview on the diverse leave arrangements across the EU-27. It mainly draws on Moss/Deven (2009), as this review of the 'International Network on Leave Policy and Research' makes leave policies one of the best investigated family policy areas.

Maternity leave is provided in almost all EU countries for working mothers, understood as a health measure and thus limited to the period around birth. In some countries, it's not restricted to women (Iceland, Norway, Portugal, Sweden); in others, it's obligatory (Austria, Germany, Italy). Its length varies from 14 to 20 weeks with earnings-related payments between 70 and 100%. Extended leave periods are provided only in few countries (Czech Republic, Hungary, Ireland, UK) (Moss/Deven 2009: 82f). Paternity leave entitles fathers to take a time off after the birth of a child, intending to support the mother and give

fathers the opportunity to get into life with a newborn child. It's only obligatory in Portugal. Usually, periods vary from two to ten days with earnings-related payment on the same basis as maternity leave. Extended periods are provided in Finland, Slovenia and Spain. As more and more countries introduce non-transferable periods for each partner into parental leaves (e.g. Sweden, Germany, Austria), the distinction between paternity leave and parental leave for fathers is obviously blurring.

Parental leave is available for both parents and can be structured in two ways: as a non-transferable individual right with an equal amount of leave; or as a family right, which parents can divide between themselves as they choose. According to the EU parental leave directive, all member states must provide at least three months per parent, while payments etc. are not specified (Moss/Deven 2009: 84). While lengths vary considerably across Europe, one can differ between countries providing about nine to 15 months, and those providing up to three years (cf. Table 6). Most countries provide a parental leave payment. It's rather generous in come countries (Denmark, Hungary, Norway, Slovenia, Sweden), but paid at flat-rate, low earnings-related rate, means-tested or for only part of the leave period in others (e.g. Belgium, Italy, Netherlands, Poland). Finally, among EU countries there is a statutory leave entitlement for urgent family reasons in cases of sickness or accident in accordance with the EU parental leave directive.

#### 3.3 Care Services

Childcare has been one of the crucial family policy issues in the EU during the last years, being increasingly regarded a vital reconciliation element contributing to multiple goals; while care services for other persons gain less attention. Following the 2002 'Barcelona targets', the richest comparisons are EU and OECD funded studies: Plantenga/Remery (2005, 2009), OECD (2007a), Eurostat (2009a), Lohmann et al. (2009), and central policy analysis are Henau et al. (2006), Jensen (2009), Szelewa/Polakowski (2008).

As Table 7 shows, U3 childcare is particularly developed in Nordic countries, the Netherlands and Belgium. Deficient formal services with less than 10% of U3 cared for exist in Austria, Czech Republic, Hungary, Lithuania, Malta, Poland and Slovakia. Care systems for older children (3 to school age) are everywhere more expanded, with rates of at least 90% reached in 8 countries. Full-time care is more common for the older age group. Plantenga/Remery (2009: 43ff.) review staff-child ratios in the EU-27 as an important quality in-

dicator: Some countries as Denmark or UK show acknowledged ratios (1:3), while e.g. Germany, Greece or Poland exhibit non-favourable ratios. They find similar diversity for educational levels of childminders; esp. low levels seem to exist in Belgium, Germany, Netherlands and UK. Both quantity and quality relate to national policy priorities, an indicator for which is social expenditure on childcare captured in Table 9: It shows that particularly low spenders can be found among all 'family policy systems' and counterexamples exist everywhere (e.g. Romania spending quite high 0.76%).

Studying policy trends, Plantenga/Remery (2009: 58) state that while the Nordic countries, Belgium, France and Slovenia have high availability and direct efforts at enhancements, the UK, Netherlands and Germany "are clearly moving towards a fuller coverage of childcare services". They name Cyprus, Estonia, Ireland, Latvia and Malta as counterexamples, where expansionary efforts are virtually non-existent; while the other countries lie in between. Many post-socialist countries experienced major cutbacks in the 1990s and it differs in how far they strive for re-expansion. The widespread trend of childcare expansion is in some places accompanied by a choice-oriented introduction of home care allowances (e.g. Finland, France, more recently Norway, Sweden, Germany). Statutory entitlements to childcare were enacted in a number of countries (e.g. Finland, Sweden, Denmark, Norway, Germany, the UK); while in Austria, Cyprus, Hungary, Luxembourg and Poland the last preschool year was made compulsory. Explanations for the diverse childcare situations are e.g. found in different national curriculum traditions (Jensen 2009) or different beliefs on 'who should care' (Szelewa/Polakowski 2008).

### 3.4 Cash and Tax Benefits

Family cash and tax benefits primarily follow economic and socio-political motives, i.e. balance the benefits performed by families, and compensate their higher costs and lower earnings capacities. As per Gauthier's (1999) distinction of expenditure-based and family-type studies, central studies of the first (Bahle 2008; Gabel/Kamerman 2006) and second (Bradshaw 2006; OECD 2007a) approach are reviewed. While the data basis on tax benefits is poorer, central analyses reviewed are Adema (2009), Apps/Rees (2004).

As Figure 4 shows, most countries spend more in cash than in tax benefits (or services), but tax benefits are considerable in Germany, Netherlands, and also France, Belgium, Czech Republic. Child/family allowances exist in every EU country, while their levels vary consid-

erably. Gabel/Kamerman (2006), analysing allowances trends in 21 OECD countries (1980-2001), state that spending declined during the 1990s in many countries (esp. CEE), but in most of these recovered since then. Figure 5 shows benefit rates for families with one, two and three children, while Table 11 depicts whether family allowances are targeted to income, age or number of children (Bahle 2008). While most countries grant family allowances without income-testing, nine countries don't: It is noticeable that from these, four are Mediterranean and four post-socialist countries. 16 countries target to the number of children, among them representatives of all 'family policy systems'. OECD (2007a) states that most countries target financial support to low-income families. Bradshaw (2006) finds that among 15 countries, Austria paid the highest benefits in favour of lone parents, while in Belgium and Germany lone parents of the one-child model family even got *less* benefits than equivalent couples. Whiteford/Adema (2007) found that family tax/benefit packages are significant for reducing child poverty.

Family tax benefits are often not integrated in comparisons, while when they are, generosity rankings between countries change (Adema 2001). In 2006, 19 OECD countries had separate income taxation of spouses, while (optional) joint taxation existed in 11 countries (OECD 2008b). Adema (2009) shows that net payments to governments are in most countries smaller for families with children than without children; though it ranges from high differences in Austria or Hungary to small ones in Poland. Apps/Rees (2004) argue that countries with individual rather than joint taxation, and with childcare rather than cash benefits, are likely to have both higher female employment and fertility. Another important indicator is the 'gender-neutrality of tax-benefit systems' (OECD Family Database), i.e. whether countries rather support dual-earner (most countries) or single-earner couples (esp. Czech Republic, France, Germany).

# 3.5 Trends across the EU-279

This chapter summarises the main results from our survey across the EU-27. A questionnaire (Annex) was sent to two networks of welfare state researchers<sup>10</sup>: The first question asked

<sup>9</sup> We would like to thank Helena Niesing for her support in the survey and writing of this chapter.

<sup>&</sup>lt;sup>10</sup> These were the FEWS network ('Future of European Welfare Systems'; cf. the EU-27 handbook edited by Schubert et al. (2009) and the 'International Network on Leave Policy and Research' organised by the Flemish Government's Population and Family Study Centre (CBGS) and the Thomas Coram Research Unit (TCRU) at the Institute of Education University of London. As we had no questionnaires from Italy, Malta and Romania, we researched their current trends from present databases and the literature.

for most relevant publications on their country's family policy; the second question enquired about the currently three most important family policy issues on the political agenda for action. The third question was whether family policies rather develop towards de- or refamilialisation in the individual countries. It's important to keep in mind that always a *trend* is described and not the status quo or comparative ranking. Thus, some countries are grouped together since they presently exhibit similar developments, while overall they might have completely different family policies.

Table 4 and Table 5 summarise results for current EU-27 trends in family cash/tax benefits, care services, and legislative instruments<sup>11</sup>. In general, family policies in Europe are still marked by huge diversity and different preferences. On the other hand, a common trend is family policy expansion; retrenchments are conducted much less frequently. Most cutbacks are observable for child/family allowances. Family policies are now in many countries regarded a major policy field; often related with policy goals of achieving higher reconciliation and positively influencing birth rates. To give a first résumé, the most important issues in *family cash/tax benefits* across Europe are the expansion of parental leave, respectively also of paternity leave<sup>12</sup>, and the increase of child/family allowances. However, a widespread trend observable in 14 countries is means-testing of allowances, thereby tightening eligibility criteria. The issue of *care services* is dominated by expansionary efforts. Furthermore, achieving better work-life balance and quality of services have gained massive attention. The main trend in *legislative instruments* is a special support to large families (esp. Mediterranean countries). Children's rights and wellbeing (UK, Ireland, Portugal) and legislative acknowledgement of family diversity (Denmark, Spain, Slovenia) are also big issues.

Figure 6 locates policy trends between de- and re-familialisation. De-familialising trends in the Nordic countries and Belgium are little surprising; while they no longer discuss childcare expansion, but quality of early education and work-life balance through flexible opening hours etc. De-familialisation trends are somewhat surprising for Ireland, the UK and also for Hungary, which (similar to Finland) offers rather positive re-familialisation for the U3 sector, but where current trends are rated de-familialising. Some continental countries as Germany or Austria have implemented far reaching policy changes, moving towards positive

<sup>11</sup> A '+' signals introduction/expansion of a family policy instrument, a '-' its retrenchment/abolishment.

<sup>&</sup>lt;sup>12</sup> A widespread trend across Europe is the mobilisation of fathers. Measures vary from a (obligatory) paternity leave with wage compensation (Estonia, Slovenia, Poland), the two wage-compensated 'daddy month' within the German/Austrian parental leave benefit to the Swedish 'gender equality bonus', which is given to women when they deliver care duties to their partners and work fully in paid employment.

de-familialising policies and childcare expansion, but policy trends remain mixed (e.g. home care allowance in Germany from 2013). Many Mediterranean countries still rely rather on family care and instead focus on means-tested financial support esp. for large and poor families (Greece, Spain, Cyprus). Parental leave extension is on top of the agenda in Greece and Portugal. Post-socialist countries are not homogenous at all: While trends in Latvia are rather de-familialising and service-providing, Bulgaria, Lithuania, Slovenia and Slovakia focus on refamilialising measures. The other CEE countries pursue mixed policies. Cutbacks in answer to the economic crisis were conducted esp. in the Baltic countries, while most countries increased family support at first (Angermann et al. 2009): Further (long-term) consequences of the economic crisis for European family policies are a crucial area for future research.

#### 4. Conclusions

The 'family policy systems' outlined in Chapter 2 were needed for this report as a structural category, but it became successively obvious how these five clusters don't adequately depict the empirical basis<sup>13</sup>. There is need of more empirical cross-national research, which can result in a more recent and reliable family policy typology. Yet such a typology cannot be 'carved in stone', but must pay attention to dynamics and, in the consequence, country and/or cluster changes. This requires both EU-27(+) encompassing and longitudinal data; also of countries significantly under-researched so far. These are esp. those sharing one or several of the following characteristics: being a new member state, being small, and not being in the OECD (e.g. Bulgaria, Cyprus, Romania, but also Finland or Ireland). The diversity also challenges comparative research since situations are often very country-specific (e.g. with the strong Irish or UK housing policy complicating comparisons of their pension or family policies with those of other countries).

This report was limited to state family policies, but for comparative research, the inclusion of other actors is highly relevant. This concerns government-NGO relations, occupational family policies; or local family policies, rarely taken into account, though they "had a considerable and growing impact in come countries" (Thévenon 2008: 174). The European Commission advised to enhance knowledge transfer between research and politics, yet si-

<sup>13</sup> For example, Chapter 3.3 illustrated that the Barcelona-envisaged 33% for U3 childcare is reached in conservative Netherlands, but not in Austria; in liberal UK, but not in Ireland; in southern European Spain, but not in Greece; in post-socialist Slovenia, but not in Poland; and in Denmark, but not even in Nordic Finland (which supports long leaves and homecare for the U3 sector).

multaneously reckoned this challenging due to different 'languages' and time horizons (BMFSFJ 2009). These hurdles could be lowered by a continued exchange also on the different 'logics of action', e.g. politics conforming long-term perspectives and foresighted research, and scientific policy advice also including e.g. questions of 'political feasibility'. Some areas relevant for future family policy-making are: international benchmarking (cf. family-friendliness index by Dieckmann/Plünnecke 2009); evaluation of policies; or challenges of population ageing. Regarding the latter, the often missing inclusion of care for elderly people into reconciliation studies constitutes a research gap; relating also to corresponding limitations in databases (Thévenon 2008).

Concerning methods, mainly macro-quantitative methods are used for comparing a large number of countries; their advantage being generalisable statements on cause-andeffect relations. Qualitative, small-n designs allow to investigate specificities of individual cases while keeping the comparative advantages (Pfennig/Bahle 2000). Meso (or even micro) level analyses are much less frequent, though they have many insights to offer. In particular, they are essential for answering the main questions of policy analysis: what governments do, why they do it and what difference it makes. An example: Why did some countries manage to modernise their family policies and adapt them to current challenges, while others seem not willing or able to do so? Is it due to problem pressure, the colour of government, policy learning or something else? More in-depth, qualitative comparisons are needed to understand and explain policy reforms and processes, i.e. speaking in terms of the policy cycle: how problems are defined, set on the political agenda, policies are formulated in response, the political decision is made, the policy is implemented, possibly evaluated and finally either terminated or re-formulated (Blum/Schubert 2009: 101ff.). Understanding why policy changes are achieved in one place, but not in the other, due to which 'veto players' they are blocked or due to which path-dependencies mitigated will be of utmost importance for facing future challenges.

### 1 Introduction

In many European countries, family policies have gained importance and partially even risen from so called 'soft' to 'hard' policy in recent years. Part of the explanation certainly is an increased political awareness of challenges, whose impacts are already perceivable today and will intensify in the future: population ageing, decreasing birth rates, internationalisation of labour markets, diversification of family forms, and the parting from a male breadwinner/female carer model. Yet not only are European welfare systems affected very differently by these processes (with e.g. birth rates of only 1.25 in Slovakia and 2.01 in Ireland in 2007; Figure 7). Even to common challenges the national reactions vary substantially and "timing, rate, pace and, sometimes, the direction of change differ markedly between and within countries" (Hantrais 2004: 3). This report summarises and analyses research results regarding the major trends of state family policies in Europe. Thereby, it will also identify, in clearly laid out info boxes, significant challenges (and possible best practices) from a specific policy analysis point of view.

# 1.1 Family Policies within the Welfare System<sup>14</sup>

Family policies "do naturally not exist in isolation from other parts of social policy systems, but are integrated within a larger social policy context" (Ferrarini 2006: 5) and correlated with 'welfare regimes'. It is often stated that families were disburdened with the emergence of the modern welfare state (e.g. with children no longer needed as provision for one's old age or healthcare systems taking over care-work for sick family members). On the one hand, this holds true and families are disburdened more effectively in mature welfare systems than in rudimentary ones. One the other hand, it conceals the problematic that *all* post-war welfare states were narrowly committed to healthcare and income maintenance, while they "did not absorb the family caring burden" (Esping-Andersen 1999: 54). State responsibility for families developed later and more hesitantly than most other social policy fields like pen-

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<sup>&</sup>lt;sup>14</sup> As shown by Schubert et al. (2009b), it is more fruitful not to use the narrow category of welfare *states*, but the one of welfare *systems*, which e.g. also encompasses areas as taxation, economic or education policy and does not limit the circle of welfare participants to the state, but includes e.g. private companies, the family and non-governmental organisations (cf. Kaufmann 2003; Seeleib-Kaiser 2008).

<sup>&</sup>lt;sup>15</sup> In fact, "Lord Beveridge and other builders of the post-war welfare state explicitly assumed that mothers would be housewives" (Esping-Andersen 1999: 54). Only in the late 1960s did the first countries start to expand family and childcare services (Denmark, Sweden, and later Norway, Finland, Belgium and France), and other countries to introduce explicit family benefits (e.g. Germany, Austria, Luxembourg).

sions, healthcare, or unemployment (Gauthier 1996). A first characteristic of family policy thus is its belated and – compared to other social policies – small degree of institutionalisation. Whether this facilitates policy reforms, however, is a question of debate<sup>16</sup>: On the other hand, the policy area is considerably normative<sup>17</sup> and highly ideologised positions of actors restrained policy reforms in many cases. Yet recently some scholars as Gerlach (2006: 2) conclude that family policies have in many places been de-ideologised. This does *not* mean that norms and ideas no longer play a decisive role, but that family policy justification and rationale have changed from value- to purpose-orientation. This is related to family policy being regarded an integral part of 'new social risks policies'<sup>18</sup> (Bonoli 2005), and one of the few expansion and not retrenchment welfare areas.

Anne Gauthier defines family policies as an "amalgam of policies directed at families with children and aimed at increasing their level of well-being" (Gauthier 1999). This definition acknowledges the fact that family policy is, like hardly any other policy, a cross-cutting issue (Gerlach 2010: 168), which – from a broad perspective – may include "topics as varied as employment, transport, food, and education policies" (Gauthier 2002: 456). This intensifies a problem well-known in comparative welfare state research, namely that family policy determinants, which are of particular importance in one country, might lack equivalents in another (Gerlach 2010: 358). It poses a challenge to international comparisons of family policy and amplifies the need of clear conceptualisations. Furthermore, the cross-cutting requirements are almost nowhere conformed in the organisational structures (Gerlach 2010: 437), wherefrom negative impacts of reforms in other policies as pensions, labour market or taxes can (and do) follow.

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<sup>&</sup>lt;sup>16</sup> For example, Clasen (2005: 182) argues: "Family policy is less institutionally entrenched than pension or labour market policy. [...] It left governments more of an 'open field' and thus choice for designing new types of public intervention and deciding on their scope."

<sup>&</sup>lt;sup>17</sup> This derives from the fact that family policies are "intimately linked to basic assumptions about the role of the family in society" (Kaufmann 2000: 424) and that there is a correlation between family policy and what is defined to be or ought to be a family (Lüscher 1999: 8).

<sup>&</sup>lt;sup>18</sup> New social risks policies "aim at protecting individuals from the consequences of postindustrial socioeconomic trends in the labor market or in the family field" (Bonoli 2007: 508) and e.g. include family policy or active labour market policy, as opposed to industrial social risks as old age or unemployment.

### Challenge: Lack of "Family Mainstreaming"

Based on the gender mainstreaming instrument, by "family mainstreaming" politics and public administration should "analyse the impact of their policies on families" (European Parliament 2004) and integrate the family perspective into the whole policy process, i.e. problem definition, agenda setting, design, implementation and evaluation of policies (cf. OECD 2008a). This could include introducing family commissioners, analogous to equal opportunity commissioners (Gerlach 2010: 437).

When family-affecting state interventions are not (non-intended) by-product of other policies, but explicitly launched, they are usually driven by one or several of the following six motives (Kaufmann 2000: 426-428<sup>19</sup>):

- Institutional motives, to preserve the family as an institution of its own right, often linked with conservative policy and a traditional family model;
- Demographic motives, gained importance in view of demographic changes, e.g. via
   measures to increase birth rates or diminish abortions;
- *Economic motives*, 1) to stress the family's importance for human-capital-building and balance its benefits performed for society; 2) more recently also to emphasise the economic functionality (e.g. strengthening the workforce via childcare);
- Socio-political motives, to compensate for direct and opportunity costs of family responsibilities (e.g. caretaking, income losses) and to fight poverty;
- Gender equality motive, to remove economic and social disadvantages esp. for women; more recently also measures to reach a more gender-equal share of family and employment tasks and set special incentives for fathers;
- *Children's welfare motive*, to provide the framework for public provision of children's needs (incl. socialisation inside and outside the family).

The development of these motives differs substantially between countries and different 'family policy systems' (Chapter 2.2). To follow the motives – which can of course overlap, while some of them are contradictory – policy-makers have a range of different instruments at their disposal. One can broadly distinguish between the three policy instrument types of 1) regulation, 2) information and 3) financing, the latter incl. taxes, benefits in cash and in kind (Blum/Schubert 2009: 85). A non-exclusive list of major family policy instruments in-

<sup>&</sup>lt;sup>19</sup> Kaufmann (2000) originally subdivided the demographic into *natalist* and *eugenic* motives and additionally introduced a *societal* motive, which is here included into the *economic* one. Furthermore, the motive of *women's issues* has here been renamed into *gender equality*.

cludes the following measures: 1) *regulation*: family law (e.g. marriage, adoption, divorce, child support), job protective leaves from employment, equal opportunity laws; 2) *information*: family support programmes, benchmarking and performance indicators (e.g. within OMC), scientific advisory councils; 3) *financing*: childcare, parental leave payments, child/family allowances, social insurances (e.g. pensions, health), family taxation, housing allowances. Again, as for the family policy motives, these instruments differ substantially across countries, with patterns of different 'family policy systems' being observable. Another characteristic of family policy, however, is the long time-lag between agenda setting/enacting of a policy and its (possible) effects, as opposed to the usually short time horizons of policy actors (Hantrais 2004: 212). From this, a further challenge can be identified.

# Challenge: Long-term policy needs and sustainability

As a long-term policy, family policy is notably in need of policy planning and foresighted policy research. This requires "both information systems sensitive to early warning systems and a capacity to focus public discussion and consensus-building processes on problems of the future" (Scharpf 1970: 464). It relates to questions of sustainability.

'Sustainable family policy' has also been a German strategy in recent years, which entails the two goals of increasing both birth rates and the labour-force participation of women by a well-balanced use of infrastructure, time and cash benefits. In this context some research on what a sustainable family policy would entail and how it can be reached was conducted (e.g. Bertram et al. 2005); Bertram (2009) gives a European perspective.

### 1.2 Outline and Method of the Report – A Policy Analysis

For the purpose of this report, an approach from the political science's sub-discipline of *policy analysis* is particularly fitting. This is due to policy analysis' self-conception as a problem-solving science, which – content-oriented and multi-disciplinary – participates in political consulting (Lerner/Lasswell 1951). For this purpose, the policy sciences (albeit their rather short history) have a number of analytical tools and theoretical approaches at their disposal<sup>20</sup>. Overall, policy analysis tries to find out: *What governments do, why they do it, and* 

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<sup>&</sup>lt;sup>20</sup> Policy analysis, which emerged in North America after World War II and was only fully established in Europe from the 1980s, exhibits a variance of agency-oriented theories (e.g. pluralism) and functionalist theories (e.g. neo-institutionalism), all stressing different variables to explain political decision-making processes (e.g. also problem pressure, power resources, path-dependency, policy ideas). Furthermore, a multitude of quantitative

what difference it makes. (Dye 1972: 1) This report primarily focuses on 'what governments do in family policies' across Europe (i.e. policy outputs), but pays some attention also to 'why they do it' (i.e. explanations/drivers of family policy change). It won't be possible to analyse in detail 'what difference it makes' (i.e. policy outcomes), but the other existential field reports give information about that.

Chapter 2, "Family Policy Systems", examines the literatures<sup>21</sup> on welfare state typologies (2.1) and, related yet not congruent, on family policy typologies (2.2). Between the various typologies developed for European family policy systems, it will chose the one most apt for the subsequent analysis of 'what governments do' in these regions in the third chapter. Furthermore, since 'major trends' in these family policy systems and the corresponding literatures are to be studied in Chapter 3, consequently the question follows: Trends *in what direction*? Thus, an adequate conceptualisation of the trend-setting family policy changes is needed and will be developed in Chapter 2.3.

Chapter 3 describes major trends in state family policies in Europe along the following issues: institutional settings and regulatory framework (3.1), leave policies (3.2), care services (3.3), cash and tax benefits (3.4). It draws on a review of the recent literature and is structured along the identified family policy systems. Family policies have repeatedly been described as marginalised within comparative welfare state research (e.g. as opposed to pension policies), and one reason was the lack of comparative and longitudinal data. Yet recently, both the social sciences literature and the databases have increased and improved. Here, data from Eurostat and the OECD Family Database are used, while the focus remains on comparative developments within the EU-27. In Chapter 3.5, this perspective is replaced with a country-specific one. For this purpose, narrowly-defined new empirical work has been conducted: A questionnaire (Annex) was sent to two existing networks of welfare state re-

and qualitative methods is applied. Sometimes criticised for arbitrariness, this variety's mostly appreciated for providing policy analysts with the essential tools in each case of specific research questions and interests (Blum/Schubert 2009: 171).

<sup>&</sup>lt;sup>21</sup> The literature review was conducted by a systematic and comprehensive search in databases and electronic journals (e.g. Journal of European Social Policy, Social Politics, Zeitschrift für Sozialreform), and EU (esp. funded under the European Commission's Framework Programmes for Research and Development), OECD and Council of Europe research. The main focus was on comparative studies, integrating as many EU countries as possible. Statistical databases, which provide harmonised national data, as Eurostat, OECD Family Database and the Council of Europe Family Database have also been reviewed. The whole report is basically restricted to publications since 1990; with the exception of research classics. Chapter 3, in which current trends of family policies are analysed, mainly draws on the literature of the last five years.

searchers in all EU-27(+) member states<sup>22</sup> in November 2009. The main research interest of this fieldwork was which issues are on the political agendas for action in the EU-27 and what is the direction of current policy changes. Chapter 3.5 summarises the results.

Finally in Chapter 4, results from the research review are summarised and an outlook given on future developments, challenges, and important research needs. Relating this again to policy analysis, the discipline is also concerned with an issue that has recently gained importance in family policies, namely in how far countries can *learn* from each other; often with the Nordic countries set as a 'best practice' model (Fagnani 2008: 88). Policy analysts developed theoretical approaches to analyse how and when 'policy learning' (Hall 1993; Rose 1993) occurs and how processes of 'policy transfer'<sup>23</sup> (Dolowitz/Marsh 2000) between different jurisdictions take place. A more intense exchange of this strand of research and public policy-makers could help to increase the knowledge about specific prospects and obstacles of the 'learning from each other' approach. Also with regard to family policies it has been figured out how the "transferability of policies between countries is largely dependent on the match between prevailing circumstances [...], policy environments and processes" (Hantrais 2004: 207). Therefore, esp. the factors retrieved in Chapters 2.2 and 3.1 on family policy systems and institutional settings will co-determine chances and obstacles to family policy transfers.

# 2 Family Policy Systems

### 2.1 European Welfare Systems

Into the 1980s, comparative welfare state research developed its basic concepts and differentiated; e.g. by Marshall's (1950) work on the expansion from citizens' rights to social rights or, each on the development of the welfare state, Flora and Heidenheimer's (1982) qualitative-historical approaches as well as Wilensky's (1975) quantitative comparisons. Then with

<sup>22</sup> These were the FEWS network ('Future of European Welfare Systems'; cf. "The Handbook of European Welfare Systems" edited by Schubert/Hegelich/Bazant 2009) and the 'International Network on Leave Policy and Research" organised jointly by the Flemish Government's Population and Family Study Centre (CBGS) and the Thomas Coram Research Unit (TCRU) at the Institute of Education University of London.

<sup>&</sup>lt;sup>23</sup> Dolowitz/Marsh (1996: 344) define policy transfers as "a process in which knowledge about policies, administrative arrangements, institutions etc. in one time and/or place is used in the development of policies, administrative arrangements and institutions in another time and/or place."

Esping-Andersen's (1990) groundbreaking publication of "The Three Worlds of Welfare Capitalism", the entrenched approach of clustering welfare states in order to facilitate systematic comparisons (e.g. Titmuss 1974; Korpi 1985)<sup>24</sup>, was established as the predominant strand of research.

### Three worlds of welfare capitalism...

The innovation of Gøsta Esping-Andersen's seminal work was to overcome the prevalent approach of comparing welfare states by their aggregate social spending: He argued that it is not enough to know how much welfare states spend, but for what and why. To answer the first question, he analysed social policies in 18 countries and using three indicators: 1) decommodification, 2) social stratification and 3) the interplay of state, market and family in social provision. 1) De-commodification describes the "extent to which individuals and families can maintain a normal and socially acceptable standard of living regardless of their market performance" (Esping-Andersen 1990: 86), e.g. through benefits in case of unemployment, old age or parenthood. 2) Social stratification measures in how far the welfare state itself is an active force in the ordering of social relations, e.g. through income-related benefits. While de-commodification doubtless is the most important parameter to Esping-Andersen, these two are neatly defined and statistically tested. The 3) interplay of state, market and family in welfare production, however, is not comparably integrated into the analysis. Esping-Andersen arrives at a threefold typology: the liberal, the conservative, and the social-democratic welfare state regime<sup>25</sup>.

Table 1: Esping-Andersen's Welfare State Regimes

Liberal	Conservative	Social-democratic	
Australia	Austria	Denmark	
Canada	Belgium	Finland	
Ireland	France	Norway	
New Zealand	Germany	Sweden	
UK	Italy		
USA	Japan		
	Netherlands		
	Switzerland		

<sup>24</sup> Titmuss differs between the residual welfare model, the industrial achievement-performance model, and the institutional redistributive model. Korpi discerns the marginal from the institutional welfare type.

<sup>&</sup>lt;sup>25</sup> Welfare regimes are "institutional arrangements, rules and understandings that guide and shape concurrent social policy decisions, expenditure developments, problem definitions, and even the respond-and-demand structure of citizens and welfare consumers. [...] short term policies, reforms, debates, and decision-making take place within frameworks of historical institutionalization that differ qualitatively between countries" (Esping-Andersen 1990: 80).

While in reality there will mostly be hybrid forms, these three ideal types are characterised as follows: Liberal welfare states show low levels of de-commodification, individualistic self-reliance, means-testing and primacy of the market. Conservative welfare states distinguish themselves by medium de-commodification, earnings-related and status-preserving social security systems, subsidiarity and promotion of traditional family structures. And finally, so-cial-democratic welfare states are marked by high de-commodification, generous and universal benefits plus a strong focus on solidarity and gender equality. To answer the question as to *why* the world of welfare systems resolves into three different regime types, Esping-Andersen (1990: 29) develops a theoretical argument of three interacting factors: class mobilisation (esp. working class), class-political action structures, and the historical legacy of regime institutionalisation.

...or what?

Albeit its milestone-character and essential contribution to comparative welfare state research, there have been numerous and diverse criticisms of Esping-Andersen's approach and conclusions. This critique can be differentiated into 'three dimensions' criticism regarding 1) space, 2) time and 3) indicators (cf. Schubert et al. 2009b).

1) On the spatial dimension, one important criticism was that (apart from Italy), the southern European countries are not included. While Esping-Andersen seems to assign them into the corporatist-conservative model (e.g. by a common Catholic imprint and strong familialism), others have argued for the existence of a specific 'Latin Rim' (Leibfried 1992), 'Southern' (Ferrera 1996) or 'Mediterranean' welfare regime (cf. Arts/Gelissen 2002: 142). Concerning outside Europe, Castles (1998) and Korpi/Palme (1998) have criticised the placing of Australia and New Zealand within the liberal model and instead argued for the existence of a specific Antipodean model, characterised by high thresholds for means-tested benefits and thus a much higher entitlement share than in the other liberal welfare states. Esping-Andersen includes 18 countries in his analysis, 13 of them European and eleven of them EU member states today.

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<sup>&</sup>lt;sup>26</sup> These three, partly intersecting dimensions are arguably the most relevant, while further points have been criticised, e.g. that Esping-Andersen mixes up 'ideal types' and 'real types' and it remains unclear whether differences are of conceptual or empirical nature (Kohl 1993). Also, it has been argued that he sees things through 'social-democratic glasses', esp. by attaching most importance to the indicator of de-commodification (Manow 2002). Furthermore, it was methodically criticised that the data used are not publicly available and thus other researchers could not retest (Scruggs/Allan 2006). And eventually, there are also researchers denying the use and explanatory power of typologies as such (esp. Baldwin 1996).



Figure 1: White spots of Esping-Andersen's typology

Source: Own figure on the basis of Esping-Andersen 1990

That is, more generally speaking: When using this typology today, there remain a lot of white spots on the map of European welfare systems. This applies esp. since the Eastern enlargement of the EU, with the post-socialist welfare systems only gradually being included and still under-represented in comparative research.

2) Welfare state research has delineated the mid 1970s as the end of the so-called 'golden age of the welfare state' and from then on identified three dimensions of fundamental changes, i.e. retrenchment, re-commodification and recalibration<sup>27</sup> (Pierson 2001b) – often associated with processes of globalisation, Europeanisation, and other profound developments<sup>28</sup> (Pierson 1997/2001a; Svallfors/Taylor-Gooby 1999; Bonoli et al. 2000; Jessop 2002; Schmid 2002; Ferrera 2005). These developments have since the mid 1990s been linked to the questions, what the over-time-consequences are for individual welfare states and for European welfare states in comparison. For the national level, debates have ranged

<sup>27</sup> Whereas retrenchment describes cutbacks and cost-containment in welfare benefits, re-commodification denotes efforts to reverse the de-commodification elements described above. Recalibration, on the other hand, characterises qualitative restructuring of welfare policies, which seek to make the welfare state more consistent with contemporary goals and challenges. (Pierson 2001b)

<sup>&</sup>lt;sup>28</sup> Too name but a few, these include e.g. the end of the Cold War, the spread of information technology or the introduction of a European currency as common developments; and German reunification or the introduction of the 'flat tax' in the Czech Republic as national ones (Schubert et al. 2009b: 8).

from *path-dependency*<sup>29</sup> of (different) welfare policies on the one hand, to *system change* on the other (Clasen 2005; Ebbinghaus 2005; Streeck/Thelen 2005). For the comparative level, some researchers diagnose welfare state *convergence*, while others discern path-dependency/stability or even *divergence* of welfare systems (Seeleib-Kaiser 1999; Alber/Standing 2000; Starke et al. 2008). Today, the majority of researchers witness more or less far-reaching policy changes and path-departures in European welfare systems and thus criticise Esping-Andersen's (and other) typologies for being static concepts, which don't allow for these dynamics.

3) With regard to Esping-Andersen's indicators, the most important is the so called feminist criticism. It finds faults in that generally gender-specific problems of welfare states as well as the family's role in welfare provision are neglected, and specifically the decommodification index is 'gender-blind'30 (Orloff 1993; Daly 1994; O'Connor 1996). Consequently, alternative typologies have been developed which focus on these issues<sup>31</sup>. In a famous typology, Lewis/Ostner (1994), looking at mothers' employment, individual social security of women and public care services for children and the elderly, identified three groups of countries: strong, moderate and weak male breadwinner models. Their grouping differs substantially from Esping-Andersen's: For example, the UK, Germany and the Netherlands are all considered strong breadwinner models, while France or Belgium are classified moderate and Sweden a weak breadwinner model. In another typology, Korpi (2000) studies the degree to which gender equality is supported or constrained by different institutions and arrives at three categories (cf. Hiilamo 2002: 152). General family support models (e.g. Germany, France) aim at strengthening the man's breadwinning position, e.g. through family cash and tax benefits. In market-oriented models (e.g. USA), family policies are undeveloped and the division of family/waged work is market-regulated. Dual earner support models (e.g. Sweden, Finland) strengthen the labour market participation of both parents, e.g. through public care services or paid parental leave for parents of small children.

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<sup>&</sup>lt;sup>29</sup> Path-dependency means that once a policy is implemented, its formative elements will mark all future policies. Esping-Andersen (1996: 24), emphasising the historical legacy of regime institutionalisation, assumes path-dependancy and coined the expression of the welfare states' 'frozen landscapes'.

<sup>&</sup>lt;sup>30</sup> De-commodification, as outlined earlier, measures the degree of autonomy from capitalist labour markets. Through this focus on gainful employment, women disappear from the analysis by the time they disappear from the labour market (Lewis 1992: 161).

<sup>&</sup>lt;sup>31</sup> While these typologies developed by the feminist strand of welfare state research pay more attention on the family's role in welfare provision and on family policy, they can be differentiated from explicit family policy typologies. The latter are discussed in Chapter 2.2. Borders between both are fluent, though. Other typologies developed by feminist welfare state research are e.g. Daly/Lewis (2000) or Sainsbury (1999), who on the basis of gender roles, differs between the 'breadwinner model' and the 'individual model'.

### Diversity beyond existing categories

Reinforced by the desire to categorise and systemise the plurality of European welfare states for comparative research, there emerged one surprising desideratum in that "the number of countries studied or used as evidence remained relatively small" (Schubert et al. 2009b: 3). To make a point: Numerous analyses examined Sweden, the UK and Germany as representatives of social-democratic, liberal and conservative welfare states, while other countries, esp. outside the OECD world, remained largely under-researched. The "Handbook of European Welfare Systems" (Schubert et al. 2009a) for the first time analysed all 27 EU member states using the same categories and structure. After the 27 country chapters, the question is raised whether meaningful clusters can be identified. Testing this for four basic elements of welfare systems – 1) social spending, 2) financing modes, 3) political actors involved and 4) guiding leitmotifs – the highly interesting finding is: "First that it is possible to identify groups, but second these groups have not much in common with any well-established welfare cluster, and third vary according to the specific characteristic" (Bazant/Schubert 2009: 515). The following pictures illustrate these findings – exemplary for the two indicators of social spending-GDP ratio and its financing – very clearly.

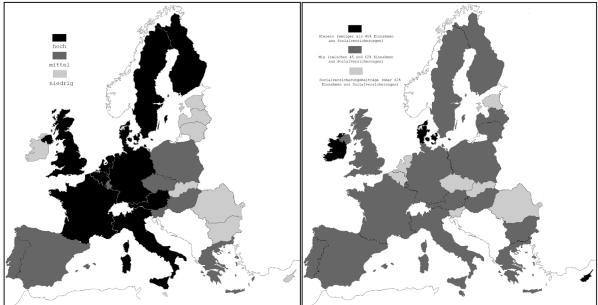


Figure 2: The varied landscape of European welfare systems

Source: Bazant/Schubert 2009: 520/526

The findings thus show diversity beyond existing categories: It was neither possible to ratify any of the existing typologies, nor to identify clear-cut new clusters (Bazant/Schubert 2009: 533).

### 2.2 European Family Policy Systems

Against the background of this space-, time- and indicator-related criticism of Esping-Andersen's "Three Worlds of Welfare", novel typologies (e.g. the male breadwinner models) as well as the diversity beyond existing categories shown in "The Handbook of European Welfare Systems", it can be concluded: Typologies cannot be developed and be valid for welfare systems in general; but it is still possible to construct country-groups for different policy fields. Thus, the subsequent question is: What do the typologies of 'European family policy systems' look like? As was shown, clusters differ according to the indicators used (Bazant/Schubert 2009). This becomes also apparent in the numerous accesses at construing family policy models for systematic comparisons<sup>32</sup>, which will now be looked at in more detail.

Anne H. Gauthier (2002: 457) distinguishes two main approaches to capture state support to families: 1) constructing indicator series that capture the support received by various family types (e.g. Bradshaw et al. 1993) and 2) using more highly aggregated indicators that capture the overall governmental effort to support families (e.g. Kamerman/Kahn 1997b). While it surely is significant how different family types are supported, the latter approach has "the advantage of being available for a large number of countries, and for long time periods" (Gauthier 2002: 457). It is also the approach dominating comparative welfare state research and will therefore be depended on in identifying European family policy systems in this report, yet alongside qualitative analyses that allow for national characteristics and specify the highly aggregated quantitative data. Figure 8 builds on the latter and shows functional expenditure for families in the EU-27 as a per cent of total social spending. Family policy expenditure range from only 4.2% in Italy and 4.3% in Poland to 13.6% in Ireland and

<sup>32</sup> Not all established family policy typologies can be presented here. Others were e.g. developed by Bahle (1995), who differs between the three types of egalitarian-universal, conservative-supportive as well as subsidiary family policies. He locates the egalitarian-universal type in countries with protestant state churches, individually-targeted and interventionist family policies (Sweden, Denmark). The conservative-supportive type characterises centralised, secular states, where family policies have developed early and conservative (e.g. France, Belgium). Finally, subsidiary family policies, which are little interventionist, emerged late in countries with alliances between the Catholic Church and the state (e.g. Spain, Portugal, Ireland). Here, Ireland is in a group with Spain, while they belong to different clusters in many other studies. Further family policy typologies

were developed by Kaufmann (1993) or Harding (1996).

even 16.5% in Luxembourg. Somewhat below the EU-average (7.7%) are countries like Belgium (6.6%) or the Czech Republic (7.3%), somewhat above it countries like Lithuania (9%) or Germany (10.8%).

Kamerman/Kahn<sup>33</sup> (1978) in an early typology examined family policy-making styles and differed between the three models of *explicit and comprehensive* (e.g. Sweden, France, Hungary), *sectoral* (e.g. Austria, Germany, Poland) and *implicit and reluctant* (e.g. UK, US) family policies. Gauthier (1996) in her historical analysis of family policy traditions in OECD countries identified four groups: The *pro-egalitarian* model (e.g. Sweden, Denmark) fosters parallel reconciliation of family and paid employment for both parents by high state support and liberal attitudes towards different family forms. The *pro-family/pro-natalist* model (e.g. France) focuses on demographic policies and subsequently reconciliation for mothers (e.g. by childcare services, birth benefits). The *pro-traditional* model (e.g. Germany) is characterised by moderate state support for families and private welfare provision in accordance with the subsidiarity principle. The *pro-family but not interventionist* model (e.g. UK) provides means-tested, limited support.

Later, in her well-known 2002 study, Gauthier analysis trends in family policies in 22 OECD countries by use of two indicators: 1) cash benefits and 2) support for working parents, i.e. duration and payment of maternity and parental leave. Her specific interest lies in convergence, i.e. in whether the countries' family policies have, in the analysed period since the 1970s, become more similar and whether there have been any changes in country clusters. As a starting point and reference period she identifies the following clusters as of the late 1980s and early 1990s.

<sup>&</sup>lt;sup>33</sup> Similarly, and interesting from a policy analysis point of view, Schultheis (1990) distinguished between countries with either *explicit and legitimated, implicit* or *negative* family policy-making (compare for a similar approach also Hantrais 1995). The latter is relevant, since it points to the fact that "the absence of (family) policy is also a policy" (Hiilamo 2002: 148). So called non-decisions (i.e. issues not getting on the political agenda) and negative decisions (i.e. political decisions to not alter the status quo) are a highly interesting, but underresearched phenomenon of political decision-making (Blum/Schubert 2009: 118).

Table 2: European family policy systems about 1990

Policy regime	Overall	Cash support	Support for working	Countries
	Characteristics		parents	
Social-	Universal state sup-	Medium-level	High-level support to	Denmark
Democratic	port, high commit-	cash benefits,	both parents, long	Finland
	ment to gender	high-level other	leave and extensive	Norway
	equality	benefits	childcare facilities	Sweden
Conservative	Employment-related	Medium- to high-	Medium-level sup-	Austria
	state supports,	level cash support	port, long leave and	Belgium
	driven by more		limited childcare	France
	traditional gender		facilities	Germany
	view			Ireland
				Luxembourg
				Netherlands
Southern Euro-	High occupational	Low-level cash	Low-level support	Greece
pean	fragmentation, mix	support		Italy
	of universal and			Portugal
	private benefits			Spain
Liberal	Low-level, need-	Low-level, need-	Low-level support	UK
	oriented support	oriented support	with strong private	Switzerland
	and market forces		sector	

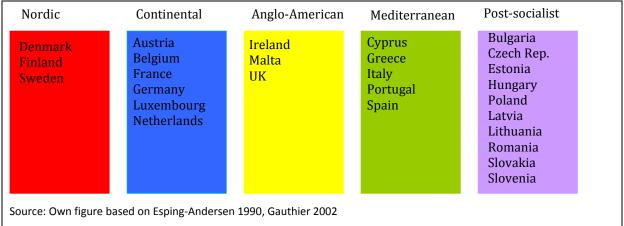
Source: Adapted slightly modified from Gauthier 2002

Interestingly, Gauthier finds from her quantitative analysis that these clusters have only developed from the mid 1980s to the end 1990s, while they were not yet perceivable in the 1970s (Gauthier 2002: 466). This finding surely contests the so called 'frozen landscape scenario': Obviously, welfare states and corresponding typologies *do* change. It gives – in addition to the afore mentioned ones yet another – good reason to assume that the landscape of European family policy systems has since then changed again.

It can be concluded that there exist well-founded and useful typologies for family policy systems, but country groupings differ. The Nordic countries seem to "make the strongest case" (Hiilamo 2002: 143) and to inevitably end up in the same cluster no matter what dimension is examined. Contrariwise, the post-socialist welfare systems are hardly ever structurally integrated into comparative studies, and when they are, tend to spread over all groups. Furthermore, all family policy typologies share a common weakness: The problem of not all EU-27 member states being covered *always* remains. And, methodically speaking, additional countries/clusters cannot simply be put "to an existing cluster analysis without reassessing the overall ratio of the individual elements" (Schubert et al. 2009b: 15). Furthermore, esp. the older typologies, as being static models, most likely do not show a realistic picture of European family policy systems today, after the enlargement and the sometimes path-breaking family policy changes that can be witnessed. Therefore, this report will take

the 'geographical typology' (cf. Esping-Andersen 1990; Gauthier 2002) as its starting point and structural category.

Figure 3: European family policy systems - A temporary solution



Characteristics and dynamics in each family policy type will be analysed in Chapter 3. However, the groupings are used more as a 'guidepost' and heuristic rather than a clear-cut typology and the report will watch out for changes in countries and/or clusters (e.g. after major policy reforms). Prospectively, there is need for a more encompassing and up-to-date typology of European family policy systems.

### 2.3 Family Policy Change – Conceptualisation

While it became apparent that there is an ongoing fluctuation and profound dynamic within the family policy regions in Europe, with some countries seemingly 'switching clusters' (e.g. Germany), and countries reacting very differently to "in a functionalist understanding [...] the same challenges" (Thoenen 2008: 1), the following question remains to be answered: What changes exactly are taking place in state family policies in Europe? This question will be addressed in Chapter 3; yet to answer it, a conceptualisation of what constitutes 'family policy change' and how to measure in what *direction* implemented changes are going, is needed.

Chapter 2.1 summarised the feminist criticism of Esping-Andersen's typology and its neglect of the family's role. The Danish scholar (1999: 51) answered to this criticism and introduced the distinction between familialistic and de-familialising welfare states<sup>34</sup>, defining de-familialisation as "the degree to which households' welfare and caring responsibilities are

<sup>&</sup>lt;sup>34</sup> "A familialistic system [...] is one in which public policy assumes [...] households must carry the principal responsibility for their members' welfare. A de-familializing regime is one which seeks to unburden the household and diminish individuals' welfare dependence on kinship." (Esping-Andersen 1999: 61)

relaxed either via welfare state provision or via market provision". Esping-Andersen (1999: 61) captures the welfare states' degree of de-familialisation by four indicators<sup>35</sup> and in comparatively testing them finds a general congruence with his three worlds of welfare based on the de-commodification index<sup>36</sup>. The distinction between de- and (re-)familialisation will be used in this report to assess the direction of family policy change in the EU welfare systems. Empirically, however, between the two it is "more a matter of degree than of an 'either-or'" (Esping-Andersen 1999: 51). Therefore, it will be derived from the literature whether, with regard to certain issues (e.g. parental leave), major trends within the different family policy regions are *predominantly* de- or (re-)familialising. What is more, it is arguably not even desirable for a welfare system to be *purely* familialistic of de-familialising (e.g. because a latter regime wouldn't permit taking times out from the job to care for children or elderly family members). This argument becomes clearer in consideration of the fruitful further distinction between positive and negative de- or (re-)familialisation (Ostner 2003).

Table 3: Family policies between de- and re-familialisation – Exemplary measures

	(Re-)Familialisation	De-familialisation	
Negative measures	<ul><li>lack/reduction of care services (e.g. for children, elderly, chronically sick)</li><li>lack/reduction of state pensions</li></ul>	<ul> <li>abolition/reduction of derived benefits</li> <li>(e.g. survivor's pensions)</li> <li>individualisation of taxation</li> <li>Shift towards private pensions</li> </ul>	
Positive measures	<ul> <li>care allowances/pensions-credits for non-employed parents</li> </ul>	<ul><li>expansion of care services (e.g. for children, elderly, chronically sick)</li><li>legal entitlement to place in childcare</li></ul>	

Source: Own listing on the basis of Ostner 2003, 2009, Leitner et al. 2004

While negative measures constrain the spectrum of possible ways of living, positive measures increase parents' choices and reconciliation of work and family life (Leitner et al. 2004: 17). On the basis of this diagram, policy change can be "charted as shifts from familialization to de-familialization and vice versa and/or as swings in the logic of measures (from positive to negative ones and, again, vice versa)" (Ostner 2009).

# 3 Major Family Policy Trends

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<sup>&</sup>lt;sup>35</sup> These are 1) overall servicing commitment, 2) overall commitment to subsidising child families, 3) diffusion of public childcare, and 4) the supply of care to the aged.

<sup>&</sup>lt;sup>36</sup> That is: generous, de-familialising family policy in the social-democratic countries; transfer-biased, familialising family policy in the conservative countries (incl. the much less generous southern European countries); and residual state intervention, but some market de-familialisation in liberal welfare states.

### 3.1 Institutional Settings and Regulatory Frameworks

Polities – institutions, norms and regulatory frameworks – according to institutionalist theoretical approaches and path-dependency, substantially limit the scope of action for policymakers and shape future policies<sup>37</sup>. Furthermore, they are very difficult to reform. Then again, neither do polities determine policies nor are they unalterable. The family policy types as discussed in Chapter 2.2 have evolved in the context of distinct families of law, which were identified by Dopffel (1994: 6): The German (e.g. Germany, Austria), Nordic (e.g. Denmark, Sweden), Romanic as influenced by the Code Napoléon/Code Civil (e.g. France, Italy, Netherlands), Anglo-American (e.g. Great Britain) and Eastern European (e.g. Poland, Czech Republic, Hungary) families of law. Gerlach (2010: 369) points out, however, that the regulatory frameworks of family policies in Europe are only partially consistent with these families of law, since moreover they were influenced by the different welfare systems, and by statechurch-relations within the emergence of the nation state. Among comparative family policy analyses, those focusing on family benefits and benchmarking outnumber the ones examining institutions or family law. Of course, typology-building studies often follow an institutionalist approach (e.g. Esping-Andersen 1990; Castles 1993; Bahle 1995), but they tend towards a high level of abstraction and neglecting change or transformations. Yet concerning the latter, family policies have in many European countries quit their weak standing within public policies and become a major area of reform. Thus in the following, the traditional characteristics of the different family policy systems will be shortly described, and contrasted with institutional or regulatory changes. Important studies here, results of which will be revised, are: Hantrais 2004<sup>38</sup>, Cizek/Richter 2004<sup>39</sup>, Ostner/Schmitt 2008<sup>40</sup>, Apple-

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<sup>&</sup>lt;sup>37</sup> De Henau et al. (2006: 145) regarding childcare policies in the EU-15 even state that "the major element determining the conception and design of policies remains the set of prevailing cultural values, social ideas and historical legacies".

Hantrais' book (2004) builds on three collaborative research projects funded by the EC, which she coordinated between 1994 and 2003. The first (1994-96) studied concepts in comparisons of European family policy and the second (1998-99) interactions between socio-demographic change and economic policies across the EU. The third (2000-03) was on "Improving Policy Responses and Outcomes to Socio-Economic Challenges: changing family structures, policy and practice" (IPROSEC). The book's strength is to pay special attention to institutions, family law and family concepts in public administration.

<sup>&</sup>lt;sup>39</sup> Cizek/Richter (2004) is the final report from the EU Observatory on the Social Situation, Demography and the Family at the Austrian Institute for Family Studies and pays some attention to regulatory settings.

<sup>&</sup>lt;sup>40</sup> Ostner/Schmitt (2008) contain eight articles on family policies in the Nordic countries plus the UK, the Netherlands and Germany. As one of the very few they include the rights of children to their analyses.

ton/Byrne 2003<sup>41</sup>, Saxonberg/Sirovatka 2006, Boele-Wölki 2007<sup>42</sup>, Vlaardingerbroek 2002; Council of Europe (2009), the corresponding new database<sup>43</sup> and MISSOC.

To start with, speaking about institutions and law, *European Union* regulations of course impact on national family policies. For example, following the 1996 Council Directive on parental leave (96/34/EC), *all* member states had to change their existing law in one way or other (Falkner et al. 2002). Vlaardingerbroek (2002) points out how common law<sup>44</sup> caused a harmonisation of national family laws and a common trend towards a more flexible and open system of family relations. Due to limited responsibilities, however, the EU mostly addresses family policy via the open method of coordination (OMC), esp. the one on social protection and social inclusion. While there is a growing literature analysing the EU reconciliation/family policy (Weiss 2000; Lewis 2006; Ahrens 2008), the influence of EU hard and soft law on national family policies is a fascinating topic, but only very few studies exist (Lindén 2009). A number of recent studies (e.g. Knijn/Smit 2009) critically discuss an economic bias of EU reconciliation policies and its strong focus on de-familialisation. Many studies acknowledge that the OMC approach is in accordance with the high national diversity described in the following.

Family policies of the *Nordic countries* have been heavily influenced by the Protestant church and left-wing governments. They became gradually focused on gender equality, reconciliation and, esp. since the first oil crisis, female labour market integration through defamilialising policies (Ferrarini 2003). Nordic family policies aim at "promoting the interests of individuals rather than of families as units" (Hantrais 2004: 133) and have no institutionalised family policies with designated ministries<sup>45</sup>. However, an institutional change took place in Denmark 2004, when the 'Ministry of Family and Consumer Affairs' was newly created. Also, none of the Nordic countries mention the family in their constitutions (while e.g. Den-

<sup>&</sup>lt;sup>41</sup> Appleton/Byrne (2003) analyse government-NGO relations in family policy formulation across the EU and ascribe differences to the three factors of party ideology, political culture and political transitions.

<sup>&</sup>lt;sup>42</sup> Boele-Wölki (2007) gives a overview of family law changes as regarding same-sex partnerships in Europe. She applies a juridical perspective, while encompassing policy analyses on this issue are missing.
<sup>43</sup> The Council of Europe Family Database has some considerable strength, e.g. it collects data on often ne-

<sup>&</sup>lt;sup>43</sup> The Council of Europe Family Database has some considerable strength, e.g. it collects data on often neglected areas (e.g institutional frameworks) and exhibits a rarely applied process orientation (e.g. shifts in policy objectives over last decade). It covers 40 European countries, many of them hardly ever included in crossnational comparisons (esp. non-EU/OECD countries). However, when using esp. the qualitative information for research, it should be noted they were provided by national ministry representatives.

<sup>&</sup>lt;sup>44</sup> This was esp. the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR). Its Art. 8 (rights of family life), 12 (right to build a family) and 14 (right of non-discrimination) were interpreted extensively by the European Court on Human Rights and by national courts.

<sup>&</sup>lt;sup>45</sup> It a matter of dispute, however, whether it is more beneficial to family (or other) policies for them being ascribed to a singly ministry or not, for as mentioned earlier family policy is a typical cross-cutting issue.

mark mentions the rights of children). With regard to family law, the Nordic countries are particularly advanced in putting unmarried and same-sex couples on a par with marriage; and e.g. introduced contracts for unmarried cohabitants already in the 1980s (Hantrais 2004: 113). The option of a registered partnership for same-sex couples was introduced in Denmark as the first country in the world in 1989, later in Sweden (1994) and Finland (2002) (Boele-Woelki 2007; Cizek/Richter 2004: 15). The Nordic countries also pay particular attention to the well-being of children (Ostner/Schmitt 2008), and e.g. early introduced joint custody after divorce and promote it as a rule <sup>46</sup>. Legal family obligations are very weak and individual citizens assumed. Family allowances are tax-funded. Governmental-NGO cooperation is strong in Nordic family policies, as e.g. in Sweden "the civil society sector is well integrated, closely coordinates its own sector's work and cooperates with the state in formulating family policies" (Appleton/Byrne 2003: 212).

Family policies of the continental countries have been heavily influenced by the Catholic church and the subsidiarity principle; also being the ideological foundation for Christiandemocratic parties (Borchorst 1994): It holds that the state should only engage in social problems, when the family, church or voluntary organisations fail to solve them. In case of family/work-tensions it basically prioritises the first and takes a sceptical view towards public care (Sjöberg 2004: 109). Family policies are traditionally characterised by male breadwinner/female carer norms. In countries with Bismarckian, earnings-related social security schemes (esp. Austria, Germany), social protection of "women and children may still be dependent on marriage and family relationships" (Hantrais 2004: 117). While, traditionally, few countries adopted explicit and comprehensive family policies (Kamerman/Kahn 1978), conservative countries did comparatively often: Austria, Germany and Luxembourg have longstanding traditions of designated family ministries; France and Belgium are maybe the countries with the most explicit and consistent family policies across Europe (Hantrais 2004: 138). In 2007, the Netherlands created a new 'Minister for Youth and Family', who's task is coordinating without portfolio. Several continental welfare systems prescribe a state protection of the family in their constitutions (France, Germany, Luxembourg). Regarding family law, some countries followed the Nordic example regarding equal treatment of non-married couples, and the majority of countries introduced same-sex registration schemes (e.g.

<sup>46</sup> According to Council of Europe (2009: 58), 17 EU countries have joint custody today (either as the rule or as an option), of which the post-socialist are under-represented. Joint custody doesn't exist in Bulgaria, Czech Republic, Estonia, Lithuania, Romania, Slovakia, and Belgium, Greece, Malta, Luxembourg.

France with its 1999 pacte civil de solidarité) (Boele-Wölki 2007). Family allowances are typically mixed-funded from contributions and taxes. Governmental-NGO cooperation is ambivalent in many continental countries: While the civil society sector has a strong role in policy implementation (cf. subsidiarity principle), its role in agenda-setting and policy formulation is quite weak (Appleton/Byrne 2003).

The Anglo-American countries (Ireland, Malta, UK) share common ground in weak state intervention, need-oriented support and high role of the market, but differ in others. Malta and Ireland have stronger familialist traditions than the UK. Ireland prescribes family protection in its constitution and has a designated ministry for family policies. Also with regard to family law, e.g. divorce was made legal in Ireland only in 1996 (Hantrais 2004: 110), and is still illegal in Malta today (as the only EU country). Ireland planned since 2007 to introduce a legislation similar to Britain's civil partnership law (Boele-Wölki 2007), and published the bill in summer 2009. At large, family relationships are not strictly regulated in the liberal systems but neither are duties of the state, leading to a heavy reliance on the private and voluntary sectors (Hantrais 2004: 129). Since social welfare is in individual responsibility and the benefits directed at means-tested minimum coverage, family policy is not explicit and comprehensive, but part of general welfare policies like antipoverty programmes or social housing (Rüling/Kassner 2007: 22). Family allowances are tax-funded in Ireland and the UK, while Malta, being a hybrid case in several respects, exhibits mixed-funding. Governmental-NGO cooperation is less integrated than in the Nordic countries, but e.g. in the UK with family policy developing into a more specific policy in the 1990s, some civil society organisation were called on by the state for expertise and have since then been quite tightly integrated (Appleton/Byrne 2003).

The *Mediterranean countries* share similarities with the continental systems in male breadwinner/female carer traditions and Catholic influences. With regard to family law, the Mediterranean countries legally assign mutual obligations to the extended family<sup>47</sup> and the state only supports on a low level, when these sources are exhausted (Hantrais 2004: 129). State duties to protect the family are prescribed in the national constitutions of Greece, Italy, Portugal and Spain. Authority, however, is often delegated to the local and regional level, leading to regional discrepancies (Hantrais 2004: 144). The overall approach is rather fragmentary; e.g. in no Mediterranean country a designated ministry for family policy exists,

<sup>47</sup> This is e.g. apparent at Cyprus, where "the family and informal support networks have always offered, and continue to offer, the core care and support" (Republic of Cyprus 2004: 40; cf. Shekeris et al. 2009).

but in 2006 Italy created a coordinating 'Department for Family Policies'. Spain makes a case for institutional and legal reforms: Under the social-liberal coalition in 2005 it eased the divorce law and also took the lead regarding civil unions (Bertelsmann 2008). Portugal only de facto recognises same-sex partnerships (without registration), in Italy a 2007 draft bill failed and Greece, Malta and Cyprus currently undertake no legislative activities (Boele-Wölki 2007). Regarding family allowances, the Mediterranean countries have taken different paths – with tax-funding in Spain, Portugal, Cyprus and mixed-funding in Greece, Italy – but share the similarity of being underfunded. Governmental-NGO cooperation is weak and, in the context of a rather uncoordinated policy approach, NGOs don't contribute to policy formulation, with some exceptions: e.g., NGOs have a stronger role on Spanish regional levels and the Catholic church constitutes a bridge between NGOs and government in Italian family policy formulation (Appleton/Byrne 2003).

The post-socialist countries make most interesting cases, since they repeatedly reached 'fundamental junctures' and implemented dramatic institutional shifts: Before WWII, the Central European Countries in particular were based on the conservative Bismarckian model and their family policies showed all signs of familialism. Then with restructuring since the 1990s, following an employment-centred, universal welfare provision during the socialist era, some features exhibit path-dependence from this time<sup>48</sup>, while predominantly there is institutional redesign. Case studies have shown that all former communist countries - to differing degree – quit the path of de-familialisation and "tried to reintroduce the traditional familization regime [...] as they move back toward the path of re-familization" (Saxonberg/Sirovatka 2006: 186; Hantrais 2004). Some countries implemented implicit negative refamilialisation (through welfare state retrenchment and market-liberal policies), others explicit positive re-familialisation (trough policies supporting women to leave the labour market to raise their children). Some constitutions mention protection of the family (Hungary, Estonia, Latvia, Poland). Designated ministries exist in Romania, Slovenia, Slovakia (MISSOC 2008) and also Latvia, where it was created in 2004 "with increasing perception about importance of the family policy" (Cunska/Muravska 2009). Legal obligations of extended families are strong, while state duties are weak and no explicit or coherent family policies exist. Regarding same-sex partnerships, Eastern Europe lags behind and only Slovenia, the Czech

<sup>48</sup> To given an example, Trumm/Ainsaar (2009: 154) describe for Estonia how "the legacy of the 'state-socialist welfare traditions' has made a remarkable imprint on the current social policy system [...], e.g. prevalence of employers' contributions in social policy funding, relatively developed system of child care."

Republic and Hungary have such legislation (Boele-Wölki 2007). Family allowances in all post-socialist countries are tax-funded and underfunded. Governmental-NGO cooperation is affected by the latter being outlawed under Communism, and by the Catholic church often holding a monopoly over NGOs after its collapse. Cooperation is developing, but faces obstacles as the preoccupation with economics and the "legacy of social dissatisfaction with state intervention in family life" (Appleton/Byrne 2003: 217).

Concluding, it can be stated that the Nordic and Anglo-American countries have less explicit family policies than the conservative, Mediterranean and post-socialist ones and unlike them don't protect the family as a social unit with their constitutions. Hantrais (2004: 143) assumes that a constitutional protection of the family might restrain progressive reforms. Regarding same-sex partnerships, 13 of 27 countries had introduced a statutory registration scheme in 2007, with rising tendency (Boele-Wölki 2007). In 2009, only ten out of 27 EU countries had designated family ministries (MISSOC), the trend, however, going slightly upwards. The Council of Europe (2009: 20) found that among the EU-27, in 22 countries family policy is coordinated by one main institution (frequently a ministry, though mostly no designated *family* ministry), and in only five countries it is made by various institutions (Belgium, Denmark, Greece, Ireland, Latvia).

# 3.2 Leave Policies<sup>49</sup>

Policies aiming to support working parents with care responsibilities can be traced back to the end of the 19<sup>th</sup> century when some European countries developed limited maternity leave and corresponding pay schemes (Gauthier 2000: 3). These arrangements basically intended to protect the health of the mother and the newborn child and were often short and low paid. Nevertheless, care responsibilities of working mothers were for the first time considered by law. A substantial improvement in the maternity leave systems in Europe was made during the 1960s and 1970s. The Nordic countries adopted a more gender egalitarian perspective in the sense that they transformed maternity leave into a gender-neutral parental leave. The reforms in most other countries were in fact less extensive, but included at least the expansion of periods of maternity leave and the increase of payment. Since the 1970s and 1980s, there has been a significant growth and diversification of leave policies

<sup>&</sup>lt;sup>49</sup> This chapter focuses on leave policies for working parents and others with care responsibilities. Leave policies available to the whole population (without care responsibilities), such as career breaks or time accounts will not be covered.

throughout Europe. Besides maternity leave, most of the Northern and central European countries have adopted some system of parental leave – a development which was fostered in southern Europe (Italy, Spain, Portugal) one decade later in the 1990s (Gauthier 1996: 77f). Several countries additionally have developed childcare leaves between one and three years following the maternity or parental leave period and being paid at flat rate. In the 1990s – with the Nordic countries as path-breakers – a few countries have adopted paternity leave as leave entitlement for fathers only. This was the policy response on the very low share of parental leave by men, intending to increase the involvement of fathers in childcare and to facilitate gender equality on the labour market. Furthermore, nearly all European countries offer at least unpaid time off to care for a sick child. At the end of the 1990s, most European countries had developed a range of different types of leave for working parents and others with care responsibilities. The trend of increasing leave time was accompanied by the expansion of part-time work. With the Nordic countries being pioneers again, in several countries working parents gained rights to reduce working time (Morgan 2008: 3).

As has been illustrated, leave policies have been an area of great dynamics over the past decades. The expansion of leave arrangements in almost all European countries reflects economic and demographic motives of policy-makers as well as the political pressures on governments to support parents in balancing work and family life (Morgan 2008). Hence in most countries, parents and other persons with care responsibilities are entitled to a range of different types of leave. Nevertheless, within Europe there are considerable variations concerning the structure and the wording of these arrangements related to the country's political objectives. In the following paragraphs, the four most common types of leave arrangements within Europe (i.e. maternity leave, paternity leave, parental leave and leave for sick children) will be introduced and described in a comparative way. As already mentioned, the 'geographical typology' with its five regions (i.e. Nordic, continental, Anglo-American, Mediterranean, post-Socialist; cf. Figure 3) is used as the structural category in this report. Table 6 (Annex) summarises the existing leave entitlements referring to this typology as well as to every country within EU-27. The main source for this comparison is the review of the International Network on Leave Policies and Related Research (Moss/Deven 2009).

## Maternity leave

This type of leave is understood to be a health and welfare measure as it focuses on protect-

ing maternal and infant health. For that reason, it is limited to the period just before and after birth and available for mothers only. Almost all European countries provide that kind of leave for working mothers. Albeit in a number of countries (Iceland, Norway, Portugal, Sweden), the available leave around the child's birth is not restricted to women. Maternity leave is in some countries obligatory (e.g. Austria, Germany, Italy). The period of maternity leave in general varies from 14 to 20 weeks with earnings-related payment between 70 and 100 per cent. Extended leave periods are provided only in some countries (Czech Republic, Hungary, Ireland, UK) (Moss/Deven 2009: 82f).

## Paternity leave

Paternity leave is available for fathers only. It entitles fathers to take a period of leave immediately after the birth of a child. This type of leave intends to support the mother and give fathers the opportunity to get into life with a newborn child. Interestingly, Portugal is the only country making paternity leave obligatory. Usually, paternity leave periods vary from two to ten days with earnings-related payment on the same basis as maternity leave. Extended periods are provided in Finland, Slovenia and Spain. As in some countries parental leave includes a period reserved only for fathers (father's quota), the distinction between paternity leave and parental leave for fathers is obviously blurring.

#### Parental leave and childcare leave

Parental leave is available equally for mothers and fathers. It can be structured in two different ways: either as a non-transferable individual right with an equal amount of leave or as a family right, which parents can divide between themselves as they choose. According to the EU Parental Leave Directive, all member states must provide at least three months parental leave per parent. This directive does not specify further requirements regarding payment or flexibility (Moss/Deven 2009: 84).

Concerning the length of parental leave periods, there is a wide range within Europe. Nevertheless, the countries can be clustered into those providing about nine to 15 months and those providing up to three years (Table 6). There is also much heterogeneity in whether it is a family or individual entitlement or a mixed model. Most countries provide some element of payment though it varies considerably in its level. In many countries the payment is earnings-related, either pitched at more than 50% of earnings or at full earnings with a

maximum ceiling (except Slovenia as the only country with no upper limit). Besides Slovenia, also in Denmark, Norway, Sweden and Hungary the payment is comparably generous. By contrast, in several other countries the parental leave benefit is paid at flat-rate, low earnings-related rate, means-tested or for only part of the leave period (e.g. Belgium, Italy, Netherlands, Poland). Some countries (e.g. Austria, Czech Republic, France, Germany) provide a general 'childrearing' benefit paid to all parents with young children and not only to those taking parental leave.

Some countries provide a further period of leave, usually referred to as 'childcare leave'. It is to be taken immediately after parental leave and intends to support parents in fulfilling their care responsibilities. Parental leave and childcare leave are creating a continuous period of leave, sometimes with different conditions concerning payment. In five countries (Estonia, Norway, Portugal, Hungary and Finland), additional childcare leave can be taken after the parental leave period. In Estonia, Norway and Portugal it is unpaid, in Hungary and Finland there is a (relatively low) flat-rate benefit.

## Leave for sick children

Among EU member states, referring to the EU parental leave directive as a legal basis, there is a statutory leave entitlement for urgent family reasons in cases of sickness or accident. In general, this type of leave is rather unspecified. Some countries provide explicitly an entitlement to leave to care for sick children. In these cases, leave is paid at a high level of income (except Italy). The length of leave is in some cases related to the age of the child and usually decreases as the child gets older (e.g. Hungary, Italy). Most of these countries provide a leave entitlement of about ten days to care for sick children.

#### 3.3 Care Services

Childcare has been one of the crucial topics and reform areas of family policies in the EU during the last years, being increasingly regarded a vital reconciliation element that contributes to multiple goals<sup>50</sup> (e.g. regarding female employment, gender equality, birth rates, early learning). An important impetus for this certainly was the Barcelona European Council of March 2002, where two important targets for the quantitative improvement of childcare

<sup>&</sup>lt;sup>50</sup> Naturally, predominant motives differ between countries and hence do respective policies, e.g. regarding policy mixes between financial allowances, time facilities and services (Plantenga/Remery 2009: 8).

provisions were adopted<sup>51</sup>. Other drivers were the OECD's research into PISA, "Starting Strong" and "Babies and Bosses", which pointed up the importance of early childhood education and care (ECEC) policies also to many countries, which traditionally stress the care rather than the education dimension of childcare facilities. Until today, EU countries differ substantially with regard to decisive childcare features as coverage rates, affordability, quality etc. And compared to childcare, care services for other people still come second in political as well as academic attention. The most important information on care service situations in EU countries stem from publications funded by the EU and OECD: Plantenga/Remery 2005, 2009<sup>52</sup>; Da Roit/Sabatinelli 2007; OECD 2007a; Eurostat 2009a<sup>53</sup>; Lohmann et al. 2009<sup>54</sup>. In this chapter, however, the main focus is not on the characteristics of the national care service systems (which are shortly reviewed here and more detailed in the existential field report on "Social Care and Social Services"), but on the policy processes and state family policy perspective. Important policy analyses literature focusing on processes and explanations are: Henau et al. <sup>55</sup> (2006), Jensen (2009), Szelewa/Polakowski (2008).

To start with, Table 7 on the "use of formal childcare services in the EU-25 (2006)" from Eurostat (2009a) has here been arranged in order of the identified family policy systems (on which as observable they only partly depend). It shows that childcare services for under three year olds<sup>57</sup> (U3) are particularly developed in the Nordic countries, esp. Denmark (73%) and Sweden (44%), but also in the Netherlands (45%) and Belgium (40%). Con-

<sup>51</sup> "By 2010, Member States should provide care facilities to cover, first, at least 90 per cent of children aged between three and the age at which compulsory schooling begins and, second, at least 33 per cent of children below three years of age."

<sup>&</sup>lt;sup>52</sup> The Plantenga/Remery (2009) report was issued by the EC's Expert Group on Gender and Employment Issues and gives information both on qualitative and quantitative provision of childcare services in the EU-27(+). It is based on recent EU-SILC data (statistics on income and living conditions), which since 2007 contain harmonised statistics on the provision of childcare services.

<sup>&</sup>lt;sup>53</sup> This recent book brings together data around reconciliation (e.g. childcare, leave, working flexibilities).

Lohmann et al. (2009) is a report from a project initiated by the EU Government Expert Group on Demographic Issues and develops a framework for assessing national family policy performance.
 Henau et al. (2006) presents results of the MOCHO project (The Rationale of Motherhood Choices: Influence

<sup>&</sup>lt;sup>55</sup> Henau et al. (2006) presents results of the MOCHO project (The Rationale of Motherhood Choices: Influence of Employment Conditions and of Public Policies), funded by the EC's fifth framework programme.

<sup>&</sup>lt;sup>56</sup> In some countries, other arrangements like professional childminders or informal solutions (e.g. grandparents) are crucial. They can be used parallel to formal care, esp. when this is insufficient. They are esp. important (more than 35%) in Mediterranean (Cyprus, Greece, Italy, Portugal) and post-socialist (Lithuania, Hungary, Poland, Slovenia) countries and Ireland, Netherlands, Austria, UK (EU-SILC 2006). Due to data problems, only formal childcare will be looked at here, but "for a correct interpretation of these data the availability of informal arrangements also has to be taken into account" (Plantenga/Remery 2009: 29).

<sup>&</sup>lt;sup>57</sup> Most countries differ between care services for under three year olds and for children between the age of three and school entry – and so do most statistics (as well as the Barcelona targets). And yet there are exceptions, e.g. French *crèches parentales* are provided for under four year olds and Italian *scuola maternal* is for children aged three to six (Lohmann et al. 2009: 68).

versely, deficient formal systems with less than 10% of under three year olds cared for can esp. be found in post-socialist Czech Republic (2%), Hungary (8%), Poland (2%), Lithuania (4%), Slovakia (5%), but also in Austria (4%) and Malta (8%). Care systems for children from the age of three to mandatory school age are everywhere more expanded, with rates of the Barcelona-envisaged 90% and more reached in Denmark, Sweden, Belgium, France, Germany, Ireland, Italy and Spain. Noticeable low numbers of less than 60% exist in Malta (57%), Lithuania (56%) and esp. Poland (28%). Regarding opening hours it can be stated that part-time exceeds full-time esp. in conservative Austria, Germany, Netherlands, but also liberal Ireland, Malta and UK — revealing also institutional traditions and cultural norms. Overall, full-time care is more common for the older age group than the younger one.

While quantity of childcare is one issue, another one, which often comes second but is arguably even more important, is quality. While esp. for national studies qualitative information are vital (e.g. parents' satisfaction with services), quantifiable data like staff-child ratios or education of nursery-school teachers prevail in international comparisons (Lohmann et al. 2009: 72). The OECD Family Database contains information on both indicators. Plantenga/Remery (2009: 43-47), building on 2008 national reports, give data for all EU-27<sup>58</sup>. Regarding staff-child ratios, the national reports show that there are again considerable differences throughout Europe: For the U3 group, some countries as Denmark (1:3) or UK (1:3) show an acknowledged staff-child ratio, while others as Italy (1:7 to 1:10) or Germany (1:6.4) exhibit non-favourable proportions. 59 Some countries just give average ratios, which are not distinguishable for different age groups, but in need of improvement in either case, e.g. Czech Republic (1:12-13), Greece (1:18.5) or Poland (1:15). Similar diversity exists with regard to the educational level of childminders and pre-school teachers: Plantenga/Remery (2009: 45) state that particularly low educational levels seem to exist in Belgium, Germany, Netherlands and UK. Furthermore they, as also the OECD (2006) "Starting Strong" review, criticise that there are considerable gender imbalances in the childcare staff, also somewhat related to the personnel in many countries being educated and paid significantly less than school teachers. Moreover, staff qualification tends to differ between different childcare

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<sup>&</sup>lt;sup>58</sup> Yet they point out the "severe lack of harmonised statistics" (Plantenga/Remery 2009: 8) on childcare quality; as well as on affordability and (cultural) attitudes towards formal childcare. De Henau et al. (2006: 135) also give staff-child ratios for EU-15 countries.

<sup>&</sup>lt;sup>59</sup> Fiene (2002) stated that for infants there should be a staff-child ratio of 1:3 and two staff members per group, while for preschoolers the staff-child ratio should be 8:1.

institutions within countries, and e.g. private childminders working from home "usually have a significantly lower level of education" (Plantenga/Remery 2009: 45).

Both quantity and quality<sup>60</sup> of childcare relate to national policy priorities, one indicator for which is social expenditure on childcare (Lohmann et al. 2009: 70), captured in Table 9<sup>61</sup>. Data show that while Nordic countries and UK spend more on the 0-2 than the 3-school age group, many countries exhibit an allocation clearly to the disadvantage of the younger age group (esp. Hungary, Poland, Portugal, Slovakia). Furthermore, it can be observed that the Nordic countries and France spending more than 0.9% of their GDP on childcare raise the EU-27 average to 0.57%, while particularly low spenders are Austria (0.3%), Ireland (0.26%), Greece (0.13%) and Poland (0.29%). These cases show that low spenders can be found among all 'family policy systems' and counter-examples exist everywhere, e.g. with conservative Belgium (0.79%), Malta (0.6%), Italy (0.61%) and Romania (0.76%) spending quite much on childcare as compared to their neighbouring countries (though not as compared to the Nordic welfare states).

However, not the status quo and stocktaking is of main importance here, but from a policy process point of view the reforms and expansionary/retrenchment measures conducted over the last years as well as policy challenges. Continuous data for all EU-27 are provided by new EU-SILC statistics<sup>62</sup> (Table 10) and show that some countries make expansion efforts for the 0-2 sector, e.g. raising full-time care between 2005 and 2007 in Belgium from 19 to 23%, in Luxembourg from 8 to 14%, in Ireland from 6 to 11% or in Slovenia from 22 to 27%. Often, however, these don't seem to be additional places, but former part-time places now expanded: From the just named countries and during the same time-span, part-time places decreased in Belgium, Luxembourg and Ireland, but not in Slovenia. Full-time places

<sup>60</sup> Also important is childcare affordability and costs division between state, parents and employers. Comparatively assessing this is complicated since financial structures are complex and childcare is subsidised through very different measures (e.g. direct payments, tax reductions, vouchers), as Plantenga/Remery (2009: 48) state. They nonetheless, drawing on national reports, divide between three clusters: Those with a low parental costs share of less than 25% (e.g. Sweden, Hungary, Austria, Germany), those with a mediocre share of about 40% (e.g. Portugal) and those with a very high parental share of more than 75% (e.g. UK, Poland). More specific country information are given in Eurostat (2009a: 60-61), but these are not in a narrow sense comparable, as is an OECD report, which uses the concept of net childcare costs (Immervoll/Barber 2005). Comparative data on the costs share of employers would be desirable.

<sup>&</sup>lt;sup>61</sup> Lohmann et al. (2009: 70) point out that these data are not unproblematic, since there are indications to underreporting, thus actual national spending on childcare might lie higher and furthermore, employers' investments may not be included. This is an example of a data gap to be filled.

<sup>&</sup>lt;sup>62</sup> EU-SILC (Statistics on Income and Living Conditions) has since 2003 replaced the European Community Household Panel (ECHP).

offer more choice to parents, but sometimes it seems this does not mean that the overall number of places is increased.

On the other hand, these 2007 data might not sufficiently reflect expansionary efforts: Plantenga/Remery (2009) analyse childcare provision achievements in EU countries and come to more promising results than these numbers show. They state that while the Nordic countries, Belgium, France and Slovenia have a high level of availability and direct efforts at enhancements, the UK, Netherlands and Germany "are clearly moving towards a fuller coverage of childcare services" (Plantenga/Remery 2009: 58). Germany set a very concrete and ambitious aim of reaching a U3 childcare rate of 35% until 2013, requiring an annual increase of 70000 new places from 2008. For Luxembourg, Portugal, Italy and Spain, Plantenga/Remery discover expansionary trends as well, though at more moderate pace; as holds true for Greece and Austria (from very low starting points). Yet for Cyprus, Estonia, Ireland, Latvia and Malta, they describe developments as "extremely limited – perhaps virtually non-existent" (Plantenga/Remery 2009: 59). Finally, Hungary, Slovakia, Czech Republic, Lithuania, Poland<sup>63</sup>, Bulgaria<sup>64</sup> and Romania experienced major downward trends during the 1990s and it differs in how far they strive for re-expansion: While e.g. strong efforts to increase childcare are discernible in Hungary, in the Czech Republic, Lithuania or Slovakia policies remain in line with female carer norms. Thus, there is an overall trend of defamilialisation through childcare expansion, from which a number of (mainly CEE) countries have to be excluded.

This de-familialisation trend, however, is recently in some places accompanied by another, which Mahon (2002) detected for France and Finland and called 'new familialism'. Its emphasis is on parental choice "between (temporary) homemaker status and paid employment" (Mahon 2002: 350) and the primary policy instrument to achieve this is a home care allowance. Both Finland and France introduced such flat-rate home care allowances in the mid 1980s, Norway (1998) followed and recently Sweden (2008) and Germany (from 2013)<sup>65</sup>. Quite interestingly, explanations at the politics level are similar: The Finnish allow-

<sup>63</sup> Siemieńska/Domaradzka (2009: 391) describe this drastic process for Poland: "Between 1990 and 2003, the number of places in nurseries decreased by 75 per cent."

<sup>&</sup>lt;sup>64</sup> As Stoilova (2009: 72) points out, family policy priorities in Bulgaria are nonetheless much more directed at public childcare facilities than at childcare allowances, which are the lowest in the EU.

<sup>&</sup>lt;sup>65</sup> Actually, also the Austrian parental leave regulation, the *Kinderbetreuungsgeld* (childcare allowance) can be counted among these. It was introduced in 2002 as a positive re-familialising measure and has been reformed several times since then, so as to offer parents the choice between different length and corresponding pay-

ance "was introduced as part of a compromise package combining the care allowance for those who wished to stay home with a guarantee of the right of a child to a place in municipal child care for those who wanted it" (Mahon 2002: 351). The situation in Germany was very much the same <sup>66</sup>: In 2008, Conservatives esp. from the Bavarian Christian Social Union only supported the introduction of a right to childcare from the age of one year in exchange for a parallel introduction of a home care allowance (Ahrens/Blum 2009). One the one hand, there is severe criticism of home care allowances, e.g. preventing female employment, minimising equality of educational opportunities etc. (OECD 2007a). On the other hand, care allowances as measures of positive re-familialisation could together with measures of positive de-familialisation indeed increase parental choice (Table 3). The challenge is how to rebalance time, money and services (Plantenga/Remery 2009: 60) into a consistent system opening up different opportunities according to individual circumstances and preferences.

## **Challenge: Consistency of childcare systems**

Family policies and esp. childcare systems often consist of various different policy instruments that have emerged over time and might altogether not result in a consistent system. For example, "the period of leave [...] is not in all cases attuned to the provision of childcare services" (Plantenga/Remery 2009: 65). The German Family Ministry in 2006 set up a competence centre of six academics from different disciplines. They are supposed to systematically examine family-related services and benefits in international comparison and on this basis to suggest policy changes.

Statutory entitlements to childcare – which Lohmann et al. (2009) rightly commend as an important assessment indicator for family policy – get slowly but surely on national policy agendas (as far as fragmentary data show<sup>67</sup>). Finland is the only EU country with a legal right to *all* children not yet of schooling age (OECD 2007a: 160). In Sweden, working parents have an entitlement to childcare and since 2002, non-working parents have a right to part-time care (Dörfler 2007). Denmark introduced a legal right to children six months and older in 2006 (Plantenga/Remery 2009: 40). Since 2009, Norwegian children have a right to day care

ment heights. From 2010, these also contain an income-related version of twelve months plus two partner's months, similar to the German regulation.

However, while explanations are similar, starting positions of these countries are very different: While for Finland, the care allowance has been rated as a "break with the egalitarian ideals of the 1970s" (Mahon 2002: 351) from an already high level of de-familialisation, positive de-familialisation efforts were only starting in the traditionally familialist German system.

<sup>&</sup>lt;sup>67</sup> Bennett (2008) gives an overview on selected OECD countries. For policy analyses, however, it's not only interesting to know whether entitlements exist, but also to know about the dynamics behind (e.g. when, by whom or against which resistance they were introduced) and about the real-life consequences (e.g. are all demands satisfied, are they part-time or full-time entitlements).

from the age of one year, as will be the case in Germany from 2013. From April 2006, children in the UK are entitled to part-time care from the age of three to school age. In France, entitlement to childcare was a topic in the run-up to the 2007 Presidential elections, and implementation was set for 2012 (Plantenga/Remery 2009: 58). Often, however, the right is only to part-time care. Some countries have not only introduced a right to childcare, but made the last pre-school year compulsory and free of charge. This has been e.g. the case in Austria (from 2010), Poland (2011) and Cyprus (2004), Luxembourg and Hungary (Eurostat 2009b).

Regarding explanations for the varying childcare situations and expansions, Jensen (2009) or Szelewa/Polakowski (2008) made valuable contributions. Jensen analysed for 16 OECD countries the causes of varying childcare expansion, which interestingly he identified in the institutions, namely different curriculum traditions<sup>68</sup>: Countries with a readiness-for-school-curriculum (UK, Italy) have expanded provision significantly more than countries belonging to the social-pedagogical-curriculum tradition (e.g. Germany, Finland) (Jensen 2009: 7). However, Jensen uses data from 1997 to 2003 and newer developments might challenge his hypothesis (e.g. ambitious expansionary efforts in social-pedagogical Germany vs. low expansionary efforts in ready-to-school Ireland). Szelewa/Polakowski compare childcare policies in CEE countries by four dimensions<sup>69</sup> and relate the astonishingly different dynamics and changes to these countries belonging to four different clusters<sup>70</sup>: e.g. the Czech Republic shows an 'explicit familialism', in which the state actively supports the traditional family model (e.g. through generous leaves, but limited childcare), while Hungary has 'comprehensive support' for families and thus offers them freedom of choice (e.g. through generous leaves and extended childcare).

In the context of reconciliation, there is an apparent focus on childcare rather than care for persons other than children. This is somewhat surprising, since the latter raises similar, but different problems to the reconciliation of work and family life and will increasingly do so in the future due to population ageing. Again, detailed information on care needs and arrangements will be given by Existential Field Report 6, but some issues are important here

<sup>&</sup>lt;sup>68</sup> Bennett (2005) differs the readiness-for-school-curriculum tradition, emphasising cognitive goals (e.g. mathematical skills) and basically relying on preschool teachers, and the social-pedagogical-curriculum tradition, emphasising children's overall development (e.g. social skills) and relying on pedagogues.

<sup>&</sup>lt;sup>69</sup> These four dimensions are extensiveness of childcare services, quality of childcare services, generosity of parental leave, and its universality (Szelewa/Polakowski 2008: 118).

<sup>&</sup>lt;sup>70</sup> These are implicit familialism (Poland), explicit familialism (Czech Republic, Slovakia, Slovenia), comprehensive support (Lithuania, Hungary), female mobilizing (Estonia, Latvia).

from a family policy point of view. Kröger (2001: 13)<sup>71</sup> states that "for several decades, the policy emphasis has been distinctively on deinstitutionalization and community care". Only at the end of the 1980s, long-term care was institutionalised as a discrete policy area in most European countries (Blome et al. 2008: 172): Thus there were trends in the 1990s of public responsibilities accruing in a field, where familial care or sometimes inclusion into general health insurance were predominant in all EU countries except of Scandinavia. An example is the 1994 introduction of a long term care insurance in Germany. Nonetheless, Kröger's above statement of deinstitutionalization in elderly care policies applies, as - somewhat opposed to childcare - an expansion of residential care facilities is not considered a suitable solution to rising care needs, since elderly people should be able to stay in their familiar surroundings and residential homes are criticised for being cost-intensive and of inferior quality (OECD 1996). Blome et al. (2008: 173) identify three key aspects deciding on in how far families are unburdened from long term care work: 1) the regulatory framework, i.e. care services as a social right as in the Nordic countries or as a duty of the wider family as in most Mediterranean countries (cf. Chapter 3.1), 2) care allowances for family members, 3) availability and access to public care services, their affordability and quality.

The OECD (2005) analysed latest trends in long-term care policies in 19 OECD countries and gave most interesting information on differences and similarities in public/private expenditures, quality of services or current reform issues. However, the term 'family policy' was not mentioned once in the report (which is just exemplary for research on elderly care). It is problematic that elderly care policies in stark contrast to childcare policies are to date not systematically integrated into family policy analysis. This problem is intensified by two state family policy challenges emphasised above, namely the lack of 'family mainstreaming' and 'policy consistency': Since policy goals, instruments and outcomes are strongly interconnected between both policy fields, comparative research into these connections would be very useful.

#### 3.4 Cash and Tax Benefits

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<sup>&</sup>lt;sup>71</sup> Kröger (2001) conducted a state of the art report on comparative research on social care in a EC funded project and gives a comprehensive overview on research to that date. He states that during the 1990s there were a number of comparative research projects esp. promoted by the EC (e.g. 1999) and the OECD (e.g. 1999), but that they are limited by the lack of reliable quantitative data.

Picking up on the different family policy motives outlined in Chapter 1.1, cash and tax benefits for families primarily follow economic and socio-political motives: Families perform valuable benefits for society and have higher costs, lower earnings capacities (due to care obligations) and often higher poverty risks than households without children (Lohmann et al. 2009: 78). Based on Gauthier (1999), one can distinguish between different approaches to international comparisons of family benefits<sup>72</sup>, esp. expenditure-based or family-type studies. While studies of the first approach analyse public social expenditure data (e.g. Bahle 2008; Gabel/Kamerman 2006; Gauthier 2005<sup>73</sup>; Kamerman/Kahn 1997b), those of the second provide information on benefits for different family types (e.g. Bradshaw 2006; Bradshaw/Mayhew 2006; OECD 2007a). Both approaches have their specific advantages and weaknesses<sup>74</sup> and will in this chapter both be reviewed to combine perspectives. In general, the data basis on family tax benefits is poorer than that on cash benefits, as also criticised by the OECD (2007a) when providing comparative data on this issue<sup>75</sup>. Analyses were conducted by Adema (2009), Apps/Rees (2004); Dingeldey (2001). Additional important publications reviewed in this chapter are: Council of Europe (2009); Lohmann et al. (2009); Plantenga/Remery (2005).

Tying in with the preceding chapter on 'care services', esp. the OECD (2007a) has researched the family spending proportions of cash, services or tax measures.

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<sup>&</sup>lt;sup>72</sup> All in all, she differentiates between six types of general family policy comparative studies on the basis of their methodology, i.e. institutional comparison, expenditure-based, indicator-based/average family, family type, scenario-based, and component-based analyses.

<sup>&</sup>lt;sup>73</sup> Gauthier (2005) using OECD data analyses UNECE (UN Economic Commission for Europe) countries' family policies and initiatives since 1994, esp. financial assistance and support to working parents.

The expenditure-approach popularised from Wilensky (1975) allows for large-scale comparisons with standardised, up-to-date data, but has been repeatedly criticised for neglecting qualitative differences and individual measures as well as sometimes comparing 'apples and oranges' (cf. Lohmann et al. 2009: 80). The family-type approach's strength is to illuminate differences in the granting of individual benefits between family types and countries, but the classification of family types can be arbitrary (Gauthier 1999) and comparisons are restricted with regard to countries and years covered.

<sup>&</sup>lt;sup>75</sup> The OECD highlights that in contrast to cash and in-kind-benefits, on which national statistical offices largely provide information, information on tax benefits are often estimated by tax authorities.

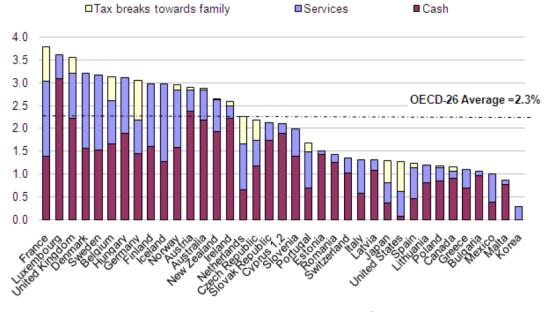


Figure 4: Family spending in cash, service and tax measures (2005)

Source: OECD Family Database; in per cent of GDP.

As the figure shows, most countries spend more in cash benefits than in services or tax benefits; though as Gabel/Kamerman (2006: 261) state, the "growth of in-kind benefits has outpaced the growth of cash benefits in several countries and the role of tax benefits is growing". De Henau et al. (2006) formulated the 'childcare triad hypothesis', i.e. countries clearly privilege either public childcare, leave policies, or cash and tax benefits rather than offering mixed support. Among EU countries, service ratios lie higher in France, Denmark, Italy and Spain. Tax benefits for families are of considerable size esp. in Germany and the Netherlands, but also in France, Belgium and the Czech Republic.

Cash benefits, in the majority of countries the (financially) most important family policy measures, are reviewed first in this chapter. Among these, the OECD Family Database distinguishes child/family allowances, parental leave payments (reviewed in Chapter 3.2), support for single parents, and public childcare support through earmarked payments to parents. Of course, families also profit from social insurances or housing benefits, but these are not discussed here to keep the focus narrow. Child/family allowances exist in practically every EU country (Plantenga/Remery 2005: 67), while their levels vary considerably. Figure 5 shows family allowance variation across Europe for families with one, two and three children.

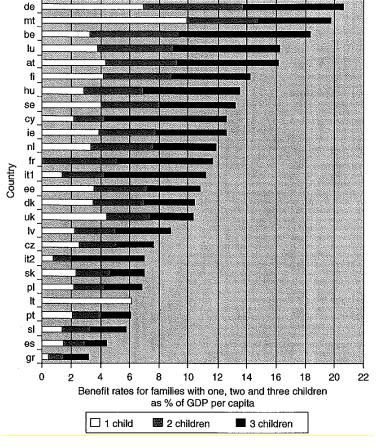


Figure 5: Variations in family allowances across Europe (2004)

Source: Bahle 2008: 111 (calculations based on Eurostat and MISSOC)

Regarding trends in family allowances, Gauthier (2005) using OECD data finds that during the 1990s, in most countries family cash benefits expenditures as a per cent of GDP decreased: Of 24 countries, only Germany, Italy, Luxembourg, Spain, Switzerland and Turkey spent more in 1998 than in 1993. Especially for the CEE countries, she describes downward trends in the years immediately following the collapse of the socialist regimes<sup>76</sup>, but a gradual restoration trend since then. Gabel/Kamerman (2006: 240) analysing family allowances trends in 21 OECD countries from 1980 to 2001 (and thus using slightly more current data) also state that in many countries "spending on children and families declined in the 1990s, but in most of these it has since then recovered". OECD SOCX data, which are now available until 2005 and displayed in Table 10 show for the 19 EU countries encompassed that between 2000 and 2005, public expenditures on family cash benefits increased in a slight majority of eight countries (Denmark, Germany, Ireland, Luxembourg, Portugal, Slovakia, Spain, UK). In five countries, they remained rather stable (Austria, Greece, Hungary, Italy, Sweden), while in six

<sup>&</sup>lt;sup>76</sup> To give an example, in Romania child allowances declined from a high level of "nearly 3 per cent of GDP in 1989 to less than 1 per cent in 1994" (Gauthier 2005: 96; cf. World Bank 1997).

countries they were retrenched (Belgium, Czech Republic, Finland, France, Netherlands, Poland).

Variations of family allowances also regard other criteria than spending levels: In some countries family allowances are paid as a universal benefit, in others depending on income, age or number of children. Bahle (2008) conducted a valuable study of these variations. Combined with 2009 Council of Europe Family Database data they are depicted in Table 11. From these information, several conclusions regarding eligibility criteria and policy motives can be drawn. Only in five EU countries, eligibility is based on employment (and not residence) and thus excludes parts of the population. While most countries grant family allowances without income-testing, nine countries don't: It is noticeable that from these, five geographically belong to the Mediterranean<sup>77</sup> and four to the post-socialist countries. Bahle (2008: 109) concludes that in the southern countries this income-testing constitutes a policy principle, while in the post-socialist ones it's rather borne out of scarce resources embedded in an otherwise universal approach.

A family allowance targeting to the number of children is conducted in a slight majority of 16 countries; among them representatives of all family policy systems. This criterion can reflect pro-natalist motives (e.g. France), but can in other places just allow for families with many children having higher relative costs (e.g. because they need bigger cars). Bahle (2008: 209) interestingly points out that those countries which have benefits varying by *both* age and number of children all are "family policy pioneers, [...] have long histories of family allowances [and] except for the Netherlands, they are predominantly Catholic." Regarding the age limit of family allowances it should be noted that the Nordic countries all show relatively low limits because of their individualistic approach: Above this age, young adults receive benefits directly and not via their parents.

The latter information already led over to the 'family-type approach'. Lohmann et al. (2009: 86) also point out the crucial distinction made between state family policies through the issue of targeting. The OECD (2007a) found out in a calculation from OECD tax-benefit models (cf. OECD 2007b; 2007c) that the financial support families receive varies clearly with income levels<sup>78</sup>, but not in all countries: Belgium, Germany, Hungary, Ireland, Luxembourg, the Netherlands and Slovakia are all found to have little targeting of financial assistance to

<sup>&</sup>lt;sup>77</sup> With Malta here counted among the Anglo-American systems, but constituting a strong hybrid case.

<sup>&</sup>lt;sup>78</sup> A family with two children aged four and six was set as model and assistance calculated as a percentage of earnings of an average worker. 28 countries were included.

families. Table 11 also showed that these countries don't conduct income-testing for family allowances. On the other hand, in the majority of OECD countries "financial assistance for families with low earnings (up to 25% of average earnings) is at least twice as high a proportion of household income as for families at twice average earnings" (OECD 2007a: 76). Targeting degrees of family tax/benefit systems lie particularly high in Poland, the Czech Republic and many (liberal) welfare states outside the EU (e.g. Canada, Australia, Korea).

Bradshaw/Mayhew (2006)<sup>79</sup> in a more detailed analysis examined what family cash and tax benefits different model families receive in seven countries. They test for six different model families (e.g. lone parents, couples with different number and age of children) and five income cases (e.g. none, one or two earners at half or full average wage). Predominantly, they compare the net disposable income of a childless couple and a couple with children on the same earnings. Their results show that unexpectedly the UK's benefit package seems to be the most generous, mainly via the Child Tax Credit<sup>80</sup>, but preoccupied with child poverty and strongly income-related. Bradshaw (2006) with the same research design gives results for 15 countries. Among these, he finds Austria to be the clear top ranker; e.g. for lone parents with one school-aged child as compared to a couple with one school-aged child, Austria clearly pays the highest benefits in favour of the former (Bradshaw 2006: 75). Also the Nordic countries and the Netherlands are much more generous to lone parents than to couples. Contrastingly, in Belgium and Germany lone parents with one child even receive less benefits than equivalent couples, due to tax discriminations. Interestingly, Bradshaw also relates the benefit packages to outcomes in mothers' employment, fertility and child poverty. He points up that there are no easy answers: For example, the Nordic countries and Belgium show low child poverty rates and varying child benefit packages, while Austria and the UK have high child poverty rates in spite of generous packages (Bradshaw 2006: 87). This corresponds to OECD (2007a: 66) findings that "it is the employment status of parents' that has the strongest influence on the extent of child poverty". Nonetheless, Whiteford/Adema (2007) found that family tax/benefit packages have a significant role in reducing child poverty and that on average of 19 OECD countries, 40% of all households with children were

<sup>79</sup> This analysis updates the earlier Bradshaw/Finch (2002) research report.

<sup>&</sup>lt;sup>80</sup> UK's Child Tax Credit (CTC) is paid to working and non-working parents with children, whose income is below £58000 (ca. €64500) and part of a principle the government called progressive universalism, i.e. delivering help for all families and more help for families who need it most (Mitton 2009: 489).

lifted out of relative poverty by public transfers and taxes in 2000; and even about 70% in the Nordic countries, Belgium, the Czech Republic and France.

Looking now in more detail at family tax allowances, it could be seen that tax credits were integrated in some of the analyses discussed above, but not in others. In fact, they are often not incorporated in cross-national analyses, while Adema (2001) pointed out how, when they are, social expenditure data rise and the ranking of generosity across welfare states changes. Historically, the first forms of family allowances in European countries were introduced in the post-war period as so called 'housewife bonuses' reflecting and reinforcing single-earner family norms (Dingeldey 2001: 656). With rising female labour market participation since the mid 1970s, separate taxation instead was introduced in some countries (e.g. Sweden), while others kept joint taxation systems (e.g. Germany). According to the OECD (2008b), 19 OECD countries had separate income taxation of spouses in 2006, while joint taxation or options for joint taxation existed in 11 countries<sup>81</sup>. Apart from these general taxation information, however, tax benefits for families - e.g. the child-related tax allowances existing in practically every EU country (Plantenga/Remery 2005: 67) – are diverse and hard to take stock of due to data problems. The Council of Europe Family Policy Database compiled information, subdivided fiscal policies towards families into several categories<sup>82</sup> and gave an overview on recent reforms, but not yet recapitulated and compared the retrieved plurality<sup>83</sup>.

Dingeldey (2001) analysed the impact of tax system on family employment patterns for ten European countries. Three of the countries have extremely high or moderate tax burdens, in which sole earners receive significant reductions (Belgium, Denmark, Germany). Two countries have moderate tax burdens and little if any tax relief for sole earners (Netherlands, Sweden). Five countries have relatively low tax burdens and insignificant reliefs for a particular family status (Austria, France, Portugal, Spain, UK). Contrary to frequent assumptions, she detects that family patterns of labour force participation can not be explained by the family taxation systems *alone*, e.g. because contradictory effects in other policy fields

These were the EU countries Czech Republic (for couples with children), France (families), Germany (married couples), Ireland (married couples), Luxembourg (married couples), Poland (married couples), Portugal (families), Spain (optional) and the non-EU countries Norway (optional), Switzerland (married couples) and the US (married couples) (OECD 2008). However, as Dingeldey (2001) and OECD (2007a) point out, the tax unit – individual or joint/family – is only party of the story, as e.g. many individual taxation system exhibit joint elements that e.g. lower taxes for single-earner families.

These subcategories are tax benefits towards 'children', 'other adults', 'household composition (single parent, etc.)', 'all dependants' and 'only certain categories (students, disabled, etc.)'.

<sup>&</sup>lt;sup>83</sup> A summarising report on the Council of Europe Family Database findings will be published in 2010.

might be dominant. Clear 'shaping effects' thus could only be found when various social policies, i.e. the "design of the tax system and labour market regulation, family policy and – most important – childcare supply are coordinated to support a certain model of families' labour force participation" (Dingeldey 2001: 653). This was found to be the case in Germany and Sweden respectively.

Apps/Rees (2004) start off from the finding that in international comparison there is a positive relation between female employment and fertility: Countries with high female employment rates often have above-average birth rates and vice versa. They test among OECD countries in how far this relation can be explained by family taxation and the system of family support. Their results suggest that countries with individual rather than joint taxation, and "which support families through improved availability of alternatives to domestic child care, rather than through direct child payments, are likely to have both higher female labour supply and higher fertility" (Apps/Rees 2004: 760).

Adema (2009) summarises results from several OECD studies. He points out that in most OECD countries net payments to governments are smaller for families with children than for similar households without children; though it ranges from very high differences in Austria or Hungary to quite small ones in Poland. However, he concludes that this generosities are not necessarily reflected in positive outcomes (e.g. regarding higher birth or lower poverty rates), for this "crucially depends on the extent to which tax/benefits systems give parents financial incentives to work and help them combine work and care commitments" (Adema 2009: 193). For a comparison of family tax benefits, which is attentive to this correlation, Lohmann et al. (2009: 86) suggest to use the OECD Family Database indicator 'genderneutrality of tax-benefit systems', which assesses differences between countries on the basis of tax rates of model families. Using the available OECD data, they compare the tax rates of a single-earner family with that of a dual-earner family. They arrive at the conclusion that dual-earner couples have smaller tax rates in almost all EU countries – and significantly so in Austria, Finland, Greece or Hungary - except of the Czech Republic, France ('family splitting" and Germany. Hence according to this indicator, almost all countries support either an equal division of paid labour in families or show neutrality in the taxation of single-earner

<sup>84</sup> For a couple without children, the French like the German joint taxation system applies a splitting divisor of 2. In case of families with children, however, the French taxation system adds a splitting factor of 0.5 per child. For the third and every further child, the splitting divisor even increases by 1, exhibiting pro-natalist motives. (Steiner/Wrohlich 2006) This French family splitting has repeatedly been advocated for a policy transfer in Germany and Austria, but these proposals always met with harsh criticism.

and dual-earner couples (Lohmann et al. 2009: 92). Adema (2009: 194) gives results for another important indicator in this context, namely whether it pays off for secondary earners in a family to move into employment, or whether earnings would be taxed away: OECD calculations of 'average effective tax rates' showed that financial incentives for potential secondary earners exist in most countries<sup>85</sup>, but appear to be relatively weak in Belgium, the Czech Republic, Denmark, Germany, the Netherlands and Poland.

Plantenga/Remery (2005: 67) describe how, in reaction to the identified correlations (regarding the nature of tax/benefits systems, female employment, fertility and child poverty) and as part of 'making work pay' reforms, countries like Hungary, Ireland, and the UK ('working tax credit'<sup>86</sup>) have reformed their family tax credit systems.

# 3.5 Trends across the EU-27<sup>87</sup>

This section summarises the most important findings from our survey across the EU-27. A questionnaire (Annex) was sent to two networks of welfare state researchers in all 27 EU member states and additionally to Norway. The first question asked researchers for current and most relevant publications on the family policies of their country. The second question asked for current trends, i.e. the three most important family policy issues on the political agenda for action. The third question was aimed at finding out whether family policies develop towards de- or re-familialisation in the individual countries. While reading the analysis of the answers, it is essential to keep in mind that always a *trend* is described and not the status quo or comparative ranking. A case in point: Whereas the *degree* of de-familialisation in Irish family policy is regarded relatively low, the country expert nonetheless sees the *trend* going into this direction. Therefore, in this analysis, some countries are grouped together because they currently exhibit the same trends or developments, while when examining their status quo, these states might have completely different family policies and preferences.

Major issues on the political agendas for action

<sup>&</sup>lt;sup>85</sup> This indicator, however, does not account for childcare costs, which lie very different across countries (Chapter 3.3). Thus in some countries, financial incentives to enter paid employment might exist for secondary earners, but be outbalanced by high childcare costs (or, of course, insufficient formal childcare).

<sup>&</sup>lt;sup>86</sup> UK's working tax credit (WTC) is an in-work-benefit for low earners, and relates the CTC named above.

<sup>&</sup>lt;sup>87</sup> We would like to thank Helena Niesing for her support in the survey and writing of this chapter.

Altogether, we compiled three diagrams to summarise the results from 'Question 2' on the three most important family policy issues on the political agendas for action: While the first diagram shows current trends in family cash and tax benefits, the second and third depict trends in care services and legislative instruments respectively. A '+' depicts the introduction of a certain family policy instrument and/or its expansion, whereas a '-' signals the retrenchment or abolishment of a certain family policy instrument. As we had no filled out questionnaires from Italy, Malta and Romania, we researched their current trends from present databases (e.g. MISSOC, Council of Europe) and the literature.

Two general statements can be made. On the one hand, family policies in Europe are still marked by huge diversity and different preferences. Countries choose different family policy instruments e.g. due to institutional and religious backgrounds or following governmental turnovers. On the other hand, a common trend across Europe is the *expansion* of family policies. While retrenchments are conducted much less frequently, most cutbacks are observable for child/family allowances (Estonia, Hungary, Latvia, Lithuania, Spain). Furthermore, it became clear from the questionnaires that today, family policy is in many places regarded a major policy field; often related with goals of achieving higher reconciliation and positively influencing birth rates<sup>88</sup>.

To give a first résumé from Table 4, the most important issues in family cash and tax benefits across Europe are the expansion of parental leave and respectively also of paternity leave, esp. in the Mediterranean and post-socialist countries. Also the increase of child/family allowances is high on the agendas in these regions. However, the most important trend, noted in not less than 14 countries, is means-testing of allowances. This tightening of eligibility criteria is observable, so to speak, across all 'family policy systems' as identified in Chapter 2.2.

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<sup>&</sup>lt;sup>88</sup> Fagnani (2008: 100) also summarises family policy trends across OECD countries and identifies the decline of the male-breadwinner model, work-life reconciliation and gained importance of gender equality issues. Yet she also points out possible differences in the future, esp. different value systems and cultural norms. (Fagnani 2008: 88f.) Furthermore, she names postponing of childbearing, cohabitation without marriage and changing attitudes of fathers as trends in the situation of families.

Table 4: Current trends in family cash and tax benefits

		cash & tax								
	Countries	means-tested allowances	parental leave <sup>1</sup>	Child / family allowances	(obligatory) paternity leave	extra retirement pensions	housing allowance	home care allowance	tax reduction	
Nordic	Denmark	+								
	Finland				+		+			
	Norway				+					
	Sweden	+						+		
	Austria		+							
7	Belgium									
Continental	France	+	+		+	+				
	Germany		+					+		
	Luxembourg	+							+	
	Netherlands									
Anglo- American	Ireland	+								
	Malta	+	+	+						
	UK	+	+							
-	Cyprus	+								
Mediterranean	Greece	+	+							
	Italy		+	+					+	
	Portugal		+	+						
	Spain	+		-						
Post-Socialist	Bulgaria		+							
	Czech Republic		+	+					+	
	Estonia			-	+	+				
	Hungary			-						
	Latvia	+		+/-						
	Lithuania	+	-	-			+			
	Poland		+		+	-				
	Romania	+								
	Slovakia		+	+			+			
	Slovenia	+	+		+					

<sup>1)</sup> includes maternity leave as well as parental leave

A widespread trend across Europe is the mobilization of fathers, so called 'active fathering'. Measures vary from a (sometimes obligatory) paternity leave with wage compensation (Estonia, Poland, Slovenia), the two wage compensated 'daddy months' within the new German and Austrian parental leave benefits to the Swedish 'gender equality bonus'. This bonus is given to women when they deliver their care responsibilities to their partners and work fully in paid employment.

As shown in Table 5, the issue of care services is dominated by the massive expansion of care facilities, mainly for children, but also for the elderly. Secondly, the achievement of better work-life reconciliation has gained massive attention. Quality of care services ranks third and has predominantly been identified as a major trend by researchers from the Nordic and continental welfare systems. In the field of legislative instruments, one trend in Europe is towards special support to large families (esp. in the Mediterranean countries). Many

countries also have children's rights and children's wellbeing on top on their agenda (Ireland, Portugal, UK). Another observation across Europe concerns a new understanding and definition of 'family' and family structures. Family diversity is acknowledged, new forms of living together are legalised, e.g. same-sex partnerships (Denmark, Slovenia, Spain).

Table 5: Current trends in care services and legislative instruments

			care :	services	5	legislative instruments			
	Countries	care facilities	work / life balance	quality	early education	free of charge	support to large families <sup>1</sup>	children's rights	diversity of families <sup>2</sup>
Nordic	Denmark			+				+	+
	Finland								
	Norway	+		+					
	Sweden			+					
Continental	Austria	+				+			
	Belgium	+		+	+				
	France						+		
	Germany	+		+	+				
	Luxembourg								
	Netherlands		+					+	
Anglo- American	Ireland		+					+	
	Malta	+							
	UK	+						+	
nean	Cyprus	+	+				+		
	Greece		+				+		
erra	Italy	+	+				+	+	
Mediterranean	Portugal	+						+	
	Spain				+		+		+
Post-Socialist	Bulgaria	+							
	Czech Republic								
	Estonia		+						
	Hungary	+	+						
	Latvia								
	Lithuania						+		-
	Poland	-							
	Romania						-	+	
	Slovakia								
	Slovenia		+			+			+

<sup>1)</sup> not exclusively meant financially, e.g. in Greece: preferential treatment in recruitment in public and large companies

To throw a glance at the *scope* of national family policy changes: Some countries such as Germany, UK or Austria have implemented far reaching policy changes (and possibly paradigm shifts), as they moved from re-familialising family policies enhancing the traditional

<sup>2)</sup> new forms of living together are acknowledged and legalised, e.g. cohabitation without marriage, same-sex partnerships

family towards rather 'female-mobilizing' ones. Other countries still rely very much on family support instead of public offered care facilities and put instead their focus on financial support especially for large and poor families (Cyprus, Greece, Spain). The most advanced countries in family policies do no longer discuss the extension of childcare facilities – they offer enough supply –, but their main focus concerns quality of early education, and even better work-life balance through flexible opening hours etc. (Denmark, Finland, Sweden). The Eastern European countries are not homogenous at all: On the one hand, there are female-mobilizing countries such as Latvia and Estonia; on the other hand Poland's family policy is rather familialising and on a low level.

## Country perspectives

In this section, some interesting findings from a country-specific perspective are highlighted and combined with insights from the present literature.

A general trend in the Nordic countries is towards even higher gender equality, e.g. through the gender equality bonus in *Sweden*: "Parents who share parental leave equally by each taking an equal number of days will receive the maximum bonus on condition that one partner works while the other takes leave." (Fagnani 2008: 103) For despite *Sweden's* gender-neutral family policy, women still take the major part of parental leave, which makes the re-entry on the labour market harder and might preserve traditional gender roles (Duvander et al. 2005: 2). The new bonus aims at a more equal distribution of parental leave. Another trend in the Nordic welfare systems is the enhancement of 'free choice' for parents; e.g. *Sweden* now also offering a home care allowance<sup>90</sup>. This might be seen as a little 'turning point' in its family policy, because it softens the otherwise strong labour market attachment. All in all, the Nordic countries again make the strongest case and show huge similarities, while more heterogeneities come to light within the other 'family policy systems'.

Many continental countries make efforts to support parents by better work-life balance and to facilitate higher labour market integration of women. *Germany* in particular has implemented a 'paradigm shift', as the interplay between (de-)familialisation, (de-

<sup>89</sup> As defined by Szelewa/Polakowski (2008: 126), female-mobilizing countries are characterised by low generosity of parental leave provisions and high childcare coverage with good quality standards. Parental leave is mostly universal, but due to the low level, women are encouraged to return to work more quickly.

<sup>&</sup>lt;sup>90</sup> Criticism of the home care allowance, also in the other countries (Chapter 3.3), mainly concerns possible effect of excluding low-skilled and low-paid women from the labour market (Duvander 2008: 13) and, correspondingly, of lower education opportunities for children who don't get early childhood education.

)commodification and social stratification has been changed (Henninger et al. 2008: 287). Similar to Germany, *Austria* has also introduced an (optionally) income-related parental leave in 2010. As Germany introduced the income-related parental leave, which encourages better-paid women to re-enter their job quite soon without major income losses, it was criticised that this reform favours better-educated women with higher incomes, while women with low incomes still have to rely mainly on a male breadwinner<sup>91</sup>. Henninger et al. (2008: 304) criticise that the commodification of mothers occurs without a sufficient simultaneous positive de-familialisation, as e.g. the German legal entitlement to childcare from the age of one year will only be in place from 2013.

Many continental countries focus on the expansion of care facilities and on the improvement of educational standards: except for *France, Luxembourg* and the *Netherlands*, where the coverage is already high. *France* supports large families and has restructured its leave system<sup>92</sup>. Interestingly, France has always been a 'hybrid case' (Morgan 2003: 268) between the other continental countries, as its family policy is more oriented towards Scandinavian standards and exceeds them even in the provision of public preschools<sup>93</sup>. The *Netherlands* strive for work-life balance through the model of the one and-a-half earner family: In the so-called 'combination scenario' both, women and men engage in paid and unpaid work and thereby reach more gender equality (Lewis et al. 2008: 265). Morel (2007: 618) concludes for the *Netherlands*, as well as for *France* and *Belgium* that the "promoting of 'free choice' in all four countries has justified the introduction of measures that have simultaneously reinforced social stratification in terms of access to the labour market – meaning that some women have much more 'free choice' than others – and weakened certain labour market rigidities."

Anglo-American *Ireland* and the *UK* both focus on children's rights and wellbeing. Support for families is means-tested and tends to support esp. poor families or families with many children with certain privileges. *UK* is most generous to poor families across Europe (Fagnani 2008: 89), but also suffers from one of the highest child poverty rates. *Ireland* seeks better work-life reconciliation. *UK* has focussed on the massive extension of maternity leave, which is already the longest in Europe. Maternity pay has been doubled and extended from

<sup>91</sup> For a detailed discussion of the effects of the parental benefit in Germany see Henninger et al. (2008).

<sup>&</sup>lt;sup>92</sup> For a detailed explanation see Revillard (2006).

<sup>&</sup>lt;sup>93</sup> Morgan (2003: 270) accounts for this development with the secularisation of political life like in the Scandinavian countries, whereas Christian democratic countries have rather hindered women from entering the labour market in the past.

14 weeks to nine month, with plans to enlarge it to twelve months in 2010 (Lewis et al. 2008: 271). Just recently, family policy has become a part of state intervention which is quite an alteration for a very market-oriented, liberal state with the least possible intervention in private sphere (Lewis et al. 2008: 271). Nevertheless, childcare for under three-years-olds remains mainly in private responsibility.

Many Mediterranean countries emphasise means-tested support, esp. targeted at families with many children and at poor families. The focus is rather on cash than service support. The extension of parental leave is on top of the political agenda in *Greece* and *Portugal*. *Spain* acknowledges a greater diversity of family models. All in all, many Mediterranean countries also put a greater focus on work-life balance and the expansion of childcare facilities. However, in a European perspective, this development is still at its beginnings. For example, the welfare state researchers from *Cyprus* write about a 'vicious circle', i.e. "since the family is strong and cohesive then it is not necessary for the state to support its citizens; since the state is not supportive of its citizens, then the family has to remain strong and cohesive." (Peristianis/Kokkinou 2008)

Developments in the post-socialist countries are highly interesting and contrary to many notions, they are not homogenous at all. There are very advancing, female-mobilizing countries such as *Latvia* and *Estonia*, while e.g. *Poland* is still characterised by rather underdeveloped and familialising family policy. Some countries even seem to take a step back and cut some family benefits. However, this development is often due to the financial and economic crisis rather than ideological choices (esp. in the *Baltic* countries). Generally speaking, the trend also moves towards 'active fathering' and better work-life balance, while length and amount of cash services differ fundamentally between countries<sup>94</sup>. A very interesting classification of the CEE countries was made by Szelewa/Polakowski (2008). They distinguish between four clusters<sup>95</sup>: *explicit familialism* (Czech Republic, Slovenia, Slovakia), *implicit familialism* (Poland), *female mobilizing* (Estonia, Latvia) and *comprehensive support* (Hungary, Lithuania). All in all, it can be stated that the post-socialist countries probably constitute the most heterogeneous family policy region, but diversity marks the other regions as well.

<sup>&</sup>lt;sup>94</sup> Švarc/Švarcová (2009: 60) distinguish the *Czech Republic, Hungary, Poland* and *Slovakia* as follows: "To sum up, the Czech system provides strong financial incentives to have a child for a very limited part of the population characterized by very low incomes. Hungarian and Slovak systems are less generous to low income groups but much more couples fall within this category. In Poland, all couples face important income loss due to parenthood if one of the parents decides to stay at home with a child."

<sup>&</sup>lt;sup>95</sup> They use the categories extensiveness and quality of childcare services as well as generosity and universality of benefits. For the detailed explanation of the four clusters see Szelewa/Polakowski (2008).

Family policy trends between de- and re-familialisation

The results from 'Question 3' summarise the family policy trends in the individual countries and locate them between de- and re-familialisation <sup>96</sup>.

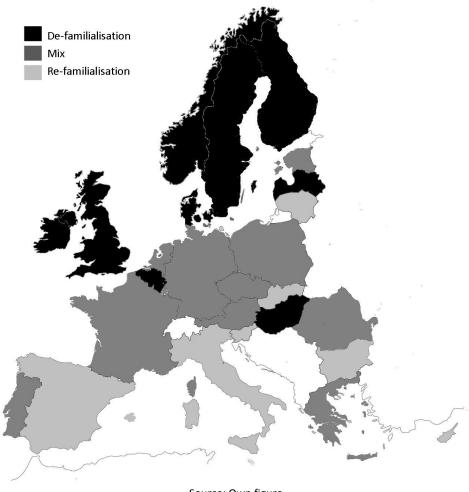


Figure 6: Family policy trends between de- and re-familialisation

Source: Own figure

Interestingly, the answers from the southern European countries emphasise a little development towards de-familialisation. Compared to the Scandinavian countries, these developments might seem minor, but they could mark a first step towards greater convergence. So far, however, re-familialising measures are still dominant there. Contrariwise, family policy trends in the Nordic countries are still rated as predominantly de-familialising; although

<sup>&</sup>lt;sup>96</sup> As outlined in Chapter 2,3, de-familialisation takes place when social policy (or markets) take over welfare and care responsibilities from the household, often with the aim of higher (female) labour market integration (e.g. through public childcare, abolishing survivor's pensions). Re-familialisation means that the family is responsible for the welfare of its members, often encouraging more traditional family forms (e.g. lack of public childcare, strengthening of survivor's pensions).

countries such as Sweden have moved a step back from a completely de-familialising model and put their focus more on the individual choice how to care for children, e.g. through the hotly debated home care allowance. The researchers from UK and Ireland describe their countries' family policy trends in the questionnaire as de-familialising. In Ireland, the state and the market more and more replace the role of the family in care work and increased childcare is provided.

Other countries, as mentioned above, have implemented more far reaching family policy changes towards de-familialisation (Austria, Germany, Netherlands), which, however, they combine with re-familialising policies. Germany constitutes an example with its introduction of the parental benefit and a home care allowance, which combine contradictory goals and give account of conflicting interests. France is also grouped in the 'mixed' countries although its high female employment rate and high coverage of (early) childhood care. This is due to the so-called 'French Paradox', which means that "the state recognition of family interests is very strong, and was initially rooted in familialism, an ideology that promotes the family as an institution, and has often played against women's rights." (Revillard 2006: 133) The post-socialist countries are very diverse: While trends in Latvia are rather defamilialising and service-providing, Bulgaria, Lithuania, Slovenia and Slovakia focus on refamilialising measures. The other CEE countries pursue mixed policies. Cutbacks in answer to the economic crisis were conducted esp. in the Baltic countries, while most countries increased family support at first (Angermann et al. 2009): Further (long-term) consequences of the economic crisis for European family policies are a crucial area for future research.

## 4 Conclusions

In this chapter, results from the research review are summarised and an outlook given on important research needs in the context of future developments and challenges.

Mapping European family policies: diversity and dynamics

In Chapter 2.1 it was shown that the diversity of European welfare systems exceeds existing categories, and in Chapter 2.2, the five family policy systems were called a 'temporary solution'. For this report, such a structural category was needed, but it became more and more obvious how these five clusters don't adequately depict the empirical basis. For example, Chapter 3.3

illustrated that the Barcelona-envisaged childcare rate of 33% for U3 is reached in the Netherlands, but not in Austria; in the UK, but not in Ireland; in Spain, but not in Greece; in Slovenia, but not in Poland; and in Denmark, but not even in Nordic Finland (which supports long leaves and homecare for the U3 sector). Similarly, Chapter 3.4 has shown how the ratio between service, cash and tax spending normally expected from the different 'family policy systems' cannot be confirmed empirically (cf. Figure 4). For example, conservative and southern European countries are normally described by a bias towards cash benefits, but France, Italy and Spain (the latter, of course, from lower starting points) have similar service ratios as Denmark or Sweden. And finally, Chapter 3.5 demonstrated how esp. family policies in the post-socialist countries are not homogenous at all. Thus, there is need of more empirical research across the EU-27, which can result in a more recent and more reliable family policy typology. Such a typology, however, cannot be 'carved in stone', but must pay attention to dynamics, policy changes, and, in the consequence, country positions and/or clusters changing.

This requires both EU-27(+) encompassing as well as longitudinal data. The first relates to a problem already addressed in Chapter 3.1, namely that several EU countries' welfare systems and family policies are significantly under-researched, esp. when they bear one or several of the following characteristics: being a new member state, being small, and not being in the OECD. This esp. concerns Bulgaria, Cyprus, Malta or Romania; but also Denmark, Finland, Ireland or Portugal have rarely been included into cross-national projects and networks (cf. Hantrais 2009: 55). The second entails that – even for the countries where family policies are comparatively well researched – there is a lack of over-time information guaranteeing comparability. MISSOC<sup>97</sup> is updated every year and provides a good empirical basis on basic features. Between 1994 and 2004, comparative research was also enhanced by the European Observatory on National Family Policies<sup>98</sup>. It merged into the Observatory on the Social Situation and Demography in 2004, "thereby reinforcing the importance of the demographic dimension and reducing the visibility of family policies" (Hantrais 2009: 48).

<sup>97</sup> MISSOC (Mutual Information System in Social Protection) was created in 1990 at the initiative of the EC, It provides information on twelve areas (e.g. health care, maternity, family benefits) of social protection systems of the EU-27 (plus Iceland, Liechtenstein, Norway and Switzerland). Information are given by national ministry representatives.

<sup>&</sup>lt;sup>98</sup> The European Observatory on National Family Policies was established in 1989 of twelve national experts from the member states at that time. They analysed the situation of families and the national family policies undertaken and reported annually to the EC.

Reviewing research: research needs in data and content

The diversity also poses the challenge to comparative research that situations are often very country-specific. An example is UK's or Ireland's housing policy<sup>99</sup>; the policy field also pointing to another research gap: As Gauthier (2005: 96) points out, for housing benefits, comparative data "sources are not complete and oftentimes do not distinguish the programmes by type of recipients". Important studies here are Bradshaw/Finch (2004) and Kuivalainen (2003), but they also point to the complex problems and data gaps. Comparative research on family and housing policies would be fruitful.

Furthermore, this report was limited to state family policies, but for comparative research, the inclusion of other family policy actors is highly relevant. This concerns government-NGO relations as a very important topic, where results are basically limited to the Appleton/Byrne (2003) study reviewed in Chapter 3.1. It also concerns occupational family policies, which are of major importance for the reconciliation of work and family life (e.g. familyfriendly working hours, workplace childcare facilities). On this, there are almost no international comparisons, apart from a study by the European Foundation for the Improvement of Living and Working Conditions (2006)<sup>100</sup> and single/two case studies (e.g. Klammer/Letablier 2008). The 'Institut der Deutschen Wirtschaft Köln' carries out an analysis of occupational family policies in six EU countries, which will be available in mid-2010 (BMFSFJ 2009). Conceptual research on effects, evaluation and prospects of family-friendliness in companies has been conducted by the 'Forschungszentrum Familienbewusste Personalpolitik' (cf. Dilger et al. 2007). And it also concerns local family policies, which is rarely taken into account, though "it has had a considerable and growing impact in some countries in recent years" (Thévenon 2008: 174). For example, local family policies are of high importance in Spain and the German childcare provision differs substantially between the western and the eastern, former GDR parts of the country.

# Family policy research and policy-making

The European Commission called upon governments to enhance the transfer of knowledge between research and politics. It simultaneously reckoned that this cooperation is some-

<sup>99</sup> As McCashin/O'Shea (2009: 269) explain, "the dominance of private ownership makes Irish housing distinctive in a European context." With 75% of the total housing stock being owner occupied, this obviously related to family policy and also to pension policy. In 2005, Ireland spent for housing 2.8% of total social spending, only outnumbered by the UK with unrivalled 5.5% (Eurostat).

<sup>&</sup>lt;sup>100</sup> Companies were asked if they offer part-time employment and if employees have taken parental leave.

times a challenging process; due to different 'languages' and time horizons (BMFSFJ 2009: 19). These hurdles could be lowered by a continued exchange not only of knowledge, but also on the different 'logics of action'. That is: On the one hand, politics are requested to develop and implement long-term policies, taking into account foresighted family policy research. But on the other hand, family policy research and corresponding political consulting should not be limited to 'the power of the factual' (Schubert/Blum 2010). Sometimes, questions of 'political feasibility' also have to be included, e.g. regarding questions of path-dependency, as Rose (1993: 78) argued: "New programs cannot be constructed on green field sites." Scientific policy advice then does not define the 'best solution' by rational criteria only, but also by criteria of political feasibility. This would be fostered by an exchange platform between politics and research, which builds on a sustained basis and a bottom-up, pluralist approach.

One area interesting for policy-makers is international benchmarking: Often, only an international comparison can show, how family-friendly a country is in a specific area, e.g. childcare or cash benefits. The 'Institut der Deutschen Wirtschaft Köln' recently developed a Family-Friendliness-Index for 19 countries, comparing their goals and family support in leave policies, cash benefits and services (Dieckmann/Plünnecke 2009). Another field of interest for policy-makers of course is the situation of families, current and future challenges. For this, family policy reporting in the member states – which could possibly be designed more comparative in the future – is important. Linz/Sittermann (2009) examined family policy reporting in 20 EU countries and descried that eight countries have (either regular or irregular) reporting, ten cover the situation of families within their general socio-political reporting, while two have no reporting 101. To name a last field of interest for the research-politicsnexus, the evaluation of policies gains more importance; but the necessary tools to investigate the effects of a certain policy are underdeveloped in many countries (Hantrais 2009: 56).

Population ageing as a future challenge for all countries, though to differing degrees, exemplifies, how the knowledge transfer between research and politics, but also the foresighted thinking has room for improvement: The developments could have been foreseen

<sup>101</sup> Regular reports exist in Austria, Germany, Luxembourg and Latvia; irregular reports in the Czech Republic, Denmark, Estonia and the Netherlands. General socio-political reporting is conducted in Bulgaria, Finland, France, Hungary, Ireland, Lithuania, Slovakia, Cyprus, Greece and the UK. So far there is no reporting in Spain (planned) and Poland.

since the 1970s (and actually were few and far between), but only came on the political agenda for action in the 2000s. In Chapter 3.3, the often missing inclusion of care for elderly people into reconciliation studies has been identified as a research gap. Thévenon (2008: 174) also points to corresponding limitations in databases: "These databases should not only cover support for families with children [...], but also support for families that have to care for dependent elderly members."

'What governments do and why they do it': used methods and policy explanations

The results from our fieldwork in all EU-27 countries summarised in Chapter 3.5 highlighted the varying policies and priorities in national family policies: The expansion of childcare facilities is high on the agenda in many countries, and so is the expansion *or* reduction of child/family allowances and parental leave policies, often including elements of 'active fathering'. The latter makes a good example of a data gap applying to many policies, namely that no information are given on take-up rates: "Being able to compare actual policy take-up more effectively is a key to better assessing their effects on fertility and other behaviour." (Thévenon 2008: 174) A common trend all across Europe – though of course to differing degrees and with different policy preferences – is reconciliation and work-life balance. Gauthier (2005: 97) also concluded that "of all the family-related initiatives launched since 1994, the areas that appear to have received the highest level of priority are that of gender equality and work-family reconciliation".

Concerning methods, predominantly macro-quantitative methods are used when comparing a large number of countries. Their advantage are generalisable statements on cause-and-effect relations, but they also show certain drawbacks<sup>102</sup> (Obinger 2009: 232). Qualitative, "'small-n design' sharpens the view for historical developments which have shaped a country's family system and policy in specific ways" (Pfennig/Bahle 2000: 3), they allow to investigate the specificities of individual cases, while keeping the advantages of the comparative approach. What is so far largely missing<sup>103</sup> for family policy are Qualitative Comparative Analyses (QCA) (Ragin 1987), which at best combine the advantages of both, quan-

<sup>102</sup> These drawbacks are e.g. the so called 'small-N problem' (sometimes there are more independent variables than cases) or the 'black box problem' (even if causality is indicated by regression analyses, the causal mechanisms remain undetected) (Obinger 2009: 233).

<sup>&</sup>lt;sup>103</sup> Some studies exist. For example, Misra (2003) tests different factors for explaining the adoption of family allowances in 18 countries. Eliason et al. (2008) analyse family policies and women's labour force participation in 14 countries by combining fuzzy-set and statistical methods.

titative and qualitative approaches. Meso (or even more micro) analyses are conducted far less frequently, though they, allowedly being a more extensive task, have a lot of insights to offer for comparative family policy research.

Coming back to the main question of policy analysis – what governments do and why do it – this esp. holds true for the latter part, which is decisive with regard to future family policy challenges. To give an example: Why did some countries obviously manage to modernise their family policies and adapt them to current challenges (e.g. Germany), while others seem not willing or able to do so? To name but a few explanatory factors normally identified in comparative welfare state research: Are the explanations for the nature of policy changes – be they system-shifting or virtually non existent – to be found in problem pressures (e.g. demographics), the colour of parties in power, policy inheritance, ideas and policy learning or something else? More in-depth, qualitative comparisons are needed to understand and explain the family policy reforms and the policy processes. Hantrais (2009: 56) also pointed out that the 'family and welfare' research within the EC's framework programmes rarely involved in-depth, qualitative analysis of the policy process - that is, speaking in terms of the policy-cycle (cf. Blum/Schubert 2009: 101ff.), how problems are defined, set on the political agenda, policies are formulated in response, the political decision is made, the policies are implemented, possibly evaluated and finally either terminated or reformulated.

This gains importance when looking at the following three fields: learning from each other, reactions to the current economic crisis, and responding to future challenges. Looking at the first, learning from each other depends on understanding why a certain measure was introduced in another place, why it worked there or why it did not – also negative lessons are helpful (cf. Hantrais 2009: 57). With regard to the current economic crisis it is important to research the (long-term) consequences for national family policies. In a first study, Angermann et al. (2009) distinguished between four groups of countries <sup>104</sup>: While some countries already cut back family support in reaction to the crisis and some currently evaluate whether to do so or not, most countries increased family support. In a forth group of coun-

Family support was increased (e.g. tax breaks, higher family allowances) in Belgium, Finland, France, Italy, Luxembourg, Malta, Austria, Poland, Portugal, Romania, Czech Republic, UK. Ireland and Latvia were evaluating family policies at the time of the study, while family support had been cut back in Ireland, Hungary and the hardly hit Baltic countries (Estonia, Lithuania. Latvia). The Netherlands, Poland and Slovenia froze family benefits or announced retrenchments. No changes were observable in Denmark, Greece, Sweden, Slovakia. There are double entries, since different family support measures were evaluated.

tries, no changes were observable. And looking at the responsiveness to future challenges as the third issue: Understanding why policy changes are achieved in one place, but not in the other, due to which 'veto players' they are blocked or due to which path-dependencies mitigated will be of utmost significance for facing future challenges.

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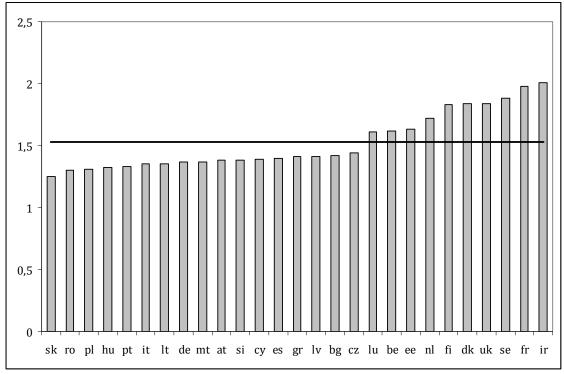
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### **Annex**

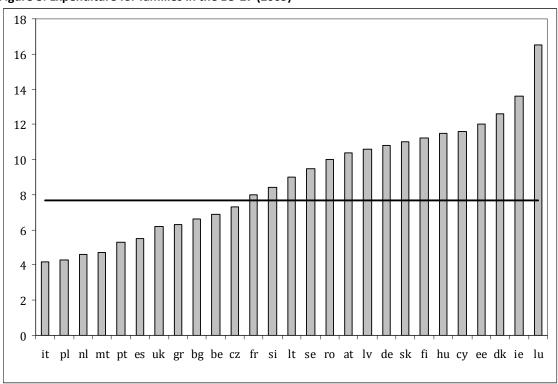
# A) Tables and Figures

Figure 7: Fertility rates in the European Union



Source: Eurostat

Figure 8: Expenditure for families in the EU-27 (2005)



Source: Eurostat, functional expenditure as a per cent of total social spending

Table 6: Leave arrangements across Europe

				statutory leave	entitlements		
Cou	ntries	maternity leave	paternity leave	parental leave	entitlement: Family/Individual	total post-natal leave per family (months)	leave for sick children
	Denmark	+++	+++	+++	F	11	х
Nordic	Finland	+++	+++	+++	F	37.5 [fn]	x [fn]
Noi	Norway	(+++) [fn]	+	+++	F/I	36.5	+++ [+]
	Sweden	(+++) [fn]	+++	+++	F/I	36.5 (16.5) [fn]	+++
	Austria	+++	x	++ [*]	F	24	+++ [+]
ja,	Belgium	+++	+++	++	1	9.5	+
Continental	France	+++	+++	++ [*][fn]	F	36.5	+ [+]
ontii	Germany	+++	х	+++ [*]	F	36 (16)	+++
ŭ	Luxembourg						
	Netherlands	+++	+++	++	1	14.5 (2.5)	+++ [+]
- un	Ireland	++	x	+	1	16	+++ [+]
Anglo- American	Malta						
A 4	UK	++	++	+	1	18 (9)	+
	Cyprus						
ean	Greece [fn] a	++	+++	+	1	15 (8)	+ [+]
Mediterranean	b	+++	x	+	1	48 (3) [fn]	Х
dite	Italy	+++	x	++	1	13,5	+
Me	Portugal	(+++) [fn]	+++	++	1	36.5 (12.5) [fn]	+++ [+]
	Spain [fn]	+++	+++	+	1	36 (3.5)	+++
	Bulgaria						
	Czech Republic	+++	х	++ [*][fn]	I	36	+++
	Estonia	+++	+++	++ [*]	F	36.5	Х
list	Hungary	+++	+++	+++ [fn]	F	36	+++
ocia	Latvia						
Post-Socialist	Lithuania						
В	Poland	+++	х	++	F	36	+++ [+]
	Romania						
	Slovakia						
	Slovenia	+++	++	+++	1	14 (11.5)	+++ [+]

Source: Own illustration of Moss/Deven 2009: 98

### Key:

- x: not statutory entitlement;
- +: statutory entitlement, but unpaid;
- ++: statutory entitlement, paid *either* at low flat-rate *or* earnings-related at less than 50 per cent of earnings *or* not universal *or* for less than the full period of leave;
- +++: statutory entitlement, paid to all parents at more than 50 per cent of earnings;
- (): brackets indicate that there is not a *designated* "maternity leave", but leave is available for women to take immediately before and after childbirth;
- \*: payment is made to all parents with a young child whether or not they are taking leave;
- F: family entitlement;
- I: individual entitlement;
- F/I: some period family entitlement and some period individual entitlement;
- [+]: additional leave entitlements covering not only children but also other family members and/or situations of serious illness;

Unbracketed numbers indicate total length of leave available to a family;

Bracketed numbers indicate length of leave that receives some payment;

#### [fn] country footnotes:

**Czech Republic:** parental leave may be taken until child is three years – benefit is paid until child is four. **Finland:** total post-natal leave includes period of low paid childcare leave. All employees have access to

leave to care for a sick child, with length and payment determined by collective agreements.

**France**: parental leave payment to parents with one child only made until six months after the end of maternity leave.

**Germany**: parental leave payment up to max. of 28 months; remainder of three year leave period unpaid. **Greece**: a = private sector employees; b = public sector employees. Women employees in both sectors can consolidate an entitlement to work reduced hours into a full-time leave of up to 3¾ months in the private sector and 9 months in the public sector. This extra leave option is not included in the total post-natal leave shown in the Table, which shows leave available to two parent family where both parents work in same sector.

**Hungary**: for insured parents, leave is paid at 70 per cent of earnings until child's third birthday, then at flat-rate; only mother is entitled to use in child's first year. Either parent in a family with three or more children may take leave during the period between the third and the eighth birthday of the youngest child. **Italy**: parental leave is six months per parent, but total leave per family cannot exceed ten months. **Norway**: there is no separate maternity leave; part of parental leave is reserved for women before and after birth.

**Portugal**: 'maternity leave' has been replaced by 'initial parental leave'. Total postnatal leave includes period of unpaid leave after parental leave.

**Spain**: women employees can consolidate an entitlement to work reduced hours into a full-time leave of up to four weeks. This extra leave option is not included in the total post-natal leave shown in the Table. **Sweden**: there is no separate maternity leave; part of the 480 days of paid parental leave is reserved for women. Each parent is entitled to take parental leave until a child is 18 months; but the 480 days of paid leave can be taken until a child is eight years.

Table 7: Use of formal childcare services in the EU-25 (2006)

		0-2 years		3-school age	
Country Hours	1-29	30+	1-29	30+	
Denmark	7 (u)	66	16	80	
Finland	5 (u)	21	21	56	
Sweden	17	27	34	58	
Austria	3 (u)	1 (u)	55	16	
Belgium	17 (p)	23 (p)	36 (p)	62 (p)	
France	14 (p)	17 (p)	52 (p)	42 (p)	
Germany	11 (p)	7 (p)	66 (p)	27 (p)	
Luxembourg	14	17	42	16 (u)	
Netherlands	41	4 (u)	82	7	
Ireland	13 (p)	5 (p)	80 (p)	13 (p)	
Malta	5 (u)	3 (u)	32	25 (u)	
UK	28 (p)	5 (p)	65 (p)	24 (p)	
Cyprus	7 (u)	18 (u)	50	37	
Greece	2 (p)	8 (p)	41 (p)	20 (p)	
Italy	10	16	24	66	
Portugal	1 (p)	32 (p)	9 (p)	66 (p)	
Spain	20	19	47	44	
Czech Republic	1 (u)	1 (u)	28	39	
Estonia	6 (u)	12 (u)	7 (u)	78	
Hungary	2 (u)	6 (u)	21	58	
Poland	0 (p)	2 (p)	7 (p)	21 (p)	
Latvia	2 (p)	14 (p)	4 (p)	56 (p)	
Lithuania	0 (p)	4 (p)	9 (p)	47 (p)	
Slovakia	1(p)	4 (p)	10 (p)	63 (p)	
Slovenia	3 (u)	26	15	66	
EU-25	14 (p)	12 (p)	44 (p)	40 (p)	

Notes: (p) provisional value, (u) unreliable, uncertain data; Age groups: 0-2, from birth until the child's third birthday; 3-school age, from three years of age until the age at which mandatory education starts; in percentage; Source: Eurostat, EU-SILC 2006 data

Table 8: Development of childcare for under three-year-olds in the EU\*

Country Time	2005 (1-29)		2005 (30+)		2007 (1-29)		2007 (30+)	
Denmark	13	(u)	60		7	(u)	63	
Finland	8		19		6		20	
Sweden	22		31		20		27	
Austria	4	(u)	0	(u)	7	(u)	1	(u)
Belgium	23		19		21		23	
France	16		16		13		15	
Germany	8		8					
Luxembourg	14		8	(u)	11		14	
Netherlands	36		4	(u)	39		4	(u)
Ireland	14		6	(u)	13		11	(u)
Malta	5	(u)	0	(u)	10	(u)	3	(u)
UK	24		5		34		4	
Cyprus	7	(u)	12	(u)	6	(u)	12	(u)
Greece	3	(u)	4	(u)	4	(u)	6	(u)
Italy	9		16		10		15	
Portugal	4	(u)	26		2	(u)	25	(u)
Spain	25		14		24		16	
Czech Republic	2	(u)	0	(u)	2	(u)	0	(u)
Estonia	3	(u)	9	(u)	1	(u)	14	(u)
Hungary	2	(u)	5	(u)	2	(u)	6	(u)
Poland	0	(u)	2	(u)	0	(u)	2	(u)
Latvia	2	(u)	16	(u)	2	(u)	14	(u)
Lithuania	2	(u)	9	(u)		-		
Slovakia	0	(u)	3	(u)	1	(u)	1	
Slovenia	2	(u)	22		3	(u)	27	
EU-25	10		13		10		14	

<sup>\*</sup>Data are given for the age group 0-2 and for 1-29/30+ hours in care respectively

Source: EU-SILC

Table 9: Expenditures on childcare (2005)

·	0-2 years spending	3-school age spending	Total spending
Denmark	0,85	0,51	1,35
Finland	0,94		0,94
Sweden	0,58	0,40	0,98
Austria	0,30		0,30
Belgium	0,23	0,56	0,79
France	0,36	0,64	1,00
Germany	0,07	0,31	0,38
Luxembourg	0,39		0,39
Netherlands	0,11	0,36	0,47
Ireland	0,26		0,26
Malta		0,60	0,60
UK	0,37	0,21	0,58
Cyprus	••	0,34	0,34
Greece	0,13		0,13
Italy	0,15	0,46	0,61
Portugal	0,00	0,39	0,40
Spain	0,44	0,00	0,44
Czech Republic	0,14	0,34	0,49
Estonia		0,39	0,39
Hungary	0,10	0,59	0,69
Poland	0,00	0,29	0,29
Latvia		0,63	0,63
Lithuania		0,60	0,60
Slovakia	0,07	0,33	0,40
Slovenia		0,48	0,48

Bulgaria	 0,76	0,76
Romania	 0,76	0,76
EU-27	 	0.57

Source: OECD Family Database; as a per cent of GDP;

Table 10: Development of public family cash benefits expenditures\*

Country/Year	1980	1990	2000	2001	2002	2003	2004	2005
Australia	0,911	1,262	2,366	2,378	2,211	2,635	2,297	2,18
			2,366					
Austria	2,831	2,201		2,34	2,391	2,494	2,434	2,371
Belgium	2,848	2,137	1,758	1,763	1,719	1,741	1,681	1,657
Canada	0,642	0,511	0,762	0,872	0,9	0,899	0,678	0,892
Czech Rep.		2,456	1,446	1,362	1,377	1,276	1,347	1,167
Denmark	1,068	1,408	1,491	1,494	1,533	1,627	1,61	1,548
Finland	1,051	1,838	1,756	1,66	1,615	1,618	1,617	1,599
France	2,151	1,46	1,473	1,456	1,463	1,447	1,404	1,391
Germany	1,816	1,204	1,187	1,17	1,212	1,196	1,17	1,43
Greece	0,303	0,381	0,662	0,623	0,685	0,767	0,748	0,695
Hungary			1,886	1,839	1,852	2,033	1,855	1,888
Iceland		1,73	1,033	1,152	1,284	1,458	1,421	1,264
Ireland	1,027	1,52	1,633	1,847	2,185	2,265	2,247	2,214
Italy	0,963	0,604	0,543	0,57	0,546	0,586	0,603	0,578
Japan	0,23	0,17	0,252	0,291	0,304	0,307	0,345	0,348
Korea		0,001	0,003	0,003	0,006	0,008	0,011	0,013
Luxembourg	1,55	1,658	2,651	2,738	2,979	3,297	3,237	3,076
Mexico			0,175	0,213	0,271	0,324	0,333	0,372
Netherlands	1,986	1,167	0,726	0,695	0,761	0,758	0,744	0,638
New Zealand	2,175	2,592	2,158	2,036	1,98	1,885	1,759	1,923
Norway	1,246	1,872	1,855	1,924	1,94	1,889	1,751	1,58
Poland		1,683	0,954	0,979	0,97	0,89	0,893	0,842
Portugal	0,661	0,626	0,618	0,622	0,654	0,685	0,744	
Slovakia			1,547	1,384	1,349	1,333	1,628	1,721
Spain	0,443	0,237	0,3	0,289	0,288	0,414	0,429	0,447
Sweden	1,703	2,096	1,501	1,58	1,565	1,56	1,546	1,52
Switzerland	0,998	0,884	1,007	0,998	1,04	1,055	1,03	1,016
Turkey	0,864	1,234	·	,	· · ·	·	••	0,017
UK	1,777	1,533	1,859	1,872	1,872	2,155	2,219	2,214
United States	0,464	0,22	0,109	0,1	0,094	0,088	0,082	0,075
OECD - Total	1,233	1,196	1,23	1,231	1,252	1,301	1,268	1,247

Source: OECD Social Expenditure Database (SOCX); \*in percent of GDP, 1980-2005

Table 11: Family allowances in the EU

·	Based on employ-	Income-tested	Varying by age /	Varying by number of
	ment (not residence)		age limit normal/	children
			further education*	
Denmark			17	
Finland			17	
Sweden			16	
Austria			18/26	
Belgium			18/25	
France <sup>105</sup>			20	
Germany			18/25	
Luxembourg			18/27	
Netherlands			17	
Ireland		•	16/19	
Malta			16/21	
UK			16/20	

 $^{105}$  France as the only country in Europe only pays family allowances from the second child onwards.

Cyprus	18/23
Greece	18/22
Italy	18
Portugal	18/24
Spain	18
Czech Republic	15
Estonia	15/19
Hungary	18/23
Poland	18/24
Latvia	15/20
Lithuania	18
Slovakia	16/25
Slovenia	18/26
Bulgaria*	20
Romania*	18

Source: Own illustration of Bahle (2008), based on MISSOC 2004 data, \*Council of Europe Family Database 2009

# B) Questionnaire

	WESTFÄLISCHE WILHELMS-UNIVERSITÄ MÜNSTER	т	TIE
			Sonja <u>Blum</u> M.A. Dr. Christiane Rille-Pfeiff
			sonja.blum@uni-muenster.de christiane.dlle.pfeiffer@univie.ac Tel. +49 251 83-25387
Questionnaire for Policies", finance	or the Project "Social Platform o ed by the European Commissio	on Research for Fam on / 7 <sup>th</sup> Framework fo	ilies and Family or Research
Please give the f	ollowing personal information:		
Name: Institution: Country:			
(Please name pref	ree most relevant publications of erably publications in English and g ations exist, please name those on	jive web link if availabl	your country?  e. In case no specific
3.			
э.			
2. What are the th cal agenda for act (Please specify sh 1.	ree most important family policy tion in your country? ortly whether and, if so, what politic		
2. What are the th cal agenda for act (Please specify sh 1. 2.	tion in your country? ortly whether and, if so, what politic	al decision on this issu	le has been made.)
2. What are the the cal agenda for act (Please specify sh. 1.  2.  3. De familialization sibilities from the hethrough public chillis responsible for the call and the control of the call and the call	tion in your country?	al decision on this issu r markets) take over w her (female) labour ma ns). ( <i>Re-)familialisation</i> icouraging more traditi	e has been made.)  elfare and care respon- rket integration (e.g.
2. What are the the cal agenda for act (Please specify sh. 1.  2.  3. De-familialization sibilities from the hithing from the hithing from the fortilack of public child.  Are recent family.	tion in your country? ortly whether and, if so, what politic to takes place when social policy (or cousehold, often with the aim of high dcare, abolishing survivor's pension the welfare of its members, often en	al decision on this issu r markets) take over w her (female) labour ma ns). ( <i>Re-)familialisation</i> acouraging more traditi- nsions).	elfare and care respon- rket integration (e.g. rmeans that the family onal family forms (e.g.

























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