

**multilinks**

The institutional framework of inter- generational family obligations in Europe¹

A conceptual and methodological overview

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1. Intergenerational obligations: An important, but fragmented research field

Intergenerational obligations – who is responsible for whom and what within families and kinship – are an important structuring dimension of family relationships and more specifically of intergenerational relationships. They are often embedded in relationships of affection, but are also independent from them (e.g. Finch 1989). In this perspective, Mavis Maclean (2005) has spoken of “contextualized individualism”, rather than “pure individualism” in modern developed societies. Obligations refer to norms which have complex and multiple roots: in expectations developed in individual and family biographies, in long standing family and social cultures and norms and in legal norms of different kinds. These include, in fact, civil law norms that explicitly regulate family relationships and obliged kin and social security norms that may or may not define entitlement to benefits also in reference to expected family obligations.

In particular, through civil and family law the state regulates a) what constitutes a family; b) who belongs to a family; c) what are the rights and obligations between family members. Rules concerning who can marry whom (see the implicit heterosexual norm present in almost all marriage laws, but also rules concerning age at marriage or the definition of incest), adoption, the distinction or on the contrary the equivalence between “natural” and “legitimate” children, divorce laws, and more recently laws regulating access to reproductive technologies – are among the main instances in which the state regulates and to some degree constructs “the family”. But the state regulates and constructs “the family” also, so to say, from the outside: through social policies not directly, or explicitly, aimed at the family, but also through education policies and more recently also through labour market policies. In regulating labour relations and conditions, and in defining which needs might be socially acknowledged and (at least partly) supported through welfare arrangements, social legislation and then social policies from the beginning have implicitly regulated, or at least interfered, with family and household formation models: redefining the relationships of dependence and interdependence between gender and generations, modifying the conditions and costs of reproduction, rewarding, or vice versa disincentivating,

particular family patterns. An example of this is the introduction of old age pensions at the beginning of the century: having a pension, in fact, allowed the elderly not only to look with a degree of security to their future out of work; it also allowed them not to depend too exclusively on their kin's, particularly children's, solidarity. On the contrary, restrictions on child and women's labour, together with the introduction of compulsory schooling, de facto, constituted a means of regulating workers' households, with regard to gender and intergenerational relations: first of all by distinguishing household members between "workers" and "family dependents". The male breadwinner household model is a specific construction of labour market and welfare state arrangements, with or without the support of fiscal policies, depending on the country. To some degree, the same may be said of the emergent ideal/normative model of the dual or one and a half earner model, in so far not only public discourses, but also welfare state arrangements support it (e.g. in the field of pensions, through the provision of childcare and more generally in the move towards an individualization of social rights).

When focusing on the impact of social policies on families, and specifically on gender and intergenerational arrangements, dimensions that are usually overlooked in standard welfare state studies and debates become visible. One has also to take account of policies usually not included in expenditure-based welfare state analyses, such as the regulation of maternity and parental leaves, family and child allowances, taxation systems, and care policies for children and the frail elderly.

Furthermore, social policies shape the institutional framework not only directly – through specific regulations- but also indirectly, by providing or not providing resources for individuals, as well as through the actual patterns of provision and the ways in which certain kinds of provision are perceived in a given country. Not only, in fact, different countries define obligations differently and offer different provisions. The "same" provision may also have a different meaning across countries.

The specific "packaging " of intergenerational obligations, therefore, varies greatly across countries, as it has varied across time, shaping different contexts in which intergenerational relationships are played out. There are countries, such as the Mediterranean ones, where legally regulated intergenerational obligations are extensive and

ever lasting and others, such as the Scandinavian ones, in which legal obligations are restricted to parents and their underage children. Whether these differences impact on the quality of intergenerational relationships, and in what direction, has started to be studied only recently, from the perspective of the relationship between elderly parents and their adult children.

The different dimensions that make up the complex institutional and normative framework, in which intergenerational relationships are regulated, are addressed by different kinds of literature and research fields. These different literatures, however, often ignore each other and therefore render it difficult to construct an integrated approach, particularly at the comparative level. A further fragmentation is constituted by the fact that the different generational positions and age groups are also dealt with by different research traditions, for instance responsibilities towards underage children are object of a different literature than that concerning responsibilities towards adult children; and responsibilities towards elderly kin are part of still a different field of research. Only recently, and mostly only within the research on social care using a gender perspective, issues concerning the allocation of responsibilities for care for children and for the elderly to the family, the state, the community and so forth are starting to be addressed jointly. The pioneer comparative works in this perspective have been those by Millar and Warman (1996) and Anttonen and Sipilä (1996). Overall, responsibilities towards under-age children are the most explored, possibly because they are at the crossroad of many different concerns: demographic issues, gender equality and reconciliation issues, poverty and human capital issues. The least focused on responsibilities in the direct generational line are those towards adult children. Even less focused on, however, are obligations that do not follow the direct descendent (or ascendant) line: between nieces/nephews and aunts/uncles or grand aunts and grand-uncles. It is true that in most countries there are few, or no, legal obligations of this kind, with the partial exception of inheritance law. The Southern European countries, with their extensive inclusion of different kinds of obliged kin in civil law are an exception. Yet, in contexts of declining fertility and increasing childlessness, these relationships may become increasingly relevant; and whether or not institutional norms take account of them – e.g. in forms of care provision for the frail elderly – may be of interest.

In the following sections first the conceptual framework from which we analyze “institutional intergenerational regimes” is presented, and then the relevant literature and findings for the different dimensions of institutional regulation of intergenerational obligations will be discussed, with a particular view at identifying possible indicators.

2. A conceptual framework for analyzing the institutional framework of intergenerational relations within families

Intergenerational responsibilities are shaped and implemented in the interplay between collective and private forms of provision, both when care and when financial support are involved. They are by definition embedded in a “welfare mix”. The concept of “regime” first proposed by Esping-Andersen (1990) is therefore particularly fitting for understanding the complex institutional and normative framework in which intergenerational responsibilities are experienced and implemented. It focuses not on single actors, but on the balance of responsibilities between different actors.

Using a “regime” approach does not however mean to adopt Esping-Andersen’s typology as such or in one of its variants. First, it has been developed only in relation to the welfare state, while we want to address the various institutional dimensions which shape the context of intergenerational relations in families, therefore including both civil law regulations and the schooling system. Second, even with reference to its proper object, i.e. patterns of welfare regimes, Esping-Andersen’s typology, although it includes explicitly the family as an area of welfare provision, presents at least three strong limitations (for a review of the theoretical and methodological debate see Arts and Gelissen 2002, Bambra 2007, Meulders and O’Dorchai 2007): 1) an exclusive focus on standard, labour market-linked income transfers (unemployment indemnity, pensions, accident indemnity) to the detriment of services (e.g. Alber 1995) as well as of family-linked transfers such as child benefits or maternity or parental leaves; 2) a limited attention for the caring needs and the gender specific way they are addressed in families and society (e.g. Lewis 1992, Lewis and Ostner 1993, Orloff 1993, O’Connor 1993, Saraceno 2000, Leitner 2002, Daly and Rake 2004, Pfau-Effinger and Geissler 2005); 3) an undervaluation of the role of the third sector in the welfare mix (e.g. Anttonen, Baldock and Sipilä 2006). These limitations, and particularly the first two, are relevant when considering the welfare state a crucial part of the institutional regulation of intergenerational relations. Last but not least, whatever the agreements and disagreements may be on the way typologies should be constructed and countries clustered, Esping- Andersen’s and other welfare state typologies have been

developed with regard to Western European capitalist societies plus the English (and partly French) speaking non European ones (US, Canada, Australia, New Zealand). Whole continents are missing. Only countries from East Asia are considered in these exercises (Jones 1993, Gough 2000). Finally, the Eastern European countries are absent from these typologies when they still belonged to the Soviet bloc; and even at present they are still rarely integrated and largely marginal in prevalent typologies (Fenger 2007, Rys 2001). Whether those typologies may be adapted to include these other countries with meaningful analytical results is a controversial issue (Standing 1996, Deacon 2000, Fajth 1999). With regard to intergenerational policies, Bahle's (2007) effort to construct a typology of family policy regimes which includes also most of the EU new member countries is a notable exception.

Following Orloff (1993) and Hobson (1994), our approach adds to the commodification-decommodification dimension that of familisation-defamilisation. The latter dichotomy has a somewhat different meaning when it is considered from a gender and not only intergenerational perspective. From the point of view of intergenerational relations, de-familisation concerns the degree to which needs may be satisfied without the mediation of family resources and solidarity. From a gender perspective, de-familisation concerns both the degree of autonomy from family membership in accessing resources and the degree to which the gender division of labour within the household and the family are taken as given. More specifically, with regard to the latter meaning, de-familisation concerns the degree to which women's unpaid work in the family, particularly unpaid care, is substituted for by paid labour outside the family, through public or market or third sector services. Symmetrically, from a gender perspective familisation concerns both the degree to which the responsibility to provide care is assigned to women (or to particular women's positions in the family) and the degree to which men are acknowledged as having care responsibilities within the family (Saraceno 2000, 2004). The familisation-defamilisation dichotomy must, therefore, be articulated at two levels: one that concerns the degree to which norms and policies shape and acknowledge the degree and duration of family interdependencies; the other that concerns the way these norms and policies take for granted, incentive or disincentive gender specific behaviours with regard to these same

responsibilities. Partly re-formulating Leitner's (2002) varieties of familialism typology, we would speak of four different patterns along the familisation-defamilisation continuum.

- 1) *Familialism by default*, or unsupported familialism, in so far there are no publicly provided alternatives to family care and financial support. It can be implicit, but also explicit, as in the case of financial obligations within the generational chain and kinship networks prescribed by law.
- 2) *Supported familialism*, in so far policies, usually through financial transfers (including taxation and paid leaves), support families in keeping up their financial and caring responsibilities at the intergenerational level.
- 3) *Optional familialism*, in so far, particularly in the area of care, some kind of option is given between being paid to provide care to a family member and using publicly supported care.
- 4) *De-familisation*, in so far individualization of social rights (e.g. with regard to minimum income provision, or unemployment benefits for the young, or entitlement to higher education, or to receiving care) reduces family responsibilities and dependencies.

In principle, de-familisation may occur through both state and market provisions (e.g. through market provided services or private insurances against social risks). Yet the two ways to de-familisation have not the same conceptual status, not only from the point of view of social justice, but also from the point of view of the role assigned to the family. Particularly, but not only, in the field of care, recourse to the market of services is inevitably mediated by family resources. Families, therefore, remain a relevant, and highly socially differentiated, actor at least as employers. De-familisation *via* market, therefore, may be the result both of familialism by default and of supported familialism.

This conceptualization is different from that of Hantrais (2004) in so far it distinguishes between the presence of public support and the form it takes. Therefore it distinguishes between supported familialism and de-familisation. For the same reason it is also different from the proposal by Anttonen, Sipilä and Baldock (2003) to locate countries simply along a private-public continuum.

With the exception of optional familialism, which applies almost exclusively to caring needs and obligations, these ideal types may be used to assess not only family policies, but the entire spectrum of regulations of intergenerational relations within families. They may be present in different combinations within each country depending on the area of obligation, and countries may differ in the kind of familialism they choose at the various levels of intervention. In one country de-familisation may have gone further with regard to frail elderly care, in another with regard to childcare. And, of course, a degree of familialism by default is present also in the most defamilialized or supported familialized countries, particularly in the area of care. With respect to gender, familialism by default is always heavily gendered with regard to caring provision. Also supported familialism presents the risk of gender unbalances, particularly in the area of care. As Korpi (2001) observed, financial transfers instead of services tend to reinforce the gender division of labour. But, in so far it acknowledges not only the right to be cared for but also that to care (Knijn and Kremer 1997, Leira and Saraceno 2002, Leitner 2002), supported familialism may also allow a re-balancing of the gender division of labour. A case in point is the extension of the entitlement to parental leave to fathers. Optional familialism may be both gender neutral and on the contrary gendered, depending on how the entitlement to care leaves is regulated.

Having in mind these varieties of familialism, we have developed a set of indicators (see appendix A) of institutional regulations and policies, which, when collected,¹ should allow to see whether countries cluster systematically, identifying specific intergenerational regimes, or only partially and in different ways according to the area of intergenerational responsibilities involved. The novelty of the effort lies in both its conceptualization and the range of dimensions it includes, going beyond the welfare regime focus. But we can rely on the rich existing research literature with regard to specific areas. Particularly the literature dealing with gender welfare regimes offers important contributions to understanding

¹ In order to collect these indicators we rely both on institutional comparative– such as MISSOC or others – and national sources when available (see Appendix B for an overview of the main resources available). We also rely on existing studies, if recent, and, particularly in the case of Eastern European countries for which data are sometime missing in comparative sources, we also rely on national informants. At the end of the project we should have comparative indicators for the various domains for two points in time: 2003 (i.e. the period in which the GGS first wave was completed in the first group of countries to have it, and end 2008).

patterns of familialism, although it is only rarely attentive to the intergenerational dimension of social policies.

In the following paragraphs we will discuss the main domains for which we have to find adequate indicators, offering an overview of existing knowledge which is relevant for our purposes, integrating it where we have already done some progress in collecting indicators.

Indicators aim to provide empirical, valid measurements of a number of key dimensions of intergenerational relationships and of their gendered dimension. As such, they are both normative and scientific. Concepts of intergenerational relationships – how close they should be, how they should stress solidarity and interdependency rather than autonomy – as well as of gender are culturally relative and essentially normative in character, similarly to those concerning the quality of life or human well being, and generally of social indicators (see Fahey, Nolan and Whelan 2003). We must be aware of this and of the fact that between as well as within the countries we study there might be quite different cultural understandings of “proper” intergenerational relations. These different understandings may be reflected in (rather than being simply shaped by) legal norms and policies (or lack of) (e.g. Plantenga and Bettio 2004). At the same time, legal norms – for instance with regard to maintenance obligations – may be out of step with cultural developments (see e.g. van Houtte and Breda 2005). Awareness of the cultural relativity and normativity of indicators is particularly important in cross country comparisons. It might also recommend some caution in developing comparative efforts across too different cultures. Or else, this comparison should require also indicators of values and cultural norms, not only of institutional frameworks. An example is the diversity found across a wide range of countries concerning whether a pre-school age child is likely to suffer if its mother works.

The scientific dimension of indicators comes into play when such normative dimensions need to be measured. To be useful, such statistics have to meet a range of requirements. Some of them are narrowly technical and pose practical rather than analytical problems: e.g. they are not harmonized across countries, or they are not accessible to researchers from other countries. But in addition to technical problems linked to data

requirements, “adequate construction of social indicators poses serious analytical challenges and makes methodological demands that the social sciences are only partially equipped to meet.” (Fahey, Nolan and Whelan, 2003, p. 10). In our case, difficulties arise also from the very tri-dimensionality of our effort: we want to have indicators which grasp the bi-directionality of intergenerational links as well as their gender specific dimension.

With this caution in mind, how do we proceed to find indicators? One way would be to start with a list of policies. But it would not be a wise decision, since we might find ourselves with a long list of policies and indicators, while losing track of our research question, which is the relative dependency, interdependency or autonomy of generations as they are shaped by legal norms and institutional conditions. Furthermore, social policies are not a clearly identified and bounded area of policies. Thus, the identification of crucial areas from the point of view of intergenerational relationships is far from simple. Are health policies (e.g. whether medical services are universally available and free or not), unemployment indemnities, income support measures for the poor relevant? Of course they are, but how far can we extend our inquiry?

We propose therefore to start not from policies but from crucial intergenerational links. So far we have identified clearly two: responsibilities for underage children and responsibilities for the frail elderly. We are working on two others – responsibilities towards adult children and the general legal framework of intergenerational obligations, keeping in mind that in some countries (e.g. the Southern European ones) they may follow not only in the direct descent line but also in the diagonal line (uncles/aunts and nieces/nephews). For these intergenerational links we then have started to tentatively identify the relevant dimensions, for which indicators must be found.

3. Patterns of legal regulations of intergenerational obligations

Civil and family laws in all countries define which relationships may be considered as having a family status and therefore lead to specific obligations. For a long time in all European countries only marriage created a family and children born out of wedlock had fewer rights (and possibly obligations) than those born within it. Since the 1970s, in all (or most) countries differences between legitimate and natural children have totally disappeared. Yet differences may remain with regard to the wider kin, particularly in countries in which there is a wide range of “obliged kin”. For instance in Italy, natural children have a much more restricted “legal” kinship than legitimate ones (uncles and aunts have no obligations towards the former), analogously to adopted children. At the same time, since the latter through adoption acquire legal grandparents, in order to adopt also the consent of prospective grandparents must be acquired. Still in Italy, while children in law are legally responsible to provide financial support to their parents in law in case of need, cohabitant couples, since no legal status is acknowledged for them, do not develop this kind of obligations (but their parents can count legally on less support, since they cannot count on children in law). Of course, the wider the obligations attributed to kin and the wider the range of obliged kin, the more important the differences between the relationships which are acknowledged as “family” and those which are not. Thus, in the Scandinavian countries there is little or no difference between the obligations of married and cohabitant couples. But this lack of difference owes as much to the very limited obligations involved in marriage as to the degree to which cohabitation has been acknowledged as an alternative institution.

Differences in the definition of what and who is “family” intertwine with social security regulations on the one hand (e.g. entitlement to child allowances or to a survivor’s pension) and with regulations concerning inheritance on the other hand. In most European countries (but not in the UK), for instance, a substantial quota of inheritance cannot be disposed of freely, but must be allocated to spouses and children, and in lack of them to kin according specific rules and quotas. To be legally included or not in the family, therefore,

makes a substantial difference for individuals that in personal relationships and biographies, but not in law, occupy a similar position.

An interesting example of the impact of (changing) regulations of inheritance on the expectations and behaviours in intergenerational relations is that of East Germany and Hungary after the fall of the Communist regimes (see Thelen 2006). In both countries, the coming back of property/inheritance rights strengthened kinship ties, but also caused conflicts between siblings, while breaking expectations linked to habits developed during socialism. For instance, in East Germany the daughter who stayed on to care the parents, “inherited” the accommodation; but after re-unification this “right” became contested on the basis of norms of equal inheritance between siblings. Conflicts are particularly acute in East Germany, since the law of one part of the country was extended to the other which did not know it beforehand, and families might have been divided between East and West.

Legal definitions of what a family is and whom it includes are also a sensitive issue both in internal migration in the EU and in the regulation of migration, particularly with regard to family reunion (cfr. also Hantrais 2004, Ch. 5). So much so that very early the European Union had to find a shared definition of the family, and particularly of “family dependants” as a part of the principle of freedom of movement. The art 10 of the EEC No 1612/68 on the freedom of movement for workers stipulates that a family dependant is: “a) his (sic) spouse and descendants who are under the age of 21 or are dependants; b) dependent relatives in the ascending line of the worker and his spouse”. Furthermore, the right to join a migrant worker includes also “any member of the family not coming within the provision of paragraph 1 if dependent on the worker referred to above or living under his roof in the country whence he comes”. This relatively extensive (although male breadwinner based) EU definition of family dependants, however, is in no way shared by all or the majority of European countries both at the level of social security regulations and of the civil code. Moreover it is a matter of increasing contestation when non EU migrants are involved.

Comparative data on national legal family obligations are not easily found. Even the important project by the Commission on European family law is not always complete. For instance, reading the volume on parental responsibilities edited by Boele-Woelki, Braat and

Curry-Sumner (2005) one might learn that in no European country except Italy parents have financial obligations towards their children once the latter come of age. This is clearly not so, as one can find out by using another very important EU source, which is being specifically developed to collect national data on maintenance obligations: http://ec.europa.eu/civiljustice/maintenance_claim/maintenance_claim_sln_en.htm.

According to this, still incomplete, source, maintenance obligations both upwards and downwards are quite widespread in Europe and, depending on the country, they may involve a differentiated set of relatives and generational levels. We might therefore say that in a number of European countries civil law norms explicitly prescribe a familialism by default, according to which financial obligations do not stop when children come of age and where generations are legally bound in case of financial need.

Table 1: The legal framework of family obligations in the EU

	Obligations towards children		Obligations towards parents and grandparents
Country	<i>At what age of the child do parents stop having legal financial obligations towards him/her?</i>	<i>Do other relatives have financial obligations towards a child and until what age (please specify – usually in legal codes they are defined “obliged kin”)?</i>	<i>If such an obligation exists, who has it towards whom?</i>
Austria	Until economic independence	No	Children owe their parents maintenance.
Belgium	Until economic independence	No	Children owe maintenance to their father and mother if they are in need.
Czech Republic	Until economic independence	No	Not mentioned.
Finland	Until economic independence	No	Parents have no right to claim maintenance from their child.
France	Until economic independence	(Great-) grandparents	Children must provide maintenance for their father and mother. Sons-in-law and daughters-in-law vis-a-vis their father-in-law and mother-in-law and vice-versa.
Germany	Until economic independence	(Great-) grandparents	(Great-) grandchildren against (great-) grandparents; (Great-) grandparents against (great-) grandchildren;
Greece	Until economic independence	Brothers and sisters have an obligation to maintain one another; If there are no parents nor siblings, there is a maintenance obligation on the relatives immediately in the ascending line.	Children to their parents.
Ireland	18 (and for education until the age of 23)	No	No

Table 1: continued

Country	Obligations toward children		Obligations towards parents and grandparents
	At what age of the child do parents stop having legal financial obligations towards him/her?	Do other relatives have financial obligations towards a child and until what age (please specify – usually in legal codes they are defined “obliged kin”)?	
<i>Italy</i>	Until economic independence	(Great-) grandparents; Full brothers and sisters; half-brothers and half-sisters; Uncles and aunts. The closest relative according to the above ranking is liable to provide maintenance; should there be more than one person at the same level, liability is divided between them according to their financial situations.	Children; Sons-in-law and daughters-in-law; Fathers-in-law and mothers-in-law;
<i>Latvia</i>	18 (and for education until the age of 24)	Grandparents	Obligation of the children to provide maintenance for parents lies upon all of the children equally.
<i>Lithuania</i>		Adult siblings and grandparents.	Adult children and grandchildren are required to support parents/grandparents in case of need.
<i>Luxemburg</i>	Until economic independence	No	Children are under an obligation to provide maintenance for their father and mother if they are in need.
<i>Malta</i>	18	The responsibility to supply maintenance falls onto siblings, including half-siblings, so long as there is no one else (spouses) to supply maintenance.	Children have a duty to maintain their parents or other ascendants if they are in need.
<i>Netherlands</i>	21	No	The obligation in the Civil Code that children are obliged to maintain their parents is overruled by the 1965 National Assistance Act which provides all needy adults with the right to claim financial support from the government.
<i>Poland</i>	Until economic independence	A maintenance obligation between blood relatives exists in case of material difficulty.	Not mentioned explicitly, but “a maintenance obligation between blood relatives” exists
<i>Portugal</i>	Until economic independence	(Great-) grandparents	Descendants.

Table 1: continued

<i>Country</i>	Obligations toward children		Obligations towards parents and grandparents
	<i>At what age of the child do parents stop having legal financial obligations towards him/her?</i>	<i>Do other relatives have financial obligations towards a child and until what age (please specify – usually in legal codes they are defined “obliged kin”)?</i>	
Romania	25 (and for education until the age of 26)	siblings	children and grandchildren towards parents and grandparents and grandchildren, great-grandparents and great-grandchildren,.
Slovenia	18 (and for education until the age of 26)	“Between other relatives” (needs to be specified)	Children towards parents.
Slovakia	Until economic independence	No	children towards parents
Spain	Until economic independence	Collateral relatives up to the second degree, if there are no closer relatives.	Children for their needy parents.
Sweden	18 (and for education until the age of 21)	No	Not mentioned
United Kingdom	Until economic independence	No	Not mentioned

Source: *European Judicial Network in Civil and Commercial Matters*, URL: http://ec.europa.eu/civiljustice/index_en.htm.

The most important comparative study so far to have explored intergenerational obligations as they are framed in civil code and social security law is that by Millar and Warman (1996) on 16 European Countries. Obligations were defined to include both cash (the obligation to provide financially for another person) and care (the obligation to look after another person). The focus was on the definition of obligations in law and policy, neither on what actually happened in practice nor on the level (generosity) of support. As a result of the study, based on national reports prepared following a common framework, the 16 countries were clustered in three broad groups – individual autonomy, nuclear families and extended families - according to the extension of the obligations attributed to families for their own members.

The group of individual autonomy includes all the Scandinavian countries – Denmark, Finland, Norway and Sweden. In these countries the emphasis in law is on individual entitlements and citizenship rights available to all. Those in need are entitled to receive state, rather than family, support and the legal requirements for families to provide support are minimal, even in social assistance (see also Saraceno 2002). Cash benefits and taxation are mainly individualized and rarely include provisions for dependent family members but in the case of underage children. Regulation of marriage is limited and differences with co-habitation minimal or not existing. Marriage (and cohabitation) is less important than parenthood in causing rights and obligations. Although underage children are the responsibility of their parents, they have also some rights of their own. Care for the frail elderly is not defined as a family obligation, although the right to receive care for the frail elderly is a more incomplete social right than in the case of children (see also Leira and Saraceno 2002).

The group of countries based on nuclear families includes most European countries, but there are substantial internal variations, which in our view are somewhat underestimated by the two authors and which are relevant from the perspective of intergenerational obligations. In the UK and Ireland, in fact, the nuclear family is defined both in family law and in social security law as comprising only parents and their dependent children. Furthermore, a child's dependency may be defined on sole (varying) age criteria or also on the basis of some other criteria, such as having completed education. In Austria, Belgium France, Germany, Luxembourg and the Netherlands at the

time of the study family law specified both upward and downward obligations, although in practice social welfare provisions focus more on horizontal obligations within the couple and downward obligations, between parents and dependent children. Moreover children's dependence may last longer than underage (see regulations concerning access to social assistance for the young and generally parents' obligation towards their adult young children e.g. in France and Germany). Marriage confers rights usually not extended to cohabitation (and some of these rights/obligations continue also after divorce). Individualization in taxes and benefits is limited.

The group of countries belonging to the "extended families group" includes the Southern European ones: Greece, Italy, Portugal and Spain. There are strong and clear obligations within the nuclear (not necessarily co-resident) family, but they are embedded in a larger set of kinship obligations (see also Naldini 2003, Saraceno 2003). Taxation may be individualized, but with allowances for a wide range of dependent kin. Social care for the frail elderly is mostly provided to those without a family and the poor.

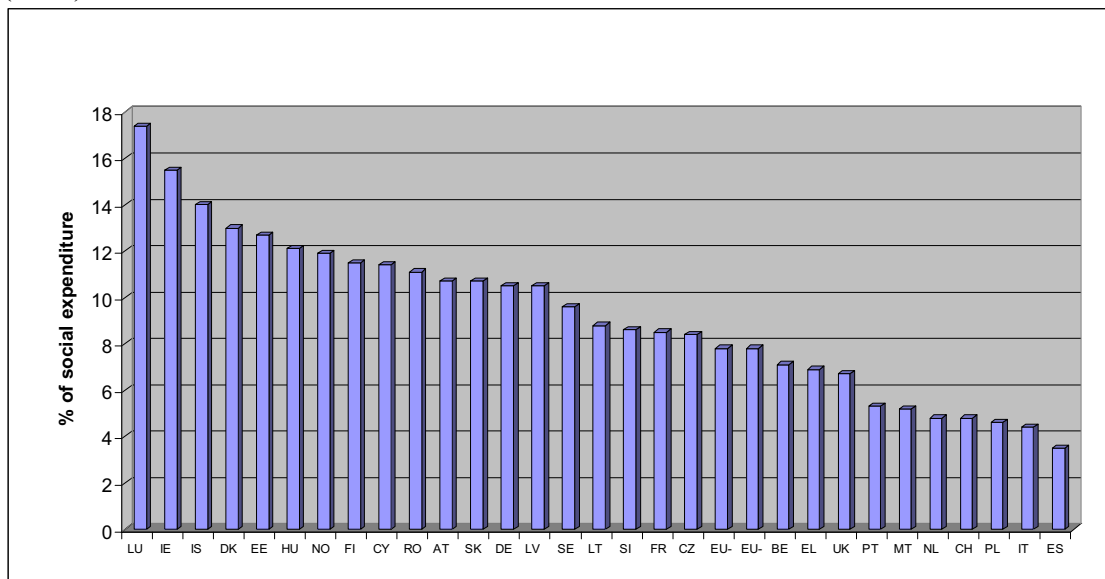
This study, and the approach it uses, confirms the usefulness of the concept of variants of familialism, introducing an attention for how the boundaries of the family are constructed in law for the purpose of defining obligations. Of course, its empirical data are outdated and limited only to the old EU 15 countries.

4. Social and family policies

Welfare state norms and provisions are certainly one of the main forms of regulating intergenerational relations at the normative and practical level, even when they do not focus directly on them. Almost all dimensions of the welfare state might in principle be deemed relevant in this perspective. The most relevant, however, concern family policies and partly also of social assistance, areas that usually are not examined in mainstream welfare state analysis with its focus on provisions concerning workers.

European countries show quite different levels of public support to families. Figure 1 gives an overview of the effort each country does in terms of quota of social expenditure devoted to the family. The Scandinavian and Central Western European countries appear in the upper half of the rank order, and typically the Southern countries, the United Kingdom and the Netherlands at the bottom. The new member states are above or, near (Poland) the European average (no data for Cyprus and Estonia). Only Malta has a place among the Southern European countries that are at the bottom of the distribution. The really pensioner-biased (Ferrera 1996) welfare states can typically be found in the South.

Figure 1: Expenditure on Family benefits as a percentage of total social expenditure (2004)



Source: Eurostat: Social Protection in the EU. In Statistics in focus, 99/2007, p. 6

Expenditure in itself, however, is an adequate indicator neither of the goals of policy nor of the actual resources they offer to families in order to help them face their needs. The same level of expenditure may characterize quite different family policy packages: more oriented to income transfers or rather to transfers in kind (services), therefore tending more towards supported familisation rather than towards defamilisation; more oriented to families with children or to families with frail elderly people; more oriented to support the male breadwinner family or the dual earner one, and so forth.

In this perspective, different traditions of family policy may be traced in Europe, both with regard to the degree to which they are explicit or not, but on their focus and of the grounds for their legitimisation. On the basis of these specific traditions, which in his view are at least partly intertwined with the way state-church relationships have been settled, Bahle (2007) identifies specific clusters of countries, which might also be located within our fourfold familisation-defamilisation typology.

In the Francophone countries (France and Belgium), family policies have been always more explicit as such (and in France they developed earlier than standard welfare policies). But specific to them is the long standing (and highly legitimized) pro-natalist motivation and therefore the focus on children and children's welfare. In our conceptual framework, they would represent a mixed case of supported familialism and defamilisation.

In the Scandinavian countries family policies, as most social policies, are based on an idea of individual social citizenship, which includes not only equal opportunities between men and women, but also the individual entitlement of children, irrespective of their family origin, as well as the individual entitlement of the frail elderly and of the disabled. For this reason, the focus is more on social services than on direct and indirect (through taxation) income transfers. In our conceptual framework, they are the most defamilised.

The former communist countries present some similarity with this approach, in so far policies supporting the family were in the communist regime based on the ideal of the citizen-the worker, including men and women. Differently from the Scandinavian

countries, however, all benefits in income and in kind (including subsidized housing) were accessed through the worker's status in a specific factory or complex. After the fall of the regimes, in most countries this approach has persisted, although in a somewhat changed form. It should be noted, however, that two young Eastern European scholars (Szelewa and Polakowski 2008) have recently disputed the homogeneity of these countries with regard to family policies. Looking only at policies concerning children (childcare and parental leaves) in eight former communist countries and using a fuzzy set approach, they find four different types: a (familialistic by default) male breadwinner one (Poland); a weak neo-familialist (or supported familialistic) one, involving generous leaves, but a low provision of services (Czech Republic, Slovenia, Slovakia); a female mobilizing one (or de-familialized), involving a good provision of high quality care (the Baltic states); a dual earner family one, involving both generous leaves and a good provision of services (Hungary). They also indicate that, from a time perspective, countries present a different stability in adhering to one or another model.

In (West) Germany, Austria and partly the Netherlands, social policy in general, but family policies in particular, are based on the subsidiarity principle, in addition to the insurance one. The state supports the family to support itself (supported familialism), also with the help of near communities and intermediate bodies. This implies de facto strong financial incentives – through the taxation and the pension system, - to the traditional male breadwinner family, based on a clear division of labour between earning and caring. Income redistribution is more generous than redistribution in kind, through services. And the focus is mainly on supporting marriage and the couple, rather than parents and children. These features remain, notwithstanding recent changes involving a stronger support to mothers' participation to paid work.

The idea that families should be able to care for themselves and to be self reliant is also at the basis of policies in the UK and Ireland. Yet, this approach in these two countries has resulted in little universalistic support, with the notable exception of child benefits, and a high degree of means-testing. Family policies in these countries are mainly framed in terms of anti-poverty policies and targeted to low income households. Until very recently, they presented a mixture between familialism by default and supported familialism for the poor. In recent years, the UK has moved towards a partial

de-familialization for the poor, particularly poor lone mothers, providing incentives for them to work for pay and offering childcare subsidies.

Subsidiarity as well as means-testing and targeting are a feature of the – scarce – family policies in the Southern European countries. But what is specific of these countries is the expectation – and regulation - of extended family solidarity and obligations. These countries have the widest and longest obligations within kin, particularly across generations, but also horizontally (e.g. between siblings). Differently from the German speaking countries, neither the principle of subsidiarity nor the male breadwinner norm are underpinned by generous financial transfers. Rather, extended family solidarity is taken as given and is often enforced through the lack of adequate measures of support (e.g. for the frail elderly, for the young unemployed, for working mothers and so forth). These are the countries where familialism by default is most prevalent.

The link between the development of social policies and individual behaviours is, of course, bi-directional: cultural attitudes influence social policy and these in turn affect cultural attitudes. Thus these differences may reflect deeply rooted cultural diversities. Yet, there is no doubt that policy and policy discourses may greatly influence not only practical options, but also cultural models and values. As a matter of fact, these different models of family policies are not fixed. Within each model there have been changes, particularly in recent years. In particular, in most European countries and in EU official policy targets, mothers are increasingly encouraged to become paid workers and therefore to be de-familialised (Lewis 2006, Orloff 2006). This change concerns all women/mothers, but particularly lone mothers. Traditional exemptions, in some country, for lone mothers from the requirement to be available for work in order to be entitled to social assistance are reduced in duration, or eliminated altogether. In order to be perceived as a good mother a (poor) lone mother must also be a provider, i.e. a paid worker. In countries such as, for instance, (West) Germany and The Netherlands, Italy, Spain, but partly also in the UK, it represents a radical overturn not only of policies, but of traditional notions of good motherhood as well as of shared cultural patterns and values (e.g. Lewis, Huerta and Campbell 2008, Knijn and Ostner 2008). Moreover, it is not always accompanied by an equivalent emphasis on equality in the gender division of

labour within the home, by the development of family friendly policies in the work-place and by the development of good quality and affordable caring services – for children but also for the frail elderly. This shift, however, has not always been accompanied by a shift of analogous intensity with regard to the provision of child care. Reflecting on the German case, for instance, Blome-Keck and Alber (2008) have pointed out that although the apparently ideal model is that for providing parental care for the first year and then returning to work, the lack of childcare services for the under three de facto compels many mothers, particularly low income ones, to still take the full three years leave at little or no compensation.

Women (even in Scandinavia) still remain the main responsible parent for childcare and more generally for care for dependents. Particularly when children are very young, when an adult family member is disabled, or very frail, women bear the responsibility, and the costs, of balancing caring and income needs. The focus of the European Union and national discourse on “reconciling” paid work and care also remains mainly on women. The responsibility for providing care remains theirs. The novelty is that that now it should be “reconciled” with participation in paid work. Equal opportunities are framed as opportunities to be offered women to enter men’s world of paid work, and only marginally as opportunities to be offered men to share the responsibility to care (see also Stratigaki 2004). The introduction in recent years, in many countries, of parental leaves that can be taken also by fathers, and even of a special period within the leave that must be taken by the father otherwise it is lost, is, in this perspective, a very important symbolic step in counterbalancing the exclusive focus on being in paid work and caring as the main form of good parenting. But its practical weight is much more limited than the redefinition of mothers as additional paid workers. For this reason, mothers’ main means of ‘conciliation’ is working part time - with consequences on their wages, careers and pension benefits - while most fathers continue to be full-time employed.

For the purposes of this contribution, we will focus on two areas of family policies that are relevant from an intergenerational, as well as gender, perspective: a) supporting families with children and children themselves; b) addressing the caring needs of the frail elderly in ageing societies and kinships. A third theme – gender equality and work-family conciliation – is transversal to both.

4.1 Who is responsible for children?

One of the most striking aspects of the ‘childhood discourses’ of the recent past decades is the extent to which childhood is formulated as an interest of public authorities – at international, state and local level. In addition to international conventions, national legislation in several countries is expanding the public regulation of the early childhood years. Increasingly, non-family institutions are setting norms for family arrangements and for ‘good’ or ‘proper’ childhood. In Western Europe, traditional boundaries between the private and the public are under renegotiation and, in some cases, redrawn (see also Leira and Saraceno eds., 2008). The two issues that historically underlie policies concerning children – who bears the cost of children and who cares for them – are being reformulated and the answers more or less radically changed.

The reasons for this focus on children as a public good are multiple and the prevalent one may differ across countries: child poverty, fertility, equal opportunities among children, investment in the human capital of the future, growing mothers’ employment. Differences in policy packages between countries, therefore, do not depend solely on the degree of overall generosity in social expenditure targeted to families, but also on the way each country sets its priorities. Moreover, the “same” policy – for instance the offer of child care – may be argued on different grounds: helping parents (mothers) to conciliate family and paid work demands, offering children of different social backgrounds an equal starting point, investing early in children as the potential human capital of the future. Different policy packages design specific structures of opportunities for parents. They also represent different understanding of the respective role of the family and the state, of fathers and mothers with regard to children’s well being.

4.1.1 Child allowances

Child allowances are an instrument of supported familialism: whatever other goals they might have (e.g. to support fertility), they provide parents some financial support in

meeting the costs of having a child. In most, but not all European countries this occurs through a variety of cash benefits, among which the four main ones are: periodical child/family allowances (which compensate the additional cost of having a child), parental leave benefits (which compensate the lost wages of the parent taking time off to give birth and care), birth grants (which compensate the initial costs of having a child), other benefits targeted to special needs (such as the presence of a handicapped child). To these, also child-linked tax allowances should be added, since in some country (e.g. France, and to a lesser degree Germany) they constitute a large part of the family benefit package. But the diversity and intricacies of taxation systems do not allow easily detecting and comparing the value of child-related tax.

Table 2 shows the differences in the rules and criteria with regard to child allowances. Within the EU, only Italy and Spain have a system which is both categorical and income tested. It means that a large quota of children do not receive any kind of benefit. Other, substantial, differences concern the level of generosity. Among the overall most generous countries in the field of family policies, child benefits are substantial in France, Belgium, Germany and Austria. They are at a medium level in the Nordic Countries, where preference is given to services and parental leaves.

Table 2: Key characteristics of child allowances/benefits around 2007

Country	Eligibility		Variation of benefits by		
	Universal	Until what age ⁽¹⁾	Age	Number of children ⁽²⁾	Other criteria
<i>Austria</i>	<i>Yes</i>	<i>18 (26)</i>	Yes	Yes	Child's disability
<i>Belgium</i>	<i>No, bounded to employment</i>	<i>18 (25)</i>	Yes	Yes	Single parent, child's disability
<i>Bulgaria</i>	<i>No, income tested</i>	<i>Max. 20 or completion of secondary education</i>	Yes	No	
<i>Cyprus</i>	<i>No, income tested</i>	<i>18 (23 up to 25 for men served military service)</i>	No	Yes	
<i>Czech Republic</i>	<i>No, income tested</i>	<i>15 (26)</i>	Yes	No	
<i>Denmark</i>	<i>Yes</i>	<i>18</i>	Yes	No	
<i>Estonia</i>	<i>Yes</i>	<i>16 (19)</i>	No	No	
<i>Finland</i>	<i>Yes</i>	<i>17</i>	No	Yes	Single parent
<i>France</i>	<i>Yes</i>	<i>max. 20 (dependent on child's income)</i>	Yes	Yes	
<i>Germany</i>	<i>Yes</i>	<i>18 (25)</i>	No	No	
<i>Greece</i>	<i>No, bounded to employment</i>	<i>18 (22)</i>	No	Yes	
<i>Hungary</i>	<i>Yes</i>	<i>18 (23)</i>	No	Yes	Single parent, child's disability, foster child
<i>Ireland</i>	<i>Yes</i>	<i>16 (19)</i>	No	Yes	Multiples
<i>Italy</i>	<i>No, bounded to employment and income tested</i>	<i>18</i>	No	Yes	Additional household members
<i>Latvia</i>	<i>Yes</i>	<i>15 (20)</i>	No	Yes	
<i>Lithuania</i>	<i>Yes</i>	<i>9 for families with less than 3 children, 18 (24) for families with more than 3 children</i>	Yes	No	Child's education
<i>Luxemburg</i>	<i>Yes</i>	<i>18 (27)</i>	Yes	Yes	
<i>Malta</i>	<i>Yes</i>	<i>16 (21)</i>	No	Yes	Income
<i>Netherlands</i>	<i>Yes</i>	<i>17</i>	Yes	Yes	Child not living at home
<i>Norway</i>	<i>Yes</i>	<i>18</i>	No	No	Single parent, northern regions
<i>Poland</i>	<i>No, income tested</i>	<i>18 (21, 24 for children with disabilities in education)</i>	Yes	Yes	
<i>Portugal</i>	<i>No, income tested</i>	<i>16 (24)</i>	Yes	No	Income
<i>Romania</i>	<i>No, income tested</i>	<i>18 or secondary, post-secondary graduation age</i>	Yes	Yes	Income

Table 2: continued

Country	Eligibility	Until what age ⁽¹⁾	Variation of benefits		
			By age	By no. of children ⁽²⁾	other criteria
<i>Slovenia</i>	<i>No, income tested</i>	<i>18 (26)</i>	No	Yes	Single parent
<i>Slovakia</i>	<i>Yes</i>	<i>16 (25)</i>	No	No	
<i>Spain</i>	<i>No, bounded to employment and income tested</i>	<i>18</i>	No	No	Child's disability
<i>Sweden</i>	<i>Yes</i>	<i>16 (another allowance for children in secondary education succeed)</i>	No	Yes	
<i>United Kingdom</i>	<i>Yes</i>	<i>16 (20)</i>	No	No	Child's disability

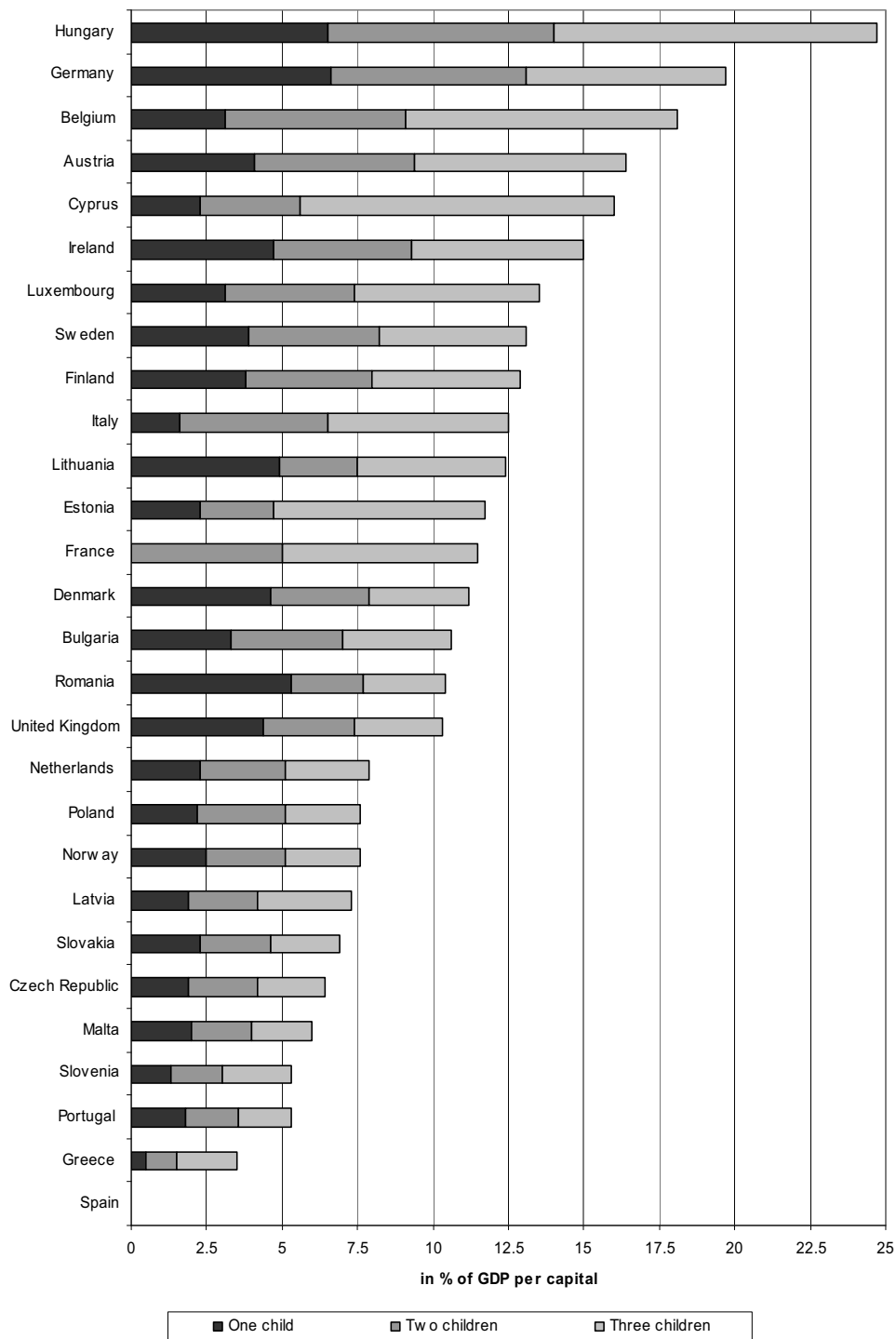
(1) Numbers in parenthesis represent the upper age threshold in case the child remains financially dependent because of education, unemployment or disability. In Austria, Cyprus, Germany, Greece, Italy and Spain there is no age limit for disabled children.

(2) The benefit is considered as varying only if there are differences in the individual amount for each subsequent child. In several countries families with many children receive additional benefits.

Source: Missoc 2007

With regard to the value of child allowances, and therefore to the actual degree of support, figure 2 shows that the range of variation is quite large, and it is not driven merely by the universalistic/categorical divide. It depends also on the relative weight given in policies to the different items which make up the overall support package for families with children, as we shall see below.

Figure 2: Variations in family allowances (2006)



Note: Assumptions are: Children live with both parents at home, family disposes of an average household income, child 1 is 2 years old, child 2 is 7 years old, and child 3 is eleven years old. Spain does not provide child allowances to families with an average income. In Italy only households of wage workers are entitled to a means tested benefit.

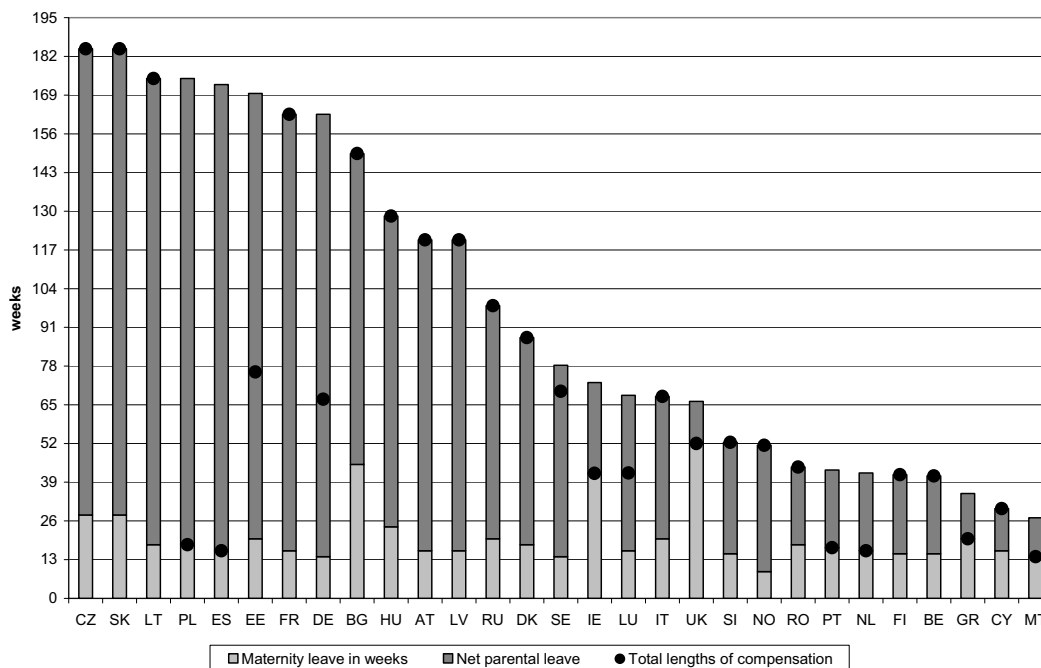
Source: own calculations, on the basis of Missoc and Eurostat data

4.1.2 Maternity and parental leaves

Maternal and parental leaves, together with childcare services address the issue of who should care for children (between the family and society, but also within the family, between mothers and fathers) and who should bear the cost of spending time to care for them. They represent the classical and longer established means of supported familialism: mothers, but now increasingly also fathers, are paid to stay home to care for their small children. They are also the item of family policies that now has a basis also in European law, the European Council Directive 96/34/EC of 3 June 1996 on the framework agreement on parental leave which has set the compulsory minimum leave (three months) which must be available to working mothers and fathers as individual entitlement upon the birth or adoption of a child. It should be noted that this directive does not stipulate any minimum compensation level (which is therefore left to national regulations) and does not distinguish between maternity and parental leaves. It stipulates instead an autonomous entitlement of working fathers, which however, 12 years after the passing of the directive, is not yet implemented in all European countries (e.g. Wall 2007).

Figure 3 shows the cross European variations in the length of the maternity leave, of the parental leave as well as in the duration of compensation. It is clear that in some countries, such as the Czech Republic, Slovakia and Lithuania, but also France, Belgium, Hungary, Austria, and Latvia, which offer a both very long and well compensated leave, familialisation of early child care is strongly supported. In others, such as Romania, Malta, Greece and Cyprus, which offer a leave that is comparatively short and paid for a short period, staying at home to care is done at own cost. Others, such as Estonia and Germany, offer a very long leave, but the compensation covers only half of it, suggesting an only partially supported familialisation. While still others, like Spain and Poland, offer quite long leaves but pay only a short period of them.

Fig. 3 Length of maternity and parental leave and duration of compensation



Source: own calculations on the basis of various sources (see Appendix B)

Research has suggested that the combination of leave duration and financial coverage – so called “effective leave” - has a significant effect both on fertility and on mothers’ labour force attachment, particularly on the latter. Specifically, an overly brief effective leave has a negative effect, but of a bi-modal nature (Waldfogel et al. 1999, Esping-Andersen 2007): if maternal and parental leave is too short, well educated women tend to limit, or forgo, motherhood, while low educated women tend to abandon employment.

4.1.4 Childcare services

The leave system influences also the need for childcare services. Almost by definition, extended leave facilities, especially in combination with an early admission age for pre-school facilities, will lower the need for childcare services. At the same time, leaves and services represent two different ways of defining the division of responsibility towards care between the family and society. Leaves, as we said, are an instrument of supported familisation; services are a means of de-familisation, not only of care work, but

also of part of early childhood experiences and opportunities for cognitive and emotional development.

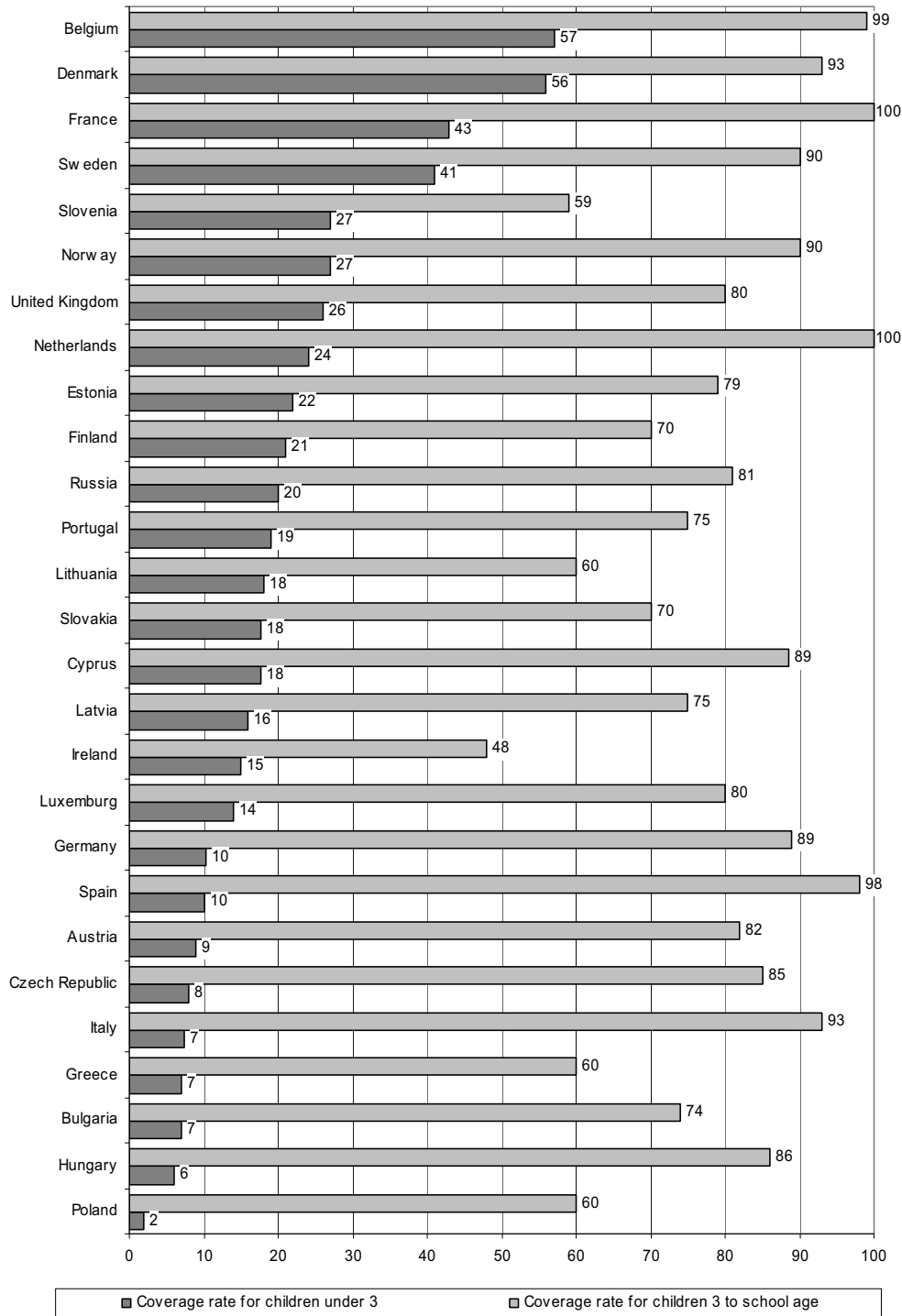
At the 2002 Barcelona EU summit, countries agreed to provide childcare to at least 90% of children between 3 years old and the compulsory school age and at least 33% of children under 3 years of age by 2010. In the Barcelona targets, the concept of childcare is unspecified, including both centre-based and certified individual provision. As Plantenga and Remery observe, narrowing the concept down to formal, centre-based arrangements is inadequate, because countries may differ widely in the organisation, institutional format and responsibility of services offered, particularly for the under 3 years old. The French case is exemplary, with its complex system of formal crèches, family day care, day-mothers, and so forth (see also Fagnani and Math 2008). Furthermore, childcare services may be the responsibility of different institutions and levels of governments in the various countries, as well as have different status (e.g. social assistance vs. education). This renders the harmonisation of data and comparative assessment of coverage difficult, particularly for the under three years old (see also Eurostat 2004). In order to overcome these problems, the Social Indicator subgroup of the Social Protection Committee has decided to use survey data, and particularly EU-SILC data, instead of institutional data on coverage, in order to monitor the implementation of the Barcelona targets (European Commission 2008). But, in our view, this further complicates the issue, on two grounds. First, the focus shifts from provision to use, the latter being estimated on the basis of survey data collected for different purposes and where there is not a specific sampling of households with children below school age. Second, there is no distinction between public or publicly subsidized and market services. Thus, on the one hand, there is the risk that data on users are not sufficiently sound, given the sampling procedure.² On the other hand, by lumping together public policies and market offer, the indicator does not grasp adequately whether a country as a polity is

² Even considering the wide and somewhat imprecise notion of “formal care” used in EU-SILC, differences between institutional data on coverage and survey data for some countries are striking and not easily explainable. For instance Portugal appears to have a coverage rate of 19%, but a usage rate of 32%. The figures for Italy are respectively 7% (now probably increased to about 10%) and 29%. For some country (e.g. France and Belgium), the difference is the opposite, although more reduced: there are fewer users than coverage.

making an effort in children's early education and care, as well as in supporting conciliation.

Since we are interested in the public effort in early child care, although we are aware of the difficult definitional problems pointed out above and of the uneven documentation across countries, we use data on coverage, including – where possible (i.e. where documented) – also services like home day care. Figure 4 offers a first picture of European diversity in this field that cannot depend only on the different visibility of various arrangements and on quality of data. In reading it, one should also keep in mind that the longer the parental leave the less need there is for very early child care. For instance, in Sweden almost no child under 1 is in collective care, since the parental leave lasts one year and is almost fully compensated. Therefore, if children under 1 were not counted, Sweden would show a much higher coverage. The same is partially true for other countries, such as Germany. In any case, differences are much greater in the case of children under three than in the case of children three-to school age, indicating that there is much less consensus, across Europe, on the degree of legitimate, or even positive, de-familisation of care of children under 3 than for the older ones.

Figure 4. Childcare coverage for children under three and three up to school age (around 2003)



Source: own elaboration on the basis of various sources (see Appendix B)

Since both paid parental leaves and childcare services are a means to publicly support the care of children, either through the family or as in (partial) substitution of the family, further developing Plantenga and Remery's (2005) and with Siegel and Sementini (2008) exercise,³ we have calculated for each country a) the amount of weeks covered by a leave compensated at the level of the average wage; b) the amount of weeks covered by child care services, calculated as the time each child under 3 years of age might attend a child care facility given the country specific coverage rate.⁴ Adding the two together we have a measure of the time/weeks left totally to family resources on the overall population (figure 5). From the point of view of the offer of services, only a handful of countries have reached the Barcelona target, while many more are far from it. If one considers also the extension (and compensation) of leaves, the picture looks more positive. But in most countries over half of the time is not covered in any form (services, paid leave). Only in a handful of countries – Lithuania, Belgium, Bulgaria, France, Sweden, the Czech Republic - the number of uncovered weeks is less than 30, while in Denmark there is a small overlap. Of course, since these calculations concern the whole population of the under three and their parents, also in countries with a low overall coverage there may be children/parents who are well, if not fully, covered, while others are not covered at all. But this kind of intra-country differences are lower where overall coverage is higher.

This figure also indicates that the same coverage may be reached through a quite different combination of leaves and services, of supported familisation and de-familisation. This difference is not neutral from the point of view of children, whose needs are defined quite differently in the two cases. In the first place, long leaves may strengthen the gendered nature of child care, given the prevalent gender division of

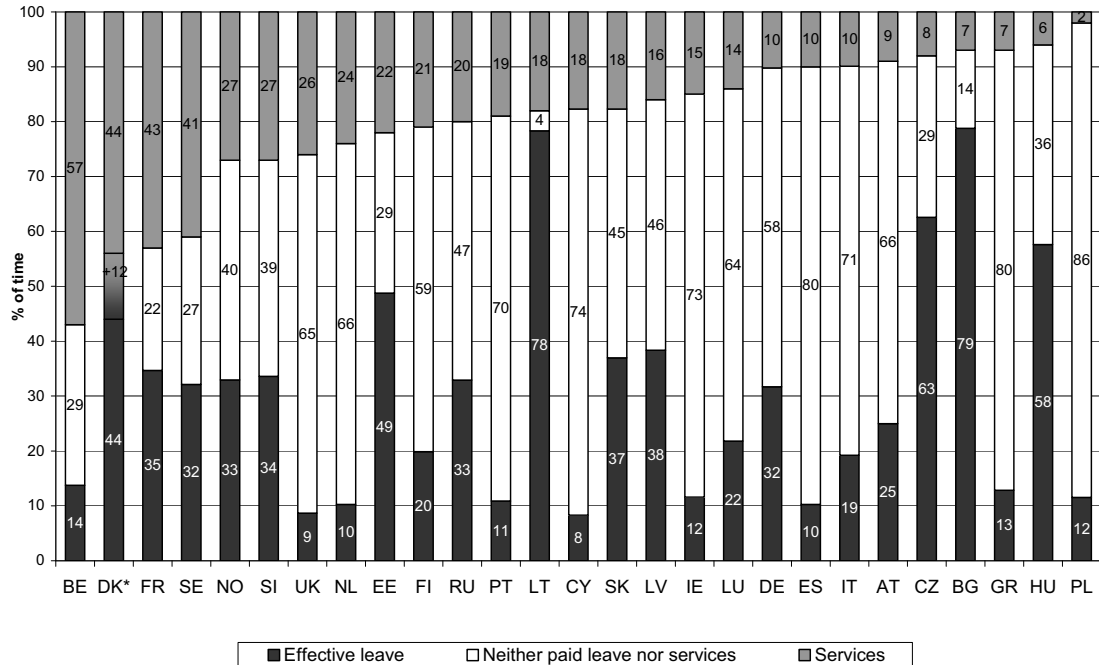
³ The two main differences are that we calculated what they call "effective leave", that is a leave adequately compensated, non in relation to the minimum wage but in the relation to the average wage. In order to have a comparable indicator we also calculated the childcare coverage in terms of week-per-child. The resulting figure is slightly different from that of Plantenga and Remery, with countries shifting places, but always within the same groupings. A similar approach is found in De Henau, Meulders and O'Dorchay (2007), but referred only to the "old" EU 15 countries

⁴ We calculated all services as full time. If we had reliable data on the opening hours, for some country the ratio would be less than that shown in the figure. The issue of opening hours is pointed out also by the Report of the EU commission (2008) on progress towards the Barcelona target. According to their data, for instance, in the Netherlands and the UK center-based care is attended mostly part time by children under three. Even services for children above three are organized on a part time in about half of all countries.

labour in care and the different duration of leaves taken by mothers and fathers. As mentioned above, they may also strengthen a polarization between women of different social classes and income resources. In the second place, childcare services in principle may be a means of equal opportunities among children. The relevance of early education has been increasingly stressed by studies on cognitive disadvantages and “cultural” poverty among children (e.g. Esping-Andersen 2004, 2005, Allmendinger 2004 and the evidence offered by the PISA study), which has its roots in a disadvantaged family background. Inequality between children and child poverty is not a new phenomenon in affluent societies and it has even increased in most OECD countries over the past two decades (UNICEF 2007). Within children at risk of poverty, migrant children are a specific case, since they and their parents may suffer from specific and multiple causes of social exclusion. For all these children, early education services may not certainly compensate the lack of material resources, but may partially offset the consequences of this scarcity on the development of cognitive skills, therefore breaking the vicious circle of the intergenerational reproduction of poverty and inequality.

The claim of equal opportunities for children and on children’s rights points to a collective responsibility towards children welfare and life chances, irrespective of their parents’ work arrangements and human and social capital. This perspective, which considers children as citizens in their own right, is prevalent in the Nordic countries (e.g. Ellingsaeter and Leira 2006): i.e. in the countries that have a long standing orientation towards equal opportunities between men and women, supporting mothers’ paid work and fathers’ caring obligations (and rights). The goals of gender equality and children’s well being, rather than being set against each other or organized hierarchically, seem to have been developed as a coherent package, in which relatively long and well paid leaves and good, affordable and universal care and education services play the most important part. This integrated package seems quite successful not only in reducing economic inequalities among children, but also inequalities in learning skills and cognitive performance, as suggested by PISA results (e.g. Esping-Andersen 2007).

Figure 5: Division of childcare responsibilities between supported familisation, defamilisation and familisation by default. EU 2003-2007



Note: effective leave is calculated as the number of weeks paid at the average level; service coverage is calculated as the number of weeks per child available on the total number of children 0-2
 * Denmark is the only country in which there is even an overlap between childcare service provision and effective leave time.

Source: Own calculation on the basis of various sources (see Appendix B)

4.1.5 The school system as a form of support for families with children

The public education system is one of the main redistributive mechanisms across social generations and between those who do not have children and those who do. For young children, it is also a form of care provision; in so far parents do not have to arrange for their children’s supervision when these are in school. Symmetrically, school schedules at the day, week, or year level are a crucial item in the overall time organization of families with young children, having an impact also on the employment options of parents, particularly mothers.

Of course, the impact the school has on intergenerational relationships and on the

intergenerational transmission of inequality is a well researched topic, particularly in social mobility studies. For the purpose of this project we are only interested in some institutional aspects which structure intergenerational obligations in this field. Thus, from the perspective of the degree to which access to education is de-familialised for the younger generation, it is important whether education (including fees, books, uniforms) is free, until what age/level and what is the minimum compulsory schooling duration/level. It is also important whether the school system is differentiated since very early, in so far a differentiated system may risk reproducing social class differences. Diversities in school systems in Europe are quite large, however, and fully understanding them for a comparative analysis requires specific expertise. From the point of view of the degree to which the school organization disburdens parents from caring/supervision tasks, relevant items are school age entrance, which in Europe varies between 5 and 7, as well as daily and yearly hours of school. To our knowledge, only the Gornick and Meyers (2003) study considers the elementary school system as part of the overall caring package, from the point of view of conciliation and of women's labour force participation.

4.1.6 The overall support package for families with children

The complex package which makes up public support to families with children (child benefits, tax allowances, paid leaves, services) and the different criteria of access to its various items across, as well as within countries make any calculation difficult and limit the validity of comparisons. A group of UK scholars since the early nineties has developed the so called vignette approach which offers a broad idea of national differences (see Bradshaw, Ditch and Homes 1993, Bradshaw and Hatland 2006, Bradshaw 2006). Given its complexity, it cannot be easily implemented on a wide number of countries. Furthermore, in countries where there are wide regional differences in the availability and cost of services, the limits of the approach appear insurmountable (in so far national informants are asked to refer to the local situation concerning prices of services or of housing). But it is worth mentioning in order to avoid simplification when considering only one piece of policy at the time.

Fagnani and Math (2008) using this approach, have calculated the overall package of publicly provided financial resources (including paid leaves and tax allowances) available to 15 different kinds of couples with children and 3 types of lone parent families in 11 Western European countries, excluding the less generous Southern ones. According to their calculations, Austria provides the most generous family package on average to both couples with children and lone parent families. The UK also unexpectedly emerges as one of the most generous countries when it comes to families and particularly so with regard to low income families. On the contrary, the Netherlands appears the less generous. Germany, Belgium and France are all at the top of the table in providing support to couples with children, but slip to the bottom when it comes to lone parent families. These authors also found that the comparatively lower level of child benefits in the Nordic countries is of little importance when placed within the overall context of other financial measures used to assist families, particularly leaves.

The fact that, notwithstanding the high vertical redistributive features of the cash benefit package in the UK, this country has one of the highest child poverty rates in Europe, together with all the Southern European countries, Latvia and Poland, whereas the Nordic countries, although more horizontally redistributive, have one of the lowest (Bradshaw and Hatland 2006, Eurostat 2007, UNICEF 2007), suggests that financial redistribution is not enough. Conciliation policies and particularly supporting the mothers' participation to (adequately) paid work seem as important for children's welfare (as well as for encouraging fertility, one might add). Possibly out of this awareness, in recent years the UK Labour Party government has not only increased its financial incentives for poor working parents (including lone mothers), but it has also tremendously increased the offer of childcare places.

4.2 Who is responsible for the frail elderly? The social care package for the frail elderly

The aging of the population is an indicator of improvement in living conditions. But it increases the chances that a quota of the elderly population experiences loss of health and physical or psychic autonomy for longer or shorter periods. This has an impact

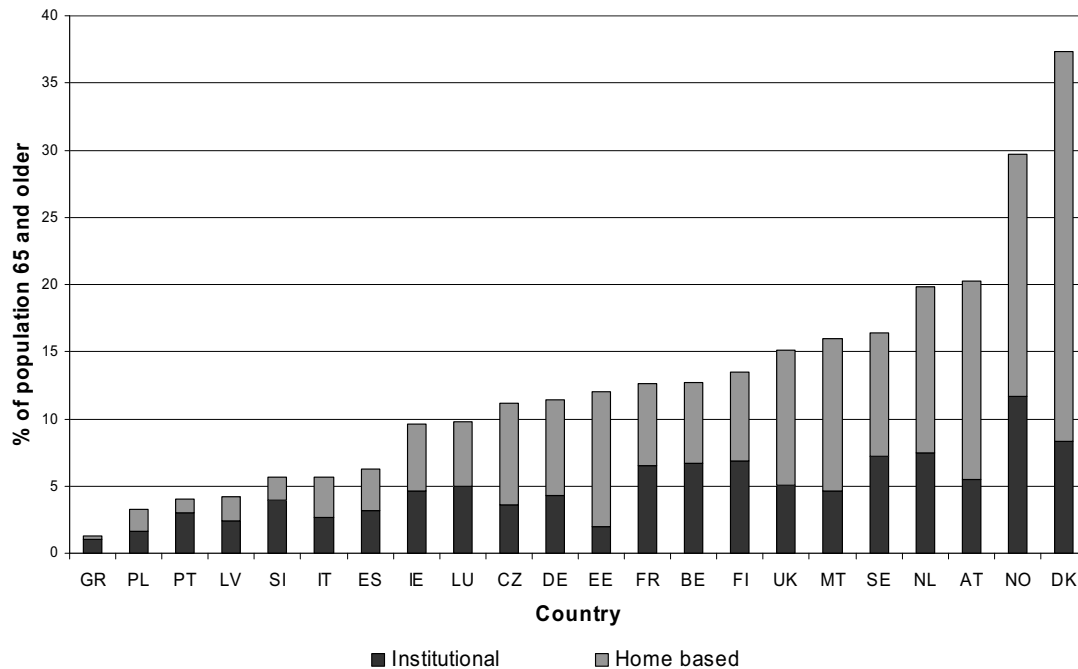
not only on the health expenditure budget but also on the family and kin resources. A number of studies has found that, contrary to much stereotypes and common sense discourses, intergenerational solidarity is alive and strongly reciprocal in all countries, both at the two and at the three generational level, with the middle generation in the “Janus position” (Hagestad 2007) of redistributing both upwards (mostly care) and downwards (care and income). But both long standing family cultures (for instance in patterns of proximity) and welfare state arrangements affect the shape of this solidarity, thus the overall social care package (on the concept of social care see Lewis 1998) – as a mix of family, volunteer, public provisions - available. This in turn affects not only the welfare of the frail elderly, but also that of their close family members and particularly of the family care givers. While in the most generous welfare state, where the frail elderly have not only individual entitlements to income resources through the pension system, but also to care resources, family solidarity integrates and enriches the overall package, in what has been defined a “mixed responsibility model” (Motel- Kliengebiel et al. 2005), in the less generous ones, which paradoxically coincide with the “pensioners’ welfare states”, the frail elderly are more frequently left to their own and family resources. In these countries, therefore, expectations concerning family care are more intensive and being without family care, if in some cases may open access to public support, also may represent a high risk of lack of needed support.

4.2.1 Services

Since the mid-nineties, at the international and international level there has been a growing awareness of the benefit, for the frail elderly, of “ageing in place” (OECD 1996, 2005, Jacobzone 1999). Together with the frail elderly’s well being and freedom of choice, also concern with cost containment plays a role in this development. This has meant an increase in the offer of at home services as against places in institutions (mostly reserved to the most severely disabled and often also isolated). Data are however more difficult to find and to harmonize than in the case of child care, as it is testified by the fact that the most recent publications both by Eurostat (2007) and by OECD (2005) contain incomplete and not updated data. With all their limitations, these data (see figure 6)

suggest that substantial differences still exist, across countries both in the overall caring support packages offered to the frail elderly and in the balance between residential and home care. Different levels of coverage of the population over 65 may not be explained solely by a different incidence of vulnerability in the various countries. They also do not reflect necessarily different positions along the universality/selectivity axis with regard to similar levels of disability. Rather they suggest that in some country services intervene first, when the disability is just starting, while in other they intervene only in the most serious cases. We can contrast, for instance the case of Germany, with its three levels of care need, with the Italian case, where only those who are fully incapacitated are entitled to support. Keeping this in mind, we can observe that in the Mediterranean countries, but also in Poland, Latvia and Slovenia, the overall package of care support is much reduced, and the bulk of care remains on the family, both from the financial and the provision point of view. Residential care plays still a relatively important role in France and Belgium, as well as in the Nordic countries. But in the latter is increasingly balanced also by home care services.

Figure 6: Elderly in old people homes and elderly receiving at home care. Percentage on the total population over 65*



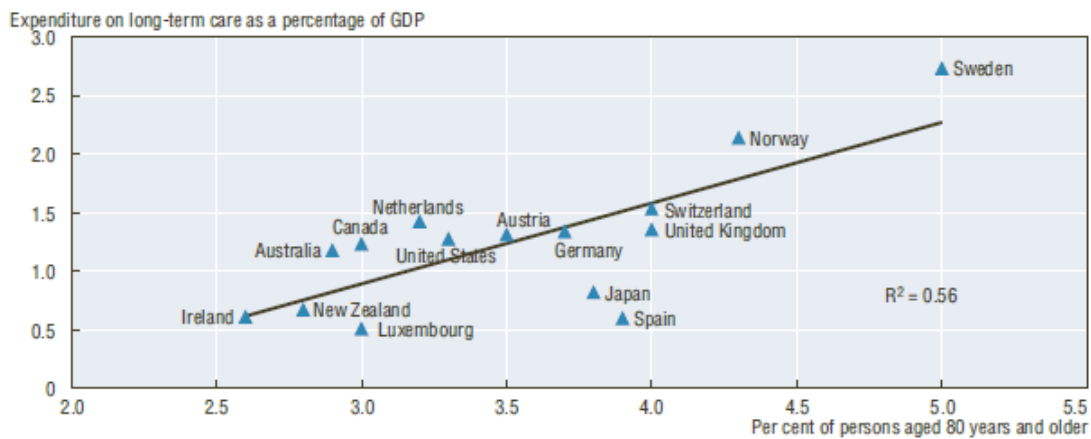
* The period on which information is available ranges between 1995 and 2006, but for most countries is around 2003

Source: own calculation on the basis of various sources (see Appendix B)

As we said, reference to a broad age group is only a very rough indicator of need. Percentage coverage on the population of that age group, therefore, cannot automatically be taken as indicator of coverage of need. The OECD (2005) study on long term care offers an interesting figure – including only a selected number of countries – on the correlation between expenditure and incidence of the population over 80, which is a more accurate, even if still generic, proxy of care needs (see fig. 7). As the 2005 OECD report observes (p. 27), “Spain and Ireland, have both similar moderate spending levels and a comparable split between spending for home care *versus* spending on institutional care. However, long-term care financing in Spain is faced with a number of very old persons in the population that is almost 40% higher than in Ireland. In addition, financing for this significantly older population in Spain comes predominantly from private sources. For Ireland, private spending accounts for only one sixth of total spending.” More generally, according to this study, countries with significantly different population shares of very old persons often have similar spending levels because of differences in program design,

such as varying public-private mix of funding and, more generally, differences in the division of labour between formal and informal (unpaid) care-giving. Norway and Sweden are the highest spending countries, both because they invest more in nursing home care than in at home care and because they offer more amenities and better quality care in their institutions. It is another instance of the need to go beyond simple expenditure indicators.

Figure 7: Correlation between total long term care spending and the share of the population over 80.



Source: OECD 2005

4.2.2 Payments for care

The data that have been shown so far concern only the provision of support in kind (services), not in money. But in some country, such as Italy and Spain and some of the Eastern European countries, the main support policy towards disabled adults and frail elderly is the invalidity pension and some kind of disability or accompanying indemnity. While the pension is meant to address the inability to earn an income, the indemnity is intended to cover the additional expenses incurred because of (non medical) caring needs. In all 15 old EU member states there has been an increasing recourse to some form of payments for care, including payments to family care givers (e.g. Lewis 1998, Pfau-Effinger 2005, Ungerson 2004, Harper and Leeson 2002, Harper 2006). In the German case, the amount of support to which a person is entitled through the long term insurance

may be used in the form of – institutional or home or day - care service, or in cash or in a mixture of the two. In Italy, the totally disabled receive, in addition to the disability pension, an accompanying indemnity which may be used as one sees fit. The same occurs in Spain. In France, the Netherlands, and Portugal, the cash benefit must be used to pay certified carers or service providers. Payments for care, therefore, may imply quite different arrangements both with regard the familisation-defamilisation continuum and specifically with regard to the risks that they reinforce gender divisions in the family with regard to caring responsibilities. In depth studies are necessary to understand whether they constitute a form of supported familialism or rather of supported marketisation/de-familisation.

A recent study on four countries (Timonen, Convery and Cahill 2006) has found that the motives for changing the balance of services in favour of payments for care are similar across the countries: to promote autonomy and choice, to fill gaps in provision, to create jobs, to promote cost savings and domiciliary care as well as efficiency. Yet, both the relevance of these goals and the outcome of these programmes vary substantially, depending on the existing patterns of provision (see also Pfau-Effinger and Geissler 2005 for a broader spectrum of trends and arrangements in Europe). Thus, while in Sweden they constitute only a small addition to the existing structure of service provision, in Portugal, where there is no established tradition of services in this field, payments for care – which can be used to buy formal and informal, including family, care are rather the main public policy. To some degree this is true in all Southern European countries, particularly Italy, Spain and Greece (less in Portugal, where care giving is more regulated) where the lack of public provisions has been faced with recourse to an often unregulated informal market, with a high prevalence of women migrants (Bettio, Simonazzi and Villa 2006, Lyon 2006). Families who cannot or do not want to perform themselves all the caring work, employ, often irregularly, a carer. Payments for care, depending on their institutional framework, may be a means of regulating this informal market and giving some social security protection to informal care workers, or on the contrary even further support it. Other developments point more explicitly to the re-familisation by default of care, in so far, as in the Netherlands since the late 1990s, the provision of professional home care became based not only, as previously, on need, nor

on a contributory record, but also on the lack of theoretically available family care. All household members are in principle recruited, irrespective of their willingness and of their other obligations (Knijn 2007). Interestingly, in this way the Netherlands has become somewhat similar to the Mediterranean countries, such as Italy, where expectations that the family (not only the household) provides care for the frail elderly have always been the norm and public provision intervenes only when no family member lives near enough. The difference is that the Netherlands restricts obligations to household members (a criterion which may discourage re-cohabitation as a form of providing care support) and are gender neutral in their – highly formalised – expectations.

One difference between childcare and elderly care provision is clearly apparent. Notwithstanding the increasing use of payments for care in the case of the latter, the main instrument of this kind used in the case of small children – paid and unpaid leaves – is almost absent in the case of the frail elderly. This results in a paradox. On the one hand, it seems that familialism by default is expected to a larger degree in the case of elderly care than in the case of child care, in so far as needs are covered only partially (e.g. Anttonen, Baldock, Sipila, 2003). On the other hand, family carers who are also in paid work are less acknowledged as such in policies. They, for instance, are almost totally absent from “conciliating policies” discourses. This may be partly due to the fact that the carers involved are middle aged or old themselves, and in addition belong to cohorts in which women had a lower rate of labour market participation. Yet, some study indicates that a growing proportion of the labour force has caring obligations towards a frail elderly family member (Reichert and Nargele 1999, Anderson 2004). This proportion is bound to increase with the increase in women’s labour market participation and with the pension reforms which have risen the retirement age. Only few countries grant leaves to care for an adult person. Germany, for example, has recently – in June 2008 – introduced the entitlement to six months of unpaid leave in the case of care for a seriously incapacitated family member (previously only some union agreements granted a similar option). And in Italy, since 1993, workers who care for a family member with a certified severe disability are entitled to three paid days off a month.

Research, and data, on these different forms taken by payments for care is still little systematic and involves only few countries (and the Eastern European ones only

marginally). Therefore data on the overall care package for the frail elderly are less complete than in the case of children, rendering any exercise to compare the two systems within and across countries somewhat lopsided.

4.2.3 Financial obligations of family members

As shown in table 1 above, financial obligations by children (or grandchildren) are not present in all countries. The elderly in developed countries in principle are financially covered by their own or derived (survivor) pension. In some countries, there is in addition a minimum universal old age pension and in other, where this universal pension does not exist, there is a social assistance pension for the elderly poor. In general, one might say that, from a financial point of view, the elderly are the most defamilised either through the contributory pension system or through some kind of public pension. Obligation to provide for a frail elderly parent may however exist in two cases: when the pension is too low to grant an adequate living condition, as in the poorer countries, and/or in the case health and dependency needs impose extra costs on the elderly's budget. In this case, in some country the state takes upon itself the duty to provide, while in others the first responsibility falls on the children and sometime also on grandchildren. As Van Houtte J. and Breda (2005) suggest, however, the norms which stipulate children's financial obligation towards their parents are increasingly contested and out of step with cultural norms, and in many case are the object of negotiation.

4.3 Minimum income policies

Income-support measures for the poor – although rooted in modern-day poor laws and in charity – are a comparatively recent addition to welfare-state packages (Loedemel and Trickey 1992; Saraceno ed. 2002). They existed in only a handful of European countries in the 1950s and 1960s, but expanded rapidly and were also subject to internal reforms in the 1980s and 1990s due to the weakening of two of the main pillars of post-war social citizenship: full and stable employment for men, and stable marriages as a means of redistributing both income and care. In the former communist countries, such

income-support measures were introduced only following the fall of the communist regimes and during the transition period (Cantillon et al. 2007). These measures are only one component of social assistance, however, and social assistance is only one component of the overall welfare-state package. They can be fully understood only by looking at the entire package, including the internal boundaries between social security and social assistance. Bradshaw (2006), for instance, argues that child allowances have an important role in reducing the proportion of children who live in poor households (see also World Bank 2007). Furthermore, income-support measures targeted at the poor are a complex package themselves. They may be linked to other benefits (housing, free social services and so forth), the value of which should be taken into account when assessing and comparing policies.

Understanding the complexities of income-support systems would require detailed, in-depth case studies. Comparative studies, however, either involve only a limited number of countries or they focus on a limited number of dimensions: the institutional framework, the level of generosity and the target definition, for example. Gough et al.'s (1997) observation that the growing importance of means-tested schemes in Europe and the mounting debate on welfare dependency are not matched in academic studies is still true. With few exceptions (Leibfried 1993; Gough et al. 1997; Ferrera 2005), anti-poverty policies and, specifically, minimum-income provisions remain at the fringe of mainstream comparative welfare-state analysis. This knowledge deficit is not compensated for, at least at the descriptive level, by the European bodies in charge of monitoring social policies within the EU. The data produced by MISSOC are quite deficient, for instance: they are often imprecise and inhomogeneous across countries, sometimes simply incomprehensible. The much richer national reports on social inclusion are full of interesting information that is not, however, comparable, since countries have developed and pursued this reporting exercise in a highly self-referential way and/or on the basis of their own traditions (or lack of them) in social reporting. Sound and fully comparable data on all countries is lacking on essential issues such as eligibility rules, income thresholds, qualifying age, duration of entitlement, links to other benefits, whether the benefits are right-based or discretionary, associated requirements, efficiency in targeting, and so forth. These conditions are important for assessing the boundaries

within which income support for the poor is defined as part of social citizenship: to whom it is provided, for how long, under which conditions, and so forth. It should be added that this policy field in recent years has witnessed many changes and seems to be in a constant process of restructuring. Rules concerning particularly duration, entitlement, generosity and patterns of enforcement of the requirement to be available for work are in constant flux and information may quickly become outdated.

The following description of the main features is based on MISSOC 2006 data, integrated with the overview by Heikkila et al. (2006) and other, less comprehensive but more detailed sources. Given the focus of this paper on intergenerational obligations, attention will be given in particular to the institutional framework, eligibility rules and generosity.

In most EU countries, income support for the poor is part of the social citizenship package in the sense that a non-categorical safety net exists for all persons below a given income threshold. This safety net may be the last addition to a number of more categorical social minima, such as in France, where the RMI (*revenu minimum d'insertion*) is an addition to a complex system of *minimaux sociaux* that include means-tested income-support measures targeted at the elderly, lone mothers, widows and the disabled. Ireland, Portugal, Spain, and Malta have similar systems. In the United Kingdom and Ireland, there are three distinct measures: one for the non-able-bodied and lone mothers with a very young child, one for the able-bodied without a job, and one for the working poor. In the Scandinavian countries, Austria, partly Germany,⁵ The Netherlands and most of the Eastern European countries, there is only one minimum income provision for all categories (but in the Eastern European countries child allowances may be means tested). Exclusively categorical measures exist only in Greece and Italy (Matsaganis et al. 2003; Matsaganis 2005; Sacchi and Bastagli 2005; Saraceno 2006). In Italy, there may also be more universal measures at the local level, but with considerable variation across municipalities. There are also strong cross-regional differences in Spain (Arriba and Moreno 2005). Here, in fact, a national framework law formally mandates the regions to set such a measure in place, but without setting

⁵ In Germany there are special schemes for the elderly poor (Grundsicherung) and for the working poor with children (Kinderzuschlag).

common standards. Hungary appears to have no general minimum income provision in the MISSOC data basis and in Heikkilä's et al. overview; but it is included in the countries having one in the cited Supporting document to the Joint Report on Social inclusion (2007). The GVV (2003) report states that providing minimum income support is a local responsibility and that municipalities set their own thresholds and criteria. Thus the situation would appear somewhat similar to the Italian one, although it is not clear whether, as in Italy, discretion concerns both the criteria of access and the actual provision of some support.

Available data on institutional frameworks, with all their shortfalls, indicate that differences are significant along most dimensions of income support measures. A first distinction concerns that between fully centralized and fully decentralized systems. Decentralization often also implies some degree of differentiation in the way entitlement is defined and resources are provided. Thus, the most decentralized systems – such as the Spanish, the Austrian, the Latvian, the Slovakian and the Polish – provide benefits of quite varying levels depending on the region and even the municipality, with the risk that benefit recipients in the poorer regions get much less than recipients in the richer regions (World Bank 2007).⁶ In other systems, such as in Germany, Sweden and Portugal, eligibility rules, income thresholds and basic income are nationally regulated, but additional benefits (for rent, heating or other expenses) are at the discretion of local governments. These within-country differences based on regional disparities suggest that income support for the poor is less strongly rooted in a social citizenship framework based on residence in the same country than pensions, unemployment, maternity, parental and child benefits. Local welfare-state arrangements may have a substantial impact in shaping this particular item of the social citizenship package, adding to cross-national diversities.

⁶ The most decentralized and differentiated system is found in Italy, where municipalities may or not have a minimum income for the poor and where the target population, income thresholds and amounts given may vary greatly even within the same region. Since neither Greece nor Italy have a general minimum income provision, they are not taken into consideration here. It should be noted that both countries, together with Spain and Portugal, also do not have universal child allowances, thus lacking this form of minimum income for children (and for families with children) which plays such an important role in other countries in keeping children above the poverty level and in reducing the poverty gap.

Eligibility rules may also differ in a way which is relevant from an intergenerational perspective. In a few countries – France, Luxembourg and Spain – the under-25s are not eligible for general income support in their own right, unless they have children of their own. In France, the young can benefit from specifically targeted measures which are less automatic than the RMI and more strictly linked to work and training. In the Netherlands, individuals aged 21 or 22 may receive a lower benefit if the municipality deems that a full benefit would disincentive them from working.⁷ Thus, in the treatment of young adults, expectations concerning family obligations and a conception of age-specific risks of moral hazard combine to motivate a lower degree of individual protection.

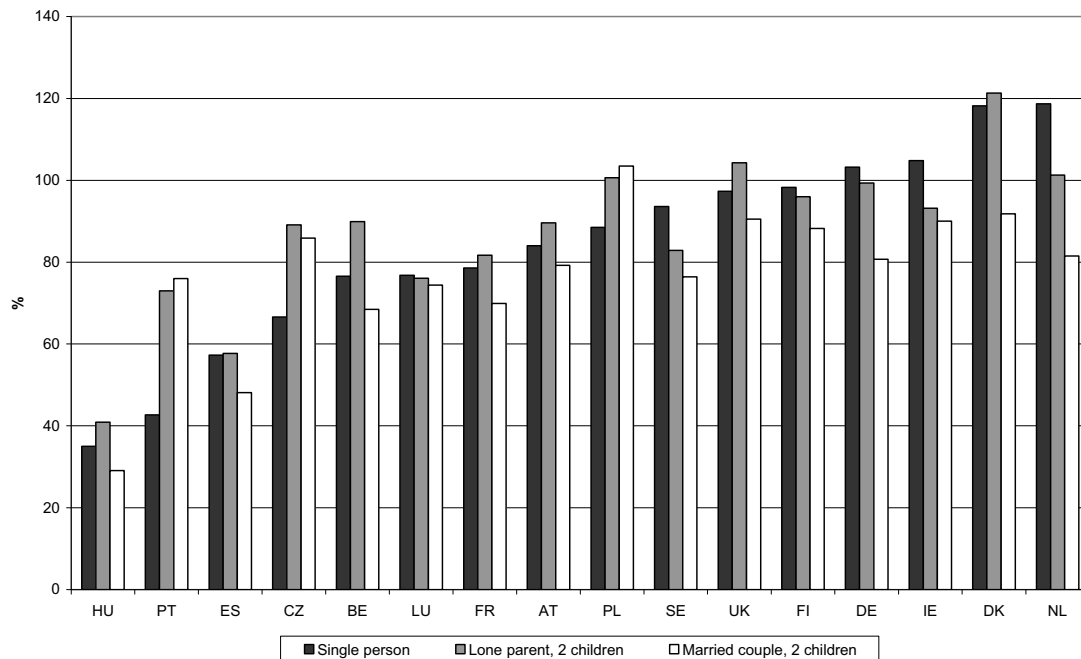
Eligibility rules are also linked to income thresholds: the lower the income threshold, the narrower the definition of poverty used and the smaller the eligible population, but also the narrower the definition of the level of unacceptable deprivation. Level of generosity, in fact, operates together with eligibility rules in shaping the actual size and personal characteristics of income support recipients. In countries with a very low income threshold, only the poorest and those with the lowest human capital have access to such support. Furthermore, although in all countries household, not individual income is taken in consideration for social assistance purposes, the boundaries of the household may be defined in quite different ways. Restricted to include only parents and their underage children in some countries, as the Scandinavia, it may include also non resident obliged kin in others, such as Italy.

Generosity involves the degree to which the minimum-income benefit permits an adequate standard of living. This depends on income thresholds and basic amounts, but also on the equivalence scales used to adjust for the income needs of different-sized households. Thresholds may be defined in reference to some absolute poverty line (basket of goods), or in reference to some other existing social minimum (e.g., the minimum wage, or the non contributory old age pension), or again in reference to an

⁷ Non nationals are in principle eligible in all countries, as long as they have a legal residence in the country where they claim the benefit. But in most countries, this entitlement includes a time requirement (length of legal stay in the country). In the most decentralized countries, such as Spain, there may also be a similar requirement for nationals coming from other regions. Not legally resident non nationals are excluded everywhere, although they might receive *una tantum* support.

average standard of living (e.g., the average wage). Equivalence scales are particularly relevant with regard to patterns of familialism. They may, in fact, presume higher or lower economies of scale and patterns of intra-household solidarity. Furthermore, Cantillon et al. (2007) observe that the comparative level of generosity of the various countries may be assessed differently depending on whether one considers purchasing power parity, average wages or relative poverty levels. In particular, these authors point out that in the former communist countries the purchasing power of social assistance recipients is lower than that found in Spain and Portugal, which have the lowest levels within “old” EU. Yet, compared to average wages or relative levels of poverty, minimum-income protection seems substantial. In Poland, in particular, lone parents on social assistance receive 60% of the average wage, which is higher than either Sweden or Finland’s rates. The EU Commission’s Supporting Document to the 2007 Joint Report on Social Protection and Social Inclusion points out that only a few countries provide workless households with a minimum income and related (i.e. housing) benefits that are sufficient to lift them close to, or above the 60% of median income threshold, and this only with respect to some family types, which may differ across countries (see also the analyses in Standing 2004, on a smaller number of countries). Figure 8, taken from the same document, illustrates these differences. Countries differ not only in the overall level of generosity, but also in what kind of household composition they support most (or to what degree they assume economies of scale). Only in Poland and Portugal couples with children receive the relatively higher benefits. In all other countries, benefits are relatively higher either for lone parent households (Belgium, Czech Republic, France, Hungary, UK) or for single person households (Netherlands, Ireland, Germany).

Figure 8: Net income of social assistance recipients for three jobless family types as percentage of the at-risk-of-poverty threshold, including housing benefits (2003).*



* Only countries where non-categorical social assistance benefits are in place are considered.

Source: Commission of the European Communities 2007. Joint EC-OECD project using OECD tax-benefit models, and Eurostat.

4.4. Housing Policies

Housing policies are usually not part of welfare state research, both at the national and at the comparative level. Yet, access to housing is an important dimension of individual and household well-being, which is often mediated by family, mostly intergenerational, resources, particularly in the case of homeownership (see e.g. Helderma and Mulder 2007, Poggio 2008). Given the difficulties that a study of this field presents, and the specific expertise it requires, we have decided not to include housing indicators in our list. Yet, it is worthwhile mentioning that housing policies and “housing regimes” should be considered in the future both in welfare state research and in research on intergenerational relationships.

Comparative housing policy analysis until recently has focused mainly on housing tenure (for a review, see Norris 2007). These studies indicate that from the end of World

War II until the 1980s three housing tenure systems prevailed in Europe: the dual and unitary systems which Kemeny (1996) distinguished in the EU 15 and the “East European model” identified by Hegedüs and Tosics (1996).

The dual system operates in Ireland and the UK. Here, homeownership is the dominant tenure pattern and the private rented sector is unregulated and unsupported by the state, while the social rented sector, owned and managed by the state, caters mainly to the disadvantaged. Also the Mediterranean countries may be enclosed in this category. Their specificity is that in these countries house purchase is financed more often through self building, personal savings, family loans and gifts, inheritance, than through the recourse to the mortgage market (Allen et al. 2004, Poggio 2008). As a consequence, housing is usually of lower quality and access to housing, particularly for the young, is mainly mediated by family resources.

In the unitary system, which operates in Germany and Denmark, state policies do not influence tenure patterns.⁸ As a consequence, the owner-occupied sector tends to be smaller than in dual systems and on the contrary the social housing sector is larger and not targeted exclusively to low income households. Furthermore, social housing is generally owned and managed by non governmental non profit agencies.

In EU15, generally, a large social housing sector is associated not only with the unitary system, but with greater housing equality and higher housing standards. In the Southern European countries, with a very small social housing sector and a prevalence of home-ownership, social housing is not even able to cater to the poor and even the private sector is often of not good quality (Allen et al. 2004). The exception is the UK, where, notwithstanding the dual system, the social housing sector was strongly developed in the 1950s and 1960s, improving overall housing standards.

The main characteristics of the East European model are the following: 1) Housing is defined as a state guaranteed social right; 2) the state controls all the phases of the process of providing housing, from building to allocation; 3) a large proportion of housing was state owned prior to 1990; 4) housing was cheap for consumers but costly for

⁸ It should be mentioned however that in Germany until 2006 there was a tax allowance which de facto incentivised home ownership

society. There were cross and intra-country differences, however. Home ownership was more dominant in rural areas, while in the cities the majority of dwellings were state-owned. Furthermore, since the 1960s, some Eastern European countries introduced marketisation reforms. As a result, by the end of the 1980s owner occupied housing was the dominant form of tenure in Hungary, Bulgaria and Romania, while Poland developed a large cooperative rental sector (Norris 2007)

Between the years 1990-2000 changes happened in all three systems, for different reasons. Table 3, taken from Norris' (2007) study, shows the developments in housing tenure in a number of European countries, following these changes. It also shows that data are missing for several countries. In many of the countries where public spending on housing was traditionally high, such as the Nordic ones, subsidies started to be reduced and focused mainly on the poorer households, inducing a decline in the availability of social rented dwellings. Other countries, such as the UK and the Netherlands, privatised part of their social dwellings stock, thus providing incentives for home-ownership (van der Heijden 2002).

Table 3 Occupied Dwellings by Tenure in European Countries (%), 1980, 1990, 2000

Country	1980					1990					2000					
	Rented	Owner Occupied	Co-operative	Other	Rented	Owner Occupied	Co-operative	Other	Rented	Owner Occupied	Co-operative	Other	Rented	Owner Occupied	Co-operative	Other
Austria	43	52	0	5	41	55	0	4	Nav	Nav	0	4	Nav	Nav	Nav	Nav
Belgium	38	59	0	3	33	67	0	0	32	68	0	0	32	68	0	0
Cyprus	16	61	0	23	13	64	0	23	14	68	0	23	14	68	0	18
Czech Republic	40	40	13	7	40	38	19	3	29	47	17	3	29	47	17	7
Denmark	43	45	1	1	40	45	5	1	39	52	7	1	39	52	7	2
Finland	30	63	0	7	25	72	0	3	32	64	0	3	32	64	0	4
France	41	47	0	12	39	54	0	7	39	55	0	7	39	55	0	7
Germany	61	39	0	0	58	42	0	0	Nav	Nav	Nav	0	Nav	Nav	Nav	Nav
Ex GDR	69	31	0	0	74	26	0	0	Nav	Nav	Nav	0	Nav	Nav	Nav	Nav
Greece	25	75	0	0	24	76	0	0	20	74	0	0	20	74	0	6
Hungary	29	71	0	0	26	74	0	0	7	92	0	0	7	92	0	1
Ireland	24	76	0	0	18	79	0	3	Nav	Nav	Nav	3	Nav	Nav	Nav	Nav
Italy	36	59	0	5	26	68	0	6	Nav	Nav	Nav	6	Nav	Nav	Nav	Nav
Latvia	Nav	Nav	Nav	Nav	79	21	0	0	30	70	0	0	30	70	0	0
Lithuania	Nav	Nav	Nav	Nav	Nav	Nav	Nav	Nav	7	91	0	Nav	7	91	0	0
Luxembourg	39	60	0	1	30	64	0	6	26	70	0	6	26	70	0	4
Netherlands	52	42	0	0	55	45	0	0	47	53	0	0	47	53	0	0
Poland	Nav	Nav	Nav	Nav	Nav	Nav	Nav	Nav	26	55	19	Nav	26	55	19	0
Portugal	39	52	0	5	28	67	0	5	21	75	0	5	21	75	0	4
Slovak Republic	Nav	Nav	Nav	Nav	28	49	22	1	21	75	0	1	21	75	0	4
Slovenia	Nav	Nav	Nav	Nav	28	49	22	1	9	74	15	1	9	74	15	2
Spain	21	73	0	6	15	78	0	7	10	84	0	7	10	84	0	6
Sweden	42	42	16	0	44	39	17	0	39	46	15	0	39	46	15	0
United Kingdom	42	58	0	0	35	65	0	0	31	69	0	0	31	69	0	0

Source: Norris 2007 (tab. 1)

Note: Nav means not available. GDR means German Democratic Republic. Data for the following countries are not available: Bulgaria, Estonia, Malta, Romania.

Changes have been more radical in the Eastern European countries after the collapse of the communist regimes. According to Hegedüs and Tosics (1998) five developments are relevant. All point to privatisation: 1) reform of property rights and the introduction of market institutions in the market sector; 2) restitution to former owners; 3) reform of the state-owned sector, which was mostly transferred to local authorities; 4) withdrawal of state subsidies for the construction of state owned housing; 5) privatisation of the state-owned sector, through the sale to tenants (as in the Western European countries). Roberts (2002) distinguishes between “fast privatisers” – countries where between 40 and 90 per cent of state owned housing was privatised between 1989 and 1994 at a low or nominal cost to former tenants – and “slow privatisers” where between 1 and 9 percent of dwellings were privatised in the same period. Hungary, Slovenia, Bulgaria, Romania and Lithuania belong to the first group, the Czech Republic, Poland, Slovakia, Estonia and Latvia to the second. These changes had a negative impact on housing quality, since many former tenants, now owners, cannot afford to pay the needed upkeep and restructuring (Domansky 2007). An additional problem in these countries is the still undeveloped mortgage sector.

A partially different way of looking at housing policies is to consider regulation for access to social housing. For instance, in Italy a low income young single person, or a childless young couple, would have no chance to access social housing, unless they have some additional characteristic (e.g. a disability) which renders them “underprivileged”. In a country where the private renting market is tight and costly, they are therefore more dependent on family resources than individuals in a similar situation in other countries, where the renting sector is wider and access to social housing granted on a broader definition of need. In general, where housing tenure is skewed towards ownership, the young have a more difficult access to housing and are more dependent on their parents’ financial help to access it. Conversely, the elderly often have most of their wealth invested in their housing, which constitutes the bulk of their children’s future inheritance. One might suggest that this situation might explain both cross country differences in patterns of proximity between generation and in patterns of exchanges between care and financial support across generations (on the latter, see e.g. Poggio 2008). But, as we said above, this is a field of research which we cannot delve into for the time being.

5. Is it possible to identify gendered intergenerational regimes?

Attention for the gendered dimension of welfare regimes has developed to a large degree separately from that concerning the intergenerational dimension, although there is substantial overlapping in the indicators used when care policies are involved: leaves, collective services, income transfers. Less focused on, in both cases, are legal regulation concerning maintenance, taxation, pension systems, which are also relevant – although at different levels and for different dimensions - from the point of view both of gender and of intergenerational relations (see e.g. Sainsbury 1996, Saraceno 2004b, Walby 2001, 2004, Pascall and Lewis 2004).

Furthermore, theoretical and empirical work is more developed with regard to the gender dimension than to the intergenerational one. There is, in fact, a quite substantial wealth of theories and studies on gendered welfare states not matched by a similar effort with regard to unravelling the intergenerational arrangements implicit in the various forms of welfare regime, notwithstanding the wealth of research on childcare policies and more recently on elderly care. Only quite recently substantial attempts at integrating the two perspectives have been implemented, although mostly focusing on a small group of countries (e.g. Lewis ed. 1998, Pfau Effinger and Gessler eds. 2005). The exception is the background paper by Neyer (2003) within the framework of the GGS programme.

The concept of gender regimes was first developed by Orloff (1993), who integrated Esping-Andersen's concept of decommodification to include gendered notion of social citizenship, with a specific attention for how far the state guarantees women access to paid work, how far this can be balanced with family life, and how far women can form an autonomous household without needing to rely on a man (see also Hobson 1994). Lewis and Ostner (1994) based their first attempt at typologising on the gender division of paid and unpaid work, using the strength of the male breadwinner-family wage model as a proxy measure. Subsequent work has further refined this approach. Gornick et al. (1997) have classified countries according to their score on two indices: the index of policies (leaves and their wage replacement rate, services, tax relief) that support

employment for mothers of children under 3 and the index of policies that support the employment of mothers of children 3 to school age. They point out that there is a meaningful correlation in most countries between policies and women's labour force participation rate, with two striking exceptions: the US and Portugal, which score low in policies, but high in participation. Letablier (1998) arrived at similar findings. Korpi (2000) categorized "gender policy models" according to the level of public care services and the level of support to families through transfers. He found that while services tend to support women's employment, financial transfers usually have the opposite effect. Building on earlier research and developing the first suggestion by Lewis and Ostner, Walby (2004) categorizes gender regimes according to whether women are treated as wives, mothers or workers; whether care is provided through services, money to purchase services or money to provide care oneself; and the actual outcome in terms of women's income and well being. Her central thesis is that there is a continuum along which gender regimes move from domestic to public. This transition may take place either through state or market mechanisms.

While all these analyses focus mainly on policies and behaviours, Pfau Effinger (2004), further developing Letablier's (1998) suggestion concerning the degree of legitimization of early child education, has developed the concept of gender cultures as intertwined, but distinct, from that of gender regimes. As a matter of fact, the role of culture in the shaping both of policies (models of appropriate behaviour, in our case of gender, intergenerational, family relations and responsibilities) and of their outcomes (how individuals and families react to, interpret, use policies) is increasingly coming to the fore in welfare state research (e.g. van Oorschot, Opielka, Pfau-Effinger eds. 2008, Kremer 2007, Lewis, Campbell and Huerta 2007, Lewis, Knijn, Martin, Ostner, 2008).

The first pioneering attempt to develop a typology of what we might call intergenerational regimes is that by Anttonen and Sipilä (1996). These authors clustered (Western European) countries on the basis of the degree to which the state assumed caring responsibility for the welfare of children and of the frail elderly. The indicators on the basis of which they cluster countries are: 1) children under three in day care as a proportion of all children in the age group; 2) children aged 3-5 in pre-school, as a proportion of all children in the age group; 3) elderly people over 65 in institutional care

as a proportion of the whole group; 4) elderly people above 65 receiving home help as a proportion of the age group. The focus, therefore, is only on de-familisation and not also supported familialism as indicated by paid leaves in the case of children and some form of payments for care in the case of the frail elderly. On the basis of the level of de-familisation, countries were distinguished as: a) generous towards the elderly but not towards children, as the Netherlands, Norway and Great Britain; b) generous towards children but not towards the frail elderly, as France, Belgium and Italy; c) generous towards both children and the frail elderly, as Denmark, Finland and Sweden; d) generous neither towards children nor towards the frail elderly as Portugal, Greece, Spain, Ireland and Germany (for a discussion see also Saraceno 2000).

In more recent years, these same authors (2005 and with Baldock 2003), as well as others like Pfau Effinger 2005, following Daly's and Lewis' (1998) concept of social care, have enlarged it to include different forms of care provision, as well as of way of funding it. Thus, they have become more attentive to the overall social care package available in different countries, and to differences between funding and provision. This difference is crucial not only with regard to public provided versus public financed collective services. It is crucial also with regard to family provision. As it is clear in the case of parental leaves, family care may be more or less actively and generously supported by public money, or instead be the only option available with no support. To a lesser degree this same phenomenon is increasingly occurring in the field of frail elderly care, where the increasing recourse to some form of "payments for care", alongside or instead of services, may represent a form of publicly supported family care, where the role of what here we call supported familialism as distinguished both from familialism by default and from de-familisation is acquiring growing importance. It is within this perspective that these authors have pointed out a common trend in all countries for care "to go public" both for children and the frail elderly, therefore changing the overall social care regimes: i.e. the balance between public and private, formal and informal, paid and unpaid caring provisions (including provision by paid, regular or irregular, migrant labor) for both age groups.

Interestingly, however, rather than clear taxonomies of the main variables on the basis of which to identify clusters of countries, these more recent analyses point to wide

variation not only across but also within countries. On the one hand, in fact, the take up and use of social care services is highly varied even where there is a relative homogeneity of coverage, quality and needs. On the other hand, “nations do not exhibit coherent patterns of social care in terms either of the principles that inform them or the ways in which they are delivered” (Anttonen, Baldock and Sipilä, 2003, p. 168). Anttonen, Baldock and Sipilä, in particular, conclude their study of five national systems by saying that it is quite difficult to search for national patterns, and it is even more “unwise to construct typologies of social care systems that are comparable to those developed in the welfare regime literature....There are also limits to which it is useful, or even possible, to document this complexity; the result is a very detailed institutional description of little analytical usefulness” (2003, p. 171). They suggest an alternative way of understanding social care that is in terms of how policies and provisions change over time. They distinguish three relevant dimensions of change: a) an increasing trend of “care going public”, meaning being removed from an entirely private domestic economy, towards a greater overlap with the formal economy of the market, the non profit sector and the state; b) a move from family entitlement to individual entitlement (process of individualization); c) from selectivity to universality of publicly funded or provided services (see *ibid*, fig. 1, p. 173). With some adaptation, this perspective could be enlarged to include, alongside care, financial support for children and also legally defined intergenerational obligations. Countries therefore might be located in a tridimensional space according to the timing and degree to which they move along these directions in care provision, financial support and family obligations.

This synthesis of trends is however in our view problematic and possibly misleading for different reasons. Firstly, it is applicable neither to all EU nor to all OECD countries (i.e. among the former communist countries divergent paths may be detected). Secondly, and conceptually more important, “care may go public” in that there is some public financial support to those who need it and/or to those who provide it. But this may also strengthen, or incentive, or allow, its familisation. It is the case of parental leaves incentivising fathers to take part of them, or mothers to stay home for a long period, or family carers to renounce work in order to care. Thirdly, the forms which public support may take are not gender neutral (payments for care are likely to strengthen gender

divisions more than services). Fourthly, they are also not neutral with regard to the market (see e.g. the Mediterranean case where transfers are used to pay for cheap migrant labour). Having said this, the lesson we may learn from that conclusion is that it is necessary to take a carefully contextualized approach and, particularly for the theme at hand, instead of starting from some kind of typology, to test empirically which indicators and which specific dimensions of the institutional framework better explain variations in intergenerational relationships and behaviour, while keeping the dual perspective of downward and upward responsibilities and obligations and of their gender specificity.

Lack of distinction between supported familialism and de-familisation is also the main limitation of the important Hantrais' effort to characterize the family-policy relationship in the EU 25 countries. She distinguishes between four clusters, which are further subdivided "according to the way in which the family-state relationship is constructed and enacted" (p. 1999).⁹ As one can see (tab. 4) the main distinction is the public/private (family) divide, as in Anttonen et al. approach. De-familisation, therefore, may include both substitution of part of family care and financing family care. What is interesting in this categorization, however, is the role assigned to forms of funding of public provisions, to the degree of institutionalization and to coordination. Interesting is also the distinction between familisation (by default), which is typical of the Mediterranean countries and re-familisation (by default) which seems the result of post-communist changes in the Eastern European countries. It introduces a dynamic perspective, although limited to these countries only.

⁹ The clustering seems to be based on a purely interpretive basis.

Table 4: The family-policy relationship in EU25 member states

<p>1 DEFAMILIALISED</p> <p>Explicit Coherent Legitimised Co-ordinated Supportive of working parents Universal/residence</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-right: 1px dashed black; padding-right: 5px;">Tax funded Individualised Service based</td> <td style="width: 50%; padding-left: 5px;">Mixed funding Family centred Institutional</td> </tr> <tr> <td style="border-right: 1px dashed black; padding-right: 5px;">Denmark Finland Sweden</td> <td style="padding-left: 5px;">France Luxemburg Belgium</td> </tr> </table> <hr style="border-top: 1px dashed black;"/> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-right: 1px dashed black; padding-right: 5px;">Ireland UK</td> <td style="width: 50%; padding-left: 5px;">Austria Germany</td> </tr> <tr> <td style="border-right: 1px dashed black; padding-right: 5px; text-align: center;">Netherlands</td> <td style="padding-left: 5px;"></td> </tr> <tr> <td style="border-right: 1px dashed black; padding-right: 5px;">Marketised Mixed delivery Tax funded</td> <td style="padding-left: 5px;">Delegated Institutional Mixed funding</td> </tr> </table> <p style="text-align: center;">Residence Partially co-ordinated Partially legitimised Rhetorical Implicit/indirect</p> <p>2 PARTIALLY DEFAMILIALISED</p>	Tax funded Individualised Service based	Mixed funding Family centred Institutional	Denmark Finland Sweden	France Luxemburg Belgium	Ireland UK	Austria Germany	Netherlands		Marketised Mixed delivery Tax funded	Delegated Institutional Mixed funding	<p>REFAMILIALISED</p> <p>Implicit/indirect Rethorical Pro-natalist Semi-legitimised Unco-ordinated Institutionalsied Transnational underfunded</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding-right: 5px;">Estonia Latvia Lithuania Hungary</td> <td style="width: 50%; padding-left: 5px;">Czech Republic Slovenia Slovakia Poland</td> </tr> </table> <hr style="border-top: 1px dashed black;"/> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; border-right: 1px dashed black; padding-right: 5px;">Greece Italy Portugal</td> <td style="width: 50%; padding-left: 5px;">Cyprus Tax funded Malta</td> </tr> <tr> <td style="border-right: 1px dashed black; padding-right: 5px;">Contributions Spain Tax funded</td> <td style="padding-left: 5px;">Contributions Religion Marketised</td> </tr> </table> <p style="text-align: center;">Underfunded Unco-ordinated Weakly legitimised Non institutionalised Fragmented</p> <p>FAMILIALISED</p> <p style="text-align: right;">3</p>	Estonia Latvia Lithuania Hungary	Czech Republic Slovenia Slovakia Poland	Greece Italy Portugal	Cyprus Tax funded Malta	Contributions Spain Tax funded	Contributions Religion Marketised
Tax funded Individualised Service based	Mixed funding Family centred Institutional																
Denmark Finland Sweden	France Luxemburg Belgium																
Ireland UK	Austria Germany																
Netherlands																	
Marketised Mixed delivery Tax funded	Delegated Institutional Mixed funding																
Estonia Latvia Lithuania Hungary	Czech Republic Slovenia Slovakia Poland																
Greece Italy Portugal	Cyprus Tax funded Malta																
Contributions Spain Tax funded	Contributions Religion Marketised																

Source: Hantrais (2004), p. 200.

The concept of varieties of familialism is at the core of Leitner's (2002) analysis of caring arrangements in the "old EU 15". She distinguishes between implicit familialism (which we instead call familialism by default, since it may be both implicit, as in the lack of support, and explicit, as in legally defined obligations), explicit familialism (which we instead call supported familialism), optional familialism and defamilialisation. In the first the obligation to care and its gendered nature is assumed as given with no support; in the second, the obligation to care as well as its gendered nature is actively supported; in the third, the right to care is acknowledged, but not equated with an obligation; in the

fourth, family carers are partly unburdened, by their right to care is not acknowledged.¹⁰ The clustering of countries within these four categories, however, is performed only separately for each policy and there is no overall final clustering. In any case, it emerges not only that countries cluster differently than in Esping-Andersen's (1990) threefold typology, but that the way he uses the concept of de-familisation introduced by its feminist critics in the subsequent, 1999, revision, does not grasp the difference between actual (partial) unburdening of obligation and financial and organizational support of those obligations. According to Leitner's analysis, in fact, the Scandinavian countries, particularly in the field of child care, are better understood as optional familialism that fully de-familialized. And in this they are similar to Belgium and France. Furthermore, her analysis confirms the reasons of those who argue that the Mediterranean countries (where implicit familialism – or familialism by default – prevails) are a cluster of their own. And Ireland and the UK seem to make up by themselves a cluster of countries where de-familisation occurs through the market. The latter, however, is a conception of de-familisation that is at least problematic, as we have argued in the second chapter, since it does not distinguish, as it happens instead between implicit and explicit familialism, between who provides care and who pays for it.

Similarly to Anttonen, Baldock and Sipilä, Bettio and Plantenga (2004) base their analysis of care regimes (in old EU 15) on the concept of social care as a mixed, multi-provider, formal and informal, package. As Leitner, they do not consider only services but also leaves and various forms of payments for care, both in the case of children and of the elderly. Interestingly in this approach is the distinction between direct provision of care and management of care, which allows to see how in more (by default but also supported) familialised countries families are not necessarily the direct providers of care, but act as “social clearinghouses” within the family network, but also with the informal and formal market of care providers, as well as with NGOs. Unfortunately, most of their data were already old at the time the article was published. They identify five clusters (in

¹⁰ There are some problems in the way she interprets policies. For instance, she says that in Italy there are no payments for care as a national policy, but only local experiments. But she ignores the national and universal accompanying indemnity for the totally disabled, which is taken mostly by the frail elderly, while local experiments concern additional payments for carers. Also it is not fully clear why France is located in the “gendered optional familialism” category, since there is no full coverage in services for children under 3 years of age, therefore the option is severely limited.

the mid-nineties). The first cluster includes the countries (Italy, Greece and Spain, with Portugal being an outlier in its low provision both of services and of informal care) that appear to delegate all the management of care to the family. Also in the second cluster (UK and the Netherlands) informal care is important. But there is a clear distinction between provisions for children and provisions for the elderly, in favour of the latter. In the third cluster, which includes Germany and Austria, public policies actively support private, family provision of care, partly compensating foregone earnings. Furthermore, in both countries there is a medium provision of institutional care for the elderly. In the fourth cluster, including Belgium and France, service provision for both children and the frail elderly is relatively well developed, pointing to a fair degree of de-familisation. Finally, the fifth cluster, which includes the Nordic countries, provides moderate to high levels of all formal care resources, with the state substituting, rather than supporting the family in its caring tasks.

A recent study (Blome, Keck and Alber 2008) on four countries - Germany, France, Italy and Sweden – is an interesting example of an integrated and systematic attempt at looking at intergenerational exchanges in different kinds of (Western European) welfare regimes. It focuses on four interlinked issues: a) the support package provided by the welfare state to different age groups (social generations), its value and its composition (financial or in kind); b) the kind, amount and direction of financial and instrumental support provided across and between generations in families; c) whether there is a substitution, crowding out or crowding in effect between intergenerational support in families and intergenerational support in society through the welfare state; d) whether indicators of intergenerational conflict in society may be detected and in which fields. The analysis focuses on four areas: 1) state pension benefits and the income situation of older persons; 2) Public long-term care provisions and the care arrangements for frail elderly; 3) direct and indirect family allowances and family income situations; 4) state-supported care services for children and their impact on mother's employment. The indicators used in this study include both policy and outcome indicators.. They exclude housing as an area of policy and regulations concerning legal obligations towards adult children.

The authors conclude that different policy fields in countries like Germany or Italy are uncoordinated and therefore pursue to some extent contradicting policy objectives with regard to the familisation-defamilisation continuum. In Germany for example, the new reform on parental leave and childcare provision promotes women's' employment, but the long-term care insurance is counting on family care for the elderly. Sweden and partly France provide a more integrated and coherent policy approach. This study also found that public support reduces the amount of financial and time resources family members have to provide, as it is mostly clearly shown in the comparisons between Italy and Sweden. But there is no evidence that public solidarity substitutes, or crowds out family solidarity. Rather, public provision complements family support, rendering the latter less univocally necessary, but also less constraining. In this perspective, it might even be perceived as a means of supporting intergenerational solidarity within families.

This synthetic overview of attempts at clustering countries and individuating typologies with regard to how responsibilities are allocated to the family and the state (and, through the mediation of both, to the market) with regard to the needs of those who occupy different generational positions shows that there are many difficulties not only at the conceptual, but at the methodological and data level. In the first place, it is clear that both the conceptualization (what is actually meant by de-familisation) and the way the institutional package is reconstructed and its specific components weighted makes a difference. A typical example is the fact that while Leitner, on the basis of the weight attributed to leaves, defines the Nordic countries as examples of supported familisation, Bettio and Plantenga, on the basis of the weight attributed to services, but also because they consider the composition of caring for children and of caring for the elderly in constructing their final typology, rather would define them as the most de-familialised.

Furthermore, the larger the number of countries included, and the more domains taken account of, the more possible to develop a non idiosyncratic clustering, but also the higher the risk of not having systematically comparable data. Finally, this field is subject to continuous change and countries located in the same conceptual space may be converging or instead diverging. For these reasons, we propose first to proceed in steps, starting from caring obligations and then continuing to other dimensions. It is totally possible that we will arrive at different patterns of clustering depending on the

dimensions focused on. Second we propose to use a dynamic perspective, looking at the situation in two points in time: around 2003, and around 2008.

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Appendix A: Indicators

COLLECTING BASIC POLICY INDICATORS ON INTERGENERATIONAL RELATIONSHIPS

Information should be the most recent. Please indicate the date to which it refers, as well as the sources. Please also indicate whether there have been substantial changes since the year 2000.

1. Domain: Responsibilities towards children

1.1. Care

1.1.1 maternity and parental leaves

Clarifications:

- a) Maternity leaves are in principle reserved to the mother and concern a period, to be specified in weeks, before and after delivery. Parental leaves concern an additional period, to be specified in weeks or months, in addition to maternity leave. If there is no distinction between the two leaves, it should be specified. Parental leaves may be reserved to the mother only, or they may be used either by the mother or the father. In some country, a specific quota of the parental leave may be reserved to the father (i.e., if the father does not take it, it is lost). We need all these specific pieces of information.
- b) When indicating the level of compensation, please specify whether it is a % (and which) of the worker's wage or a flat rate benefit. If it is a flat rate benefit, please give it in euros and specify how it refers either to the minimum wage or to the average wage.

If some measure listed below does not exist in your country, please say it. If other measures exist which are not listed exist, , please detail them following the same pattern (who is entitled, for how long, with what kind of compensation)

Indicators

Maternity leave:

- Who is entitled (e.g. all employees, also the self employed, etc.)
- Duration (specify how much before and how much after delivery)
- Level of compensation
- Financed by whom (employers and/or employee contributions, general budget, other)
- changes since year 2000

Parental leave:

- Who is entitled (e.g. all employees, also the self employed, only mothers, also fathers, some other relative caring for the child)
- Duration (after the end of the maternity leave)
- Level of compensation
- Financed by whom (employers and/or employee contributions, general budget, other)
- Is there a quota reserved specifically for the father?
- Is the right to return to one's job maintained?
- Are contributions towards the old age pension paid during this period?
- Changes since year 2000

Father's leave (it refers to a specific leave for fathers in connection with the birth of a child; it is different from parental leave and it usually lasts a few days):

- Who is entitled
- Level of compensation
- Financed by whom
- Changes since year 2000

Allowance for home caring parent (after the whole allowed leave period is exhausted):

- Who is entitled
- Duration
- Level of allowance
- Is the right to return to one's own job maintained?
- Changes since year 2000

Maternity benefit for mothers not in the labour market

- Who is entitled
- Duration
- Level of the benefit
- Changes since year 2000

Contributions equivalents in the pension system linked to having had/cared for a child (In some country each child entitles to a given number of fictive contributory months)

- Who is entitled
- Duration (how many months of fictive contribution for each child)
- Can the fictive contribution be cumulated with actual contributions for the same period (additive) or are they in alternative (substitutive)?
- Changes since year 2000

1.1.2. Child care services

Clarification: here we are interested in the publicly supported/financed provision of child care outside the family, by non family members. The provider may be private, but the care provided funded through public money. Formal child care, including pre-school, services are usually the main form of such provision. But it may include also publicly funded and monitored provision at home of the provider (as in family day care services in France) or individual carers, funded with public money, who care for the child at his/her home, such as the the *agregées maternelles* in France. These different forms of provision should be distinguished where possible.

Indicators:

Legal claim on child care: is there an entitlement to some form of non family child care/education

- For children under 3
- For children 3 to school age
- Changes since year 2000

Coverage rate (n. of places in publicly provided/financed services on the total of children in the age bracket) by services (all kinds)

- For children 0-3
- For children 3-to school age
- Regional (NUTS 1) differences in service supply (at least a range from minimum to maximum)
- Changes since year 2000

Criteria of admission in case offer of services is below demand

- For services for children 0-3
- For services for children 3-to school age
- Changes since year 2000

Cost to families of childcare use (monthly cost, in euros; specify whether they are means tested. If there are regional differences, please specify range)

- For children 0-3
- For children 3-to school age
- Changes since year 2000

Opening hours of child care services

- For children 0-3
- For children 3-to school age
- Changes since year 2000

1.2 Education

Indicators

Compulsory school

- Age at which compulsory school starts
- Minimum length of compulsory school, in years
- Minimum working age
- Opening hours of schools attended by children below 11
- Opening hours of schools attended by children below 15
- Average annual amount of teaching time in compulsory school
- Schooling costs to families in compulsory school (fees? books? uniforms? Other?)
- Percentage of children who do not complete compulsory education
- Changes since year 2000

Non compulsory school

- Transition rate (% on total of those who have completed compulsory education) to non compulsory higher education
- Cost to families of enrolment in non compulsory education (school fees, uniforms, books, others)
- Changes since year 2000

1.3 Obligations to support children financially

1.3.1 Family obligations

Clarification: In some country, legal obligations to provide financial support even in case of need stop at legal age (usually 18). In other countries they last longer; in some they last forever. We are interested in the existence of obligations which are stipulated in law.

Indicators

- At what age of the child do parents stop having legal financial obligations towards him/her?
- Do other relatives have financial obligations towards a child and until what age (please specify – usually in legal codes they are defined “obliged kin”)?
- Changes since year 2000

1.3.2 Societal obligations

Indicators

Direct child allowances/Child benefits (directly paid to families)

- Who is entitled among children in society (status of parent: all parents may receive it? If not, what are the conditions?)

- Does the entitlement depend on the birth rank of the child? If yes, in which respect (for instance, in France the child allowance is paid only from the second child onwards)?
- Amount in Euro for each child
- Does the individual amount change with each additional child (that is, is the amount for the second or third child higher or lower than that for the first)?
- Is the amount means-tested?
- Is the allowance topped up for specific groups, such as single parents, handicapped children?
- Changes since year 2000

Tax benefits

- Is the presence of a child taken into account in taxation? How? Until what age?
- Changes since year 2000

2. Domain: Responsibilities towards elderly parents in need

2.1. Care

Clarification: Care for elderly people may be differentiated in health care, personal care and home or instrumental help. We would like to distinguish in particular between health care (e.g. hospitalization, giving an insulin injection, medication, and so forth) and other forms of care (e.g. helping with personal hygiene, feeding, preparing meals, housecleaning, and so forth).

Indicators

Entitlement to receive health care:

- Is health care free for the frail elderly? If not, what are they supposed to pay for or what part of the overall costs the recipient has to pay?

Entitlement to receive non health-related care

If there is such an entitlement, under what conditions (please mention the law/provision stipulating such an entitlement):

- Level and type of disability. Please specify what kind and degrees of disability entitle to receive non health related
- Is the provision income or means tested? What are the criteria?
- Does the amount of provision (in services or in money) vary with the level of disability? If it does, please give a range.
- Others (e.g., entitlement may depend on the fact of living alone or on the lack of available relatives –please specify)
- Changes since year 2000?

In what form this entitlement is implemented:

- Disability benefit (different from the benefit for disabilities incurred while working, e.g. invalidity pension)/care allowance
- Benefits in kind (home based services, day care, residential care), Who decides on the kind of care support? Is it fully covered or financed partly by private means? If yes, to what part?
- A combination of the above (specify if possible)
- Changes since year 2000?

Non health-related caring provision

- Number of places in institutional care (old people homes) on total population respectively 65+ and 75+.
- Percentage of respectively 65+ and 75+ years old in such institutions
- Number places in protected housing (different from institutional care) on total population on total population respectively 65+ and 75+. In alternative, % of respectively 65+ and 75+ years old in such institutions
- Percentage of 75+ receiving publicly financed care at home or in day care services.

2.2. Financial responsibilities

2.2.1 Societal

Indicators

- Pensions
- Who is entitled: what kind of work status is required to obtain a pension (i. e: only employees? Including employees in agricultural sector?, Do the self employed receive an old age pension?)
- What is the minimum retirement age (the same for men and women?)
- What is the minimum contributory period (the same for men and women?)
- Is there a minimum income/pension provision for the elderly who have not earned a contributory pension, or do not have earned the minimum contributory one? Amount in Euro?
- Changes since year 2000

2.2.2 Family obligations to provide financial support

Clarification: In some country there are legal obligations to provide financial support to one's own parent (and even other elderly relative) in case of need. These obligations usually are called upon when an elderly poor asks for social assistance or for some kind of service which requires a fee. We are interested in the existence of obligations which are stipulated in law.

Indicators

- If such an obligation exists, who has it towards whom?
- What does such obligation concern : provision of income support for everyday living; co-payment of service fees or of fees for hospitality in old people home; other
- Changes since year 2000

Appendix B: An overview of the main comparative sources

Descriptive comparative databases

Specific sources on social policies

There is a number of sources both of statistical indicators and of policies. Most of them are descriptive, rather than analytical. The same is true for the periodical reports issued by the EU Commission, such as the Social situation of Europe, Social Protection in Europe, the Joint Report on Social Inclusion, and the Gender and Equality Report. Of course, they are an important reservoir of policy information, which however are not focused on intergenerational relations. Below I mention the main ones. A useful list (which partly overlaps with this), with links, may be found at <http://www.edacwowe.eu/en> - a project of the RECOWE network of excellence.

MISSOC - the Mutual Information System on Social Protection of the EU - provides information on measures in a number of policy fields which are relevant for the Multilinks project. It is now integrated with MISCEEC, which until 2002 collected with the same criteria information on the 10 Central and Eastern European Countries which were then candidate to enter the EU. Unfortunately, information is of uneven quality and not standardized. Furthermore, it is not offered in a comparative format.

Comparative data on social protection statistics are offered by EUROSTAT through ESSPROS (European System of Social Protection Statistics), which includes all 27 EU countries, plus Iceland, Norway and Switzerland. The data concern expenditure and receipt of social protection. They are published in *Statistics in Focus*, while tables are available on line. They however concern mostly financial flows.

The OECD Family Database is an online database with comparative information on family outcomes and family policies across 30 OECD countries. It contains descriptive information on parental leave systems, childcare services and early education services. The OECD Family Database brings together information from different OECD databases (e.g. the OECD Social Expenditure Database, the OECD Benefits and Wages Database, and the OECD Education Database) and databases maintained by other international organisations.

http://www.oecd.org/document/4/0,3343,en_2649_34819_37836996_1_1_1_1,00.html

The LIS Family Policy Database is a database designed to link information on family policy to micro data outcomes in the LIS dataset. It contains statistics and quantified policy information, as well as qualitative information on policy areas like family leave, working time regulations, school schedules and child care. Used by Gornick for her book (with Meyers), *Families that work*, it offers comparative tables on 19 countries. But there

is nothing concerning elderly care and generally responsibilities towards the frail elderly, nor about other dimensions of intergenerational obligations.

http://www.edacwowe.eu/en/firmShowGIW_Policy?v_id=34

The SCIP (Social Citizen Indicator Program) database developed at the Swedish Institute for Social Research (SOFI) includes institutional information on social rights legislation in 18 OECD countries from 1930 to the present. The core database is organized into five central sections: (1) old-age pensions, (2) unemployment, (3) sickness insurance, (4) work accident insurance and (5) child allowances. Only benefits granted through legislation at the national level, as a social right are included. Although information on parental leaves and benefits is being collected, it is not yet available.

The SSPTW data collection of the US Social Security Administration is a structured description of the principal features of social security programs in more than 170 countries: old-age, survivors and disability; sickness and maternity; work injury; unemployment; and family allowances. A set of tables provides additional information for each country on the types of social security programs, types of mandatory systems for retirement income, contribution rates and demographic and other statistics related to social security. The latest version (2002) of this data collection is available online at <http://www.ssa.gov/policy/docs/progdesc/ssptw/>.

The Scheme Description Database is one of the databases of Social Security Worldwide (SSW) developed by the [International Social Security Association](#) (ISSA). Its website provides factual outlines of the social security systems operating in over 170 countries. The other databases SSW provides are on profiles of the system of [complementary and private pensions](#), summaries of [recent reforms](#) (since 1995) by country, and references to [social security legislation](#). <http://www-ssw.issa.int/sswlp2/engl/page1.htm>

The European Family Policy Database was developed at the Mannheimer Zentrum für Europäische Sozialforschung (MZES) and is a collection of single family policy measures in 16 European countries from the 1960s until the mid-1990s. It is currently located at the Austrian Institute for Family Studies and available on CD-ROM (www.oif.ac.at). The measures are classified by: a) policy instruments: cash benefits, tax benefits, personal social services, benefits in kind, time rights; b) the main purpose/function: guaranteeing sufficient resources, childcare, housing, etc.; c) the target group: families, children, spouses, mothers, surviving family members etc. It is no longer updated and the data refer to a period preceding the GGS study.

The Clearinghouse on International Developments in Child, Youth and Family Policies at COLUMBIA UNIVERSITY (see <http://childpolicyintl.org/>) is a collection of dozens of cross-sectional cross-national tables from various sources (and therefore also a good source of references.) The Clearinghouse provides comparative information on the policies, programs, benefits and services available in 23 advanced industrialized countries to address child, youth and family needs. <http://www.childpolicyintl.org/>

The Comparative Family Benefits Database was developed by Gauthier (2003) on the basis of published data. It covers 22 OECD countries and the period 1970—2000. The database contains data on family benefits as well as other background demographic and economic data. The focus is on cash benefits, including family allowances and tax relief for children and on the provision of pre-primary schools. The database is available online at http://www.soci.ucalgary.ca/fypp/family_policy_databases.htm and contains 17 variables.

The GGP contextual data basis (<http://www.demogr.mpg.de/cgi-bin/databases/cdb/cdb.php>) has the ambitious goal to “enable an interpretation of the micro-level information collected from individuals and families in the surveys in its societal macro-level context and the provision of much richer information on the causes and potential consequences of family, gender and intergenerational changes. The contextual database ‘will thus permit researchers to position individuals and families in a more nuanced setting than in any previous comparative demographic research’” (Spielauer 2004, p. 6). It aims at constructing indicators not only on the basis of institutional policy data, but also on the basis of the micro data themselves. With regard to policy data, “the main focus of the CDB is on policies and policy dimensions that impact the timing, sequencing and synchronization of life-course events studied in the GGS, e.g. by having an impact on the (gendered) consequences and risks associated with these central events, or by imposing age norms directly.” (Spielauer 2004, p.18; see also Neyer 2003). The focus, therefore, is not on the institutional framework of intergenerational relationships but on how the life chances of different cohorts (social generations) have been affected by norms and policies. Furthermore, although there might be some overlapping between policy indicators in the GGP and in those for MULTILINKS, for the time being the GGP is still in a very rudimentary state of development and it is not framed in a comparative format.

EURES – the European Job Mobility Portal – which is offered by the European Commission, provides information for workers and employers as well as any citizen wishing to benefit from the principle of the free movement of persons. The information also includes an interactive database about the living and working conditions in the different member states of the EU, which itself contains information on leave policies, the educational and the health systems. Although information is in principle available for all member states, it is rather indicative and inadequate for comparisons.

<http://www.europa.eu.int/eures/home.jsp?lang=en&langChanged=true>

CESifo: Database for Institutional Comparisons in Europe (DICE) – offered by the Ifo-Institute – provides systematic information on economic institutions and regulatory systems as well as their economic effects. The information is presented as charts, tables and reports. The user can choose between current comparisons, archived documents from previous years and time series that show developments over time. In most cases, the 27 EU countries as well as some major non-EU countries are covered.

http://www.cesifo-group.de/portal/page/portal/ifoHome/a-wininfo/d3iiv/DICE_division?id=6747349&div=6747495

OECD health database: The database includes key indicators covering Health status, Health resources and utilization of services: Life expectancy, Maternal and infant mortality, Health employment, In-patient beds, Medical technology, Immunisation, Average length of stay, Discharges, Surgical procedures, and Transplants and dialyses. A new section has been added in the 2008 edition, on Long-term care resources and utilisation, and includes data on Long-term care beds in nursing homes and data on Long-term care recipients, either in institutions or at home, by age and gender.

http://www.oecd.org/document/9/0,3343,en_2649_34631_2085193_1_1_1_1,00.html

EU Commission (2002): EU Health Statistics. Key Data on Health 2001: The ECHI (European Community Health Indicators) project was carried out in the framework of the Health Monitoring Programme and the Community Public Health Programme 2003-2008. The result is a list of 'indicators' for the public health field arranged according to a conceptual view on health and health determinants.

http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-08-02-002/EN/KS-08-02-002-EN.PDF

European Health for All Database (HFA-DB) – offered by the World Health Organisation (WHO)/Regional Office Europe - is a central database of independent, comparable and up-to-date basic health statistics. It has been a key source of information on health in the European Region since WHO/Europe launched it in the mid-1980s. It contains time series from 1970. HFA-DB is updated biannually and contains about 600 indicators for the 53 European WHO Member States. The indicators cover: basic demographics; health status (mortality, morbidity, maternal health and child health); health determinants (such as lifestyle and environment) and health care (resources and utilization).

<http://www.euro.who.int/HFADB>

Eurydice - Information Network on Education in Europe - provides a vast source of information, including detailed descriptions of how European education systems are organised and how they function and comparative studies covering various aspects of education systems, such as the funding of higher education, language teaching, the teaching profession etc.

<http://eacea.ec.europa.eu/portal/page/portal/Eurydice>

Specific sources on legal norms

With particular regard to family law and to intergenerational obligations legislated within it in the various EU countries, the work performed by the Commission on European Law with the aim of arriving to develop the harmonization of European family law (www2.law.uu.nl/priv/cefl/). In particular the volume edited by Boele-Woelki, Braat and Curry-Sumner (2005) on parental responsibilities is an important source, which includes also non EU countries such as Switzerland and Russia.

Limited to the EU is the "European Judicial Network in civil and commercial matters" http://ec.europa.eu/civiljustice/index_en.htm The EJN contains large quantity of

information about the Member States, Community law, European law and various aspects of civil and commercial law. It is managed by the European Commission and regularly updated in conjunction with the Member States. With some exceptions, the EJV also contains detailed information on the aspects of maintenance claims and parental responsibility for the 27 EU member states.

At a broader level, the Legislation Database is one of the databases of Social Security Worldwide (SSW) developed by the [International Social Security Association](#) (ISSA). Its website provides short abstracts of social security legislation for more than 170 countries. The other databases SSW provides are on [social protection](#), including descriptions of social security schemes by country, profiles of the system of [complementary and private pensions](#) and summaries of recent [reforms](#) (since 1995) by country. <http://www-ssw.issa.int/sswlp2/engl/page1.htm>

ILO NATLEX is the database of national labour, social security and related human rights legislation maintained by the [ILO's International Labour Standards Department](#). NATLEX provides abstracts of legislation and relevant citation information on [migration](#), [health and safety](#), [income and social security benefits](#), [education](#), [industrial relations](#) and [work and employment](#). In particular, it offers information on Family law, maternity protection and regulations concerning workers with family responsibilities. www.ilo.org/dyn/natlex/natlex_browse.home?p_lang=en

Reports

A number of reports has addressed specific issues relevant for the MULTILINKS project, combining different indicators.

The OECD reports *Babies and Bosses* (vol. 1 – vol. 4) are a comparative analysis of family outcomes and family policies across 13 OECD countries. They aim to give a comparative point of view of the situation of families with children by offering descriptive information on parental leave systems, childcare services and early education services.

The OECD reports *Starting Strong: Early Childhood Education and Care* (ECEC) I and II offer comparative information on early childhood policies across 20 OECD countries, and on social, economic and cultural issues related to such policies. They aim to provide a comparative review and analysis to improve policy making in early childhood education and care in the participating countries. The reports present country profiles, which give an overview of ECEC systems in these countries, and they offer policy information on issues such as child development, work-life balance, early childhood education and care.

The report on Child Benefit Packages provided by the Department for Work and Pensions ([DWP](#)) of the UK provides comparative policy information on child benefit packages across 22 countries in 2001. The report offers comparative policy data on issues

as early retirement and policy reforms of active labour market programmes. Furthermore, it presents country profiles, which give an overview of child benefit packages for each country.

The International Network on Leave Policy and Research is a network of researchers from more than 20 countries established in October 2004. Its website contains annually updated information on leave policy and research for each country and annual reviews on leave policies and related research. See at <http://www.sfi.dk/sw46603.asp>

The UK Department for Business Enterprise & Regulatory Reform (BERR) publishes every year an International Review of Leave Policies and Related Research. The most recent has been published in July 2008 and may be found at www.berr.gov.uk/publications. It covers EU 25, plus Iceland and the United States

EU funding has recently supported large scale comparative data collection on specific issues, such as that on conciliation policies concerning the presence of young children by Plantenga and Remery (2005).

EU funding has also supported research on care for the elderly as in the Eurofamcare and SOCCARE projects. The former focuses on services for supporting family carers of elderly people in seven European countries (all belonging to Old EU 15) (see at <http://www.uke.uni-hamburg.de/extern/eurofamcare/>) . The latter is a qualitative study of care arrangements with regard to children and the elderly by different kinds of families (<http://www.uta.fi/laitokset/sospol/soccare/reports.htm>) .

Against the background of this existing work the novelty of our specific effort should consist in providing a system of indicators, referring to the legal and policy framework, that allow to define the context of intergenerational relationships with regard to financial and care responsibilities in a tri-dimensional way: looking at both directions in the intergenerational chain (and also going beyond the bi-generational perspective) and at how obligations and responsibilities are framed also in gender terms. Furthermore, following the best practice in this field, it will provide them in a standardized (as much as possible) and comparative way.