

Gender and Social Policy: An Examination of Four Welfare States

by

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Abstract

Drawing upon insights of dominant ‘mainstream’ welfare state theories and models, and those of their feminist critiques, this study examines two pairs of similar welfare states, Sweden and Norway (two ‘social democratic’, Nordic welfare states), and Germany and France (two ‘conservative’, continental welfare states). The focus is on two central social policy domains; family policy and labour market policy. The study determines the characterizations of each welfare regime type and level of woman-friendliness. Sweden and Norway both welfare states fit in Esping-Andersen’s initial social democratic welfare state regime type. However, with the inclusion of gender as an analytic variable the classification as a social democratic nation is somewhat problematic. With levels of woman-friendliness considerably higher in Sweden compared to Norway. Germany remains true to its original classification as an ideal conservative welfare state with low levels of woman-friendliness. Yet, France can be said to be moderately conservative and moderately woman-friendly.

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Chapter 1: Introduction

The term welfare state can be defined as ‘state responsibility for securing some basic modicum of welfare for its citizens’ (Esping-Andersen, 1998). However, the level to which a state is responsible can vary markedly across nations and, due to the disparity in definition and provision of services, has led social policy researchers to investigate the degree to which the welfare state impacts the lives of its citizens. Over the last three decades particular attention has been drawn to the impact that welfare states have on the lives of women. Early generations of feminist scholars viewed the differential treatment of women compared to men as a testament to the deep seated roots of a patriarchal society. The actions of the state were deemed to create a form of public patriarchy through its propensity to regulate, monitor and control women (Hernes, 1987). Although early feminist writers exposed the workings of patriarchy in society, their case studies predominantly examined the ‘Anglo’ welfare states in such nations as Canada, United States and the UK, and typically viewed them as largely patriarchal. Comparative researchers, however, examined nations in northern and continental Europe and reached very different conclusions regarding the character of the welfare states. Studies of Nordic nations, in particular, revealed a welfare state that was starkly different from that in Canada, the United States or the UK in the treatment of women. In fact, this research pointed to the possibility of generous and supportive programs. Helga Hernes (1987) coined the term ‘woman-friendly’ to explain the possibility of a progressive state:

A woman-friendly state would enable women to have a natural relationship with the state...a woman-friendly state would not force harder choices on women than on men, or permit unjust treatment on the basis of sex. In a woman-friendly state

women will continue to have children, yet there will also be other roads to self-realization open to them. In such a state women will not have to choose futures that demand greater sacrifices from them than are expected of men. (p.15).

Hernes' criteria of 'woman-friendly' allows a researcher to assess the effects of nation's welfare state. A state's level of 'woman-friendliness' would be seen in social and political processes that help lessen women's economic dependence on their husbands or partners, the encouragement of self-support through paid work, and public support via economic and welfare transfers (Kjeldstad, 2001). However, high levels of social support that have led some to call the Nordic states 'woman-friendly' (Kjeldstad, 2001) is not the case for all European women. For example, Germany and France have been considered 'unfriendly' to women (Fagnani, 2007), as their policies strictly reinforce some aspects of the inferior location of women within these societies.

Drawing upon insights of dominant 'mainstream' welfare state theories and models, and those of their feminist critiques, this study examines two pairs of similar welfare states, Sweden and Norway (two 'social democratic', Nordic welfare states), and Germany and France (two 'conservative', continental welfare states). It is not possible to examine the myriad measures that comprise modern welfare states across all policy domains/areas. The focus here is upon two central social policy domains; family policy and labour market policy. The goal of this study is to assess the validity of the characterization of these welfare states in light of recent feminist research.

Welfare State Typologies: Bringing Gender In

The development of welfare state typologies has been an evolving area of investigation for social policy researchers for several decades. The early development of different typologies and classification systems of welfare states were very useful for researchers.

However, they also served to mask the intricacies within individual nations. The earliest attempts at classification systems were typically linear, bipolar typologies which used one or two easily quantifiable measures, such as initial introduction of key social policies and level of social spending. The two ends of the social policy continuum were defined as ‘welfare laggard’ or ‘welfare leader’. These early typologies, while useful in a limited context, failed to provide other valuable pieces of information concerning a welfare state’s true character, ignoring areas such as, rules of eligibility, the character and generosity of income programs, and the availability and quality of social services (Olsen, 2002).

The limitations of these initial typologies led to the development of other dichotomous and trichotomous typologies. The dichotomous typology distinguished between two ideal types of welfare states, ‘residual’ and ‘institutional’. Although this approach was intended to examine more qualitative measures of welfare states, the results often grouped together welfare states that shared little in common other than the variables used to distinguish their classification. As well, feminists critiqued this dichotomous approach for painting all citizens with the same brush, resulting in the inaccurate conclusion that men and women are treated by, and experience, the welfare state similarly.

The shortcomings associated with this dichotomous approach led to the widely-embraced work of Gøsta Esping-Andersen (1998). Esping-Andersen (1998) developed a trichotomous approach which classified welfare states according to three distinct regime types. These three regimes, considered ideal types, are known as, *liberal*, *conservative*¹ and *social democratic*. Esping-Andersen (1998) established three distinct dimensions to

classify welfare states. The variations within these dimensions help to determine the regime in which a nation belongs. The first dimension is the relationship between the market and the state and, to a lesser extent, the family. Within this dimension he explored the mix of public, private and civil sectors social policies that exist across nations. The second dimension he highlighted was a welfare state's ability to 'decommodify' its citizens. The decommodification of a citizen simply means the states' '...capacity to sever or significantly erode citizens' dependence on employers and the market for their well-being.' (Olsen, 2002). The third and final dimension articulated by Esping-Andersen (1998) was the state as a system of stratification. The welfare state plays a key role in creating, sustaining or weakening class relations and inequalities (Esping-Andersen, 1998; O'Connor, 1993; Orloff, 1993). For example, some policies promote solidarity and minimize class distinctions while others foster individualism and reinforce or accentuate inequalities. Whatever the policy area/domain, the stratification effects permeate and, depending upon the regime type, determine whether the effects divide or unite a population.

Esping-Andersen (1998) stressed the 'ideal' nature of regime types; in other words, there is no 'pure' liberal, conservative or social democratic welfare state. The label used to categorize regime types hinges on these three dimensions. The 'worlds of welfare' approach allows for the categorizations of welfare states using both quantitatively verifiable information as well as qualitative variables. Due to the fact that states change over time, the categorizations of countries may change with their evolution. Given the changing nature of welfare states it is important to re-evaluate previously classified welfare states and assess the appropriateness of their assigned regime type, a

central consideration here. However, one must first understand each of the regime types as they were first articulated by Esping-Andersen² (1998) and subsequently elaborated upon.

The *liberal* welfare regime is characterised by income programs that are limited and needs-based, with coverage that is selective and low flat-rate income benefit levels. The provision of social benefits by the state is considered a last resort and is only intended to alleviate the sting of poverty, and only for those considered deserving. In addition to their emphasis upon some form of means-testing or insurance over universalism as the central means of accessing income programs, liberal welfare states are also known for their dearth of social services. The state encourages the market through guaranteeing a minimum standard and promoting private schemes. Their overall public expenditure level is low due to their reliance upon the private sector. In liberal welfare states, the civic sector welfare can be considered moderate. Among the most notable exemplars of the liberal welfare state are Anglo nations, the United States, which most closely approximates the ideal type, and Canada..

The second regime identified by Esping-Andersen (1998) is the *social democratic* regime. The social democratic welfare regime is highly de-commodified and based on the principle of universalism (Esping-Andersen, 1998). The adherence to universalism allows all citizens within this regime to benefit from the promotion of the highest standards in regards to social services and benefits. They seek to abolish poverty, not simply to alleviate it. Everyone equally benefits from the wide range of universal welfare state services, therefore, solidarity among citizens and confidence in the welfare state is promoted (Esping-Andersen, 1998). In order to meet the high costs associated with high

levels of social spending taxation levels are high. An additional distinguishing characteristic of this regime is the priority of full employment (Esping-Andersen, 1998; Olsen, 2002).

Social democratic welfare regime welfare states address both market and family concerns, with markets being crowded out from welfare provision and some family caring services provided by the state, which pre-emptively socializes some of the costs and alleviates some of the burdens of domestic labour (Esping-Andersen, 1998; Olsen, 2002). Social democratic welfare states emphasize universal, high quality social services, which are considered more egalitarian than generous income benefits because all residents, regardless of class, receive the same social services (Olsen, 2002). A social democratic welfare regime is found in Denmark, Norway, Finland and Iceland. However, the most notable example of a social democratic regime is Sweden; it most closely approximates the ideal type.

The third category is the *conservative* regime. This regime is characterized by its adherence to the preservation of community, tradition and existing differences and hierarchies. Conservative regime welfare states, historically, have strong links with the church and Christian ideology, which helps to explain their adherence to traditional family roles. The structure of the conservative regime is, 'designed to uphold and reproduce existing status and income differences among members of different classes and sectors in society rather than to create a more egalitarian society.' (Olsen, 2002). Unlike liberal or social democratic regimes, conservative welfare states rely on social insurance which is compulsory in the workplace, with the level of welfare being determined by a citizen's contributions while in the labour market. The fact that the level of social

welfare is determined by one's continued, uninterrupted contributions within the labour market helps to reinforce existing class divisions within society (Olsen, 2002). In addition, the adherence to tradition in conservative welfare states also encourages a single breadwinner model, with the expectation that women will stay within the home and assume the conventional care-giver role. The overall expenditure cost within conservative regimes ranges from low to very high (Olsen, 2002)³.

The characterizations found within Esping-Andersen's typology point to the marked differences among the advanced capitalist nations throughout the world. Unlike previous typologies, Esping-Andersen addressed both quantitative and qualitative variables in his assessment of the various welfare regimes. Although his typology has been invaluable to social policy researchers, there is one distinct and glaring oversight within his work, its' neglect of gender.

Feminist Critique of Welfare Regime Approach

'Feminist' is used to describe scholarship that uses gender as the central analytic category and/or focuses on the situation of women. It describes social and political orientations which favour diverse versions of gender equality (O'Connor, Orloff, & Shaver, 1999). Early generations of feminist welfare state scholarship suffered from some of the same short-comings as early welfare state research. For example, early studies pointed to the 'men's league' or 'men's house' of the state structure, whereby male dominance includes the rule of husbands, male bosses, men ruling most societal institutions, including politics and economies (Mies, 1998, p. 37). This term was used to express the totality of men's rule, highlighting the oppressive and dominating characteristics of the state. The result, as expressed by this group of scholars, was the denial of basic social rights, either directly

or indirectly excluding women from decent coverage within the welfare state. They described a 'dual system' in which women were treated as second class citizens and men enjoyed all the privileges and best programs the state had to offer. There were several issues which emerged within early feminist literature, including the inability to generalize findings across different states. The predominant method of investigation was the use of individual case studies, often focusing on the United States. The results of American case studies supported feminist claims of 'men's rule'. However, case studies using Sweden as their country of investigation, found a more empowering welfare state, often designating it as 'women-friendly'. The variability across these early studies made comparisons among different studies difficult. Therefore, social policy researchers have developed more refined research projects with a wider scope in order to enlarge our understanding of the relationship between gender and the welfare state, especially, how is gender addressed in welfare state policies, and how these policies order gender relations across a wide range of national contexts.

For purposes of this paper the focus of feminist literature will be in relation to Esping-Andersen's (1998) welfare regime approach. As useful as Esping-Andersen's typology is in helping us to understand key differences between and within welfare states, his analysis neglects gender, as noted above. Current feminist scholars point to the overall androcentrism located within Esping-Andersen's three worlds of welfare. The absence of gender within his welfare regime typology is consistent with feminist theorist's claims that 'mainstream' research is gender blind, and ignores, or minimizes, issues associated with the female population of a given society (Bussemaker & Van Kersbergen, 1999; O'Connor, 1993; Orloff, 1993). The ignorance of women's issues and

resulting gender blind research stems from the socialization of traditional gender norms and roles which place women within the confines of the private sphere of household management and men within the public sphere of work and labour (Bussemaker & Van Kersbergen, 1999; Drew, 2000; O'Connor, 1993; Orloff, 1993). For example, taking into account women's location within the private sphere greatly impacts Esping-Andersen's (1998) notion of decommodification. Decommodification, according to Esping-Andersen (1998), is the weakening of the worker's dependence on the labour market for their overall well-being through the provisions of social welfare. However, feminists point to his oversight in highlighting the fact that men's relative level of decommodification is dependent on women handling the domestic upkeep of the home and caring for dependents (children, elderly, and sick family members). And, the commodification of women, as they move into the paid labour force, decreases their dependence upon men (fathers, husbands, partners).

Gendering the Welfare Regimes Typology: Ann Orloff & Julia O'Connor

The gender oversight of Esping-Andersen's regime typology is the key weakness identified by recent feminist scholarship. The most notable incorporation of gender in Esping-Andersen's typology is Ann Orloff's (1993) conceptual framework for analysing gender within comparative welfare research. Her framework draws on both feminist and 'mainstream'⁴ work and seeks to remedy Esping-Andersen's gender oversight. Orloff (1993) broadens feminist scholarship beyond case studies, develops a conceptual framework through the use of mainstream literature, and proposes amendments that reflect what is known about gender relations and the state. Orloff (1993) is concerned with providing the analytical tools that equip both feminist and 'mainstream' theorists

with a framework that highlights gender, adding another key dimension to welfare state analysis. As noted above, Esping-Andersen's scheme highlights, (1) state-market relations; (2) stratification; and (3) social citizenship rights, and how these affect the de-commodification of labour, but pays scant attention to gender. Orloff (1993) considers gender to be a concept which cannot be just thrown into an analysis by simply detailing what the welfare state does for or to women. Instead, the framework must 'gender' the core concepts within the analysis.

Orloff (1993) develops her analytic scheme for welfare state research by firstly acknowledging power resources theorists' (Esping-Andersen included) preoccupations within their research⁵. These include an exclusive preoccupation with the oppressive forces of capitalism, turning labour power into a commodity, and the freedom afforded to the worker via the democratic process. They identify two sources of power; capital, and the right to vote and organise (Orloff, 1993, p. 306). For power resource theorists, 'Wage earners...will use their political resources to modify market processes and extend social rights. Conversely, capitalists will fight to let market-based processes determine welfare outcomes and to limit social rights.' (Orloff, 1993, p. 307). Their analyses of welfare states is largely focused upon the push and pull relationship between the 'male' worker and the capitalist. Although this adequately addresses class relations that develop through the welfare state, there is very little attention to gender here.

To articulate this point further Orloff (1993) points to the 'worker', used by Esping-Andersen and power resources theorists. The 'male' worker becomes the 'stand in' for all discussions of the welfare state and policies connected with ideal citizenship. The male worker's concerns become the lynchpins in this research, emphasising

programs which compensate workers based upon their contributions in the labour market to, for example, old age pensions or unemployment insurance. Sexist assumptions are hidden within gender neutral language and categories; it is the implicit male standard that dominates within welfare state analysis (Orloff, 1993). Analysts, such as Esping-Andersen (1998) and Walter Korpi (1983), illustrate the functions of the welfare state using case studies which feature the traditional; ‘male breadwinner’ with dependent wife and children (Orloff, 1993). They highlight the male’s capabilities to make claims based on their status as workers to compensate for failures in the labour market, yet ignore the fact that women make claims as ‘workers’ but primarily via their status as dependent ‘family members.’

The worker is considered the citizen of the state, a citizen whose power and status is derived through *his* participation in the welfare state. Again, the term ‘citizen,’ like the term ‘worker’, is used to describe both men and women, yet it means something very different for each sex. Women have not enjoyed citizenship, free of restraints or interference. Rather, as Orloff (1993) states,

relations of domination based on control of women’s bodies in the family, the workplace, and public spaces undermine women’s abilities to participate as independent individuals`- citizens – in the polity, which in turn affect their capacities to demand and utilize social rights. The ways that states intervene – or refuse to – are critical to women’s situation.

Orloff’s demonstrates how the term ‘citizen’ relates very differently to women vis-à-vis their status within the welfare state. Democracies throughout the world conceptualize the responsible citizen as a political agent, who can vote and participate in the political arena. However, it is often forgotten that women were long denied the right to vote solely based on their gender (Orloff, 1993). Women’s gender was used as the sole determinant of

their supposed inability to make political decisions. The denial of an essential democratic function based on one's gender, demonstrates not only the power of gender, but also the patriarchal nature of welfare state development. For men their gender is a ticket to the public sphere, free of restraints, while for women, being female has confined their roles to caregiver, and blocked their efforts to enter the public sphere.

Orloff (1993) agrees that Esping-Andersen's regime typology is cohesive and useful in comparative welfare state analysis, with the exception of its inattention to gender. In order to remedy this deficiency, she seeks to 'gender' his proposed three criteria while adding two more dimensions which would more effectively 'gender' his welfare state analysis. It is beneficial to examine how she 'genders' each criteria with special attention to her two new dimensions.

Orloff (1993) begins with a discussion on gendering the state-market-family relations. She highlights the inattention to the family within the state-market dimension and how welfare is determined through only these two variables. The recognition of the family as a primary provider of social welfare is a good starting point for the gendering of this dimension. As noted, women are predominantly responsible for a great majority of unpaid caring labour within the private sphere, and this work must be recognised in welfare state modelling. The recognition of women as providers of private family care aids us in re-evaluating the sexual division of labour. The solution within this dimension lies along two main lines, (1) increasing men's role within the household through a redistribution of unpaid labour, and (2) the allocation of social services as provided by the state. Hence, a welfare state's level of women 'friendliness' can be determined through its propensity to aid with private sphere domestic responsibilities. As Orloff

(1993) states, 'social services both allow women to work and create a large labour-market within which they can find employment' (p. 312). Therefore researchers must examine not only the state-market-family as it relates to the public sphere, but how these three intersect within the private sphere, and how that impedes or improves a woman's progress within the public sphere as well.

With regard to gendering the stratification variable, Orloff (1993) points to power resources theorists' focus on how state provisions impact on class relations, while at the same time ignoring how they affect gender relations. She poses two central ways that the state affects gender hierarchy. The first is by privileging full-time paid workers over workers who do unpaid work, or who combine part-time paid work with domestic and caring labour. The second is by reinforcing the sexual division of labour in which women do the bulk of unpaid work (Orloff, 1993, p. 314). In order to address this situation Orloff (1993) proposes that we must acknowledge the influence that gender plays in the social provision of welfare. Through this acknowledgement policies may be developed in a manner which truly creates greater equality within the population.

The gendering of Esping-Andersen's third criteria, social citizenship rights, the de-commodification dimension, begins with the gendering of the term 'de-commodification'. De-commodification in Esping-Andersen's typology provides workers with support outside the labour market which provides leverage within the labour market. The degree to which workers are decommodified influences the amount of power they possess within the welfare states, for example political or social power. The neglect of gender within this dimension ignores the fact that the work that takes place within the confines of the home (by women) allows males to enter the labour

market in the first place. Orloff (1993) calls for an amendment of the term with the following: ‘The extent to which states guarantee women access to paid employment and services that enable them to balance home and work responsibilities, and the mechanisms and institutions that implement these guarantees’ (p. 317). The male standard prevails within the original analysis of de-commodification but, with the added gender dimensions proposed by Orloff (1993), will allow us to determine if access to services is determined primarily by citizenship or labour force participation.

Alone, the three criteria proposed by Esping-Andersen are not adequate even if gendered. Orloff therefore proposes two new dimensions. The first dimension is women’s access to paid work. Access to paid work can be considered a way for women to increase their independence and power within society generally and also within their male-headed families. The degree to which a state provides access to paid employment for women can help indicate the level of ‘woman friendliness’ and renegotiation of gender relations within a state.

Closely associated with this first added dimension is what Orloff (1993) calls the ‘capacity to form and maintain an autonomous household.’ This second dimension is concerned with women’s freedom from compulsion to enter or stay in marriages in order to obtain economic support. Orloff (1993) reminds the reader of the feminist observation that women are ‘just a husband away from poverty’. Women who are economically dependent on their spouse are left destitute if the marriage crumbles and the husband leaves. In order to avoid this situation women stay in unsatisfying, or even oppressive, marriages in order to survive. Hence the new dimension allows

investigations into the degree to which this is a reality for women across different welfare regimes.

Another feminist scholar who echoes some of the same concerns as Orloff (1993) is Julia O'Connor (1993). O'Connor also critiques Esping-Andersen's neglect of gender. However, she is concerned with incorporating more accurate representations of class, citizenship and gender within comparative welfare state research. Like Orloff, she addresses Esping-Andersen's conceptualization of social citizenship, noting that the concept of 'citizen' was developed at a time when women were not truly considered as such. Therefore, the use of a term 'citizen' inherently excludes women and leads to the creation and implementation of social policies largely created through a man's experience, an experience starkly different from women. O'Connor (1993, p. 512) seeks to include the term citizen(ship) by 'reconciling the achievement of equality with difference in condition.' Through her re-imagination of citizenship O'Connor effectively highlights the different experiences of men and women.

O'Connor also shares Orloff's sentiments regarding the skewed picture which results from the invisibility of women's domestic labour. O'Connor (1993) calls for the replacement of the term 'decommodified' with 'personal autonomy'. She defines 'personal autonomy' as 'the insulation from involuntary personal economic dependence on family members and/or public dependence on state agencies, a concept which is central to unravelling the complexity of the relationships among state, market and family (1993). O'Connor, like Orloff, seeks to highlight the degree to which women are economically and socially free within different welfare states.

Jane Lewis' 'Male Breadwinner' Typologies

Unlike Orloff (1993) and O'Connor (1993), Jane Lewis (1992) did not seek to amend Esping-Andersen's (1998) existing typology. Rather, she developed an alternative one of her own. Lewis' (1992) model, like Esping-Andersen's (1998), has three categories, but she uses gender as the central organizing principle. Within her new typology Lewis categorizes welfare states according to their adherence to a 'male breadwinner' ideology and practice. Breadwinner ideology is defined by Lewis as the degree to which 'breadwinning' is deemed to be a man's primary role and caring and homemaking as a woman's primary role. She organizes welfare states into one of three categories or models: (1) '*strong breadwinner*', (2) '*moderate breadwinner*', or (3) '*weak breadwinner*'. In her analysis she uses historical accounts of policy implementation as indicators of a given country's support of this traditional model. She concludes that Ireland and Britain are good examples of a '*strong breadwinner*' model. France fits within the '*modified breadwinner*' model, while Sweden falls within the '*weak breadwinner*' model. Although her results produce an insightful re-imagining of welfare state typologies to include the presence and experiences of women, her schema fails to qualitatively or quantitatively to support her argument. Her typology falls victim to over-generalizations and faulty reasoning as to the placement of countries within different welfare state categories. Although she does not conduct close comparative analysis of welfare states she makes sweeping conclusions. She fails to establish a clear tool of assessment other than her definition of 'male breadwinner'. And her employment of historical records while useful, are used to cherry-pick facts and events to construct her argument in her favour. In fact her typology is little more than a re-telling of the current

state of women and provides no new suggestions to remedy their plight (Orloff, 1997; Sassoon, 1997).

Gender-Equality Typology

To aid in the evaluation of the degree of woman-friendliness of a welfare state, I will now turn to a gender-equality typology developed by Prue Chamberlyne (1993) and later utilized by Randi Kjeldstad (2001) to examine social policy. Chamberlyne's typology is comprised of four distinct gender-equality approaches, *gender reinforcement*, *gender neutral*, *gender recognition*, and *gender reconstruction*. The first approach, *gender reinforcement*, seeks to reinforce and perpetuate the continuation of different but complementary gender roles (Kjeldstad, 2001). The central aim here to maintain the traditional gender roles of women, rewarding home care and domestic work. However, this approach does not necessarily support an unequal outcome among men and women. Rather, it presupposes that work in the domestic and work in the public sphere are both equally rewarded.' It most closely fits with the conservative regime (Kjeldstad, 2001, p. 72).

The *gender neutral* approach to social policies seeks to endorse the same equal rights for men and women. There is no specific attention to women as they seek to guarantee rights of women on equal terms to those of men. These approaches are severely limited and are located within legislative reforms. They are 'designed to foster greater employment opportunities for women in the labour market, eliminate formal barriers to their success through anti-discrimination laws, and improve their levels of remuneration vis-à-vis their male counterparts.' (Olsen, 2011, p. 113). However useful this approach may appear, feminist critiques, including Orloff (1993), have pointed to the

gendered nature of citizenship, and simply ignoring this aspect is a hindrance to the advancement of women's rights. It most closely fits with the liberal regime.

Unlike the gender neutral approach the *gender recognition* approach, 'focus(es) on the particular obstacles women meet in gender equality process' (Kjeldstad, 2001, p. 71). Unlike gender neutral approaches, which ignore the principle of equality of outcome, gender recognition seeks to create equality of outcome to address numerous informal barriers in society and compensate for the resultant underachievement of a gender. Examples of policies within this approach include positive discrimination practices, such as quota systems, gender equality training programs, and the provision of public child and elderly care (Kjeldstad, 2001; Olsen, 2011). It most closely fits with the social democratic regime.

The *gender reconstruction* approach emphasises, 'the reciprocity in women's and men's roles in society.' (Kjeldstad, 2001, p. 72). Policies here aim to change traditional roles within society and the family. Changes in gender roles are considered a precondition for real equality within women's lives. Gender reconstruction is closely associated with gender recognition, but goes much further. It acknowledges that changes at the structural level can change the personal level. Both approaches advocate some form of equality of outcome. Some policies in nations such as Sweden fit here – such as the attempt to encourage males to see caring for children as their role via the access to full parental leave, as well as education policies. However, these measures are far from uniform across all policy domains in any nation to date (but are at least a recognized goal in some nations like Sweden, and viewed as the 'next step').

Family Policy and Labour Market Policy in Four Nations

The feminist scholars highlighted above provide useful considerations of techniques that can greatly aid in our evaluation of existing policies and programs for the advancement of women. The possible policy domains as areas of investigation include, family policy, health care policy, old age policy, disability policy, housing policy and education, among others. Each of these policy domains are relevant when discussing the degree to which welfare states are women-friendly. However, for purposes of this paper, I will examine two central policy domains: labour market policy and family policy. I will focus on four key nations, Germany, France, Norway and Sweden, in order to assess their relative level of women-friendliness. The selection of these two policy domains was determined on the basis of concerns identified by Orloff, O'Connor and Lewis, including women's disproportionate responsibility for care work which greatly influences their labour market participation rates.

Sweden and Norway were selected because both have welfare states categorized within the social democratic regime, with Sweden the closest to the ideal type. However, it has been suggested that, despite its designation as social democratic, the Norwegian welfare state is less woman-friendly, and more conservative. This suggestion has been briefly noted in several studies. For example, Diane Sainsbury (2001) pointed to some differences between Norway and Sweden and suggested that Norway may not be as woman-friendly as initially believed by earlier social policy researchers. She revealed Norwegian policy to have a stronger influence on family obligations and much sharper gender differentiation in social entitlements as compared to other Nordic countries (Sainsbury, 2001, p. 114). And it is sometimes suggested that Norway has become less

social democratic in recent years. The aim of my research is to rigorously examine the degree to which Sweden and Norway employee woman-friendly social policy when examined through a gendered lens.

This study will also examine two conservative welfare states, those of France and Germany. While Germany is the closest to the ideal type within this welfare regime, it is sometimes suggested that France is considerably more progressive in the advancement of gender equality than initially indicated by social policy researchers. Research conducted by Jeanne Fagnani (2007) examined the family policy of France and Germany and described the differences between the two. However, a close examination of the gendered issues at play were not highlighted or addressed within her research. Nor was the changing character of welfare states addressed. My research will attempt to determine the degree to which France is woman-friendly and how conservative it is, when considering the family policy and labour market policy through a gendered lens.

The complexity of the two selected policy domains (labour market policy and family policy) will be sub-divided to consider the income programs and social service programs provided in each domain by the different welfare states. This study will examine two sub-areas within each policy domain, income support measures and social services across the four welfare states.

Family Policy

Family policy encompasses an extensive and varied range of programs and measures that directly or indirectly affect families. Nations that do not explicitly provide families with special benefits, services or other provisions still have a family policy platform, which typically reflects a set of underlying guiding principles concerning the nature of families and the role of women within them.

Income

The dominant areas of investigation within the family policies of the selected countries for my research include family allowances and paternity/maternity benefits. These programs provide cash transfers and tax exemptions for families with children (Olsen, 2002). The level of compensation afforded under this particular policy domain directly influences the family within a welfare state. For example, generous income programs lessen the financial burden of families and can allow women to maintain a career and lessen their burden of care work. Restrictive generosity in programs can negatively influence a woman's entrance or continued presence within the labour market. We will also consider whether there are waiting periods and the extent of limits on benefit periods.

Social Services

The second category to be used in organizing the selected policy domains is social services provided by the welfare state in each policy domain. Social services are non-cash-based programs or other forms of support which aids the family, individual and community within a welfare state (Olsen, 2002). With regard to family policy domain

the dominant program of interest is child care. For example, does the welfare state provide adequate child care services? Are these services easily accessible? Are they generous? What is their quality? The level of child care supports given within a nation can improve the condition of women, again, through the alleviation of care responsibilities within the home. Additional examples of child care services include the provision of accredited caregiver or houseworker who enters a house and undertakes domestic chores at the discretion of the homeowner or beneficiary, such as in France.

Labour Market Policy

Labour market programmes fall into one of two categories, ‘passive’ or ‘active’. Passive labour market policies are reactive and provide a measure of income security to workers who lose their jobs (Olsen, 2002). Active labour market policies, in contrast, are proactive or anticipatory; their purpose is to prevent or discourage unemployment. As well, they promote employment via job creation and fiscal measures (Olsen, 2002).

Income

In regards to income services for labour market policy domain the predominant programs in place include unemployment insurance and unemployment assistance. Both programs are considered reactive as they provide a level of income security only *after* workers lose their jobs. Key aspects of the benefit’s generosity include; rules and regulations for compensation, the level of compensation, waiting periods, and benefit duration period. Each of these aspects determine whether workers will be able to maintain the type of lifestyle they enjoyed while working or whether they will endure a period of deprivation or poverty. In countries with low levels of compensation, workers find themselves highly

stigmatized and often go unrecognized as truly unemployed. As well, the duration of these programs significantly impacts the worker; with longer duration of benefits the worker is more likely to find more suitable employment.

Social Services

The dominant social services within labour market policy are considered active labour market policies (ALMP). For purposes of this paper the examination of legislative measures, while not traditionally a social service, will be considered as such. ALMP vary across different welfare states. Close examination of them is necessary to determine the level of supports they afford women. Through the implementation of ALMPs, welfare states protect their citizens. Therefore, continued employment of a country's citizens is a central element to investigate further. Labour market policy initiatives that seek to reduce the wage gap between women and men for the same job is of particular importance, as these initiatives directly affect the income of working women. As well, programs aimed at bringing women into non-traditional occupations is important as most jobs outside the traditional women's work increase women's earning potential and social mobility. For example, increasing the number of women in managerial or political positions would enhance their social mobility and earning potential. Family and labour market policy domains are of particular importance for my research project.

Other policy domains are also important. For example, a welfare state that provides extensive educational opportunities will increase the probability that women will partake in full time employment within the labour market. As well, welfare states that provide post-secondary education at little to no cost benefit the family dynamic as women can easily partake as well as, the burden of making tuition that is experienced in

North America, is alleviated when sending their children to higher education. Similarly, a welfare state's old-age policies have a gender component. For example, women are usually responsible for not only caring for their immediate family, such as husbands, partners, and children, but also aging family members, such as parents. The added responsibility of caring for aging or ailing parents leaves women to care work which impacts their level of labour market participation and social mobility. Therefore, welfare states with generous Old-Age policies, such as monetary compensation for home care, alleviates the caring responsibility from women and provides them with the opportunity to participate full time or even consistently within the labour market. However, this study will focus upon the two social policy domains elaborated earlier.

In terms of methodology and data, this study will be utilize a variety of resources. The predominant form of data to be used will be government/official documents provided by the countries under investigation. Information from the 'Organization for Economic Co-operation and Development' (OECD), will also be used. The newly established family database on OECD will furnish the bulk of information regarding this research project. In addition, this project will rely on data obtained through the 'International Social Security Association' (ISSA). I will utilize data published in the ISSA's *Social Security Programs throughout the World: Europe 2010* (ISSA, 2010). In addition, I will use secondary sources on welfare state policy development, gender, and welfare states, and historical accounts of implementations of social policies concerning my countries of interest.

In summary, this study seeks to enrich an area of research which has been notable for relatively little comparative research committed to gender and how gender affects the

individual as well as the welfare state as a whole. However, before the examination of the policy domains, a brief introductory history and overview of the four nations is provided as a foundation.

Chapter 2: Social Democratic and Conservative Nations: A Brief History/Overview of Sweden, Norway, German and France

Sweden

As noted above, Sweden is the nation closest to the social democratic ideal. Despite its relatively small population of approximately 9.4 million people, Sweden is a relatively large nation, in geographical terms, by European standards. It is located in northern Europe, in the eastern part of the Scandinavian Peninsula, sharing a border with Finland and Norway. Early Swedish history (prior to 18th century) highlights an agriculturally-based economy and society which resulted in stunted economic growth and political power, due to the limited capacity to expand job sectors. It also localized wealth within the hands of a few creating great divisions and inequality among society. After the Great Northern War, Swedish parliament abolished royal absolutism and firmly placed power in the hands of parliament. The 18th and 19th centuries were marked by struggle and a fledgling economy as the nation struggled to lose its agrarian character, locate new ways to increase productivity, and to discourage mass emigration out of the country⁶ (Morgan, 2006).

The shift from an agrarian society to an industrial powerhouse was rooted in the period between 1900 to 1930, as a result of a series of inventions and entrepreneurs within the engineering sector in Sweden (Swedish Institute, 2011). Its rapid industrial growth firmly established Sweden as a major European industrial nation. Alongside major industrial change, societal changes were occurring through the labour and suffrage movements, among others.

Economic development heightened the need and demand for a welfare state, and the ability to construct one, fostering the development of new programs and services to

improve the conditions of Swedish citizens. The first welfare state legislation occurred in 1890 with the introduction of the first social program, voluntary sickness insurance. The following introductions of other social insurance policy were spread across the span of the 20th century, including, the first national basic old-age and pension system (1914), first occupational pension (1917), and the introduction of child allowances (1948) (Sweden.se, 2010). Although there have been numerous amendments and changes to it, the basic building blocks of the Swedish welfare state were laid within the 20th century, and the nation is still a leader in social provision globally. Sweden is not only interesting in regard to its agrarian roots but also its adherence to the belief that public state power is the people's power. Sweden provides its citizens with a comprehensive social security network, as well as the political purchasing power that allows change to occur and peoples' voices to be heard. The Swedish welfare state is typically characterized as a central part of the 'People' Home'.

Norway

Like Sweden, Norway is a social democratic regime. Norway is located in Northern Europe with a population of approximately 4.8 million. Unlike Sweden, Norway's history is riddled with conflict and uncertainty. The Norwegian state was constructed during times of foreign influence. For example, between the years of 1536-1814, it was under the control of Denmark (Danielson, 1995). In 1814, Norway became briefly independent from foreign influence. During this time, it constructed a constitution which stripped the Danish aristocracy of influence and power and eliminated all aristocratic titles and privileges (Danielson, 1995). Soon after the creation of its constitution, however, Norway came under the influence of Sweden from 1815-1905. Norway was granted great

autonomy during Swedish control, establishing a central bank. By 1881 Norway sought complete freedom from Swedish control and fought to gain independence. Sweden's refusal incited great unrest between the nations (Derry, 1973). In 1905, Norway and Sweden enacted a peaceful dissolution of the union between them as their countries were close to war (Danielson, 1995). The dissolution of the union avoided what might have been a devastating war for both parties. With the dissolution of the union, Norwegians were finally free to independently structure their society and government.

The years that followed were marked by welfare state development and the introduction of many social policies. Some of the most notable introductions included unemployment coverage (1906)⁷, maternity benefits (1909), old age pensions (1936) and family allowances (1947) (ISSA, 2010). Norway's welfare state development was hindered at the start of World War II when its neutral position was compromised by German invasion. In response to the German occupation of Norway, the government and sitting King, fled to Britain for safety and attempted to govern in exile. This proved difficult, as German forces controlled approximately 40 percent of Norway's GDP. Norwegian officials did not regain control of their country until the end of World War Two in 1945. At this moment, they pledged to create an effective Norwegian welfare state (Borchost & Siim, 2008; Danielson, 1995). Today, Norway is considered a woman-friendly member of the social democratic regime, grouped with its Scandinavian neighbor to the east, Sweden. The principle rule in Norwegian social insurance provision is that everybody who works in Norway is covered.

Germany

Germany is identified by Esping-Andersen as closest to the ideal representative of the conservative regime type. Germany is located in central Europe, bordered by nine neighbouring countries: Austria, Belgium, the Czech Republic, Denmark, France, Luxembourg, the Netherlands, Poland, and Switzerland. Germany has the largest population of any European Union state, with approximately 82 million inhabitants.

Germany's welfare state prioritizes the social protection of all its citizens. The German Empire was formed in 1871 under the chancellorship of Otto Von Bismarck, in the first period of German unification. In the late 19th century, Otto Von Bismarck devised the initial principles of the state's social insurance scheme (Scheck, 2008). Under Bismarck's direction, laws relating to accidents and health insurance, as well as provisions for invalidity and old age, were passed. Bismarck instituted insurance programs, rather than universal measures in an attempt to undercut the growing power of the labour movement. During this time, a mere ten percent of the population benefited from the welfare legislation (Scheck, 2008). Today, almost 90 percent of people in Germany enjoy its protection.

Germany's defeat during the Great War left the nation crippled by economic instability and high inflation. The result was a rise of fascism in the form of the National Socialist Party led by Adolf Hitler. In 1934, Hitler gained control of Germany and led the country out of economic shambles and directly into World War II (Schulze, 1998). World War II led to the destruction of Germany's political and economic infrastructures, a humiliating history, and to the nation's division into the Federal Republic of Germany (West Germany) and The German Democratic Republic (East Germany). Between 1945-

1990, both East and West Germany operated very differently from one another, with the West more successful at economic growth and development in the East stifled by Soviet control (Schulze, 1998). In 1992, following the collapse of the USSR, the social security systems of the Federal Republic of Germany and the German Democratic Republic were finally merged (Schulze, 1998). Today, Germany's welfare state flourishes, and a high percentage of GDP is allotted for social security.

France

France, like Germany, is a conservative welfare regime, although somewhat distinct from the German model on family policy. France is located in Western Europe, with a population of 62.7 million. L'Hexagone has six neighbouring countries: Belgium and Luxembourg to the north, Germany and Switzerland to the east, Italy to the southeast and Spain to the southwest. The long history of France dates back eleven centuries. However, there are some key events that warrant our attention.

France was controlled by an absolute monarchy, which ultimately led the country into a state of financial ruin under the extravagant spending of Louis XIV. The subsequent tensions among the people led to the French Revolution in 1789. Following France's defeat in the Franco-Prussian war of 1870, Napoleon III abdicated and the Third Republic reigned in place of the monarchy. The Third Republic was characterized by economic and social backwardness, especially in regard to the development of the welfare state (Kedward, 2006). Despite military losses and destruction following World War I, France was considered the super power of Europe. This role came to an abrupt end with German occupation in 1940 at the start of World War Two. France was liberated by the Allied forces in 1944, and soon after the Fourth Republic was born.

From the end of WWII to 1980, France saw great economic growth and prosperity⁸. Parliamentarians introduced extensive social legislation, most notably granting women the right to vote in 1944. Today, France is the sixth largest economy in the world and its main ideals are expressed in the Declaration of the Rights of Man and of Citizen. France is a member of the United Nations, the Francophonie, and the G8.

Chapter 3: Family Policy

Family policy is a unique policy area, as its influence is varied and wide-reaching. Family policies facilitate the reconciliation of work and family life, and they can also ensure the adequacy of family resources, enhance child development, facilitate parental choice about work and care and finally, promote gender equity through employment and other opportunities. Through examining the family policies of Sweden, Norway, Germany and France we can assess the validity of the regime characterization of these welfare states and also the degree to which their family policies contribute to gender equality and are truly woman-friendly. In order to understand the complexities of the family policies of these four nations, each country's family policy will be examined through a re-ordering of their policies according to income benefits and social services.

In order to begin it is important to define what we mean by *family* and *family policy*. Family can be defined in a variety of ways, as there are a variety of family structures. For purposes of this project, family refers to a household of one or more adults living together with, and taking responsibility for the care and rearing of, one or more children⁹ (OECD, 2007). In addition, the single parent or lone parent family situation will be primarily focused on the woman's experience¹⁰. The income focus will include family allowances, as well as paternity and maternity and/or parental leaves. The primary social service will be child care services.

In order to clearly articulate the current provision within the family policy umbrella, it is important to address the following questions, including:

- What is provided in the benefit or service, including monetary amounts?
- Who can access these programs (targeted or universal)?
- What is the benefit duration?

- What are the waiting times for receiving the benefit or accessing the service?
- What is the quality of the services provided?
- Are there restrictions and what are they?

To answer these questions and determine the character of the welfare state, as defined by Esping-Andersen's 'worlds of welfare' approach, and its level of woman-friendliness, I will examine income benefits and social services for Sweden, Norway, Germany and France.

Sweden

Through its family policies, Sweden aims to equalize living conditions between households with and without children, to support both parents' opportunity to combine work outside the home with family responsibilities, and to give special support to families in vulnerable situations. Notwithstanding that the provisions of family allotments have shifted and been cut-back over the past 20 years, Sweden is still the forerunner in family provisions. Esping-Andersen notes that as a social democratic regime Sweden's income benefits are universally provided, rights-based and relatively generous. Sweden has a two-tiered compensation level, including a modest flat-rate benefit and an income related benefit. Its social services are high quality. Esping-Andersen states that the goals of Sweden's welfare state include the abolition of poverty, greater income equality, and full employment - all of which contribute to the overall 'woman-friendly' nature of this Nordic nation (Olsen, 2002). Through an examination of the Sweden's income benefits and social services provided under the family policy umbrella, we will be able to first determine if these characteristics described by Esping-Andersen are still evident, and secondly whether Sweden is woman-friendly in orientation and implementation.

Income Benefits: Allowances and Leaves

Child Allowances

The first major family policy initiative introduced in Sweden¹¹ was the 1947 introduction of its child allowance program. *Child allowances* were first introduced to aid Swedish families with the financial strains of raising children and reduce poverty across households. As well, child allowances were an attempt to increase Sweden's falling birth rates, caused by increasing financial burdens within Swedish households and the changing structure of the family (Lundquist & Roman, 2008). The roles of women and men were shifting due to the growth of industry in Sweden; industrialization was seen as men's work, and women were relegated to care work within the household (Lundquist & Roman, 2008). The resultant gender relations increased tension and strife within personal relationships, linked by many to falling birth rates (Lundquist & Roman, 2008). The solution proposed by government officials was to create more egalitarian relations among men and women via social policy (Lundquist & Roman, 2008; Morgan, 2006). In particular, policy initiatives for the family were designed to ease the burdens of care work for women and, subsequently, to foster greater gender equality.

The initial and continuing objective of child allowances is to provide parents with monetary support to aid with the rearing children. Child allowances are universal for all adults with one child or more under the age of 16. The allowance is a flat rate, tax free benefit paid in full by the government. The current 2010 rate per child per year is 12 600 SEK¹² (\$2 063 US) or 1 050 SEK (\$172 US) per month. In cases of divorced or separated families, the parent who has primary custody may receive the benefit. In cases of joint custody agreements, parents may choose who is to receive the benefit. However, if a

choice is not made the payment is sent to the *mother* by default. The benefit can be extended until the child is 20 years of age if they are students. There is no maximum age limit for child allowance if the child is attending a school for people with learning disabilities. Families with two or more children are eligible to receive the large family supplement, which translates into 150 SEK (\$25 US) extra per month for the second child, 604 SEK (\$100 US) per month for the third child, 1 614 SEK (\$269 US) per month for the fourth child and 2 864 SEK (\$477 US) for the fifth child (ISSA, 2010).

Swedish child allowances provide monetary support for families regardless of sexual orientation or gender. However, feminists have pointed to the reinforcement of traditional gender roles of women through the implicit directives of policy provisions (Lombardo, 2003). Some critics point to the overall positive nature of the provisions of monies for having children. While they observe that the default payment to the mother is positive, and provides women with added economic security in raising children, if its intention is to break down and eradicate traditional gender roles and responsibilities, then the default clause to the mother indicates an implicit reinforcement of the care-giving role (Lewis & Astrom, 1992; Lombardo, 2003). A possible alternative to the default payment would be a simple withholding of the payment until a party is chosen to receive the payment or alternatively a rotation of benefit allowance to both men and women.

Leaves: Pregnancy, Maternity, Parental and Paternity

The next major policy initiative to examine is *parental insurance* introduced in 1974. *Parental insurance* consists of *pregnancy benefit*, *parental leave benefit* and a *temporary parental allowance* benefit. The introduction of *parental insurance* came at a time when the government recognized the conflict between work and family life was a problem for

Swedish citizens. Their intent was to create gender neutral parental insurance, which would allow fathers to partake in the caring responsibilities which up until that point of time were considered solely the mothers work. The political objectives were to transform mothers into wage earners and fathers into carers (Lundquist & Roman, 2008). Today parental insurance still serves to create an egalitarian household by shifting care responsibilities to both parents in order to promote family/work balance. Parental insurance provides income loss compensation in certain cases during pregnancy, in connection with child-birth, and when children are sick, among other special circumstances.

The *pregnancy cash benefit* is paid to a pregnant woman employed in a physically demanding or dangerous job whose employer is unable to transfer her to less demanding or dangerous work. The benefit is approximately 80 percent of the insured's lost earnings. For women in a physically demanding job, the benefit is paid for up to 50 days, beginning no earlier than 60 days and no later than 11 days before the expected date of child birth. For those women in a dangerous job (defined as any job that is physically demanding) the benefit is paid for the whole pregnancy up to 11 days before the expected date of childbirth (Forakringskassan, 2011). To receive the pregnancy cash benefit, an application must be submitted to the Swedish Social Security Agency, including a maternity certificate and a statement from the employer about redeployment. As well, women are advised to provide details about all the tasks performed on the job. Once all proper documentation is received, processing time is normally 30 days, at which point the woman will be advised as to whether she was granted or denied the benefit (Forakringskassan, 2011; Norden, 2011). The ease of access and availability of this

benefit allows women the opportunity to step away from dangerous employment without fear of losing their jobs or their livelihoods.

Parental Cash Benefit

Parental cash benefit for childbirth allows for either parent to stay at home following the birth of a child. The *parental cash benefit* has two parts. The first part of the benefit is approximately 80 percent of the insured's lost earnings and is paid for 390 days. Those parents with low or no-income receive a flat rate of 180 SEK (\$30 US) a day. The maximum daily benefit for this period is 901 SEK (\$149 US). The second part of the benefit is a flat rate of 180 SEK (\$30 US) a day and is paid for 90 days. The total benefit duration for both parents combined is 480 days per child and is paid from no earlier than 60 days before the expected date of childbirth up until the child is 8 years old. Days are equally divided among both parents; the amount allotted to one parent can be transferred, with the exception of 30 days which must be taken by the transferring parent. A single or solo parent can receive all 480 days. To receive *parental cash benefit*, an application can be filed with the Swedish Social Service Agency, and will take up to 30 days to be processed applications. For first-time applicants to this benefit a wage statement is required. In addition, parents can apply and subsequently, modify their benefits through an online service provided by the social service agency (Forakringskassan, 2011; ISSA, 2010). The amount of time afforded given to new parents allows time for them to bond with their newborns, and also provides invaluable time to adjust daily routines according to their new demands as parents, with the added reassurance that bills can be covered with their benefit compensation levels. The fact that days off are equally divided between parents allows for *both* to experience the demands and joys of parenthood. The

mandatory 30 day allotment, if days are transferred, positively contributes to shifting gender roles. For example, if the father transfers his days to the mother, he still must keep has 30 days where he is responsible for the care of his child.

Temporary Parental Cash Benefit

The final benefit under parental insurance is the temporary parental cash benefit. The objective of this benefit is to provide compensation for lost income when a parent must stay home to care for a sick child under the age of 12, or (in cases such as when the child is handicapped) up to the age of 16. It also applies to situations when a visit to a doctor or health centre is necessary, and when the person who normally takes care of the child is ill. The benefit is approximately 80 percent of the insured's lost earning. The total benefit duration for both parents combined is 60 days per child a year and it may be extended for 60 days per child (Forakringskassan, 2011). The father (or other parent) is entitled to 10 extra days of benefits in connection with the birth of his child. The extra days contribute to the dissolution of traditional gender roles permitting a more egalitarian sharing of child care responsibilities. In addition, it allows parents to miss work when there are family demands, without fear of losing their job, no reduced income during sickness and general peace of mind and freedom. In most other jurisdictions, sickness can spell disaster for a single mother who is the primary care-giver to her child. In Sweden, this benefit allows single mothers to care for their child with job security and income protection.

These benefits are great for balancing work and family responsibilities. They also closely fit Esping-Andersen's social democratic model. However, the fault lines within these benefit levels is linked to the roles of women and the degree to which these programs are woman-friendly. Recent feminist scholars have criticized Sweden's

programs, both income benefits as well as social services, for reinforcing the traditional roles of women within the household as well as maintaining a heavily segregated job market (Bowman & Cole, 2009). The ‘the use it or lose it’ rule for paternal leaves is limited for creating an equal division of family care-giving roles. As to critics who see these policies reproducing a sex-segregated workforce: if women take the entire leave period, then they are absent from the work place, thereby eroding social network connections and establishment of a consistent work history. This may slow women’s progression to upper levels of management, for example, and hinder their abilities to break through the still-present glass ceiling (Lombardo, 2003). Sweden’s level of woman-friendliness is high comparatively speaking; yet outside the comparative context, Sweden still has some distance to cover before gender equality is achieved.

Social Services: Child Care

In addition to extensive income benefits, it is important to explore child care. Child care services in Sweden were initially developed in 1974. Their introduction was the result of both the rising birth rates and female employment. Currently, Sweden has one of the largest proportions of women in the workforce; therefore there is a pressing need and demand for adequate, affordable child care (Morgan, 2006). Child care was introduced to provide freedom of choice for parents to arrange child care suitable to their particular situation. Child care is funded through a combination of government funding, municipal funding and parental fees¹³. However, children are entitled to 525 free hours a year starting in the autumn term of the year they turn 4, until they start school, which is mandatory at the age of 6 (Forakringskassan, 2011).

The administrative authority for child care services was transferred to the Ministry of Education in 1996, with the National Agency of Education (Skolverket) as the central supervisory authority for child care and schooling. All services for all age groups operate with the goals of providing an environment which seeks to stimulate development and learning for children¹⁴ and also to alleviate the strains of work and family responsibilities for parents. Municipalities are obliged to provide pre-school or family day-care homes to children from age one year and up. They are to provide services for children whose parents are working or pursuing studies. In the cases of unemployed parents or parents on parental leave, a place is to be made available to each child for at least 3 hours a day or 15 hours a week. There are strict operational guidelines under the School Act which specifies that groups are to have a suitable composition and size, premises are to be appropriate for the activities, staff must have training and experience to ensure that the children's needs are met, and good pedagogical activities must be applied. Preschools actively teach gender pedagogy, which broadens children's view of what boys and girls can do, and make them question gender roles. Boys and girls are introduced to numerous activities and toys regardless of traditional gender role associations. The goal is to create equality among the sexes to eliminate traditional gender roles and to foster skills and interests in the children regardless of gender role expectations (Sweden.se, 2010).

Child care services can be divided along two main age groups of children, ages 1 to 6 and 7 to 12. For children aged 1 to 6, child care is known as pre-school. Pre-school is delivered in three different forms, pre-school, family day-care homes and open pre-school¹⁵. Pre-school centres operate all year round, with long and varying operating hours

to fit the needs of parent. Family day-care homes are run by municipal child minders who receive children into their own home. This form is primarily used by parents who live in rural areas (OECD, 2006; Olsen, 2002). Open pre-schools are centres for parents who are at home caring for their children and need to drop off their child temporarily. The hours are more restricted, but the service is provided free of charge for the parent. For children aged 6-12 child care is provided through leisure-time centres. Leisure-time centres operate as a complimentary service to compulsory school. They supervise children during periods of the day when they are not in school, or during school holidays. Further, they provide children with experiences and knowledge that are somewhat different from what they normally get in school. The school and leisure-time centre jointly contribute to children's all-round development and learning. Leisure-time centres operate year round and provide care for children whose parents work or study (Morgan, 2006; Olsen, 2002; The Swedish National Agency of Education, 2011).

This discussion reveals that childcare in Sweden is characterized by high quality and quantity. However, the new initiatives located within the child care system in Sweden presents a form of gender mainstreaming which may impact the long term relations of women and men as caregivers. The fostering of a child's natural abilities regardless of gender, allows for a child to grow independent and free from expected gender role performance, thereby creating an environment in which young girls are encouraged and praised for taking interest in fields conventionally relegated to men. Sweden demonstrates the characteristics of a social democratic welfare state as defined by Esping-Andersen. But it also does something that may be considered by some as

radical, through their use of gender mainstreaming. To many feminists, it is a welcome step to turn traditional gender role socialization on its head at an early age.

Norway

Norway is similar to Sweden in that it too is routinely classified as a social democratic nation, sharing many of the same defining characteristics in regard to its income benefits and social services. The initial introduction of family policies occurred differently in Norway, however. The creation of the family policy domain emerged through the efforts of numerous women's groups, such as *National Council of Norwegian Women* (1904) whose members encompassed a broad spectrum of women's groups and associations¹⁶.

Norway's independence from Sweden in 1905 led to the creation of a welfare state which afforded women's groups an opportunity to present new visions of women's rights and citizenship (Borchost & Siim, 2008). With their new vision came discussions and debates surrounding the changing nature of motherhood and the importance of the state to provide for all women whether, single, married, divorced or widowed. With the introduction of paid maternity leave in 1909 (under the Health Insurance Act), women enjoyed their first taste of government support and recognition (Borchost & Siim, 2008). The introduction of this new legislation created conflict between women's labour groups and the conservative *National Council of Norwegian Women* and the housewives' associations. The conflict emerged as the latter groups saw the Child Welfare Act, which expanded family policy rights for women, as an attack on both family and marriage¹⁷. The involvement of women's groups helped shape not just family policy within Norway but also other policy domains, such as employment, health and education (Borchost &

Siim, 2008). In short, the extensive involvement of women's groups gave voice to the problems experienced by women.

Income Benefits: Allowances and Leaves

Family Allowances

The first family policy to be examined under the income benefits section is *family allowances*. Family allowances were first introduced in 1946 and later amended in 2002. The total cost of family allowances is paid by the state, tax free, and covers all children residing in Norway. The family allowance is paid to the parent who is responsible for the day-to-day care of the child(ren) under the age of 18. The total yearly amount of family allowance is 11 640 NOK¹⁸ (\$2 017 US), which is paid monthly in the approximate amount of 970 NOK (\$185 US). The benefit starts one month following the birth of the child, or one month after the parent qualifies, until the child reaches the age of 18. Single parents receive extended child benefits for one child more than they actually provide for, for example if a single parent has one child, they receive payment for two. As well, single parents¹⁹ of children younger than 3 years of age are entitled to *extended child benefits* and a *full transitional benefit*²⁰ and may also receive an extra infant supplement of 7 920 NOK (\$1 508 US) a year. In Norway, the extended child benefits are discontinued if the parent marries or cohabites with a partner for longer than 12 months. Beneficiaries living in the Arctic region receive an additional annual supplement of 3 840 NOK (\$731 US) per child.

In addition to offering families a family allowance they also offer *cash benefit for families with young children*. This benefit is a monthly allowance paid for children between the ages of 1 and 3 and adopted children who have not yet started school. The

benefit may be granted for up to 23 months. To receive the full benefit, which totals 39 636 NOK (\$7 548 US) a year per child, the child must not attend a day care center that receives a state grant. If the child attends a child care center less than 33 hours a week, the family may be entitled to a reduced cash amount (ISSA, 2010).

Families do not have to apply to receive family allowances. If the mother is Norwegian, she automatically is registered with Norwegian Labor and Welfare Administration (NAV). If the mother wishes the father to receive the benefit, she must inform NAV. The only time a family must submit an application to receive family allowance is if the mother has not resided in Norway longer than 6 months; if the child is older than 6 months when entitlement to child benefit starts, or if the parent qualifies for extended child benefits. The application must be filled out and filed at a local NAV office²¹.

These income benefits provide support for families, with extra attention and monies given to single parents, to aid in the rearing of children. The *family allowance* is paid to the parent who is responsible for the day-to-day care of the child, with the benefit automatically being given to the mother unless otherwise arranged. While some feminists would contend that this is beneficial for women in the care and monetary support of their families, the implicit gendered message being sent within the benefit is the mother will be the parent responsible for the day-to-day care of the child, through the automatic registration of the mother to receive the benefit (Lewis & Astrom, 1992; Lombardo, 2003). The cash benefit for families with young children provides money for families who care for their own children and who do not utilize state sponsored child care. It thus provides extra monies for parents who either utilize completely privatized child care or

who stay at home to care for their child. This, as in Sweden, indicates that the level of woman-friendliness is high. When considering the benefits according to a gender specific analysis the implicit reinforcement of traditional gender roles is evident.

Leave Benefits

The following benefits, *pregnancy benefit*, *parental/maternity benefit* and *parental care leave* are taxable income and are funded through contributions made by insured persons/self-employed persons (percentage of gross income), employers and the government is only responsible for any deficit. The *pregnancy benefit* is provided to pregnant woman if her work, or the situation at work, can cause risk of injury to their unborn child. It is also a requirement that there is no possibility of job reassignment or arranging other work. This may include instances where the pregnant woman is exposed to dangerous/hazardous materials, physically tiring work, stressful work environment or a psycho-social situation is involved. In order to be entitled to this benefit the applicant's income on an annual basis must amount to half the basic sum of national insurance (72 881 NOK or \$13 888 US). The *pregnancy benefit* is granted from the time work is stopped up to three weeks before the expected birth. If a woman can reduce her working hours and still be in work, she may be entitled to partial pregnancy benefit. The amount received for the pregnancy benefit varies depending on the applicant's income when they leave work; for self-employed individuals it is based on the average of accumulated pensionable income in the last three years (ISSA, 2010). To receive this benefit an application must be filed with NAV. The application includes sections that must be filled out by a doctor or mid-wife, stating any medical concerns and confirming the pregnancy.

The form must then be filled out by the employer, stating whether the woman can be re-assigned to a less dangerous position. NAV determines if the benefit will be granted.

Parental and Maternity Benefit

The next major benefit to explore is the *parental benefit* also referred to in ISSA as *maternity benefit*. In order to qualify to receive the parental benefit, the insured woman must have at least 6 months of employment; in cases of self-employed women, 10 months of employment are required. A mother, father or both parents may meet the qualifying conditions²². The benefit is 100 percent of covered earnings for 46 weeks; alternatively, 80 percent of covered earnings are paid to the insured parents (mother or father) for 56 weeks. The mother must take 3 weeks of the benefit period before the expected date of childbirth and at least 6 weeks immediately following giving birth. A total of 10 weeks of the total benefit are reserved for the father if both parents qualify for benefits, referred to as the 'father's quota'. The remaining period may be shared between the parents (ISSA, 2010). The condition for granting daily cash benefits to the father is that he stays at home to take care of the child. This means that the mother has to resume work, take a full-time, publicly approved education, or combine work and an approved education which together equal full time. Reduced weekly working hours may count as a partial maternity benefit, which is paid under the same qualifying conditions as the parental benefit. In cases of multiple births, the parents are entitled to full cash benefits for five more weeks and a 7 additional weeks at the reduced rate, this applies for each child after the first.

The 10 weeks of leave, known as the fathers' quota, can be argued to be beneficial for the reconstruction of gender roles and the promotion of equality between

the sexes. Additionally, the condition for the father receiving the benefit specifies the mother must be working or studying full time and the father must be the primary provider of care to the child for the duration of his claim to benefits. Thus, it would appear to be consistent with the egalitarian ideals associated with a social democratic state. However, as in Sweden, mothers are still expected to be the primary care givers for the majority of the leave. Some will point out that benefits can be given to the father, yet, if the decision hinges on financial security, it makes sense for the mother to stay home (given the wage gap between the sexes, and men's typically higher pay grade). Such a decision appears to be a rational financial choice, but it rests on the gender inequality within the labour market. Where women earn less than men, can we say that the decision is freely made or is it pre-determined by market relations? Some feminists have pointed to the implicit inequalities within the labour market which continue to reinforce traditional gender roles and effectively place women in an overall inferior position to men (Bowman & Cole, 2009; Lombardo, 2003).

Parental Care Leave

Another benefit to discuss is the *parental care leave*²³. The *parental care leave* is paid to parents who care for a sick child younger than 12 years of age (18 if the child is disabled or chronically or seriously ill). This benefit entitles both the mother and the father to 10 days per year (20 for a single parent), for more than two children, 15 days each (30 for a single parent). For a child younger than 18 with a disability or chronic illness is 20 days (40 for a single parent), for a sick child younger than age 18 and if the illness is potentially life-threatening, as long as necessary for the treatment of the child. The benefit is 100 percent of covered earnings and is paid from the first full day of incapacity

for up to 52 weeks. The maximum earnings used to calculate the benefit is 6 times the base amount which totals 437 286 NOK (\$83 370 US). This benefit is exceptional in that it allots time for both the mother and father, but also allows single parents to receive the total time. This can be considered a high level of high woman-friendliness due to the recognition of the need for job security and income compensation. It is worth noting that the total time of 20 days for both parents may be adequate for one child, but can be used up rather quickly when there are more than one child.

Child Care Benefit

The final benefit available in Norway is called the *child care benefit*. The *child care benefit* is designed for single parents, in order to help them with the cost of child care, allowing parents to work or study. The following conditions must be met: the parent must have lived in Norway for the last three years; the parent and child must currently be living in Norway; the parent must be single, divorced, separated or widowed; the parent must be the sole care-giver of the child; and finally; the parent cannot be in a conjugal relationship with the child's parent, as this would disqualify them as single (ISSA, 2010). In addition, the parent must fill out an application form located on NAV or obtained through contacting or visiting a local NAV office. Applicants are required to submit the following documentation; confirmation of employment and income; confirmation of the education/training the applicant is undertaking; documentation of child care expenses; documentation of extended or irregular absence from the home (applications for extended child care benefit); and confirmation that the child needs significantly more care than other children in the same age group (applications for extended child care benefit).

The benefit is 64 percent of documented expenses, leaving 36 percent of child care costs to be paid by the parent. The maximum amount a recipient receives is 3 428 NOK (\$639 US) for one child, 4 473 NOK (\$833 US) for two children, and 5 068 NOK (\$944 US) for three or more children (ISSA, 2010). The amount applicants receive is determined by income. However, if the applicant's income is six or more times the basic national insurance amount (75 641 NOK or \$14 084 US) the benefit is denied. The benefit can be paid until the child completes her or his fourth year at school. If additional monies are required, the parent may be entitled to extended child care benefits. Since the child care benefit is granted one year at a time, parents must apply annually to continue receiving the benefit. Therefore, NAV recommends parents should apply before the school year begins.

This particular benefit addresses the financial strains single parents face and the need for adequate and affordable child care while at work. However, the complicated, repeated and lengthy application process raises problems. For example, the paperwork for a single mother with two or more children, can require hours of documentation preparation and execution, every year. The effect is a benefit littered with red tape, reinforcing a liberal belief that there are no free rides, rather than a social democratic ideal. If the intention of this benefit is to aid single women then the laundry list of required information demonstrates an inherent mistrust of women.

Social Services

Child care in Norway is viewed as a way for parents to balance work and family life, reflect the state's interest in improving the lives of parents and children. Child care supervises and cares for children while their parents are at work or study and it also

provides developmental and learning at an early age. Therefore, the only available publicly provided for child care services are kindergartens. Kindergartens are delivered under the authority of Norway's *Ministry of Education and Research*. They were introduced in 1975 via the *Kindergarten Act* and their stated purpose is to provide children under compulsory school age with opportunities for development and learning, and to give children an upbringing that accords with Christian values (the only exception is private kindergartens which may exclude this purpose and reinstate their own (Ministry of Education and Research, 2006). A kindergarten head teacher must have adequate pedagogical and administrative leadership, with training as a pre-school teacher or other college education that qualifies them to work with child. Other kindergarten staff must be trained as pre-school teachers or hold other pedagogical training at college level. In addition, any person working in a kindergarten must provide a police certificate confirming they have never been charged and/or convicted of sexual abuse of children (Ministry of Education and Research, 2006).

The content of kindergartens is also governed through the *Kindergarten Act*, with specifications including, but not limited to, pedagogical undertakings, provision of basic knowledge of central and topical fields, taking into account child's age, level of functioning, gender, and social, ethnic and cultural background, impart values and culture but also allow for child's own cultural creativity²⁴. The main forms of kindergartens are publicly run kindergartens, private kindergartens and family kindergartens. Family kindergartens are in an individual's home as the premises, and approval must first be obtained by the Ministry of Education and Research. As of 2009, Norway created a statutory entitlement of all children ages 1-5 to a place in kindergarten. Kindergartens are

financed through a combination of government funding, in the form of grants, and parental fees. With respect to governmental grants, as of 2004, public and private child care facilities are to be treated equally, with regard to receiving governmental funding. Parent fees are nationally regulated, with an income-based differentiation of payment and a maximum payment of 2330 NOK (\$388 US) per month for full time child care. In addition, municipalities must provide discounts for siblings and low-income families. The approximate fee charged to parents is 20-23 percent of the total cost of the kindergarten service, plus the cost of meals in some kindergarten centers. The Norwegian state notes that the aim is for child care centers to be at a cost which is low enough for anyone who needs its services to be able to partake in them. For 2011, the government has continued the maximum limit level and committed 263.5 million NOK (\$48.5 million US) to offset the cost of child care services.

The availability, affordability and quality of publicly provided child care services in Norway is not consistent with Esping-Andersen's observations about the progressive nature of social democratic regimes. Current child care provision in Norway is lacking in terms of quantity and availability of the service. Is Norway's child care system woman-friendly? The eradication of traditional gender roles is not a priority in child care services. It is also disconcerting that pedagogical teachings must align with Christianity. Christian teaching reinforces traditional gender roles with the father as the protector and provider and the mother as the nurturer and caregiver. One can deduce such policies are not woman friendly. However, in order to understand the similarities but also the differences within the Norway family policy domain it is pertinent to directly contrast it with Sweden, its more social democratic neighbor.

Sweden and Norway Contrasted

A comparison of Sweden and Norway's family policies present some interesting points of discussion. Although Norway introduced child allowances one year earlier than Sweden, the origins of the allowance is starkly different in the two nations. In Norway child allowance provisions were the result of women's groups' activism while in Sweden they emerged through efforts to redress family poverty. Norway's conservative women's groups resisted family allowances, an indicator of the cultural underpinnings concerning traditional gender roles within the country and a sign of less supportive measures. In contrast, Sweden was concerned with creating egalitarian ways to help every family member, regardless of gender. Both nations provide comparably extensive benefits to their citizens; each of them utilizes universal child and family allowances programs. The levels of support are also comparable under this benefit. A difference emerges in the way benefits are allocated. In Sweden, the parents decide who is to receive the *family allowance* benefit; if they do not, the benefit is automatically sent to the mother. In Norway, the benefit is automatically registered to the mother and it can only be changed by the mother through an application process. This distinction is important, as the stated beneficiary of the Norwegian benefit is the parent who is responsible for the day-to-day care of the child; the automatic registration to the mother can be seen as an implicit reinforcement of traditional gender role. Although, some may point to it as a woman-friendly measure because it provides a means of fostering a more autonomous household, such measures do little to re-imagine traditional gender roles. A point of departure for Sweden, as compared to Norway, is the *large family supplement* which provides additional monetary supports for families with multiple children. Such a supplement is

not present in Norway's family policy. The two nations share a concern for women who are pregnant in physically demanding or dangerous jobs and each of them provide benefits to cover this situation - a '*pregnancy cash benefit*' in Sweden and '*pregnancy benefit*' in Norway.

Parental leave for both countries is comparable in both monetary allotments and length of time off. However, Norway specifies that mothers must take 3 weeks prior to birth and 6 weeks after in order to receive the benefit. Sweden does not specify such conditions and indicates that the time off should be split between the parents unless otherwise specified by the parents. However, the transferring parent cannot transfer a total of 30 days to the other parent, these days must be used by the transferring parent. For example, if the father wants to transfer his allotted days to the mother, 30 days of the allotted days are reserved for his use only and cannot be transferred. Concerning time off for fathers, Norway invokes a father's quota, setting aside 10 weeks for the fathers to care and spend time with the newborn child. Again, Sweden and Norway are similar in support and conditions in regards to obtaining temporary parental cash benefit (Sweden) and parental care leave (Norway). Although Sweden does provide for a longer period of time and provides an additional 10 days for the specific usage by the father (or other parent).

An income benefit that Norway provides that Sweden does not offer is '*child care benefit*'. The cash support is provided to a single parent to aid in the cost of child care. However, a condition of it being revoked is through the event of marriage and/or cohabitation with a partner. The idea behind this condition is that the money will no longer be needed because the person has additional income through their relationship.

This benefit both contradicts and re-enforces the adage, women are a husband away from poverty, in that it provides support to single parents but revokes their benefit if they enter into a relationship. It assumes that the relationship is premised on a shared income or a family wage, and limits a woman's ability to form an autonomous household. An additional point concerning these benefits is that women need to apply for them every year before the commencement of the school year, thus adding an additional administrative hoop to jump through for a strained single parent. The result is a benefit that does help women but only if they can submit the paperwork on time. The benefit can be considered good in theory, but poor in execution given the unnecessarily difficult access.

The next area to review as presented in family policies is the provision of child care in both countries. It is within this area that the two social democratic welfare states differ the most. The major areas of departure include, diversity and provision in services, and pedagogy taught within the child care services. With respect to diversity and provision in services, Sweden provides far more extensive and diverse child care options for parents than Norway. The only public provision in this area in Norway is kindergarten for children aged 1-5; children from birth to 1 year of age are the responsibility of the parents. Sweden, on the other hand provides child care from 0-6 years of age in three available forms, pre-school, family day-care and open pre-school. The available options reflect their adherence to providing a variety of child care choices for the parents to decide which is best suited to their situation. Although funding and costs are comparable for parents in both nations, with the exception of open pre-schools which operate free of charge, Sweden provides parents with 525 hours, dependent on a

sliding income scale, of tax-financed child care from the age of 4 to when they start school at the age of 6. Once children are enrolled in school, child care services in Norway revert to a reliance on the private sector, with the parents locating and paying for services themselves. In contrast, Sweden operates leisure centers for children 6-12 years old, which are available after school and during school holidays. Thus, Sweden provides parents with child care until the child does not need child care provisions, while Norway stops providing public services much earlier.

The next area is the pedagogical approach utilized by child care services in each nation. Sweden actively promotes non-traditional gender roles through its emphasis upon equality. The material taught and promoted in Swedish child care centers encourages individual creativity and skill sets, challenging traditional gendered roles. In effect, children are allowed to freely access materials which interest them and are not constricted by traditional gender roles. Norway, in contrast, explicitly adheres to Christian values and norms (Ministry of Education and Research, 2006). Although privately run child care providers do not have to offer a Christian program, all publicly run centers must do so. Christian values are consistent with the promotion of traditional gender roles, women as care-givers and men as breadwinners.

We are now in a position to review whether the defining characteristics set out by Esping-Andersen are evident in the family policy domain of the social democratic Nordic nations. Esping-Andersen proposed that social democratic nations will demonstrate the following in regards to their income benefits: universal provision, rights-based and extensive. With a two-tiered compensation level, including a modest flat rate and an income determinant, social services will be readily available and high quality. Sweden's

family policies appear consistent with this assessment, as they are universally applied, rights-based, and relatively generous. The same can be said of Norway's income benefits. However, the main point of departure is located in the quality of social service, namely child care. Sweden is a forerunner in the provision of child care services, while Norway is not. The difference between the two nations becomes evident when considering their relative level of woman-friendliness. Through extensive income benefits and child care provisions, Swedish women have access to paid employment and the opportunity to form an autonomous household, in an environment of gender equality. One can argue that Sweden is more concerned with gender *reconstruction*, as demonstrated through gender mainstreaming within child care services. Norway's level of woman-friendliness is lower. For example, Norway departs from the social democratic classification on income benefits and the provision of child care services. Some may argue that the quantity of benefits offered to single parent families are woman-friendly. However, the bureaucratic red tape that is necessary for a single parent, for example to claim child care benefit, leaves one to question their level of commitment in supporting some of the most vulnerable citizens. For some the benefit is beneficial as it provides a form of reimbursement to parents choosing private child care instead of public child care. It is simply a benefit that considers choice in child care selection. Although this may very well be the case there is a potential negative outcome within this benefit. For example, if the state positively reinforces the use of private child care they could potentially be causing harm to state run child care system. If enough people elect to accept this benefit future expansion of child care spaces may be unlikely and child care prices would potentially increase as a result. In conjunction with this the limited provision of social

services with a pedagogy that teaches Christian values and norms again, reinforces a gender neutral approach to this particular aspect of family policy. An evaluation of labour market policies can provide additional information concerning Norway's woman-friendly nature, and whether its welfare state can be considered social democratic.

Germany

Esping-Andersen identifies the characteristics of a conservative welfare regime as: commitment to community, tradition (often including a strong religious adherence), maintenance of existing differences and hierarchies (thereby reinforcing inequalities), and a commitment to uninterrupted employment. Income benefits are extensive and their basis of allocation is contribution based; coverage is for employees, with income-related compensation levels (Esping-Andersen, 1998). Social service provision is limited. If Germany is an 'ideal' conservative regime type then its family policy should reflect these dimensions in its income benefits and social service provisions.

German officials consider the family to be of utmost importance, and they embrace a diversity of family structures. Germany, as a conservative welfare state, supports the traditional 'breadwinner model' and traditional gender roles. The adherence to traditional gender roles aligns with the cultural belief in Germany that women are caregivers and men are breadwinners. To what degree is belief in this gendered division of labour still relevant? If this belief is operationalized in policy, then the level of woman friendliness will be low. Alternately, if this sentiment is no longer applied, then the level of woman-friendliness would be higher.

Income Benefit: Allowances and Leaves

Family Allowances

Today, Germany's family allowances cover parents with one or more children, orphans and children who have lost all contact with their parents. In 1954, the first benefit to be introduced under this policy umbrella was the *child benefit*, followed by the *child-rearing allowance* in 1985. All three benefits have recently been revised: revisions to the child-rearing allowance were introduced in 2004, followed by changes to child benefits in 2005, and the parent benefit in 2007 (ISSA, 2010).

Child Benefit

The child benefit is paid to all families with children. The child must generally be younger than 18 years of age²⁵. If the child is younger than 18 and has an annual income of 8 004€ (\$11 888 US) or more they can no longer receive the benefit. The value of the benefit is 184€ (\$274 US) for the first and second child, 190€ (\$282 US) for the third child and 215€ (\$320 US) for each additional child (ISSA, 2010). The stipulation that the benefit will be revoked in cases where children earn more than 8004€, demonstrates the cultural belief that parental financial responsibilities have ceased, therefore removing the government's obligation to support to the family. This may be appropriate for families with two incomes. However, in the case of single parent families, predominantly headed by women, total household income might still be low enough to require public support. Thus, this aspect of German policy fails to consider women's experiences and needs.

Child Allowances

The income-tested *child allowance* is paid to parents with children under the age of 25. Legal parents or guardians who live with the child are entitled to child benefits if their earnings are less than 900€ (\$1 338 US for couples) or 600€ (\$892 US) for single parents, and their assets are below 55 800 € (\$82 938 US). Parents who receive non-contributory unemployment benefits, social benefits or social assistance, are not eligible for child allowance. The maximum benefit a parent can receive is 140€ (\$208 US) per child for up to 36 months. Parents of multiple children get multiple allowances in a single payment (ISSA, 2010). The total benefit is calculated on income, housing costs, and child allowances (including a child's own income which can reduce the benefit). The qualifying conditions for the *child allowance* are consistent with conservative regimes, reinforcing existing hierarchies and prohibiting the receipt of dual benefits (considered to be 'double dipping'). For a benefit whose aim is to aid low-income parents, the benefit does little to address those in need. Such a program is scarcely woman-friendly, and is consistent with Esping-Andersen's conservative model.

Parental Benefit

The income-tested *parental benefit* is paid to parents of children under 14 months. A parent with sole custody may receive the benefit for up to 12 months. Other parents may share the entitlement for a combined maximum of 14 months (each parent must receive the benefit for at least 2 months). Parents cannot receive the benefit if they work more than 30 hours a week. At least 67 percent of the parent's net income (from the last 12 months before birth) is paid, up to a maximum benefit of 1 800 € (\$2 675 US). Parents who are unemployed receive a flat rate of 300€ (\$446 US) per month (ISSA, 2010).

Parents must apply and submit forms to the *Family Fund of the Federal Employment Agency*²⁶ in order to receive parent benefits.

Parental benefit compensation levels are good for those who are employed, however compensation for unemployed parents is relatively low. The face value of a 300 € benefit appears high. However, it cannot cover all the expenses of a single parent or where one parent is unemployed. A positive aspect of this policy is that at least 2 months has to be taken by each parent (in a two-parent family). Therefore, if a mother takes the time off, the father must spend 2 months with his new child or will lose the benefit. Another advantage is that parents can receive the benefit so long as they work no more than 30 hours a week. This can accommodate women's high rate of part-time employment, yet denies benefits to women working full-time. This policy is consistent with a gender neutral approach, neither promoting nor prohibiting gender equality.

Maternity Benefits

Maternity benefits are paid to a pregnant woman who is a member of the sickness fund. The benefit is 100 percent of average net earnings during the previous 3 months of employment (up to 13€ or \$20 US per day is paid by the sickness fund and the remaining amount is paid by the employer), and is paid for 6 weeks before and 8 weeks after the expected date of birth (ISSA, 2010). The applicant must obtain a doctor's certificate and complete an application form. Due to long processing time, Germany advises pregnant women to submit all necessary documentation at least 6 weeks prior to intended start day of leave. Maternity benefits are restricted to those women who are members of a sickness fund; those who are not a member of a sickness fund are not covered. For eligible applicants, the compensation level is high, allowing them to maintain their lifestyle

before and after the birth. German maternity benefits do not involve fathers (unlike in social democratic welfare states), reinforcing existing gender roles and breadwinner ideology.

Social Services: Child Care

The burdens of balancing work and care of children is much harder in Germany than in social democratic Sweden or Norway. There are no public child care services for children aged 0-3 years. The lack of child care services for young children is connected to the German belief that the early care of a child is the responsibility of the mother. While child care services were better-developed in eastern Germany, reunification resulted in some losses for women. After re-unification in 1992, kindergarden legislation was introduced, guaranteeing children aged 3-6 the right to a child care space. However, this legislation only came into effect in 1999. Kindergartens are a supervised environment of learning and development for children, as in Sweden. However, most Kindergartens operate half-days and do not operate outside regular school hours, leaving parents to locate alternate child care services.

Germany aims for a sustainable, public sector-like provision at highly subsidized rates for all parents in order to increase the birth rate and foster economic growth. Despite these proposals, actual services are expensive and scarce. In a recent interview, Dr. Kristina Schroteder, the federal minister of family affairs, articulated her thoughts on child care, 'I believe in free choice...' (BMFSFJ, 2010). She did not address the lack of funding being directed toward child care services. In the same interview she was asked about increasing the child benefit, she responded; ' That would be nice - but

unfortunately we are currently in a situation in which we can not promise we will increase anything... We need to stop making debt' (BMFSFJ, 2010).

Germany's family benefits and services fit the conservative classification. For example, its income benefits reinforce existing hierarchies and inequalities. The benefits offered to eligible citizens are extensive however they are limited in scope, and leave many people uncovered. Social services in Germany leave a lot to be desired. For example, there are no child care services for children 0-3. As noted above families become more dependent on income benefits, which are needed to purchase the child care services they need. The strain of locating, securing and paying for private child care restricts parents' options and can negatively influence their decision to have more children.

German family policy displays the conservative characteristics described by Esping-Andersen. If women were given the financial supports and social supports, child care, the decision to have children is relatively easier. However, with more women choosing to enter the labour market the stark reality of being chained within the household as a result of having children has left German women to delay or ultimately refuse to have children. However, some feminists may point to the shorter maternity leave period as a positive step for women as it limits their total time away from the labour market, reducing potential strain resulting from their absence. But if this is taken in conjunction to the limited child care spaces and the lack of progressive ideological shifts in regards to gender roles then women are still responsible for the care of the child thereby eliminating any positive influence a shorter leave may provide.

France

As articulated by Esping-Andersen France's welfare regime is also conservative. The income benefits will be extensive and contribution based and social services will be limited. Entrenched within these characteristics is the adherence to tradition, and maintenance of existing hierarchies. Through an examination of the income benefits and social services in France, we will determine (1) if the state's family policy displays conservative implications and (2) if they are woman-friendly.

Income Benefits: Allowances and Leaves

Family Allowances

Family allowances are contribution-based and apply to all families with two or more children residing in France. The children must be younger than 20 years old. The amount for family allowance is 126 € (\$183 US) for two children; 287 € (\$417 US) for three children, and an additional 159 € (\$231 US) for each subsequent child²⁷. However, the earnings of a working child must not exceed 820 € (\$1 192 US) or benefits will be suspended (ISSA, 2010). Additional means-tested benefits include, *single-parent allowance* and the *family supplement*²⁸ (ISSA, 2010).

Young Child Benefit

The *young child benefit* is paid for a child born, adopted or fostered after December 2003. The following are components which fall under *young child benefit*; *birth grant & base allowance*, an *additional choice of free activity*²⁹ and *supplement for child care*.

Birth Grant & Base Allowance

The *birth grant & base allowance* are both means tested. The birth grant is a sum of 904 € (\$1 313 US) during the seventh month of pregnancy (1 806 € or \$2 625 US for an adopted child). The *base allowance* is a flat monthly rate (181€ or \$260US) paid to parents the month of childbirth up to the month preceding the child's 3rd birthday.

Additional Choice of Free Activity

The *additional choice of free activity* is for one or both parents who have one child and have stopped or reduced their working hours to care for their child³⁰. The amount is determined by the percentage of reduced hours with a maximum rate of 426 € (\$614 US) (if both parents claim benefit their combined supplement cannot exceed the maximum rate). The benefit is paid to from the month following child birth, or at the end of maternity, paternity or adoption leave period for a maximum of 6 months. If the insured resumes work while the child is between 18 months to 29 months of age, the benefit continues for 2 months (ISSA, 2010).

Supplement for Child Care

The *supplement for child care* is means tested cash benefit calculated according to the number of children and family income and is paid to compensate for child care costs. The benefit is paid for each child where care is provided by an accredited caregiver or as a payment to the family if the caregiver is a homemaker. The family allowance fund also reimburses the total social security contributions for an accredited caregiver or 50% of the social security contributions for a home worker. The supplement for child care may be combined with the additional choice of free activity with total monetary amounts varying according to family income³¹ (ISSA, 2010).

These benefits provide families in financial need with additional monetary compensation for having children. There are no restrictions that would indicate a gendered intent within these benefits. The benefits indicate an understanding within the policy domain that having children changes family finances and needs.

Parental Allowance for a Sick Child

The *parental allowance for a sick child* is a daily benefit of 42 € for a couple and 50 € for a single parent which is paid for each missed day up to 22 days per month or 310 working days spread over the allowable period. The benefit is paid for 6 months renewable up to 3 years. A reduced benefit is paid if both parents reduce their working hours to care for a sick child (ISSA, 2010). Parents cannot receive the benefit if they receive daily allowances for sickness, maternity, paternity or accident benefits, child allowances, disability benefits, unemployment benefits, supplement of free choice of activities, supplement of child care or retirement benefits. Parents must complete applications with the *Ministry of Labour, Family, Social Relations and Solidarity* website or local offices with total processing time of 20-30 days.

At first glance the conditions to receive this benefit appear restrictive. For example, the inability to combine benefits reinforces the status quo. The amount of compensation is not extensive but it does provide some support. It provides money to working parents to stay at home and care for a sick child and put their mind at ease knowing their job is secure.

Maternity and Paternity Benefits

The next important benefits to discuss are *maternity* and *paternity benefits*. In order to receive *maternity benefits* the insured must have 10 months of coverage and 200 hours of

employment in the 3 months before certification of pregnancy³². The *maternity benefit* is 100% of the insured's average earnings (minus a tax deduction) and is paid for 6 weeks before and 10 weeks after the expected date of childbirth for the first and second child³³. Women must take a total of 8 weeks off. The daily amount varies according to contributions made by the insured, the daily minimum is 8.63 € (\$12.38 US) with a maximum benefit of 77.19 € (\$110.76 US)³⁴. Pregnant women must declare the pregnancy with the Health Insurance Fund. By declaring the pregnancy, women can access their medical benefits but also file for their expectant maternity leave. This allows applicants to easily access their file online to modify and track their benefits³⁵ (ISSA, 2010).

Paternity benefits qualifying conditions are similar to *maternity benefits*, including compensation minimum and maximums levels³⁶ (ISSA, 2010). Notable conditions include, the beneficiary **must** be the child's biological father and is paid for up to 11 consecutive days (18 consecutive days for multiple births) and must be taken in the first 4 months after the date of childbirth³⁷.

This benefit is consistent with the conservative approach, for being contribution based and employment based to claim benefits. However, the benefits do consider the father with mandatory time set aside for his use only. The amount of paid time off is also generous. Overall the income benefits offered in France are extensive and attempt to cover a diversity of family arrangements. However, as with Sweden and Norway, the extensive time off has been criticized by some feminists for preserving the systematic inequalities inherent within the welfare state. For example, extended time away from the office has demonstrated a break in employment which can impact promotions and

ultimately the course of a woman's career. As well, fathers who are not the biological father are disqualified from receiving benefits. This may prove to impact women who have a child 'unconventional ways', such as sperm donors. It is outside the scope of this paper to investigate this further but, it can be seen that this stipulation supports a traditional family unit.

Social Services: Child Care

France has a very thorough and comprehensive child care provisions. The goal of French child care is to provide parents with flexibility in their child care choices, enabling them to reconcile their family and professional lives. The available child care options can be divided along two age groups, children 0-3 years old and children 3-6 years old. Child care provisions for children 0-3 fall under the responsibility of the *Ministry of Social Affairs* and the *Ministry of Health, the Family, and Handicapped Persons*, and the *National Family Allowance Fund* (Caisse Nationale des Allocations Familiales) and municipalities. The available child care options for children 0-3 years of age include; crèches collectives - centre-based services run by municipalities and/or non-profit organizations; Crèches parentales (parent co-operatives) – which involve parents in the daily management and operations of crèches; employer-sponsored crèches d'entreprise - mostly located in the public sector and hospitals, and halte-garderies and centres multi-accueil (open centres) both provide part-time and occasional care (Fagnani, 2007; The National Family Allowances Fund, 2010). The cost of these services are heavily subsidized, with parents paying an average of 27% total cost (rates adjusted according to income) (The National Family Allowances Fund, 2010).

Options for parents who do not wish to partake in the aforementioned services include, assistants maternelles (maternal assistants) who provide care in their home on a regular basis for one to three children. Assistants maternelles work directly for the parents or are part of a crèche familiale network. Parents can also employ a garde a domicile or in-home caregivers (childminders) who work in the parent's home (The National Family Allowances Fund, 2010).

At the ages of 3-6 children have a legal right to a space in école maternelle (pre-school) or private jardins d'enfants (Kindergarten). The école maternelle is part of the national education system, under the support of the Ministère de la Jeunesse, de l'Éducation nationale et de la Recherche. The ministry defines the curriculum, opening hours, and operations of écoles maternelles. The curriculum is focused on five areas, oral language and introduction to writing, learning to work together, acting and expressing emotions and thoughts with one's body, discovering the world and imagining feeling and creating. All staff must have the diploma of professe d'école, with auxiliary staff holding a CAP or secondary level certificate in early childhood education. Private jardins d'enfants vary in terms of cost and hours of operation.

To aid parents with the available options and pricing for services, the National Family Allowances Fund launched the website mon.enfante.fr. 'Mon-enfante' was intended to improve access to information and facilitate parents free-choice in choosing and locating child care options. In order to aid parents with their decision a cost stimulator is available on the website to determine the most appropriate child care option (The National Family Allowances Fund, 2010).

The variety of child care options and the availability within a suitable price point for parents runs contrary to the *conservative* characteristic of limited social service as articulated by Esping-Andersen. The affordability and ease of access, provided through the mon-enfant site, allows for parents to locate child care services that best suits their needs. The availability of child care options can produce advantageous results, for example giving women an easier transition into the labour market after giving birth. A less than progressive characteristic is found in France's pre-school curriculum that lacks progressive gender role socialization (i.e. gender mainstreaming), indicating a lag in the re-imagination of women's caregiver role.

Germany and France Contrasted

A comparison of Germany and France's family policies present some interesting similarities and differences. The first notable difference between the two nations' policies is in the quantity of available income benefit programs. Germany has a total of four available benefits – *child benefit*, *child allowance*, *parental benefit* and a *maternity benefit*, two of which are income tested (child allowance and parental benefit), compared to France's ten available income benefit measures.

An interesting condition of Germany's child benefit is the inability to combine it with another social security benefit, such as unemployment benefits. This stipulation eliminates the likelihood of 'double dipping' of citizens and enforces the belief that people are to be self-sufficient with minimal to no government support. A shared similarity between the two nations is the condition of revoking or reducing benefit levels if a child's earning is above the specified amount. This indicates the countries shared

belief that if a child is working and living at home his or her earnings are part of the family wage.

Both countries have similar paid maternity leave time, 14 weeks in Germany and 16 weeks in France. A notable difference is France's paternity benefit, that grants the father 11 consecutive days off for the care of his child. This benefit is similar in premise to the father's quota in Norway. The days are meant for increasing the role and presence of the father in the care of his child(ren). The variety of Frances' income benefits is an acknowledgment of the diversity in family structures which appears to be lacking in Germany.

With regard to social provision of child care, the availability of child care is minimal in Germany. The predominant publicly funded child care provision in Germany is Kindergarten class for children aged 3-6 years of age. They operate on half-days and do not operate outside regular school hours, forcing parents with children to find alternate *private* child care services. In contrast, France provides a wide-range of child care services and options (mon-enfante.fr, 2011). Child care is not free in France but the sliding scale for cost can accommodate any family in need of child care. In terms of availability, affordability and diversity of services France greatly surpasses Germany. Indeed, France's services are much more comparable to social democratic Sweden than to Germany.

The examination of Germany and France's family policies confirm and contradict the conservative characteristics as laid out by Esping-Andersen. As seen in the social services component, Germany demonstrates conservative characteristics (minimal services) while France does not (diverse selection of services). France's comprehensive

benefits and social service provisions surpass Germany's level of woman-friendliness by providing women with monetary and social supports.

Chapter 4: Labour Market Policy

In order to understand the status of women within a welfare state it is important to examine not only family policy but also labour market policy, another key policy domain. Labour market policy highlights women's access to employment providing some indication of women's economic independence. Labour market programmes are conventionally classified as 'passive' or 'active'. Passive policies are reactive and offer a measure of income security to workers *after* they become unemployed (Olsen, 2002). Active labour market policies (ALMP), in contrast, are anticipatory; their purpose is to encourage employment or prevent or discourage unemployment. In examining the labour market policies of the four countries under investigation, I can assess Esping-Andersen's typology and determine the degree to which these selected welfare states are woman-friendly. Some conditions in the labour market, that will be addressed along the way include, the character of unemployment insurance and the availability and quality of ALMP.

In order to identify France, Germany, Sweden and Norway's level of 'woman friendliness,' I ask three questions of their income programs:

- what are the rules and regulations for compensation?
- what is the level of compensation provided?
- how long are the waiting periods and benefit duration periods?

Answers to these questions point to the level of economic independence experienced by woman. For example, more rules and restrictions hinder women's access to financial aid during times of unemployment; if the level of compensation is low and benefit duration short women have little economic security. Esping-Andersen's typology predicts this result in the conservative regimes of Germany and France. In the social democratic

regime, we will expect income benefits to be egalitarian in application, characterized by short wait times, longer benefit duration and an overall generous level of compensation.

I will consider the social services component of the labour market initiatives in the two regime types to investigate how 'woman-friendly' are. By the 'social service' component of labour market policy, I mean those initiatives which serve to reduce the wage gap, programs aimed at bringing women into non-traditional employment and programs which seek to promote gender equality in the labour market. These factors contribute to women's long term success in the labour market and their increased economic independence.

Sweden

Income Services

The employment of all citizens is a central priority in Sweden. As such, Swedish labour market policy uses a 'work for all' strategy, emphasizing work rather over cash support (IAF, 2010b). Esping-Andersen's regime typology categorizes social democratic income benefits as generous, universally provided or egalitarian in application, exhibiting a strong commitment to full employment (Esping-Andersen, 1998).

The current employment snapshot in Sweden further demonstrates their 'work for all' strategy with the rate of employed women sitting at 70.3% compared to 75% for men. However, with a current unemployment rate of 7.4% there is a need for 'passive' unemployment programs too. Sweden recognizes the need for unemployment programs and as such they spend more money compared to the United States whose primary unemployment focus is passive measures which demonstrates Sweden's overall generous labour market policy.

Sweden's unemployment program is two-tiered, consisting of subsidized basic insurance and a voluntary income-related insurance program³⁸. Basic insurance provides income for job-seekers between the ages of 20 – 65 years old. Benefit coverage in the basic programs is 320 SEK (\$52 US) a day for those who had worked 40 hours a week before unemployment; benefit for part-time workers is reduced according to hours worked. Unemployed workers who are members of a voluntary income-related program, have better benefits and other conditions. Basic benefits are paid for a maximum of 300 days with a mandatory 5 day waiting period. The benefit length can be extended by 150 days if the beneficiary has a child younger than 18 years of age. The benefit is paid five days a week. In the *voluntary insurance programs*, benefits are 80% of previous income for the first 200 days, and 70% for the next 100 days. The maximum benefit is 680 SEK (\$109 US) a day (IAF, 1997, 2010b).

Eligibility in the two programs varies. The voluntary income-related program is designed for employed and self-employed persons younger than 65 who are members of an unemployment insurance fund. Eligible recipients must have been employed for at least 6 months (80 hours a month) or a minimum of 480 hours during a continuous 6 month period in the last 12 months. Insurance fund membership is an option for employees in specific occupations or industries³⁹ who must work at least 12-months before becoming eligible to claim voluntary benefits⁴⁰ (IAF, 1997, 2010b). Voluntary unemployment insurance funds are supervised by the Swedish Unemployment Insurance Board (IAF)⁴¹ and are financed through tax revenue, members' contributions and employers who pay a percentage of their payroll (IAF, 2010a, 2010b)

The qualifying conditions for recipients in both programs are being: partially or completely unemployed; able to work at least 3 hours every working day and at least 17 hours per week; able to accept suitable work when offered; and registered at a public employment service. Recipients must also be actively seeking work (Forakringskassan, 2011; Swedish Institute, 2011).

Job seekers must register with and cooperate with Employment Service in drafting a personal action plan for finding employment. The action plan must be approved within 3 months, and once approved the Employment Services center directs job seekers to suitable vacancies or labour market programmes (IAF, 2010a). UI benefits will be reduced or suspended if the beneficiary is: not actively seeking work; out of work without valid cause; suspended from work for improper conduct;, or refuses a suitable job or training. The suspension of benefits can range from 10 to 60 days, with a benefit reduction of 25% or 50% (Forakringskassan, 2011; IAF, 2010b). In order to receive unemployment benefits under both schemes, the insured must register with Employment Services in person. In addition to registering, every two weeks the beneficiary must submit an employment benefit card (valid for 2 weeks at a time.) All forms are easily accessible through their online service located at arbetsformedlingen.se. In both schemes, waiting periods are relatively short and benefit duration is ample. Unemployment insurance in Sweden thus is consistent with Esping-Andersen's social democratic welfare regime type. The availability of universal benefits through the basic program, illustrates Esping-Andersen's observation about universality in social democratic regimes.

The level of woman-friendliness is high in Sweden in this income component of the labor market policy domain. Women's part-time labour force participation can be

accommodated in the unemployment schemes. The option of extending basic insurance to unemployed workers with dependents helps reconcile work and family. Benefit levels are high enough to support an unemployed worker with dependents. The waiting period is relatively short and compensation is reasonable. In combination, these indicators point to a relatively high level of woman-friendliness as they minimize economic uncertainty for women.

Social Services

Social services are a second key component of Sweden's labour market policy. This section focuses on social services that promote gender equality in the domain of labour market policy. A general Swedish sentiment is that gender equality is a good thing and promotes a more egalitarian and successful country. This sentiment is reflected in government policies within the labour market and in the business sector. The Swedish government states the objective of gender equality policies in the labour market is to foster equal power for both women and men to shape society and their own lives (Swedish Institute, 2011). Sweden spends 1.1% of its total social expenditure on ALMP, the highest of the countries examined in the present study. Sweden is a pioneer in promoting and supporting equal rights, yet its labour market is still marked by gender inequalities (OECD, 2011b). For example, 19.8% of employed women work part-time, compared to 10% of men (OECD, 2010a). The gender wage gap is still considerable, with women earning only 85% of what men make (OECD, 2010a). In recognition of these disparities, in July 2009 Sweden proposed a long-term strategy, targeting gender equality in the labour market and the business sector (Regeringskansliet, 2010). The initiative includes over 60 measures aimed at reducing gender inequities and promoting greater

gender equality within the labour market. The strategy targets four separate areas; (1) measures to combat gender divisions in the labour market and the business sector, (2) measures to promote equal conditions for entrepreneurship; (3) measures that promote equal participation in working life and, (4) measures aimed at equalizing working conditions (Regeringskansliet, 2010).

Measures designed to combat gender divisions in the labour market are dedicated to breaking down traditional gender patterns and reducing gender divisions through the public education system. The government starts with pre-school, aiming to establish new roles and identities for men and women within the labour market. The goal is to eliminate sex-stereotyping, so that all individuals choose an occupation regardless of whether it is female- or male-dominated (Regeringskansliet, 2010). In addition, it seeks to promote self-employment, particularly for girls. The promotion of self-employment stemmed from recent government research which found far more men than women in Sweden own and operate their own businesses.

The government outlined eight measures to break down gendered differences within the labour market⁴². The most notable include: a mandate requiring the National Agency for Education to plan and implement gender equality initiatives at compulsory and upper secondary school level and in adult education; the establishment of a Technology Delegation to boost interest among girls and women in mathematics, science, technology, and ICT (information and communication technology); a strategy for entrepreneurship in the education sphere designed to inspire young people to start businesses of their own after completing their studies; and the appointment of approximately 880 female business ambassadors tasked with inspiring more women to

become self-employed. These measures are important because each attempts to eradicate traditional gendered labour market assumptions. For example, implementing gender equality initiatives in the education system targets young women at a pivotal point, before they start higher education and a targeted career path. Young women are being encouraged to enter fields and subsequent career paths that they may have once overlooked or considered out of their reach (Regeringskansliet, 2010). The promotion of equal conditions for entrepreneurship is focused on increasing women's chances of owning, running and expanding a business.

Another gender-equality program of the government focuses on increasing women's presence in managerial positions in both state run and private businesses. The government proposed twenty-three measures⁴³. Measures include Almi Företagspartner (Almi Business Partner) to implement and coordinate a national programme to boost the number of women on company boards, a Swedish Agency for Innovation Systems (Vinnova) to fund research on women's enterprise; and the Swedish Agency for Economic and Regional Growth must implement and coordinate a three year programme for the promotion of women's enterprise, among others. The government wants research examining how companies are addressing gender equality, for example how they plan to increase the number of women in top managerial and senior positions (Regeringskansliet, 2010).

Despite Sweden's sentiment of gender equality, sex differences still exist. For example, Swedish women's time spent on unpaid labour averages 249 minutes compared to 177 minutes spent by men (OECD, 2010b). To combat this Sweden has launched a third gender equality initiative to promote equality and reduce exclusion⁴⁴. Through

initiatives as diverse as tax relief for household services (to facilitate the reconciliation of professional and family life) to the establishment of a working group charged with analyzing issues relating to men and gender equality, the government is trying to challenge labour market inequality. The government called for further research on how women and men divide their time between household work, leisure time and jobs, gender equality in parenthood, and the functioning of the labour market from a gender equality perspective. This research is to be used to better assess and implement meaningful policy and programme changes.

Swedish women and men do not have equal working conditions. Sweden adopted a new *Discrimination Act* and created the *Office of the Equality Ombudsman* in January of 2009. Its works includes investigating the current state of women's health (women typically have more sickness claims) and how this negatively impacts their labour market participation. A continued focus within 'equal working conditions' policies is the promotion of freedom from discrimination, violence and harassment in the labour market.

Gender equality strategies proposed by the Swedish government are long-term, and so the success of these programs and initiatives is yet to be determined. Many measures are focused on research, such as research examining gender roles and distribution of unpaid labour in the household and research into how businesses address gender equity issues. Although research is always beneficial it does not translate into immediate policy changes and it certainly does not ensure a more egalitarian labour market. Instead there is a possibility women will be lost in a mountain of research with no solutions to eradicating the labour market discrimination. This concern aside, the quantity and quality of these diverse efforts indicates an attempt to increase women's

employment prospects and the diversification of women's skill sets. As such these are woman-friendly measures. Overall, Sweden's approach is progressive and may lead to greater equality among the sexes.

Norway

Income Benefits

Norway, like Sweden, is a social democratic welfare state, exhibiting many of the characteristics articulated by Esping-Andersen. To review, income benefits should be generous, egalitarian, universal and display a commitment to full employment. Indeed, the government of Norway, like Sweden, places a high priority on the employment of its citizens. The government aims to provide effective active labour market policies that stimulate labour supply and maintain employment. Therefore, like Sweden, Norway's reliance on passive labour market measures is strictly as short-term financial aid while unemployed citizens search for work (NAV, 2009)

Norway first introduced unemployment benefits in 1906, in order to help workers who had lost employment. Today, Norway's unemployment benefits cover both employed persons and self-employed persons⁴⁵. Funds for Norway's social insurance program come from both workers and employers. The insured worker contributes 7.8% of their income, the self-employed worker pays 11% of their income to the national insurance scheme, and employers contribute 14.1% of gross payroll. The qualifying conditions specify that annual earnings in the last year before employment must be at least 1.5 times the base amount at the time of the claim or annual earnings in the last 3 years of at least 3 times the base amount at the time of the claim⁴⁶. The insured person must be able and willing to work. As in Sweden, the loss of employment cannot be due to

voluntary leaving, termination due to misconduct, participation in a labour dispute or refusal of suitable employment offer or retraining (ISSA, 2010).

The unemployment benefit is 0.24% of the annual income per day, which roughly translates into an average of 62.4% of previous earnings (Government of Norway, 2011; NAV, 2009). The benefit is paid after a mandatory 3-day waiting period and is paid for up to 52 weeks, if annual income prior to unemployment was less than 133 624 NOK (\$24 224 US). Unemployed workers who earned more than 133 624 NOK (\$24 224 US) may receive unemployment benefits for up to 104 weeks. Insured persons with children under the age of 18 receive an additional 17 NOK (\$3.10 US) a day for each dependent child. The maximum daily unemployment benefit is 1 049 NOK (\$191 US) plus child supplement and all benefits are subject to taxation (ISSA, 2010; NAV, 2009).

In order to obtain unemployment benefits the insured person must register as a jobseeker online or at a local employment office. When registering at local employment offices, jobseekers are advised how to use the online services, post resumes and apply for jobs. He or she may also be required to submit additional documentation, such as a letter of termination, reference letters from all previous employment for the last 6 months, documentation of income and for those with children, notice of custody including birth certificate of dependant⁴⁷. Processing time is 3 weeks. Those who receive unemployment benefits are required to keep NAV, the national agency, abreast of their current employment situation through submitting notifications (NAV, 2009). The notification card must be sent every 14 days, either online or in paper format, and the beneficiary must disclose any hours worked during the period. By submitting the card the beneficiary

is advising NAV that they are still a jobseeker (Government of Norway, 2011; NAV, 2009).

Norway's unemployment policy is generous, and consistent with the social democratic regime description. Norway's Ministry of Labour is the governing body responsible for labour market policy, and as such, it seeks to achieve an inclusive and well-ordered employment market. The Ministry uses active labour market policy to stimulate access to labour, counteract the transition from employment to permanent social security benefits and the reduction and prevention of unemployment. Noticeably absent from these stated goals are initiatives and programs attempting to eliminate gender inequalities or increase women's full employment participation in non-traditional employment fields.

Social Services

The primary characteristic of social services should be high quality, according to regime theory (Esping-Andersen, 1998). The Ministry of Children, Equality and Social Inclusion is responsible for promoting gender equality in the labour market. The Ministry seeks to strengthen the rights of consumers, families, children and young people, and promote anti-discrimination and full equality between men and women (Government of Norway, 2011). The Norwegian government and its ministries prominently publicise their adherence to gender equality policies. They acknowledge link between gender equality, economic growth and the labour market.

Norway, like Sweden, has taken numerous steps over the past 40 years to increase women's labour market participation. Yet, Norway has one of the most segregated labour markets in the European Union and, despite its concern with gender inequalities,

still exhibits a marked wage gap between the sexes at a rate of 10% (OECD, 2010a). The nation currently lags on equality between the sexes. Women perform more unpaid labour, with a daily average of 225 minutes, and have a very high part-time employment rate at 30.4% (OECD, 2010a, 2011c) Gender inequality in Norway led the government to revise its Gender Equality Act (1978) in 2005. The main purpose of the revised *Gender Equality Act* is to promote gender equality and improve the position of women (Government of Norway, 2005). The Act contains multiple sections dedicated to gender equality in the labour market⁴⁸. The most notable are ‘affirmative action in favour of one of the sexes’, ‘gender equality in connection to employment’, and ‘equal pay for work of equal value’ (Government of Norway, 2005).

Affirmative action measures are widely used in Norway; indeed, it appears to be the central tool for addressing gender inequality. For example, in 2004, the government acted to ensure *balanced* gender representation on all state-owned company boards (since as of 2003, only 7% of company boards were composed of women). In 2006, the government further mandated all state-owned and privately-owned public limited companies to have a minimum 40% representation of each gender⁴⁹. By 2008, the total percentage of women on state-owned and privately-owned public limited companies stood at an average of 39% (Government of Norway, 2011). The results of the new measure led the government to extend the requirement to large co-operatives (those with more than 1000 members).

There are some problems with relying on affirmative action alone. One obvious problem with public-sector mandated affirmative action is that it excludes private sector companies. Private sector businesses are left alone when it comes to gender equality.

Additionally the requirement for at least 40% women does not translate into equality. Moreover, affected companies barely made it to 40%, indicating minimal support for the mandate. Companies did just enough to adhere to the measure but did not go further. This indicates that companies implicitly approve the status quo, and shows the need for stronger action to eradicate gendered norms and roles.

In 2008, the Norwegian parliament published an interesting *White Paper*, produced by the *Ministry of Children and Equality*. The report spoke about the impact male gender roles play on gender equality and the overall status of gender equality. Included in this White Paper was a section dedicated to gender segregation in the labour market (Norwegian Ministry of Children and Equality, 2008). The report reiterated the findings of the Norwegian Equal Pay Commission which established a clear link to gender segregation and unequal pay (Norwegian Ministry of Children and Equality, 2008). However, concise and practical solutions to the issue were in short supply. The proposed line of action included continued research into gender equality, with a focus on men's needs. It is puzzling that men's needs, rather than women's, were foregrounded. This particular report is yet another example of how the status quo is maintained, how existing inequalities in the labour market are ignored, and of how critics can be quieted by research funding.

A public campaign to encourage women to enter male-dominated professions came from the *Ministry of Education*. Most recently, it launched an '*Action Plan for Gender Equality in Early Childhood Education and Care, in Basic Education 2008-2010*', which promotes gender equality through non-traditional career choices for both boys and girls (Ministry of Education, 2008). The long-term strategy of desegregating the

labour market includes presenting traditionally feminized career choices to boys and traditionally masculine career options to girls. The success of this campaign cannot be yet determined.

Is Norway woman-friendly in this sub-area or component of the labour market policy domain? While Norwegian social services are high quality, they leave a lot to be desired regarding gender-equality in the labour market. The level of woman-friendliness is hindered by the lack of targeted initiatives that seek to change the gender inequalities in the labour market. Instead, attempts at gender equality appear to be Band-Aid solutions without an effort to actually implement real change, more consistent with a 'gender neutral' approach. Norway's approach can be considered gender neutral because they focus on legislative reforms to eliminate formal barriers. However, these initiatives often ignore the systemic and social obstacles faced by women in the labour market. The programmes do not attempt to offer gender focused training courses or employment choices outside the status quo for women implicitly reinforcing the gendered inequalities. Formal legal equality is not the same as substantive equality.

Sweden and Norway Contrasted

Let us now address the similarities and differences located in labour market policies of Sweden and Norway. The primary income benefit examined was unemployment insurance. The benefits offered are slightly different from each other. Recall that Sweden offers a basic insurance program and a voluntary insurance fund. The voluntary insurance fund is for employed and self-employed persons, with the operative word being 'voluntary'. In Norway, employment benefits are offered as part of the national insurance scheme. The most obvious difference is that while Norway has one unemployment

scheme, Sweden has two (one of which is voluntary). Both countries offer a universal program. Sweden has the same basic coverage, but its two-tier system offers more choice and covers more unemployed people. This increased coverage contributes to a higher level of woman friendliness because Sweden's system provides greater opportunity for women to access benefits. Increased access to benefits translates into added economic security for women in times of unemployment.

Qualifying conditions are noticeably different in both countries. Sweden requires that an unemployed person must have previous employment totalling 6 months or 80 hours a month and belong to any insurance fund for a period of 12 months. Norway, alternatively, specifies that unemployed person's previous annual income must be 1.5 times the base amount. Norway's central qualifying condition is more consistent with Esping-Andersen's criteria of universality. But if one considers the fact women are predominantly employed in part-time or precarious employment, Norwegian women have more difficulty reaching the base amount for eligibility. Sweden's qualifying condition is more woman-friendly because it allows more flexibility through their use of hours and/or time length easily accommodating those employed in part-time employment.

Both nations require unemployed persons to register at the local employment agency as jobseekers that are willing to accept suitable employment. They must construct an action plan within both countries and be actively seeking work. In addition, benefits can be reduced or suspended in both nations under certain conditions, such as, refusal of suitable work, or not actively seeking work. Sweden allows persons claiming unemployment benefits to initially register online or via telephone, with a meeting scheduled at a later time for the construction of their employment plan. This invariably

speeds up the processing time and causes relatively little inconvenience to begin the application process. On the other hand, Norwegian policy guidelines mandate that the unemployed person must register in person with all materials needed for the application. The person must bring along all necessary paperwork, as failure to do so will slow down the processing time and subsequent approval process.

Small differences exist between waiting period and duration of benefits in each country. In Sweden, there is a 5 day waiting period, financially covered by the employer (by law), following the registration as a job seeker with the employment center; for Norway it is 3 days. However, the processing time for an application with the Norwegian employment agency can take 3 weeks. Norway specifies that the unemployed person will receive benefits from the date in which the application is filed. But for a family or a person without an income and bills demanding their attention, the three week processing time this can severely impact their livelihood.

The duration period of Swedish unemployment benefits is 300 days (200 days at 80% of their income and 100 days at 70% of their income). An additional 150 days are available if the unemployed person has a dependent child. Norwegian unemployment benefits are available for 52 weeks (and can be extended to 104 weeks if the unemployed person makes more than the specified amount) at 24% of the unemployed person's annual income per day (the rough equivalent of 62% of previous pre-tax income). Compensation in Sweden is considerably higher than in Norway. This disparity means the pain of unemployment is felt more deeply in Norway than in Sweden.

The most significant difference is in the area of active labour market policies designed to combat gender inequality in the labour market. Both countries have a claim

to be pioneers in women's rights and gender equality. Sweden has implemented numerous measures with the aim of utilizing the skill sets of all its citizens regardless of gender. Sweden is attempting to change traditional gender roles in the family and society through a gender reconstruction approach. Norway, on the other hand, has done less. It made minimal and ineffective revisions to its *Gender Equality Act* (1979), relying on affirmative action to achieve gender equality between the sexes in the labour market. Norway's act focuses more on protection against discrimination than proposing solutions to address gender inequality in the labour market.

Norway's affirmative action measures, such as quotas, led to an increase of women in managerial and board positions. Targeted companies were required to achieve the 40% minimum female representation, but they did not exceed the floor. However, the legislation was resisted by business officials who claimed qualified males would be overlooked in favour of under-qualified females (Matsa & Miller, 2011). Other Norwegian measures focus more on men, than on women, a curious proposition given that gender asymmetry harms women more than men.

One may say that the Norway is promoting gender equality. But one taken in relation to the level of woman-friendliness that might be expected in a social-democratic regime, Norway falls short compared to Sweden. Overall, the level of woman-friendliness is higher in Sweden where women have a greater chance at full-time employment and the capacity to form independent and autonomous households. Despite Sweden's progressive initiatives, an unequal distribution of unpaid labour tasks persists in both countries.

Germany

Income Services

Germany is characterized as the best example of a conservative welfare state. This suggests that it will (1) have an extensive range of programs, (2) the basis of allocation will be contribution-based, and (3) coverage will be for employees, with income-related compensation levels. As well, the level of woman-friendliness is expected to be low, with little attention to gender equality and women issues, despite high levels of support for women in their 'traditional spheres'. The stated goal of German labour market policy is to safeguard jobs and reduce unemployment. As such, it is concerned with maintaining gainful employment of its citizens with minimal reliance on passive unemployment benefits. Social assistance and social insurance provide temporary compensation while the unemployed person finds employment. The primary agency responsible for overseeing all matters related to labour market policy is the Federal *Ministry of Labour and Social Policy* (BMAS). The BMAS is thus responsible for the administration and maintenance of unemployment benefits (BMAS, 2011). It is also responsible for monitoring demographic changes in the workforce in order to identify current and future gaps within the labour market. Demographic research is then used to develop strategies, in the form of initiatives and programmes which will respond to current and upcoming employment realities.

Unemployment insurance and employment services were first introduced in 1927. The type of support includes both social insurance and social assistance⁵⁰. Social insurance benefits primarily cover employed persons, but is also available to self-employed persons and caregivers among others⁵¹. The stated exclusionary group are

those persons with *irregular* employment. Social assistance covers unemployed job seekers. Germany's social insurance program is funded through the contributions paid by workers (1.4% of covered earnings)⁵² and employers (1.4% of covered earnings). The federal and municipal government cover shortages between employer and employee contributions as well as the cost of non-contributory unemployment benefits (BMAS, 2009; ISSA, 2010). The total cost of social assistance (the basic unemployment benefit) is covered by government funding (monies obtained through general taxation). In order to qualify for social insurance unemployment benefits, the person must be unemployed, have completed 12 months of covered employment in the last 2 calendar years, be registered as an unemployed person with the local employment agency, and be capable of, available for, and actively seeking employment (ISSA, 2010).

Job seekers qualify for unemployment benefits under social assistance. They too must be capable of, available for, and actively seeking work⁵³. The basic subsistence needs of the beneficiary must not be met by any other benefit. If the conditions of social assistance unemployment benefits are violated, the benefits may be reduced or suspended.

The amount of the insured unemployment benefit is 67% of their insured net earnings. The benefit is reduced to 60% where there are no dependent children. The benefit is paid for 6 to 24 months, according to the length of the covered work period and the insured person's age⁵⁴ (BMAS, 2009; ISSA, 2010). The calculation of benefits is according to contingency risk rather than contributions made to the insurance scheme⁵⁵ (BMAS, 2009).

For both social insurance benefits and basic social assistance unemployment benefits job seekers must register with the local Employment Agency. Individuals must register no later than the first day of unemployment and fill out the appropriate application form to start receiving benefits. Training and employment opportunities are offered to registered jobseekers by the Employment Agency (BMAS, 2011).

The basic means-tested social assistance unemployment benefits are paid at various rates according to family income and need⁵⁶. The rates are paid once a month in the amount of either, 287 € (\$414 US), 323 € (\$468 US) or 359 € (\$518 US)⁵⁷. It is important to note that, if a person has a *certain* amount of savings, her/his benefits will be reduced on the belief that the savings should be used to subsidise their income, eliminating the need for state funding. An additional dependant supplement is also available under the basic income for job-seekers or social assistance recipients. This supplement is paid for dependent children under the age of 15, and relatives or spouses who are unable to work⁵⁸ (ISSA, 2010).

German unemployment policy is consistent with Esping-Andersen's classification of it as a conservative regime. For example, Germany offers two-tiered unemployment benefits, and a number of supplements in the social assistance program. Social insurance - Germany's primary program - is contribution-based, the coverage is for employees, and compensation levels are income related. Yet, those who are employed in irregular employment are denied assistance, regardless of their financial need. This is especially troublesome for women who are predominantly employed in irregular employment. Germany's unemployment benefits encapsulate a conservative classification. The level of woman-friendliness is low.

Social Services

Just 0.7% of total social expenditures in Germany are allocated for ALMP. Germany has a gap in social service provisions because it adheres to a labour market policy that is largely determined by the individual's participation in the labour market. This is consistent with Esping-Andersen's description of conservative regimes as limited.

When considering its level of woman-friendliness Germany is expected to demonstrate little concern over gender equality and, instead, will actively reinforce existing traditional gender roles through the absence of programming. This becomes clear when examining the country's gender segregated job market and gendered wage gap of approximately 25% between men and women (OECD, 2010a). In addition, women spend a daily average of 269 minutes on unpaid labour within the home (OECD, 2011c). And the percentage of women engaged in part-time employment is very high, with rates currently sitting at 38.1% (OECD, 2010a). Yet, Germany is focusing on programs promoting employment among the disabled and for the 50-plus populations. Programs specifically aimed at gender, are lumped together with overarching equality programs, such as the reduction of bullying at work through reporting problems to the anti-discrimination office (BMAS, 2011). Germany, like Sweden and Norway, has made discrimination based on sex, race, religion and nationality illegal. However, it falls short on producing an explicit and detailed gender equalizing labour market targeted program or strategy.

The only mention of a gender sensitive program is *PROGRESS*. Launched in 2009 by the United Nations, this program was established to financially support the implementation of the objectives of the European Union in employment, social affairs

and equal opportunities (UNDP, 2009). *PROGRESS* is open to the 27 EU Member States, EU candidates, and members of the European Free Trade Association (EFTA) and European Economic Area (EEA) (UNDP, 2009). It targets member states, local and regional authorities, public employment services and national statistics offices, specialized bodies, universities and research institutes, as well as the social partners and non-governmental organizations can participate. Germany's participation and adherence to this program cannot be determined as there is no available data or information concerning their direct involvement. Although Germany has been praised for its labour market stability during the 2008 global economic crisis, and current European Union instability, it has been less concerned with gender equality initiatives. In fact, the OECD pointed to these deficiencies in its '*Doing better for families*' report (2011). In this report, the OECD articulated the severely low birth rates in Germany as being connected to both their inactive labour market policies targeting women and women's needs (OECD, 2011a). The OECD points out that more women are delaying or opting out of having children altogether due to the lack of supports offered through family and labour market policies (OECD, 2011a).

Social assistance in Germany is under-developed and therefore woman-unfriendly. As a conservative state Germany reinforces the existing gender order, with consequences such as a dwindling fertility rate, a sizable gender pay gap, and unequal distribution of care responsibilities. The inattention to women's concerns within the labour market shows the regressive character of this particular form of welfare state.

France

Income Services

France, like Germany, is classified as a conservative welfare state. As always, its dominant components of labour market policy will include an extensive range of programs, the basis of allocation will be contributions, and compensation levels will be income-related. Labour market policy in France is focused, much like in Sweden and Norway, on continued employment through programmes and training, and not exclusively on unemployment benefits. France spends 0.9% on ALMP, second only to Sweden, and commits 1.4% of total social expenditures to unemployment benefits, similar to its conservative neighbour Germany (OECD, 2010a). The first French unemployment framework was introduced in 1905, and the most recent amendments were made in 2009. The types of unemployment programs include a social insurance and a social assistance. The social insurance program is funded through contributions made by the worker (2.4% of covered earnings) and the employer (4% of covered payroll)⁵⁹. Social assistance is funded by the government of France (ISSA, 2010).

The coverage of unemployment insurance⁶⁰ includes persons employed in France^{61,62}. Civil servants and self-employed persons are explicitly excluded from the insurance scheme. Unemployment assistance is means-tested for those persons who are not eligible for unemployment insurance benefits, as well as for certain other designated categories of unemployed persons⁶³ (ISSA, 2010).

The social insurance scheme's qualifying conditions include the following, the insured must be younger than 60 years of age⁶⁴, they must have at least 4 months of work in the last 28 months⁶⁵ and they must reside in France. The individual must also register

at an employment office and be capable of, and available for work (ISSA, 2010).

Unemployment cannot be a result of voluntary leaving, misconduct or the refusal of a suitable job offer.

The benefit rate for unemployment insurance varies between 57.4% and 75% of the average daily wage during the last 12 months of work. The length of benefit is determined by the number of months the insured has contributed, for a maximum benefit length of 24 months⁶⁶. The benefit can be partially combined with income from gainful activity for up to 18 months. Some financial support is provided to unemployed persons to encourage relocation and vocational training. In addition, employers who hire job seekers who have been registered at an employment office for at least 12 months (3 months if over 50 years old) can receive a financial incentive (Government of France, 2011; ISSA, 2010)

In order to start receiving benefits, the insured must provide proof of contributions made during their employment and must establish that they worked the required number of hours necessary to make an unemployment claim (Ministry of Employment, 2010a). After submitting an application, applicants will be contacted within 72 hours to arrange the mandatory interview with an employment officer (Baker, 2006). At the interview, the unemployed applicant must bring a valid piece of identification (such as a passport or identity card) confirming their identity and their right to access benefits. As well, they need to bring the original certificate of employment, a photocopy of their social security card and bank account information. During the interview, a *Projet Personnalisé d'Accès à l'Emploi (PPAE)* or customized employment plan, will be developed. The PPAE must be completed within 15 days of registration in order to be

trigger benefits (Government of France, 2011; Ministry of Employment, 2010a). The PPAE outlines the job seeker's training, qualifications, skills, knowledge, professional experience, personal and family circumstances, and wage expectations. This customized action plan includes the employment center's role in aiding in the job search and the job-seekers action plan to achieve re-employment. The plan is re-evaluated every three months with the employment advisor (Ministry of Employment, 2010a, 2010b). Where a job-seeker remains unemployed after three months, he or she must meet with their advisor every month until obtaining a job. The monthly meeting allows the job-seeker to receive advice and support. If a reasonable job offer is made, the job-seeker can only refuse with good reason⁶⁷. The employment center can suspend benefits if a job-seeker refuses to update their PPAE according to the specified conditions; refuses to complete goals or training specified in their PPAE or twice refuses suitable employment without reason (Ministry of Employment, 2010b).

Overall, France demonstrates those characteristics articulated by Esping-Andersen. Its benefits are extensive, determined by contributions and are related to income level. However, one notable deviation from Germany is France's commitment to the employment of its citizens through programmes and training, not solely through monetary compensation of unemployment benefits. On face value, France exhibits a neutral level of woman friendliness.

Social Services

We should expect to uncover very limited social services, especially in relation to gender equality and the promotion of a woman-friendly state. In regard to active labour market policies, France currently focuses its policy initiatives on providing equal access to

employment opportunities, including training of the unemployed and updating of skills of those currently employed. Although such policies are not gender specific, they are relevant for women.

France's policies were introduced to combat the effects of the global economic crisis of 2008. The reform of its employment and training programs was initiated to provide greater equality of access to training and employment for its citizens. The changes were concentrated on a newly mandated fund for career security, the right to information, vocational guidance, and greater transparency in vocational training. France also took more directed action to target those most vulnerable to unemployment, such as youth, the long-term unemployed, and unemployed persons aged 50 and older (travail-emploi-sante.gouv.fr, 2011).

French youth unemployment rates are among the highest in OECD countries. To combat youth unemployment, the French government introduced training through employment program (OECD, 2010a). The program is for youths aged 16-25 years of age. They call the agreement entered in by the youth and employer, 'a learning contract'. A learning contract provides youth with on-site job training in combination with an apprenticeship learning center (for North American readers, it is similar in concept to co-op programs). However, what make the French program unique is that it provides defined benefits for the youth and employer. Youth receive valuable 'on-site' learning and a minimum wage determined by their age, current qualifications and the job itself. Employers receive a tax credit and potential new employees trained according to their specifications. Both parties benefit from the working/learning relationship. Although

gender is not specified in this program, it is equally open and available to both young men and women (Ministère du Travail de l'Emploi et de la Sante, 2011).

France also introduced tax credits for any employer who enters into a professional contract with a person 45 years or older in their company. As part of the contract, the employer provides training in exchange for a tax credit and general relief, and in some cases an exemption of social security. Employees provide labour in exchange for income.

France's introduced 'the individual right to training' in the employment sector. The individual right of training enables employees to benefit during his or her working time. The employee has a right to 20 hours a year of training, conditional upon length of employment and approval to participate from the employer. If the employer does not respond to the request for training within 30 days of receipt of request, the request by default is approved⁶⁸. Funding for re-training and continued training under the individual right to training is paid for by employer tax contributions⁶⁹ (Ministère du Travail de l'Emploi et de la Sante, 2011)

France lacks labour market policies specifically targeting women. However, French labour market policies are gender-neutral, theoretically equally applying to, and providing the same opportunities for, men and women. The problem with gender-neutral policies is that they do not acknowledge the issues particular to women in the labour market. For example, the gender wage gap sits at a relatively high rate of 12% and 22.4% of all women work part-time (OECD, 2010a). French women also dedicate more time to unpaid labour than men, with a daily average of 258 minutes (OECD, 2010a, 2011c). While France is consistent with Esping-Andersen's conservative classification its level of women-friendliness is low.

Germany and France Contrasted

Germany and France both have a social insurance scheme, as well as a social assistance scheme. Both countries agree that unemployment benefits are meant to maintain livelihood during periods of unemployment and are not to be accessed over the long term. The qualifying conditions in both nations require the unemployed person to seek employment and be registered as a jobseeker. Qualifying conditions to receive benefits vary by required length of previous employment. Germany strictly requires 12 months of covered employment in the 24 months while France has the less stringent condition of 4 months of employment in the last 28 months. France has easier access to unemployment benefits.

As well, both countries require the unemployed person to register as a jobseeker. As part of this process France's unemployed must construct a customized employment action plan.. Failure to register and complete the PPAE results in denial of unemployment benefits. In comparison, Germany does not make an employment plan a condition. However, Germany does specify that if an unemployed person fails to notify the employment center on the day of becoming unemployed unemployment benefits can be denied. There is no mandatory waiting period located in either nation's unemployment benefits. The waiting period can be considered the total processing time of an application.

The level of compensation differs with Germany providing a total of 67% of the covered earnings where there is at least one dependant (reduced to 60% for earners without a dependant). French compensation is between 57.4% and 75% of former wages, depending upon the person's annual contributions. A distinction between France and Germany is the additional supplements and benefits for parents in France. For example,

an unemployed person with dependents, may qualify to receive a number of supplements in addition to their unemployment benefits. France also offers companies financial incentives and tax breaks for hiring a jobseeker who has been unemployed longer than 12 months⁷⁰.

Both countries are consistent with Esping-Andersen's classification as conservative regimes. For example, both countries offer contribution based programs with compensation levels determinant on previous income. Esping-Andersen (1998) specified conservative welfare states will typically display an extensive range of programs, France to a greater degree than Germany. The most notable difference between these nations occurs when considering the level of woman-friendliness. France has a qualifying condition of 4 months of employment in last 28 months while Germany has a 12 month pre-requisite, Germany is far more restrictive on women accessing unemployment benefits. Additionally, Germany explicitly excludes those in irregular employment, regardless of their financial need. This negatively impacts a woman's economic security during times of unemployment, while France makes it easier for women to receive unemployment benefits. France's mandatory PPAE completion is an active step to aid unemployed individuals by focusing their job hunt and honing marketable skills. Does the PPAE indicate a higher level of woman-friendliness? It is in this possibility that France starts to deviate from Germany. At this point, it can be said that France is more woman-friendly than Germany although the exact degree is uncertain.

An examination of the active labour market policies to combat gender inequality in both nations reveals Germany's fully conservative orientation and France's modified conservatism. In Germany, labour market policies aimed at resolving gender issues are in

short supply. Instead its policy objectives are broad and non-inclusive of gender. The only initiative or program for women is the country's participation in PROGRESS. Germany's general lack of attention to gender issues was called out by OECD who noted that German neglect severely impacted the family and women's labour market participation.

In sharp contrast to Germany, France's active labour market policies are targeted to specific national gaps in the labour market. For example, France mandated the following career security, the right to information, vocational guidance, and greater transparency in vocational training all in the hopes of targeting the most vulnerable persons. These mandates do not specifically target women; rather, these programs are gender neutral and can be easily applied to both men and women. The overarching goal of increasing access to programs can translate into aiding women in locating gainful employment. However, both nations fail to address gender segregation in the workplace or address the lack of female presence in top managerial positions in the workforce. The overall conclusion is that Germany much more strictly adheres to the conservative principles, as specified by Esping-Andersen, while France displays more flexible initiatives that target women through its universal application of its programs and vocational training. France can be seen as wavering conservative welfare state. Woman-friendliness is more evident in France than in Germany.

Chapter 5: Conclusion

Through the examination of income benefits and social services in the family policy and labour market policy domains of Sweden, Norway, Germany and France the characterizations of each welfare regime type and level of woman-friendliness was determined. In order to provide a summation of the research results, we will first explore the *social democratic* welfare states of Sweden and Norway, followed by an evaluation of the *conservative* welfare states of Germany and France. I will also provide an account of the limitations of this study, the contribution it will make, and a discussion of some, potential avenues for future research. In the evaluation of each set of countries the following two broad questions will be addressed: (1) is the conventional characterization of these four welfare states still valid? and, (2) what is the relative level of woman-friendliness in these two sets of nations?

Sweden and Norway: What have we learned?

The Nordic nations of Sweden and Norway are considered social democratic welfare states. Nearly 20 years ago Esping-Andersen (1998) classified these nations as such because each embodies characteristics of universalism, strong commitment to employment, high quality social services, and generous income benefits, all of which contribute to high levels of solidarity and confidence in the welfare state. Feminist research also indicated these nations stood alone in their promotion and support of woman-friendly income benefits and social services. The passing of time indicates a need to re-evaluate these initial classifications and determine the extent to which these welfare states may still be viewed as woman-friendly.

As evidenced in the income benefits offered under the family policy umbrella both Sweden and Norway are consistent with a social democratic welfare state. As indicated in *Family Policy Summary Table 3.0*, both countries offer a cohesive, generous, universal and easily accessible set of income benefits for families with children. For example, each nation includes a ‘father’s quota’ time set aside specifically for the father shifting care responsibilities away from the mother. Another notable benefit available in both countries is compensation for either parent if they need to stay home with a sick child. This benefit is important because it protects employment and guarantees some level of monetary support if a day of work is missed due to a child’s illness.

Although income benefits are comparable between Sweden and Norway, they part ways when considering the available social services. The primary social service investigated was child care. As evidenced in *Family Policy Summary Table 3.0*, child care services offered in Sweden are the best in all the nations examined; they are diverse, affordable, easily accessed and of high quality. Swedish child cares operate during a variety of hours accommodating those parents who are employed in non-traditional occupations. This ease of access is starkly different from the limited hours of operation found in Norwegian child care. Norwegian opening hours seem appropriate starting at 07:00 but pick-up times of either 17:00 or 18:00 is restricting, leaving parents who work in non-traditional employment with limited access to child care.

The provision of child care services is important because it allows both parents, in particular women, to access paid employment with greater ease and without disruptions. As Orloff (1993) argues access to paid employment also fosters a greater capacity to form an autonomous household and more importantly, the promotion of personal autonomy.

On the other hand, restricted or inferior child care services impede women's access to paid employment, subsequently diminishing their capacity to form an autonomous household and their level of personal autonomy.

The labour market policy income benefits, unemployment benefits or unemployment insurance, and social services, ALMP of each nation was then examined. As evidenced in *Labour Market Policy Summary Table 4.0*, Sweden's income benefits surpass Norway's in scope, duration, accessibility and compensation levels. Sweden's benefits are universal in theory and execution while Norway's income benefits are universal in theory, but more limiting and exclusionary in execution.

As evidenced through the social service component Sweden greatly surpasses Norway in the implementation and execution of ALMP that target women and increase gender equality within the labour market. Norway leans heavily on legislative reforms and positive discrimination, in order to increase the visibility of women in the labour market. Sweden, on the other hand, has implemented numerous measures seeking to address gender inequality in the labour market. Sweden's gender equality approach can be classified as gender reconstruction because the implemented measures actively try to re-imagine gender relations from the earliest stages of socialization. The progressive and diverse ALMP demonstrate Sweden's ideal social democratic character and high level of woman friendliness as compared to Norway.

By taking into account the family policy and the labour market policy of Sweden and Norway, the character of Sweden's welfare state remains intact while Norway's can be described as somewhat removed from the social democratic welfare state. Norway's income benefits both in their labour market policy and family policy are somewhat

consistent with the social democratic welfare state, their classification is wavering when considering social services component in each policy domain. With regard to the level of woman-friendliness, Sweden far surpasses Norway in both the family policy and labour market policy domains. Sweden provides women with access to paid work, which provides them with a greater chance of creating an autonomous household and toward greater personal autonomy. Sweden's ALMP also account for gender inequality in the labour market with gender reconstruction actively occurring at the earliest of ages. In comparison, Norway falls short as they effectively limit women's access to paid work through their ineffective child care services, somewhat restrictive unemployment benefits and ineffective ALMP. Without the consideration of gender both nations easily fit in Esping-Andersen's initial welfare state regime type. However, with the inclusion of gender as an analytic variable the classification as a social democratic nation is somewhat problematic. It is recommended in order to remove Norway as a social democratic nation an examination of the remaining social policy domains becomes pertinent.

Germany and France: What have we learned?

Esping-Andersen (1998) classified both Germany and France within the conservative welfare state regime/world because he found income benefits to be extensive and the basis of allocation was contribution based, with income related compensation levels. Social services offered in these nations would be limited. The level of woman-friendliness was expected to be low, supporting traditional gender roles. By reviewing what was learned through the examination of the family policy and labour market policy in each nation we will determine if the welfare states of France and Germany are still conservative and what is the level of woman-friendliness.

As summarized in *Family Policy Summary Table 3.1*, Germany and France offer very different income benefits. France provides an extensive range of benefits while Germany offers a limited selection of benefits. The benefits offered in both countries are similar in level of compensation and duration, with the exception of France's two-child minimum to claim family allowance⁷¹. The income benefits offered in each nation are consistent with a conservative welfare state. It is in the social service of child care where these two nations begin to differentiate from one another. It becomes very apparent that France surpasses Germany in all areas related to child care provisions. France offers a variety of child care options for children operating at different hours to accommodate diverse working hours with cost dependent on family income. The variety of child care options fosters more choices accommodating a parent's needs and lifestyle. In comparison, Germany only offers kindergarten for children aged 3-6 years old, which operates half days, leaving parents with children ages 0-3 to locate private child care services. Germany's restrictive child care services point to the country's commitment to tradition and its belief that child care is a private responsibility of the family, not the state. Germany's family policy remains consistent with an ideal conservative welfare state.

The level of woman-friendliness is considerably higher in France than in Germany. France provides extensive benefits and its child care services very reminiscent of Sweden. The provision of child care services in combination with their income benefits fosters a high level of woman-friendliness. In comparison, Germany's family policy reinforces traditional gender roles through limited income benefits and the absence of child care services. This confirms a low level of woman-friendliness.

When considering labour market policy Germany and France share similar forms of unemployment insurance benefits. As evidenced in *Labour Market Policy Summation Table 4.1*, Germany and France have similar qualifying conditions, access and benefit duration. Compensation levels are slightly different but both determined through employee contributions. Notable differences include more income benefits and the construction of the PPAE in France. The additional income benefits ease the financial burden of being unemployed while the PPAE aids the jobseeker to locate training, suitable employment options and support. Overall these characteristics are consistent with being classified as conservative welfare states.

The social services of ALMP should be limited, especially when considering policies seeking to reduce gender inequality in the labour market. An examination of Germany's ALMP finds that they are all but non-existent. Germany participates in the PROGRESS program, but its level of commitment is unknown. Germany focuses most ALMP programs on the 50 plus population with no attention to gender inequalities. With a gender wage gap of 25% they are sending a clear message, tradition prevails. ALMP are consistent with gender reinforcement and consequently a very low level of woman-friendliness.

France, like Germany, does not have ALMP which specifically target women or women's needs. However, the ALMP policies the nation does have can be said to target men and women equally. For example, France has increased funding for career security, the right to information, vocational guidance, and greater transparency in vocational training for those recently unemployed or looking for employment. The new initiatives are for the most vulnerable to unemployment, such as youth, long-term unemployed, and

unemployed older persons aged 50 and older. These policies can be understood as gender neutral, as they do little to specifically target women but can be equally applied to both sexes.

Both Germany and France are lacking in ALMP specifically addressing gender inequality in the labour market, but France has a higher level of woman-friendliness. For example, in France, the provision of child care and the child care supplement allows a single mother to enrol her child in suitable child care service allowing for full access to the labour market. She is better able to create an autonomous household and thereby increase her own personal autonomy. For a German single mother, she will be severely impacted by the lack of affordable child care services and income benefits. The result is limited access to employment, impacting chances of a full time career, and personal autonomy. Germany remains true to its original classification as an ideal conservative welfare state. Yet, France can be said to be moderately conservative.

Contribution

This comparative research study of Sweden, Norway, Germany and France's family policy and labour market policy helped determined each nation's consistency with Esping-Andersen's original classification and the level of woman-friendliness in the current environment. Comparative research using European nations allows North American readers to comprehend and appreciate a welfare state other than their own. It provides further understanding to how these two particular policy domains interact and directly affect the lives of women and more specifically, how gender roles are created and fostered by welfare states.

At a time of global economic uncertainty studies supporting the necessity of a functioning, egalitarian welfare state are more crucial than ever. The present research points to the importance of a gendered welfare state that supports family policy and labour market policy. This research highlights the advances and shortfalls of four European nations regarding the pursuit of gender equality. One such shortfall across the board is that women are still responsible for the primary care of children and are expected to balance work and family with ease. Society tells women the balance of career and family is easily attainable if they just put in enough effort. This research is important to demonstrate that achieving the enviable balance between career and family is not the sole responsibility of the woman. There needs to be support from the family *and* the state. It is time to change the conversation from an emphasis upon what women can do better to a greater emphasis upon what the husband or partner *and* state can do to help achieve the career-family balance. Even with unequal distribution of paid vs. unpaid labour, noticeable gender wage gap and women largely absent from top managerial and political positions we are told to be stop our complaining. One must consider the silencing of gender inequalities experienced by women as just another example of public patriarchy rearing its ugly head.

Limitations

The findings of this research highlight the variance in different countries welfare state classifications and levels of woman-friendliness, there are limitations. The first limitation is the selection of nations and policy domains offer a snap-shot in a particular time and place. The examination of these policy domains offer a sense of what the different countries offer however, the results are only relevant so long as the policy domains

remain unchanged. The selection of two policy domains is limited and does not account for the additional policy areas such as, health, old age, education to name a few, which can affect the overall impact on welfare state classifications and the level of woman-friendliness in a nation. Due to differences socially, culturally and historically the generalizability of this research is limited to the specific countries under investigation. Despite this, the information provided here is very useful in North America for understanding different welfare states and present alternatives to our own state, the results may not adequately account for the European context. Studying these welfare state helps to unveil the complexities of gender inequality it is necessary to examine other institutions that impact women and existing gender relations. The information provided does not account for sexuality or race which can limits the generalizability of the research presented.

Future Research

The results of this study point to the need for additional research in the study of gender and its relationship to welfare states. Since only two major policy domains was examined here the need for future research on the remaining policy domains is warranted as they can provide greater insight on how women are treated within the welfare state. The inclusion of all policy domains would also demonstrate the inter-connectedness between and within different policy domains. In addition, research that included a liberal welfare state can provide information of how North American women experience the welfare state as compared to European nations.

It also important to undertake research that interviews women from various socio-economic backgrounds who can bring a voice to the lived experience of the different

welfare state regimes. It is important to include the human experience in future research because policy on paper can be felt and experienced differently when implemented.

Future research is needed to highlight the complexities of gender inequality in society.

Endnotes

¹ Also referred to as 'corporatist', to emphasize the statist and organicist character of this regime type.

² Esping-Andersen developed his 'Three Worlds of Welfare' through the use of Thomas Humphrey Marshall's (T.H. Marshall), 'Citizenship and Social Class' (1950) and Richard Titmuss', 'Essays on the Welfare State' (1958). Like Titmuss, Esping-Andersen identified three similar categories or families of nations, but he used some additional considerations to construct them.

³ Low expenditures are located within the Mediterranean nations, such as Spain and high expenditures within the Continental European Nations, such as Germany or France.

⁴ Esping-Andersen's approach was originally considered 'radical' in contrast to 'mainstream' functionalist approaches. However, given the concerns of feminist welfare state research, his work is identified as part of the larger 'mainstream' researchers that ignore gender.

⁵ Other key power resources theorists include John Stephens, Walter Korpi and Joakim Palme.

⁶ in the late 1800s and early 1900s mass emigration led to an extremely large Scandinavian population in Minnesota and Wisconsin (Swedish) and North Dakota (Norwegian).

⁷ Work injury benefits were the first policy initiatives introduced in Norway, they were introduced in 1894.

⁸ 1968 many violent student protests and factory workers strikes brought down the government of Charles de Gaulle. The country is paralysed by strikes for more than a month.

⁹ Due to length and time restrictions there will not be a focused attention on same-sex relationships. However, it should be noted that both Sweden and Norway recognize same-sex unions and families to receive the same benefits as heterosexual couples.

¹⁰ It is acknowledged that there are single male parent households however, for purposes of this study the female experience is the primary focus of inquiry.

¹¹ The first social program was created in 1890 with the introduction of voluntary sickness insurance.

¹² The currency used in Sweden is the Swedish Krona (SEK). Although a member of the European Union they elected not to adapt the euro and continue to use their national currency.

¹³ Child care allowances can be granted to parents taking care of a sick child or a child with a disability. The child must need special supervision and care for at least six months. They are also entitled to child care allowance if they have large additional expenses due to the child's disability or illness.

¹⁴ Often referred to as 'educare'.

¹⁵ Pre-school class is offered for children who are 6 years old. The class provides a structured learning environment similar to compulsory school. The child is to receive 525 hours and it is free to parents to enrol their child(ren).

¹⁶ Members of the National Council of Norwegian Women included women's rights groups, suffrage clubs, health associations, business and professional organizations, housewives' associations, temperance unions, moral decency societies and local women's councils.

¹⁷ The Child Welfare Act was introduced in 1915 and granted municipal mothers pensions to unmarried women.

¹⁸ The currency used in Norway is the Norwegian Krone (NOK). Norway is not a member of the European Union and therefore their national currency is still in use today.

¹⁹ 'Single' includes those parents who are separated, divorced, widowed, if their partner has been missing or is imprisoned longer than 6 months.

²⁰ Transitional benefit falls under the Old Age, Disability and Survivors domain, in order to receive this benefit a surviving spouse who is not eligible for an earnings-related survivor pension may be eligible to receive this benefit. This benefit is income tested, if the surviving spouse's income exceeds 50% of the base amount, the pension equals the difference between the full pension and 40% of the amount that the spouse's income exceeds 50% of the base amount. The amount received is the value of the universal survivor pension plus the earnings-related survivor pension; if the insured was not eligible for an earnings-related pension, the benefit is the value of the universal survivor pension plus the special supplement.

²¹ The application process for those who do not automatically qualify for family allowance includes submitting the appropriate form with confirmation of residence permit if the mother or the child is not Norwegian or a citizen of a Nordic country and the birth certificate for children not registered in the Norwegian National Population Register. For those who are applying for extended child benefits the following documents are required (according to specific situation), divorce certificate or separation order (proof that the person is separated), mediation certificate for cohabitants with joint children under the age of 16 years, declaration of break-up of relationship (for cohabitants with joint children over the age of 16 years and for married couples who have been split up for at least six months), dual domicile agreement needed for applications for split payment which needs to be signed by both parents and/or documentation of imprisonment or similar (for prison sentences or remand in custody lasting longer than six months).

²² A maternity grant is paid to insured mothers who are not entitled to cash maternity benefits which totals 33 583 NOK (6 400 US). As well, 1 765 NOK (337 US) is paid for giving birth at home.

²³ Parental care leave is classified under sickness benefit.

²⁴ For complete list of conditions of Act no. 64 of June 2005 relating to Kindergartens (The Kindergarten Act) please see <http://www.regjeringen.no/upload/kilde/kd/reg/2006/0037/ddd/pdfv/285752-barnehageloven-engelsk-pdf.pdf>

²⁵ Supplementary rules allow to support to children up to age 21 if unemployed, 25 if attending an educational institution, with no limit for children with a disability

²⁶ The forms can be located online. Once the forms are completed they can be sent, along with supporting documentation, to the Family Fund. The status of an application can be obtained through calling the Family Fund. The total processing time can vary from approximately 20 days to 36 days.

²⁷ A flat-rate allowance of 79 € (\$114 US) is paid for up to a year to families with three or more children entitled to family allowances including one child who is age 20.

²⁸ Family supplement for families with more than 3 children can be obtained in the amount of 164 € (\$236 US). It is means tested. For example, families with two parents with one income and three children cannot earn more than 35 493 € (\$51 030 US) and families with one parent/two parents with two incomes and three children cannot earn more than 43 419 € (\$62 426 US).

²⁹ Also known as the supplement for reduced work.

³⁰ An unemployment benefit can be suspended in order to receive the additional choice of free activity, however the recipient cannot claim both.

³¹ However, the following are the reported rates if the parent has one child under the age of 3 and an income that does not exceed between 20 079 EUR (\$28 842 US) they receive 448 EUR (\$644 US), when the child is 3 to 6 years old they receive 224 EUR (\$322 US). If the parental income of one child are between 20 079 EUR (\$28 842 US) to 44 621 EUR (\$64 094 US), they receive 283 EUR (\$406 US) for child under 3, and 142 EUR (\$203 US) when the child is 3 to 6 years old. If the parental income exceeds 44 621 EUR (\$64 094 US), they receive 170 EUR (\$244 US) for a child under 3, and 85 EUR (\$122 US) when the child is 3 to 6 years old.

³² Female job seekers receiving, or who have received, an unemployment benefit during the last 12 months, or who have ceased work within the last 12 months are eligible for the maternity benefit based on their last wage.

³³ For the third child, the maternity leave is 8 weeks before and 18 weeks after the expected date of childbirth. In cases of multiple births, the maternity leave is to last 12 weeks before and 22 weeks after the expected date of childbirth for twins, and 24 weeks before and 22 weeks after the expected date of childbirth for multiple births of three or more children. The benefit is paid for two additional weeks if maternity hospital care is required as the result of complications arising from the pregnancy or childbirth, except in cases of multiple births. If the mother dies as a result of complications arising from childbirth, the father is eligible for a paid leave period equal to the postnatal leave period followed by a paternity benefit leave period. In the event of miscarriage, the duration of the benefit paid is based on the duration of the maternity benefit normally paid after childbirth. In cases of an adoption of a child, benefits are paid for 10 weeks for one or two child(ren), 18 weeks for three children and 22 weeks for multiple adoptions regardless of number of children. The adoption leave can be shared between the mother and the father, in which case the leave period is extended by 11 days (18 in cases of multiple adoptions).

³⁴ The maximum monthly earnings used to calculate benefits is 2946 EUR (4225.47 US)

³⁵ There are no additional forms for the expectant mother to file with the exception of their employer filing a salary declaration form with the Health Insurance Fund. It is the responsibility of the expectant parent to make sure their employer submits this declaration. In order to obtain paternity leave benefits the father must submit an application and a copy of the birth certificate. Their employer must submit a registered letter with acknowledgment of receipt concerning the specific duration of the leave. All documentation must be submitted to the Health Insurance Fund. All applications and necessary forms can be located with the Health Insurance Fund or at any local health office.

³⁶ Male job seekers receiving, or who have received, an unemployment benefit during the last 12 months or who have ceased work within the last 12 months are eligible for cash paternity benefits based on their last wage.

³⁷ Along with the paternity leave period, the employer must pay for an additional 3 day leave period in accordance to labour code.

³⁸ The use of the term voluntary does not refer to a private sector scheme that people can join if they want to or not. Rather, it is an union-affiliated schemes, introduced long before there was traditional public UI. It was one of the reasons the workers joined unions, and a key reason for class/labour solidarity in Sweden.

³⁹ For the complete list of the 36 unemployment funds please see www.laf.se.

⁴⁰ For self-employed persons they must cease commercial activities, dispose of the company, including its assets, and deregister the company.

⁴¹ The first legislation on unemployment was introduced in 1934 in the form of an optional unemployment insurance scheme, with the first Unemployment Insurance Act coming into force in 1935. The act allowed the unemployment insurance funds to receive government registration and state grants for the payment of benefits.

⁴² The complete list of measures, (1) the establishment of a Delegation for Gender Equality in School; (2) the establishment of a Delegation for Gender Equality in Higher Education; (3) a mandate requiring the National Agency for Education to plan and implement gender equality initiatives at compulsory and upper secondary school level and in adult education;; (4) a proposal to reform upper secondary education with a view to preventing pupils (mostly boys) from dropping out or leaving school without pass grades; (5) a mandate requiring the National Agency for Higher Education to analyze gender differences in teacher training; (6) the establishment of a Technology Delegation to boost interest among girls and women in mathematics, science, technology, and ICT (information and communication technology); (7) a strategy for entrepreneurship in the education sphere designed to inspire young people to start businesses of their own after completing their studies; , and (8) the appointment of approximately 880 female business ambassadors tasked with inspiring more women to become self-employed. The introduction of these particular mandates is to increase women's self-employment rates

⁴³ For a complete list of measures please refer to www.sweden.gov.se

⁴⁴ For a complete list of measures please refer to www.sweden.gov.se

⁴⁵ This includes public service employees and seamen.

⁴⁶ Base income amount is 75 641 NOK (13 713 USD)

⁴⁷ For a complete list of documentation please visit nav.no.

⁴⁸ For a complete copy of the Gender Equality Act, please refer to <http://www.regjeringen.no/en/doc/laws/Acts/the-act-relating-to-gender-equality-the-.html?id=454568>

⁴⁹ State owned companies refers to companies owned or partially owned by the Swedish government, these companies are subject to the same rules and regulations as privately owned companies (Sweden.gov.se, 2010). Publicly owned refers to a company whose ownership is held by the general public, including individuals, officers, employees, and institutional investors.

⁵⁰ Also referred to as basic income support for job-seekers.

- ⁵¹ It also includes, household workers, apprentices, and trainees; additional groups may be included subject to specific conditions. In addition, voluntary coverage is offered for self-employed persons, caregivers and foreign workers outside the EU, again, subject to certain conditions.
- ⁵² Self-employed persons pay a total of 2.8% of their monthly reference value. The monthly reference value is 2 555 € (3 601.10 USD).
- ⁵³ In addition to unemployment benefits, there are benefits for short time work benefit, which is paid to short time workers who lose working hours due to economic restructuring in the workplace. Short-time transfer allowance paid to short-time workers to avoid dismissal due to economic restructuring in the workplace. And, bad weather allowance paid to construction workers whose work is halted because of bad weather.
- ⁵⁴ The benefit is paid for up to 24 months to unemployed persons older than 58 years of age with at least 48 months of covered work.
- ⁵⁵ The contingency risk is the loss of wages caused by loss of employment.
- ⁵⁶ A portion of the beneficiary's income above 100 € (144.25 USD) a month is deducted from the benefit (20% of income from 100.01 € (144.27 USD) to 800 € (1 154.08 USD); 10% of income from 800.01 € (1 154.10 USD) to 1 200 € (1 731.00 USD) to 1 500 € (2 163.75 USD). Certain types of income are exempt from the deduction.
- ⁵⁷ There is support available for housing and heating costs and further provisions if needed.
- ⁵⁸ The amount paid is 215 € (\$310 US) for children under 6, 251 € (\$362 US) for children aged 6-14 and 287 € (\$414 US) for spouses or civil partners under the age of 18 and other relatives who are needy and unable to work living in the household. And finally, the amount of 323 € (\$468 US) is paid for an adult spouse or civil partner who is needy and unable to work.
- ⁵⁹ Employer contributions may increase according to employer's age and the company's total number of employees if an employee is older than age 50 and is laid off.
- ⁶⁰ In addition to unemployment benefits there is also a pre-retirement benefit available, the insured must be at least 57 years of age, at the end of their labour contract, have at least 10 years of employment, and have worked with the same employer during the last year of employment. The employer must have concluded an agreement with the government. A reduced benefit is paid under certain conditions at the age of 55 if labour contract is changed into a part-time labour contract. For additional details regarding restrictions and monetary compensation under this benefit, please refer to www.issa.org.
- ⁶¹ As well as those within the principality of Monaco.
- ⁶² There is a special system established for construction workers, dockworkers, merchant seamen, aviators, household workers, contract workers, doorkeepers, disabled personnel in sheltered workshops, journalists, performing artists, and certain expatriates. Benefits include home workers, child caregivers, and some salaried public-sector workers other than civil servants
- ⁶³ For those long term unemployed who are unable to obtain unemployment insurance benefits. Unemployment social insurance programs include, a solidarity allowance, insertion allowance, insertion minimum income, activity minimum income, unemployment retirement-equivalent allowance. All of

these programs are means-tested, for long term, over 50 years of age, unemployed persons. For details concerning qualifying factors and monetary supports given under these programs please refer to www.issa.org.

⁶⁴ Those who are between the ages of 60 and 65 are only able to claim unemployment insurance if they are without the number of qualifying quarters to be considered for old age pension (162 quarters).

⁶⁵ 28 months increases to 36 if the individual is 50 years of age or older.

⁶⁶ If the insured is over 50 years of age they can receive benefits for up to a maximum of 36 months.

⁶⁷ Reasons for refusal of proposed job offer includes a salary level lower than the wage normally practiced in the region for the profession, a part-time job (if a job-seekers PPAE specifies full time) and if the job offer is fixed employment (if PPAE specifies otherwise).

⁶⁸ For a complete list of conditions and requirements to access the right to training please see www.travail-emploi-sante.gouv.fr.

⁶⁹ The monies collected for employee training is paid to two agencies, Joint Organization Authorized Collection and the Tax Collector Organization Learning, who are responsible for collection and funding distribution.

⁷⁰ The 12-month requirement for financial incentive for companies is reduced to 3 months if the jobseeker is 50 years old or older.

⁷¹ This stipulation resulted from the country's once dwindling birth rate. Currently, it has one of the highest in Europe (OECD, 2011a).

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Appendices

FAMILY POLICY SUMMARY TABLE 3.0		
	SWEDEN	NORWAY
Income Benefits Offered	<ul style="list-style-type: none"> • Child Allowances • Parental insurance <ul style="list-style-type: none"> ○ Pregnancy benefit ○ Parental leave benefit ○ Temporary parental benefit 	<ul style="list-style-type: none"> • Family Allowances • Pregnancy Benefit • Parental/Maternity Benefit • Parental Care Leave • Child Care Benefit
Access	Universal	Universal/Targeted*
Qualifying Conditions	<p><i>Child Allowance</i></p> <ul style="list-style-type: none"> • One or more children. <p><i>Pregnancy Benefit</i></p> <ul style="list-style-type: none"> • Pregnant woman in physically demanding or dangerous employment. <p><i>Parental Benefit</i></p> <ul style="list-style-type: none"> • For all citizens following birth/adoption of a child. <p><i>Temporary Parental Benefit</i></p> <ul style="list-style-type: none"> • Paid to parent(s) following an absence from work to care for a sick child younger than 12 years old. 	<p><i>Family Allowances</i></p> <ul style="list-style-type: none"> • One or more children¹. <p><i>Pregnancy Benefit</i></p> <ul style="list-style-type: none"> • Pregnant woman in physically demanding or dangerous employment. <p><i>Parental/Maternity Benefit</i></p> <ul style="list-style-type: none"> • For all citizens following the birth/adoption of a child. <p><i>Parental Care Leave</i></p> <ul style="list-style-type: none"> • Paid to parent(s) following an absence from work to care for a sick child younger than 12 years old (18 years old if child is disabled or chronically ill). <p><i>Child Care Benefit*</i></p> <ul style="list-style-type: none"> • Single parents living in Norway who demonstrate financial need.
Benefit Duration	<p><i>Child Allowance</i></p> <ul style="list-style-type: none"> • Until the child reaches 16 years of age (20 if a student or attending school for learning disabilities). <p><i>Pregnancy Benefit</i></p> <ul style="list-style-type: none"> • Up to 50 days beginning no earlier than 60 days before due date and no later than 11 days before due date. <p><i>Parental Benefit</i></p> <ul style="list-style-type: none"> • 390 days at 80% of earnings (maximum of 901 SEK or 149 US daily). • Low income receive flat rate of 180SEK or \$30 US a day. Plus 90 days at the flat rate. Total time 480 days. Is paid no earlier than 60 days before due date. <p><i>Temporary Parental Benefit</i></p> <ul style="list-style-type: none"> • 60 days and can be extended an additional 60 days per child. 	<p><i>Family Allowance</i></p> <ul style="list-style-type: none"> • Until the child reaches 18 years of age. <p><i>Pregnancy Benefit</i></p> <ul style="list-style-type: none"> • From the time work is stopped up until 21 days before due date. <p><i>Paternal/Maternity Benefit</i></p> <ul style="list-style-type: none"> • Total of 365 days. <p><i>Child Care Benefit</i></p> <ul style="list-style-type: none"> • Until child reaches fourth year at school. <p><i>Parental Care Leave</i></p> <ul style="list-style-type: none"> • 10 days per parent for one child (20 days for single parents). • 15 days per parent for 2 or more children (30 for single parents). • 20 days per parent if child is chronically ill (40 for single parents).

¹ Single parents may receive extended child benefits, full transitional benefits and extra infant supplement.

FAMILY POLICY SUMMARY TABLE 3.0 Continued		
	SWEDEN	NORWAY
Waiting Times	<p>Minimal</p> <ul style="list-style-type: none"> Maximum 14 days for application processing. 	<p>Minimal</p> <ul style="list-style-type: none"> Maximum 20 days for application processing.
Benefit Compensation	<p><i>Child Allowances</i></p> <ul style="list-style-type: none"> 12 600 SEK (\$2 063 US) per year¹. <p><i>Pregnancy Benefit</i></p> <ul style="list-style-type: none"> 80% of insured's lost earnings. <p><i>Parental leave benefit</i></p> <ul style="list-style-type: none"> 390 days at 80% of insured's lost earnings. 90 days at flat rate of 180 SEK (\$30 US) a day. Flat rate of 180 SEK (\$30 US) is paid to low income citizens for benefit duration. <p><i>Temporary parental benefit</i></p> <ul style="list-style-type: none"> 80% of insured's lost earnings. 	<p><i>Family Allowances</i></p> <ul style="list-style-type: none"> 11 640 NOK (\$2 017 US) per year. <p><i>Pregnancy Benefit</i></p> <ul style="list-style-type: none"> Varies depending on income of applicant when they leave work. <p><i>Parental/Maternity Benefit</i></p> <ul style="list-style-type: none"> 100% of insured's earnings for 46 weeks. 80% of insured's earnings for 10 weeks. <p><i>Parental Care Leave</i></p> <ul style="list-style-type: none"> 100% of covered earnings. <p><i>Child Care Benefit</i></p> <ul style="list-style-type: none"> Approximately 64% of documented child care expenses dependent on insured's income.
Restrictions/Additional Points	<p><i>Parental Leave Benefit</i></p> <ul style="list-style-type: none"> Days are divided between parents, if days transferred, there are 30 days reserved for the use of the transferring parent. 	<p><i>Parental/Maternity Benefit</i></p> <ul style="list-style-type: none"> Father's quota - 10 weeks must be taken by father. <p><i>Child Care Benefit</i></p> <ul style="list-style-type: none"> Must be applied for every year before school starts. Benefit stops if the parent marries, or is cohabitating with a partner.
Social Services Offered	<ul style="list-style-type: none"> Child care for children 0-6 years of age. <ul style="list-style-type: none"> Pre-schools Family Day-Care homes² 	<ul style="list-style-type: none"> Child care for children 1-5 years of age. <ul style="list-style-type: none"> Kindergarten
Availability/Hours of Operation	<ul style="list-style-type: none"> Varied to accommodate diverse working hours. 	<ul style="list-style-type: none"> Open at either 07:00 or 08:00 and close at either 17:00 or 18:00.
Cost	<ul style="list-style-type: none"> Dependent upon income 	<ul style="list-style-type: none"> 20-23% of cost is the parental fee, with maximum limit of 2 330 NOK (\$388 US) a month.

FAMILY POLICY SUMMARY TABLE 3.1		
	GERMANY	FRANCE
Income Benefits Offered	<ul style="list-style-type: none"> • Child Benefit • Child Allowance • Parental Benefit • Maternity Benefit 	<ul style="list-style-type: none"> • Family Allowances • Young Child Benefit <ul style="list-style-type: none"> ○ Birth Grant ○ Base Allowance ○ Additional Choice of Free Activity ○ Supplement for Child Care • Parental Allowance for a Sick Child • Maternity and Paternity Benefits
Access	Universal/Targeted	Targeted
Qualifying Conditions	<p><i>Child Benefit</i></p> <ul style="list-style-type: none"> • One or more children. <p><i>Child Allowance</i></p> <ul style="list-style-type: none"> • Income tested benefit for parents with children younger than 25, who are able to meet their needs but not their child's.. <p><i>Parental Benefit</i></p> <ul style="list-style-type: none"> • Income tested for parents with a child younger than 14 months working less than 30 hours a week. <p><i>Maternity Benefit</i></p> <ul style="list-style-type: none"> • Paid to pregnant woman who is a member of a sickness fund with an employment contract. 	<p><i>Family Allowances</i>¹</p> <ul style="list-style-type: none"> • Two or more children. <p><i>Young Child Benefit</i></p> <p><i>Birth Grant</i></p> <ul style="list-style-type: none"> • Means-tested lump sum of money for each child during the 7 month of pregnancy. <p><i>Base Allowance</i></p> <ul style="list-style-type: none"> • Means-tested for single parents and couples. <p><i>Additional Choice of Free Activity</i></p> <ul style="list-style-type: none"> • For parents who have at least one child and have stopped or reduced working hours to care for their child. <p><i>Supplement for Child Care</i></p> <ul style="list-style-type: none"> • Income-tested benefit to compensate families for child care costs. <p><i>Parental Allowance for a Sick Child</i></p> <ul style="list-style-type: none"> • Paid to single parents and couples who take time off of work to care for a sick child. <p><i>Maternity and Paternity Benefits</i></p> <ul style="list-style-type: none"> • Must have 10 months of coverage and 200 hours of employment in the last 3 months.
Benefit Duration	<p><i>Child Benefit</i></p> <ul style="list-style-type: none"> • Until the child reaches 18 years of age; 21 years old if unemployed; 25 years old if attending an educational institution and unlimited if the child is disabled. <p><i>Child Allowance</i></p> <ul style="list-style-type: none"> • Paid for a maximum length of 36 months. <p><i>Parental Benefit</i></p> <ul style="list-style-type: none"> • Two parents may share for combined total of 14 months. • Single parent 12 month maximum. <p><i>Maternity Benefit</i></p> <ul style="list-style-type: none"> • A total of 14 weeks – 6 weeks before due date and 8 weeks following the birth. 	<p><i>Family Allowances</i></p> <ul style="list-style-type: none"> • Until the child reaches the age of 18 or if the child earns more than 55% of minimum wage <p><i>Young Child Benefit</i></p> <p><i>Birth Grant</i></p> <ul style="list-style-type: none"> • One-time payment. <p><i>Base Allowance</i></p> <ul style="list-style-type: none"> • Month of child birth until the month before the child's 3rd birthday. <p><i>Additional Choice of Free Activity</i></p> <ul style="list-style-type: none"> • Month following child birth of end of maternity, paternity or adoption leave for 6 months.

FAMILY POLICY SUMMARY TABLE 3.1 Continued		
	GERMANY	FRANCE
Waiting Times	<ul style="list-style-type: none"> Approximately 20 – 36 days for application processing. 	<ul style="list-style-type: none"> Approximately 20-30 days for application processing.
Benefit Compensation	<p><i>Child Benefit</i></p> <ul style="list-style-type: none"> 1 – 2 children 184 EUR (\$274 US) per month. 3 children 190 EUR (\$282 US) per month. 215 EUR (\$320 US) for each additional child per month. <p><i>Child Allowance</i></p> <ul style="list-style-type: none"> Dependent upon income; maximum benefit amount 140 EUR (\$208 US) per month¹. <p><i>Parental Benefit</i></p> <ul style="list-style-type: none"> 67% of net income from previous 12 months. Maximum benefit is 1 800 EUR (\$2 675 US); Flat rate of 300 EUR (\$446 US) for an unemployed parent. <p><i>Maternity Benefit</i></p> <ul style="list-style-type: none"> 100% of average net earnings in the previous 3 months of employment. 	<p><i>Family Allowances</i></p> <ul style="list-style-type: none"> 2 children 125.78 EUR (\$182.77 US) a month. 3 children 286.94 (\$416.94 US). 158.78 EUR (\$230.76 US) for any additional children.² <p><i>Young Child Benefit</i></p> <p><i>Birth Grant</i></p> <ul style="list-style-type: none"> 903.07 EUR (\$1 312.32 US) <p><i>Base Allowance</i></p> <ul style="list-style-type: none"> Flat rate 180.62 EUR (\$2 624.72 US) per month. <p><i>Additional Choice of Free Activity</i></p> <ul style="list-style-type: none"> Full rate 426.12 EUR (\$613.65 US) – if parent does not receive base allowance. 141.62 EUR (\$203.95 US) if parent works 50-80% of regular work hours. 245.52 EUR (\$358.40 US) if parent is working less than half regular work hours. <p><i>Supplement for Child Care</i></p> <ul style="list-style-type: none"> Dependent upon family income. <p><i>Parental Allowance for a Sick Child</i></p> <ul style="list-style-type: none"> 41.79 EUR (\$59.23 US) for couples. 49.65 EUR (\$70.37 US) for single parent. <p><i>Maternity and Paternity Benefits</i></p> <ul style="list-style-type: none"> 100% of insured's average earnings. Minimum of 8.63 (\$12.38 US) per day. Maximum of 77.19 EUR (\$110.76 US) per day.

¹ A child's income can reduce the amount of the benefit.

LABOUR MARKET POLICY SUMMARY TABLE 4.0		
	SWEDEN	NORWAY
<i>Income Benefits Offered</i>	<ul style="list-style-type: none"> • Unemployment Benefits <ul style="list-style-type: none"> ○ Basic Insurance ○ Voluntary Membership in Insurance Fund 	<ul style="list-style-type: none"> • Unemployment Benefits
<i>Access</i>	<ul style="list-style-type: none"> • Universal 	<ul style="list-style-type: none"> • Universal for employees who meet minimum earnings
<i>Qualifying Conditions</i>	<ul style="list-style-type: none"> • Partially or completely unemployed • Able to work 3 hours per day or 17 hours a week • Be prepared to accept suitable work • Be registered with the public Employment Service • Drafting of an action plan with Employment Service • Be employed at least 6 months (80 hours a month) or at least 480 hours during a continuous 6 month period (at least 50 hours a month) in the last 12 month period. • Insurance Fund Members must meet the above as well as be a member for at least 12 months. 	<ul style="list-style-type: none"> • Must have annual earnings of at least 1.5 the base amount. • Be unemployed • Register with a public employment office. • Be able and willing to work
<i>Benefit Duration</i>	<ul style="list-style-type: none"> • Total of 300 days with a possible 150 extension if the insured has a child under 18 years old. 	<ul style="list-style-type: none"> • 52 weeks¹ (365 days)
<i>Waiting Times</i>	<ul style="list-style-type: none"> • Mandatory 5 day waiting period. 	<ul style="list-style-type: none"> • Mandatory 3 day waiting period.
<i>Benefit Compensation</i>	<ul style="list-style-type: none"> • Basic Unemployment <ul style="list-style-type: none"> ○ 320 SEK (\$51.60) per day². • Insurance Fund Unemployment <ul style="list-style-type: none"> ○ First 200 days 80% of insured's previous earnings. ○ Last 100 days 70% of insured's previous earnings. 	<ul style="list-style-type: none"> • 0.24% of the annual income per day. (average of 62.4% according to nav.no)
<i>Restrictions/Additional Points</i>	<ul style="list-style-type: none"> • If suitable employment opportunity is offered and is rejected without grounds benefits can be suspended or reduced 25-50%. • Must submit unemployment benefit card every 2 weeks or benefits will be suspended. 	<ul style="list-style-type: none"> • A notification card must be sent every 14 days, online or in paper format, the beneficiary must disclose any hours worked during the last 14 days.

¹ For those insured who earned more than 133 624 NOK (\$24 224 US) or more can receive unemployment benefits for up to 104 weeks.

²² This level of compensation is dependent upon the person working 40 hours a week in their previous employment. If the person worked less than 40 hours a week the benefit will be adjusted in proportion to the number of hours worked.

LABOUR MARKET POLICY SUMMARY TABLE 4.1		
	GERMANY	FRANCE
Income Benefits Offered	<ul style="list-style-type: none"> • Unemployment Benefits <ul style="list-style-type: none"> ○ Social Insurance • Basic Unemployment Benefits <ul style="list-style-type: none"> ○ Social Assistance 	<ul style="list-style-type: none"> • Unemployment Benefits <ul style="list-style-type: none"> ○ Social Insurance ○ Social Assistanceⁱ
Access	<ul style="list-style-type: none"> • Social Insurance – All contributing employed persons • Social Assistance – Means-tested 	<ul style="list-style-type: none"> • Social Insurance – All contributing employed persons
Qualifying Conditions	<ul style="list-style-type: none"> • Be unemployed • Be able and capable to work • Registration as an unemployed person • Social assistance – must be between the ages of 15 to retirement age. • Social insurance – must have at least 12 months of employment in last 2 calendar years. 	<ul style="list-style-type: none"> • <i>Social Insurance</i> <ul style="list-style-type: none"> ○ Under the age of 60ⁱⁱ ○ Must reside in France ○ Must have at least 4 months of employment in the last 28 months. ○ Registration at an employment office, ○ Be capable of, and available for work
Benefit Duration	<ul style="list-style-type: none"> • 6 to 24 months 	<ul style="list-style-type: none"> • Up to 24 months
Waiting Times	<ul style="list-style-type: none"> • Processing time of approximately 2 weeks 	<ul style="list-style-type: none"> • The next monthly payment that distributed.
Benefit Compensation	<ul style="list-style-type: none"> • Social insurance <ul style="list-style-type: none"> ○ 60% of net earnings for individuals without children. ○ Approximately 67% of net earnings for those with children. • Social Assistance <ul style="list-style-type: none"> ○ Flat-rate of, 287 EUR (\$414 US), 323 EUR (\$468 US) or 359 EUR (\$518 US) dependent on assessed level of needⁱⁱⁱ. 	<ul style="list-style-type: none"> • Social Insurance <ul style="list-style-type: none"> ○ 57.4% and 75% of the average daily wage during the last 12 months
Restrictions/Additional Points	<ul style="list-style-type: none"> • If the potential beneficiary has savings this is taken into account of level of compensation for social assistance claims. 	<ul style="list-style-type: none"> • Cannot claim benefits if the loose of employment was the result of voluntary leaving, misconduct or refusal of suitable job offer. • Monthly up-date regarding employment status and activities.

ⁱ The following benefits are offered under the social assistance unemployment benefits (all are means-tested), solidarity allowance, insertion allowance, insertion minimum income, activity minimum income, unemployed retirement-equivalent allowance. For a complete explanation of qualifying conditions and compensation for the aforementioned please visit issa.org.

ⁱⁱ Those individuals between the ages of 60-65 can claim unemployment only if they do not have the necessary amount of qualifying quarters for retirement.