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FAMILY CHANGE, FAMILY POLICIES AND THE RESTRUCTURING OF WELFARE

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INTRODUCTION

In the industrialised countries the family is the subject of social policy debates from two perspectives. First, changes in family and individual behaviour are modifying the way these societies reproduce themselves; this involves not only changes in the age-structure profile of the population, but also shifts in the gender division of labour, inter-generational redistribution and solidarity, and the balance between caring needs and caring resources. Secondly, welfare restructuring increasingly involves a re-drawing of the lines between governmental and family responsibilities, redefining individual expectations and family obligations.

These processes are not homogeneous across the industrialised countries. However, in all of them the "family question" (Martin, 1996), in this dual sense, as a possible source of social problems and as a resource for addressing these same problems, is at the centre of policy debates around the restructuring of the welfare state. In addition, the way that other, indirect "family questions", such as the ageing of the population or the greater fragility of labour market attachment, are defined in policy debates is greatly influenced by the way this central "family question" is interpreted in each society.

CHANGES IN FAMILY ORGANISATION AND BEHAVIOUR

Among the behavioural changes which are found to some degree in all the industrialised countries, and which have a profound impact on social policies, are three in particular:

- growing labour force participation by women with family responsibilities, particularly by mothers of young children;
- growing marital instability, and greater fragility of the father-child relationship. There is also a rising proportion of births out-of-wedlock, although there are considerable cross-national differences in the size and meaning of this trend (Kamerman, 1995);
- declining fertility, or at least stabilisation of fertility at under-replacement rates.

Growing participation of women in the labour force

Women's lives have changed quite dramatically in the industrialised countries over one or two generations. In all OECD countries, women's activity rate increased substantially from the 1970s, and women's share of total employment has grown (Commission of the European Communities, 1993; OECD, 1995). At the same time, women in the younger cohorts now tend to remain in the labour force throughout their adult life, even if and when they have children (see Saraceno, 1993).¹ In 1991, half of all mothers with children under 10 in Europe were employed outside the home (Millar and Warman, 1996).

Of course, both the activity rate and the relative presence of women in the different activity sectors vary between countries and within each country. Thus, in the Scandinavian countries, Canada and the United States, women's activity rate is consistently above 60 per cent (touching 70-80 per cent in the

Scandinavian countries). In Australia, Belgium, France, Germany, the Netherlands, Switzerland and the United Kingdom it is above or around 50 per cent. In other countries, such as Ireland, Italy and Spain it remains below 50 per cent. However, even in these latter countries, the activity rates of the youngest cohorts are similar to those in the first group of countries, particularly among better educated young women; for example, in Italy, in the 25-50 age bracket the activity rate of women holding a high school or university degree is 77 per cent, compared to 46 per cent for women with minimum compulsory schooling (Carmignani and Pruna, 1991). Women's share in the overall increase of the labour force since the 1980s has been larger in the European Free Trade Association (EFTA) countries than in the United States and Japan, where men and women contributed more evenly to the total increase (Commission of the European Communities, 1994).

These differences are partly due to the size of the service sector, which, with the exception of Germany, is larger in the more prosperous countries. In particular, the larger the extent of welfare provisions in each country, the greater the participation of women as workers in welfare services and administration. For example, in Denmark and the Netherlands service sector employment is around 70 per cent, compared to 48 per cent in Greece and 44 per cent in Portugal. In countries with a larger service sector, women's participation in the labour market is made easier not only by the greater availability of jobs in this sector, but also by this sector's providing personal and social services, some of which would otherwise be shouldered by families, and by women within them. In these countries a greater portion of what traditionally has been women's family work has been transformed into women's paid work.²

The comparative picture is complicated by two additional factors. First, some countries with a low overall women's activity rate, such as Italy, not only have a higher percentage of women working full-time, but also have a lower gender gap in earnings than countries, such as Denmark, where women's activity rate is almost double. Secondly, in countries with a lower activity rate of women and high rates of unemployment, such as Spain and Italy, a substantial number of women work in the informal sector. In these countries, women in employment may have greater difficulty in balancing the demands of family and work, because of a lack of social services and because of a longer working day. In addition, a higher proportion of working women are vulnerable to labour market and life-course risks because they do not benefit from the social protection granted to formal workers. Their economic security, particularly, but not only, in old age, remains highly dependent on their attachment to a husband.

Irrespective of these important differences, in all the industrialised countries it is mothers with young children who have most increased their labour force participation, and the number of families in which both parents hold a regular part-time or full-time job is growing (Jallinoia, 1989; Saraceno, 1992). In Japan, "working wives" outnumbered full-time housewives for the first time in 1983 (Carney and O'Kelly, 1990). Table 3.1 shows the level of employment participation of mothers, both married and alone. This phenomenon, which reverses the trend of the 1950s and 1960s, when young mothers were the largest group of women outside the labour force, has a number of causes:

- First, young women are on average better educated than older women, aspire to better jobs, and have grown up in the expectation of gender equality.
- Secondly, the experience of growing male unemployment, and the resultant weakening of the "male breadwinner" role, is rendering the dual worker family a normal strategy for maintaining economic security, not only for women but for households.
- Finally, young mothers are motivated to enter and remain in the labour force by the greater instability of marriage, and therefore of lifelong attachment to a male breadwinner. Holding a job is an insurance for oneself and one's children against the uncertainty of marriage.

The growing labour force participation of women is not only changing women's lives, but also family and wider kinship ties; in particular, it affects the availability of women to provide care. This has hitherto been the assumption underlying both the division of labour within the family and the division of responsibilities between government and the family which has shaped modern welfare states.

Table 3.1. Percentage employed full-time and part-time (less than 30 hours per week), for married/cohabiting mothers, and lone mothers, most recent available data

	Married/cohabiting mothers			Lone mothers		
	Full-time	Part-time	All employed	Full-time	Part-time	All employed
	% of employed who work full-time			% of employed who work full-time		
Australia	24	32	56	23	20	43
Austria	28	18	46 ¹	43	15	58 ¹
Belgium	36	22	61	52	16	68
Denmark	64	20	84	59	10	69
Finland	62	8	70	61	4	65
France	49	20	68	67	15	82
Germany (reunited) ²	21	20	41	28	12	40
Greece ³	-	-	-	-	-	-
Ireland	29	12	32	-	-	23
Italy	29	12	41	58	11	69
Japan	17 ⁴	20 ⁴	54 ⁴	53 ⁵	34 ⁶	87 ⁷
Luxembourg	32	13	45	61	13	73
Netherlands	13	39	52	16	24	40
New Zealand	31	27	58	17	10	27
Norway	40	37	77	44	17	61
Portugal ⁸	48	7	55	43	7	50
Spain (Madrid region)	-	-	38	-	-	68
Sweden	42	38	80	41	29	70
United Kingdom	21	41	62	17	24	41
United States	45	19	64	47	13	60

1. Excludes 13 per cent of married/cohabiting mothers and 20 per cent of lone mothers who are on parental leave.

2. 36+ hours.

3. Information not available in this form, but 51 per cent of women in likely age group were economically active and 5 per cent of working women worked part-time.

4. For married/cohabiting women with or without dependent children (1992).

5. Including self-employed.

6. Including working for family.

7. Includes self-employed who may work full-time or part-time.

8. If the definition of lone mothers was restricted to single, separated and divorced women (to counter the bias resulting from the disproportionate number of widowed women in the Portuguese definition of lone mothers), Portugal would have a much higher level of lone mothers in paid work.

Source: Bradshaw et al. (1996).

Growing instability of marriage and the father-child relationship

Marital instability, with its resultant one-parent families, is not a new phenomenon. Only during the 20th century has the sudden death of a parent-spouse at a young age ceased to be a common event, even in the most affluent regions of the world (Anderson, 1985). In most of the industrialised nations, with the possible exception of the Scandinavian countries and the United States, the rate of family break-up today, due to separation and divorce, is far lower than that a century ago arising from the death of the husband or wife. However, while divorce and separation were permitted in many countries in the past, they did not occur as frequently as they do today.³

The growing instability of marriage due to desertion, separation and divorce today must be read against this background. While separation and divorce affect only a minority of all children even in countries with high divorce rates (Duncan and Rodgers 1990; Kiernan and Wicks, 1990), they are leading to a growing proportion of children living with only one parent, and to a growing number of women acting as the only, or main, responsible parent both for care and for maintenance. National levels of lone parenthood vary: children in Canada, Great Britain, Sweden and the United States are more likely to be affected than those in France or Germany, and far more likely than in Italy, Portugal or Spain. Nonetheless, the trends are similar everywhere in the industrialised world, including Central and Eastern Europe.

The proportion of children living in one-parent households in the United States rose by a factor of 2.5 between 1960 and 1986; by 1986 nearly one child in four was living with only one parent, the highest proportion in the industrialised countries. By the mid-1980s, of all families with children, 17 per cent were one-parent families in Sweden, 15 per cent in Canada, 14 per cent in Denmark and the United Kingdom, around 13 per cent in France and Germany, between 10 and 12 per cent in Belgium, Luxembourg and the Netherlands, between 5 and 10 per cent in Ireland, Italy, Portugal and Spain, around 7 per cent in Japan and less than 5 per cent in Greece (US Bureau of Census, 1990; Kiernan and Wicks, 1990; Kamerman and Kahn, 1989). In Czechoslovakia the figure was close to 11 per cent (Kroupová, 1988).⁴

If the rate of separation and divorce is the main factor in the increase in the proportion of lone parent families in recent years,⁵ the growth of the proportion of children born outside marriage is an important secondary factor. With the exception of the Mediterranean countries, the number of children born to unmarried mothers has increased substantially in recent decades.⁶ For example, in the United Kingdom one-third of all births are to unmarried mothers, in Ireland one in six. The proportion is also high in the United States and in the Scandinavian countries, although in the latter a substantial proportion are born to cohabiting parents (Roussel, 1989; Commission of the European Communities, 1994). It is also noticeable that the likelihood of lone parenthood at some stage appears greater where there has been early child-bearing, whether in or out of marriage.

In the late 1980s, lone parent families were estimated to represent 10-15 per cent of all families with dependent children in the OECD countries, with the exception of Ireland, Japan and Spain, where the proportion was below 10 per cent (OECD, 1990). However, the proportion of all families which pass through a lone-parent phase is higher. Over 90 per cent of non-widow, lone-parent families are headed by the mother. Lone-parent families may, therefore, be more accurately defined as lone-mother families.

In all countries lone mother families tend to be poorer than two-parent families, notwithstanding that in most countries the proportion of lone mothers holding a job is higher than that of married women in two-parent households. The greater risk of poverty experienced by lone parent families arises from a number of factors:

- Firstly, there is only one adult to provide the care and income which in two-parent households are provided by two. This renders it more difficult for the lone parent to balance the demands of caring and work, constraining the range of employment options. This is particularly the case if child-care services are scarce, of low quality or too costly. Lone-parent families, in fact, are a new and specific kind of one-earner family, different from two-parent ones.

- Secondly, no-longer or never-cohabiting fathers often contribute only a fraction of the cost of children, irrespective of their own income level. There is a strong tendency for absent fathers not to acknowledge their financial obligations towards their children after their relationship with the mother has ended (Festy, 1988; Seltzer, 1994).
- Thirdly, lone mothers' chances in the labour market are often constrained not only by their present need to balance caring and income demands, but by their past investment in marriage and child-raising, and by the persistence of occupational segregation on the basis of gender (De Singly, 1987).

The higher risk of poverty incurred by lone parents thus arises largely from the gender division of labour and responsibilities within marriage, and from the expectations this encourages at the level of social behaviour and at the level of labour market and social policies. At the same time, it is also a "side-effect" of the growth of dual-earner families, in so far as marital instability is highest where the proportion of women in the labour force is higher. The highest proportion of lone-parent families which experience poverty, however, and risk to remain poor for a longer time, is found among unmarried mothers who do not cohabit with the father of their children (OECD, 1990). In this case, poverty is not only the consequence of lack of child support and of the difficulty in balancing caring and work responsibilities, but often also of lack of education and training, which render it more difficult for mothers to find jobs which are suitable both from the point of view of income and from that of time schedules, as well as to find adequate and affordable child care.

Even where poverty can be avoided, lone mothers face other disadvantages. They must carry the dual responsibility of being the main breadwinner and the main carer in a labour market where breadwinners are usually perceived as being free from caring responsibilities, and in relation to other social organisations which often continue to take for granted the flexibility and availability of a mother's time (*e.g.* the time schedule of schools, the offer of child-care services, the time schedule of shops, public offices, etc.).

There also appears to be a general weakening of the father-child tie with growing marital instability. In contemporary societies, while the mother-child bond seems to become stronger, the father-child bond is on the contrary becoming weaker, in so far as many fathers seem to remain attached to children, and to feel obligations towards them, only when they live with their mother. Thus, it seems more likely that a man will feel obligations towards the children of his new companion rather than towards his biological children (Jensen, 1992; Seltzer, 1994; Marsiglio, 1995; Arendell, 1995). This phenomenon is related to the gender division of labour and responsibilities within marriage, in so far as fathers define their responsibilities towards their children mainly in terms of bread-winning, not of caring, and allow their relationship with their children to be mediated by their mother.⁷

Marital instability and the growth of lone-parent families confront social policies with two questions in relation to family and governmental obligations towards children: who should care for the children? and who should support them? Answers differ between countries, both with regard to the degree, and manner to which government is willing to help lone mothers to shoulder the dual responsibility as breadwinner and as carer (offering income support, or care support, or both), and with regard to the degree to which government either enforces or substitutes for fathers' obligations. These differences directly affect the welfare of children involved, as well as that of their mothers.

Reduced fertility

In most industrialised countries the fertility rate is well below replacement level. In some countries where the level of fertility is now lowest it continues to decrease, as in Italy, Japan, Portugal and Spain, while in others, such as France and Sweden, which were first to fall below replacement level in recent years, a reversal of this trend is seen. Up until the 1970s, the level of fertility was negatively related to the level of women's participation in the labour force and their level of education. Within the last twenty years, this association has been almost reversed in inter-country comparisons: the fertility rate is now lowest in countries where women's participation in the labour force is lowest⁸ and some countries which have a high level of labour participation by women, such as Sweden, also have the highest levels of

fertility. This must be due not only to cultural differences, but also to the different ways in which national policies deal with family obligations and have responded to the growth in female employment.

Notwithstanding these national differences in trends, in all industrialised countries reduced fertility, together with the lengthening of life, has changed the experience of childhood on the one hand, and the form of inter-generational ties on the other. There are more grandparents than grandchildren. Children now have a greater chance of having two or three generations of adults in their family network than of having two or three siblings or cousins in their own generation.

This phenomenon is usually debated either from the point of view of inter-generational redistribution, through the pension system, or from the point of view of the cost of children and policies aimed at supporting fertility. It is less debated from the point of view of the redefinition of children's experience in growing up. The fact that children are likelier to have very few other children in their immediate kin network should prompt a reflection on child-care services and on the role of the school in socialisation. Child-care services can no longer be viewed only in terms of support to working mothers. They are also a means of allowing both parents and children to share experiences which otherwise may no longer be found easily within the kin network. Particularly, they offer children the experience of a peer group where children at slightly different stages of development are present: an experience once common within families with three or more children, but now increasingly rare. Analogous arguments may be offered in the case of the school, which for children and adolescents has become the main social space in which they can meet, compare and share experiences.

Another consequence of reduced fertility which is not sufficiently reflected in policy debates is that the next generation of elderly people, if and when it becomes frail, will be less likely to have daughters and daughters-in-law available to provide care: partly because more women are in the labour force, but mainly because they will simply be less numerous. Even in those countries, such as Japan, where many elderly people still live with the next generation, the new cohorts entering old age may find that their own fertility behaviour has restricted dramatically the pool of children among whom to choose to live, or by whom to be chosen.

This imbalance will be all the greater as the number of the elderly is increasing in absolute and not just relative terms, due to the lengthening of life. At the same time increasing marital instability is weakening expectations of continuity in inter-generational relationships: sons- and daughters-in-law may no longer feel an obligation to support parents-in-law when their own marriage has ended.

AGEING OF THE POPULATION

Demographic ageing arises from reduced fertility rather than from rising life expectancy. Yet, longer average life has a great impact on inter-generational relationships within the family.

On the one hand, higher life expectancies mean that more elderly people live longer and better lives. This implies that the elderly must not be conceptualised as implicitly needy or burdensome. On the contrary, just as longer life and better health in older age are prompting a redefinition of the ageing process in relation to employment, so it should with regard to family relations (see Laslett, 1989). The elderly may be and often are a resource for younger generations, both in terms of supporting their children well into adulthood, and in terms of offering care for their fewer grandchildren.

Dependence typically arises only in a few years of the period of life which we call "old age", and affects only a small proportion of the elderly at any one time. Yet when it occurs it is highly costly in terms of health care and professional services, and in demands on social care and relationships. Recent research in Italy has indicated that 16.4 per cent of all the elderly suffer from some kind of disability (ISTAT, 1994). There is in all industrialised countries a general belief that children have an obligation to care for their needy elderly parents, even if they are not on good terms (Leseman and Martin, 1993), although this obligation is only expressed in law in a few. Moreover, in all industrialised countries, not only the most "family-centred" family members are the main providers of care (Sundström, 1994; Moen and Forest, 1995). The presence of frail elderly relatives has a considerable impact on the family

network, imposing constraints both on economic and time resources (although the degree to which all or part of the provision or cost of care is assumed by central or local government makes a great difference).

Research has indicated that family care-givers are mostly women (Finch and Groves, 1983; Finch, 1989; Ungerson, 1989; Facchini and Scortegagna, 1993): daughters, daughters-in-law, grand-daughters, nieces, but particularly wives. Given the age differential between spouses, and the greater life expectancy of women, family care-giving to a frail elderly person is largely performed by an elderly wife (although there are also a smaller number of elderly husbands providing care). "Family care", through a spouse, is therefore more available to frail elderly men than to frail elderly women. In Italy, for instance, 58.6 per cent of men aged over 80 live with a spouse, while 20.8 per cent live alone, compared to 12 per cent of women aged over 80 who live with a spouse and 50.4 per cent who live alone. Policies which assume that "families" will be available to provide care may therefore overlook the burden they are allocating to elderly women.⁹ Moreover, elderly women are and will be likely to be exposed to higher risks of not receiving needed care. Given the interplay between the gender division of labour, women's greater life expectancy and the gender age differential within marriage, elderly women, in fact, are more likely than older men to be widowed and to have lower incomes. This might change with the cohorts which are not young; but it will be true for a number of cohorts entering old age in the near future.

When a spouse is not available, caring is performed mostly by other female kin. Since in all the industrialised countries, with the partial exception of Japan, the most common family form has for some time been the nuclear family, elderly couples and elderly single people often live by themselves out of their own choice. If and when they become frail, caring by kin involves a number of changes, negotiations and arrangements which are underestimated by policies which stress the primacy of family obligations. Adult daughters and daughters-in-law are now fewer in number, and have their time divided between their own family and work obligations, and also normally live in a different household, and often in a different town or city, from that of the elderly person needing care. A study in Italy has shown that 45 per cent of all lone elderly receive help from kin in the form of health and body care, as well as household chores, compared to about 15-20 per cent of all the elderly receiving this kind of support (ISTAT, 1994). Even when the person needing care now lives in the same household, this has often necessitated the reorganisation of the caring person's household and family life, and of the cared-for person's life, sense of privacy and autonomy and social relationships.

Research has indicated that in countries where family obligations are more binding, the family network of elderly people is more dense, but that their overall social network is reduced (Hollinger and Haller, 1990; Lecchini *et al.*, 1995). The frail elderly in these countries may be able to rely more on their kin, but are more exclusively dependent upon them. Where they have no kin available, they are left with few social resources.

FAMILY OBLIGATIONS AND SOCIAL POLICIES

There are variations between countries in the way the trends described above have been experienced, and variations in the ways that national policies have responded. These are accounted for partly by differences in national labour markets and economies, and partly by differences in religious, political and family cultures. Particularly relevant are the assumptions concerning gender relations and inter-generational solidarity that are implied in the different social arrangements and national welfare regimes: we might say in national concepts and embodiments of social citizenship.

Assumptions about gender relations in social policies

Gender relations have until recently been absent from most analyses of welfare policies and welfare models.¹⁰ The concept of social rights which informed the development of welfare states, and which stemmed from the labour and social-democratic tradition, was focused more on men as (full-time, stable) workers, enabling them to exercise civil and political rights, than it was on overcoming the social and economic inequalities which derived from the gender division of labour. In this section I consider

the effect of in-built gender assumptions in three social policy areas: child care and parental leave; care for disabled and frail elderly people; and the design of social security systems.

Child care and parental leave policies

Even social policies which have addressed women specifically, such as maternity leave and child care, have their origins in the view that, on the one hand, the ability to give birth is a weakness in the ideal worker, and, on the other hand, that the mother's exclusive responsibility for caring for her children is part of the natural order of things.

These assumptions are mirrored in social arrangements and policies in most industrialised countries. For example, a study in 1988 of 12 EU countries showed that, with one national exception, fathers of children under 4 years old were taking almost no part in child care, irrespective of the mother's working status. Only in Denmark was "a high degree of joint responsibility towards children" reported (Phillips and Moss, 1988, p. 4). Given this lack of fathers' involvement, it is therefore the availability of good and inexpensive child care that affects the labour market participation of mothers with pre-school children.

One conclusion to the 1988 study was that "the single biggest child-care problem in the Common Market is simply the lack of it."¹¹ Most European working parents cannot choose to go out to work in the secure knowledge that their children will be well cared-for" (*op. cit.*, p. 15). However, the term "mothers" should be substituted for "parents": fathers are rarely hampered from entering the labour market because of a lack of child-care services. Mothers, on the other hand, may be accused of "abandoning" their children to child-care services, and of shifting their duties and the resulting costs to the collectivity. Their social rights, as workers and as citizens, are therefore less institutionalised and legitimate than the long-acknowledged workers' rights to sick pay and health care. The situation is no better in the United States and Canada, where only 5 per cent and 1 per cent respectively of the under two-year olds and 2 per cent and 35 per cent of the three- to four-year-olds are in publicly-funded child care. The figures for Australia are 2 per cent and 26 per cent (Kamerma and Kahn, 1991, 1994a, 1994b; Gornick *et al.*, 1996). In these latter countries, and in the United Kingdom, most child care is provided outside the state sector. In Australia there are low-income subsidies and in the United Kingdom a "free area" within the in-work benefit Family Credit, both designed to support access to child care, as a different strategy to direct provision.

Policies concerning maternity and parental leave differ widely between countries, as do the degree of, and criteria for, compensation for lost wages. A study of EU countries published in 1989 found that the Netherlands, Portugal and the United Kingdom had the shortest statutory ante-natal and post-natal leave, while Italy had the longest, followed by France, Spain and Luxembourg (Commission of the European Communities, 1989). Since then there has been an extension of rights in some countries, including the United Kingdom, following the EU's Pregnant Worker's Directive. However, even in Italy, which appears very generous on the statutory level, many working mothers have in fact no entitlement, either because they work in the informal labour market or because they are self-employed, and some full-time employees, such as housekeepers and domestic servants, have less leave entitlement and very reduced compensation. Australia and Canada also have mandatory paid leave, although in Australia it covers only a fraction of working women (about 10 per cent). In the United States it is not mandatory and it covers about 25 per cent of working women (Gornick *et al.*, 1996).

Some form of parental leave entitlement was identified in 12 out of 14 EU countries studied in 1993. In Ireland and the United Kingdom, however, there is no provision for workers' parental duties and family responsibilities beyond those around birth (Pillinger, 1992, pp 26-29). Since this lack is coupled with a general scarcity of child-care provisions, mothers in these two countries are particularly hard-put to maintain any continuity of employment while their children are young.¹² In the United States entitlement either to parental (extended) or to paternity leave is not present, although labour contracts may provide them. The same occurs in Canada. In Australia both extended leave and paternity leave are available, although only for those who are covered under publicly-mandated maternity benefits (Gornick *et al.*, 1996).

The level of labour-market participation by women reflects not simply the age and number of children and availability of child-care services, but the entire specific national mix of cultural patterns, social behaviours and available alternative forms of child care. A 1992 study proposed that the European Union countries fall into four categories in this respect:

- Those in which having children does not influence the mothers' activity rate, because women are expected to be in the labour market and there is a high provision of child-care services. This is the case in the Scandinavian countries.
- Those in which having children has a minimal impact on the female activity rates. This is the case with France, where the level of employment of mothers does not fall noticeably until the third child. The same is true of Italy in recent years, although with overall lower activity rates of employment as well as much lower fertility rates. In Italy it would appear that young women are reducing their fertility to a minimum, in order to enter and remain in the labour force.¹³
- Those in which the difficulties of combining family life and career result in part-time work. This is the case with Germany¹⁴ and the United Kingdom.
- Those in which women's activity rate drops with the birth of the first child, as in Ireland and the Netherlands.

The activity rate of lone mothers, as shown in Table 3.1, appears to depend even more than that of married mothers on both cultural assumptions and social policy provisions. It is lower in those countries such as Australia, Germany, the Netherlands, the United Kingdom and, to a lesser extent, the United States, where income support policies suggest that it is legitimate for mothers to stay at home to take care of their children, and to receive, therefore, economic support when in need. All these countries have income support policies specifically designed to help low-income lone mothers. It should be pointed out, however, that in recent years in these same countries there has been a growing concern about the development of long-term benefit dependence, leading to more or less dramatic shifts in policies: through limiting the number of years a lone mother may benefit from income support, as in the Netherlands and the new United States welfare reform bill, or through promoting education and training programmes which should help these women to enter the labour market, as in Australia and Germany, or through changes in benefit rules in order to encourage working while avoiding the poverty trap, as in Australia and the United Kingdom.

In a recent overview of the institutional framework of family obligations in the European Union, Millar and Warman (1996) suggest that, even in countries in the first of the above categories, there has been a recent shift to home child care rather than care in centres, as a cost-containment measure. In Denmark, a home-care supplement has been introduced and extended parental leave provided for parents who give up work to care for children at home. Similar provisions apply in Sweden and Finland. Since it is mostly women who take up this opportunity, particularly within the least-skilled groups, concern has developed about the implications of such a trend for gender equality. These provisions, as so often with measures supporting mothers, may be read either as a measure enabling women to deal more flexibly with their work and family obligations or, on the contrary, as a measure encouraging women to remain at home (Fagnani, 1994).

Care for disabled and frail elderly people

A similar analysis may be developed with regard to the provision of care for disabled or frail elderly people. Informal care, and particularly more intensive informal care, is predominantly provided by women in all industrialised countries. However, the level of public obligation differs quite substantially between countries and has a considerable impact on the resources and rights of those needing care and on the constraints on women as family carers. More generally, it has been pointed out that informal family care of the ill or infirm is a tremendous social resource; yet, the absence of policies or institutional supports for the "hidden patient", *i.e.* the caregivers of older or chronically ill relatives, may have the effect of draining this very resource (Moen and Forest, 1995).

Millar and Warman (1996), for instance, have proposed a four-way categorisation of EU countries on the basis of how they conceptualise family obligations to care for disabled adults and the frail elderly:

- In the first group, which includes Italy, Portugal and Spain, there are wide-reaching legal obligations between kin-members to support each other in both economic and caring terms. Thus, in Italy home-help is provided by the municipality under a dual test of means, such that it is provided only to disabled or frail individuals with both a low income and no close kin, particularly female kin, available to provide care.¹⁵
- In the second group, which comprises Austria, Belgium, France, Germany, Greece and Luxembourg (to which may be added Japan outside the EU), there are legal obligations on the next generation to support the elderly. In some of these countries, however, the costs of long-term care which are not covered by health insurance can be paid through local social assistance if the individual cannot meet these costs.¹⁶ However, recent changes in Austria and Germany, where the social insurance systems now include compulsory "care insurance", have reduced these obligations, partly in response to growing public expectations of welfare services.
- In the third group, comprising Ireland and the United Kingdom (to which may be added the United States), there are no legal obligations on kin to provide or pay for the care of frail or disabled adults. However, access to nursing homes is means-tested against the disabled or elderly person's assets, and other family members may feel obliged to meet some of these costs themselves. As Millar and Warman (1996) observe, this causes discontent, as public attitudes are different from countries in the first two groups, such that "(...) paying for the care of even elderly parents is not generally accepted as being 'natural' in the United Kingdom". The view that providing constant care is a role for welfare services rather than the family may also grow in countries where family obligations traditionally have been deeper. There is evidence of this process happening in the past in, for example, Norway (Daatland, 1990).
- The fourth group comprises the Scandinavian countries and the Netherlands, in which public obligations to adults with care needs are made explicit and where support is directed to the individual rather than the family. Although even in these countries adult children, and particularly daughters, are the primary informal care-givers, older people regard access to public services as an entitlement, independent from their family situation, while help received from family members is seen as an extra contribution deriving from choice.

This pattern has been somewhat complicated in recent years by the growth of payments for care (Evers *et al.*, 1994). There are differences between countries where payments go to care-givers and countries where they go to care-receivers. However, there is a more fundamental difference between situations in which payments for care are a substitute for other, more expensive, forms of service,¹⁷ and situations where payments have the aim of granting more rights to care-givers and care-recipients, while promoting more family involvement.¹⁸ Yet, in all payment-for-care schemes, it is mostly women who are called upon to act as paid care-givers. This form of support may therefore reinforce the traditional gender division of family caring obligations precisely at the moment when there are fewer daughters available to care.

It should be pointed out that while payments for care performed by kin are being introduced in many countries, time off for caring for handicapped or frail elderly kin has difficulty in finding its way in social security and leave policy, although various countries have started some usually very limited experimentation, mostly confined to public sector employees.

The design of social security systems

The way in which social security systems are linked to status in the labour force and to family status has a strong influence on women's participation in the labour market and on their degree of economic autonomy.

Many national pension systems, such as those of Belgium, Italy, the Netherlands and the United Kingdom, in the past adopted different statutory pensionable ages for men and women. It

indicates the tendency of pension systems originally to be designed around an assumption about the "normal" age differential between husband and wife, and of the wife's dependence on the wage-earner. It also indicates the wider tendency of pension systems to be designed largely to protect the future income status of full-time regular employees. Equal opportunities legislation, as, for instance, within the EU, has initiated a process of equalising pension ages.

Women remain less likely to be able to earn an occupational pension. Women's interrupted employment patterns, and the fact that more women than men are employed in the irregular labour force, reduce their chances of having a significant "second tier" pension from their employment. In some private pension regimes, for example the United Kingdom, women with rights to an occupational pension who become widowed must decide which pension to take: their own, or a survivor's pension deriving from their husband's contributions and work record. Many working women therefore pay contributions from which they will not benefit.

Since in most industrialised countries there is no universal non-contributory flat-rate public pension irrespective of work history, many women in old age at present must rely either on a social assistance pension, which is often very low, or on a survivor's pension. Given the increasing instability of marriage the latter, however, can become unavailable when it is too late for a woman to start her own contributory record. At the same time, in countries where the survivor's pension is paid to the surviving spouse irrespective of her or his income and contributory history, there may be women (as well as, to a lesser degree, men) who may benefit from two pensions.¹⁹

Income supplementation for those of working age is normally also paid in a way that reinforces the economic dependence of women. In most industrialised countries income supplements are paid on a family base and to a family head – that is, there is no individual entitlement to income support. Women therefore do not have access to an individual income even when the family unit is entitled to social assistance. At the same time, they are discouraged from seeking paid employment, as this will be taken into account when testing the family's entitlement to support. It has been argued by Holland (1993) that "the institution of the family payment – one payment for the entire family, comprising a payment for the main claimant and his (in a few cases her) dependents – is probably the single greatest testament to the state's unwillingness to provide an independent income to women when they are married".

The obligation to provide for children

The increasing presence of working mothers also raises a different, although intertwined, social policy issue, which, together with gender relations, is central to the debate about the boundaries between the family and the State: that of the formal obligations of parents towards their children.

In all countries parents are defined as the main, and natural, responsible actors towards their children. Yet, the specific boundaries and contents of these obligations vary quite widely both at the level of social values and at the level of legislation. In addition, there is great variation in the degree to which government may enforce, or substitute for, parental obligations.

Values differ in relation to public responsibilities towards children. The offer of public child-care services could be viewed as an interference with family autonomy and responsibility; alternatively, an effective absence of such services could be viewed as indicating a degree of social irresponsibility towards children and parents, or even neglect of the individual rights of the child. These varying responses reflect different underlying ideas about parental responsibilities and the rights of children, but also about the operation of the principle of subsidiarity by the State.

Subsidiarity in state-family relations may be interpreted as government having the right to intervene only in exceptional cases in which the family is demonstrably inadequate or unfit to care for its dependent members; alternatively, it may be seen as indicating an obligation on government to provide support for families to enable them to fulfil their obligations. The latter interpretation may in turn be used to justify a range of specific policy options, *e.g.* enabling women with young children to stay at home; enabling women to reconcile employment and family responsibilities; or enabling both parents to share in child-care responsibilities.

In the industrialised countries, parents' duties of guardianship and care for children generally cease at the latest at the age of 18-19, when children are deemed "adults". But while in some countries, e.g. the Scandinavian countries, the United Kingdom and the United States, this also marks the end of any legally-enforced financial obligation, in other countries the parent's legal financial obligations can continue until the child is "self-supporting", and in some countries may continue indefinitely. In Austria, Belgium, Germany, Italy²⁰ and Luxembourg, for instance, a child unable to support him or herself, even if able-bodied, can claim support from his parents throughout his or her life. This means that, for example, if adult children claim social assistance, the parents may be legally required to contribute.²¹ On the contrary, in Denmark, Finland and Sweden, students are entitled to financial support in their own right, and without any account being taken of parental income, at 18-20 years of age, when their parents lose entitlement to child allowances.

A further distinction arises between countries in which parents' financial obligations are actively supported by government, and those in which they are only expected and enforced. Thus, in the majority of EU countries, government shoulders a part of the cost of a child up to a certain age (legal majority, or the end of full-time schooling), through child allowances or child benefit schemes. In other countries, such as Greece, Italy, Spain and the United States, public support is only provided to parents in low-income groups.

Bradshaw *et al.* (1993) ranked the industrialised countries using an index of average income support offered to families with children (including child allowances, housing allowances, health care costs, etc.). This indicated that countries are clustered in identifiable groups which do not always correspond to those used in comparisons of welfare state regimes (see also Wilensky, 1990). As Table 3.2 indicates, three clusters may be identified by declining order of average level of financial support to families:

- Belgium, France and Luxembourg cluster with the Scandinavian countries as the most generous;
- Germany and the Netherlands are grouped with Australia and the United Kingdom;
- Greece, Ireland, Italy, Portugal and Spain are grouped with Japan and the United States.

It is noticeable that those countries in which the subsidiarity principle seems to be interpreted as low direct public support are also those in which both women's labour market participation and (with the exception of Ireland) rate of fertility are lowest.

Table 3.2. Average ranking of selected OECD countries on the basis of family supports

	Before housing expenses		After housing expenses
Sweden	3.6	France	3.7
Luxembourg	3.7	Luxembourg	3.8
Norway	4.3	Norway	4.8
France	4.5	Belgium	5.1
Belgium	4.8	Sweden	5.3
Denmark	7.2	Denmark	7.0
Germany	7.6	United Kingdom	7.6
United Kingdom	9.3	Germany	8.0
Australia	9.7	Netherlands	9.4
Netherlands	10.1	Australia	9.6
Portugal	11.1	Italy	10.3
Italy	11.4	Portugal	11.3
Japan	11.8	Spain	12.8
United States	12.1	Ireland	13.1
Ireland	13.0	Japan	13.4
Spain	14.1	Greece	14.3
Greece	14.1	United States	14.9

Note: Rankings have been obtained taking the average of 36 rankings for each of 36 family types. Each ranking goes from 1 for the most generous country to 17 for the less numerous. Thus, when household expenses are taken into account France is ranked first, with an average ranking of 3.7, while the United States is 17th, with an average ranking of 14.9.

Source: Bradshaw *et al.* (1993).

A further indicator of public responsibility towards children is the degree and type of regulation of child support when one parent, usually the father, is absent. It is a particularly crucial issue given the increasing fragility of marriage and of the father-child relationship. Policies in this respect have developed along two, sometimes alternative, sometimes integrated directions: first, that of strengthening and enforcing of fathers' responsibilities, and, secondly, that of partial substitution of public support for that of the absent father.

Legislation and practice in many countries tend to encourage, or enforce, the father's responsibility towards his children, irrespective of his relationship with the mother. Thus, in the event of separation and divorce, joint custody may be preferred, or even enforced (e.g. in France and California), rather than custody by one parent. This policy is supported by the need to sustain a continuing relationship between father and children, and by the belief that, if fathers are given direct responsibility for their children, they are more likely to continue freely to support them. Research in the United States (Seltzer, 1991) generally confirms this, indicating that joint legal custody encourages similarities between the way divorced fathers and fathers in two-parent households invest in their children. Although qualitative research finds that occasionally fathers with joint custody fail to contribute to the child's support above that which they spend on "their" share of custody, irrespective of the mothers' economic situation (Arendell, 1995),²² the overall positive outcome of this arrangement should not be undervalued.

A different way to enforce the father's responsibility is that recently adopted in Australia and the United Kingdom, where recent legislation has defined the father's financial obligations and a public agency has taken on the task of enforcing it (Stuart, 1991; Scheiwe, 1994). This approach may be criticised as being more focused on coercing fathers to do their duty (and obliging mothers to denounce "failing fathers", with possible conflict as a result), than on providing adequate support when fathers fail to do so. Yet, the question of how to enforce and support fathers' responsibility may not easily be overlooked.

The second policy line, that of partial substitution, does not deny the parents' (and specifically fathers') responsibility, but aims to extricate this issue from the personal relationship between the parents, and to focus directly on the need for material support, rather than on the identity of the ideal supporter(s). Therefore, in some countries, e.g. France, the Scandinavian countries and the United States, government provides material support where the father does not or cannot. The collection of the non-cohabitant parent's share of support is a public responsibility (either in all cases or in particularly conflictual cases). Further, in the United States objective criteria have been developed - first experimentally in Wisconsin and then extended to other states - to get the level of child support as a percentage of the noncohabitant parent's income. Thus, the level of child support is no longer left to negotiation between parties or to judges' discretion.

As Millar and Warman (1996) have concluded, "In examining the relationship between parents and children it is clear that there is no simple continuum from interventionist to non-interventionist approaches. Much seems to depend on whether the context for intervention is primarily one of family privacy or one of family support".

A NEW APPROACH TO FAMILY POLICIES

Family policies (or, more accurately, family-relevant policies) draw different boundaries between families, between individuals and families, and between the state and families. It has been seen that, in Italy, Spain and Portugal, legally-enforced obligations cross household boundaries to include a substantial number of family members (including those through marriage), while in France and Germany these obligations involve only the nuclear family (with the partial exception of parents and adult children, whose reciprocal obligations are deemed as lasting through life); and, in the Scandinavian and most Anglophone countries, most reciprocal family obligations cease once a young person reaches adulthood, and children may be perceived as having rights of their own, irrespective of their family membership (Therborn, 1993).

The precise role of government within each of these three broadly similar situations varies from country to country. It may positively enforce family obligations through legal means, or simply require

them to be met by not providing any alternative supports, or offer positive help in meeting them. To see legal frameworks, public policies and social expectations as merely reflecting deeply-rooted national values is to overlook the political conflicts and negotiations which underlie them, and the specific policy history which has resulted in each current set of national conditions.

The industrialised countries are faced by the task of re-drawing these arrangements in the face of three-fold pressure:

- pressure from changing social values, *e.g.* about gender relations, and about trans-generational obligations;
- pressure from the increasing fragility of traditional forms of support, be this from marital and family arrangements or from the social security system;
- pressure from budget constraints.

Countries approach this task from different vantage points, with regard to the nature of their labour markets, and with regard to their political and social cultures, with the family values and expectations that these include. From this perspective, it is not surprising that those countries which have most relied on extended family solidarity and on a gendered division of labour, and which now experience severe budget constraints and higher unemployment rates, seek a solution in appealing to strengthened family solidarity. However, this approach may constrain family, and particularly female, choices, and perhaps therefore also constrain fertility, hence further aggravating the demographic imbalance. Alternative solutions appear difficult to articulate in these countries in a way which may gain the necessary social consensus for redesigning the social policy framework.

This "familistic" approach is less feasible in countries where extended family obligations are less supported by law and by social practice, and where gender relations are less asymmetrical. There are some tendencies in these countries towards a re-familisation of social obligations, *e.g.* with the growth of payments for care, but the strong culture of individual social rights and of gender equality necessitates that any re-definition of boundaries and obligations be carefully negotiated.

It has been proposed that a useful way of analysing welfare states is to assess to which degree economic and social rights are granted to individuals of all ages and family conditions or are *vice versa* contingent on family membership and circumstances. From this perspective, some authors have suggested that the concept of "de-familisation" might be useful, indicating "the terms and conditions under which people engage in families, and the extent to which they can uphold an acceptable standard of living independently of the (patriarchal) family" (McLaughlin and Glendinning, 1994, p. 65). As family obligations typically now rest on a smaller circle of family members, and on more fragile family ties, the extent of de-familisation may be as crucial for the welfare of individuals and families as is the strength of family obligations themselves.

De-familisation in this perspective does not imply a breaking of family bonds. On the contrary, it might be conceived as a means to support them by allowing individuals to undertake family responsibilities without being trapped in them; while at the same time avoiding the individual's life chances being all staked in his or her family circumstances or resources. To quote McLaughlin and Glendinning again, "The issue is not whether people are completely 'de-familised', but rather the extent to which packages of legal and social provisions have altered the balance of power between men and women, between dependents and non-dependents, and hence the terms and conditions under which people engage in familial or caring arrangements" (*op. cit.*, p. 66).

This focuses on the question of what "supporting the family" might mean. If it means enabling the family and its members to take care of each other, to shoulder the obligations they freely choose to enter, without at the same time creating power imbalances, over-dependence and closed exits, a degree of de-familisation could become a basis on which new forms of contract between the individual, the family and the state may be negotiated. By contrast, over-familisation of responsibilities and rights may result in over-burdening, thus causing further social problems, or in a growing refusal to assume family obligations, through (un)reproductive behaviour when young and through reluctance to fulfil obligations towards the elderly when older. From this perspective, Moen and Forest (1995, p. 827) suggest that the underlying goal of family policies should be "to foster competence and indepen-

dence", allowing families and their individual members "to actively negotiate resources to develop their own adaptive strategies and retain maximum independence and autonomy at all stages of the life-course".

Within this approach, particular attention should be given to children and to families with children. Not only for demographic reasons, it is apparent that investment in the future and protection from the risk of poverty during the life-course due to lack of education, of needed professional and social skills, require that resources be invested in a sustained way in the younger generation, from early childhood on. This might require a shift in the balance of the social budget towards younger cohorts and younger families.

Finally it should be pointed out that families and governments are not the only relevant actors in this redrawing of boundaries and responsibilities. The labour market, enterprises, and trade unions also have a role in shaping a society which is more friendly to individuals - women, as well as men - with family responsibilities. From this point of view, the flexibilisation of the working time and of the working life might be perceived and negotiated as a means of meeting the needs both of workers and of enterprises.

NOTES

1. Together with this feminisation of employment there has been a feminisation of unemployment. In 1986 women accounted for 46 per cent of the unemployed in the EC countries, rising to 52 per cent in 1989 (Pillinger, 1992, p. 17). Women also account for a great share of the under-employed, the "casually employed" and the part-time employed (Women of Europe, Supplement 1992). Women are therefore more exposed than men to the vagaries of the market, and have greater economic dependence, either within their families or upon the welfare state.
2. Within services, as within industry, women remain segregated from men and concentrated in a narrow number of jobs. They are also likely to work in jobs which are lower skilled than men's and are often clustered in those manual and assembly line jobs which are most vulnerable to restructuring (Pillinger, 1992, pp. 46-47).
3. One exception is Japan, where one consequence of modernisation, up to the late 1970s, was increased marital stability, given the different rules concerning marriage and divorce applying in the past. But separation and divorce are now also increasing in Japan (Kumagai, 1983; Preston and Kono, 1988; Goode, 1993).
4. All these data must be read with caution, since different countries use different criteria both to define "a child's presence" in the family (on the basis of age) and to define one-parent households (see for instance Ermisch, 1990; Hantrais and Mangen, 1994).
5. Very recently, the average duration of marriages which end in divorce has been declining, so that the age of children involved tends to be lower. The likelihood of children being involved in a marriage break-up has diminished, as a larger share of marriages ending in divorce are now childless (Barbagli, 1990; Goode, 1993).
6. Unmarried mothers tend to be younger women, often teenagers. 10-18 per cent of all 15-19 year old females become pregnant in Czechoslovakia, Hungary and the United States, the countries with the highest teenage pregnancy rates in the industrialised world.
7. An indirect demonstration of this can be seen in the finding that the more fathers have been involved in child care during marriage or cohabitation, the less estranged they become once their relationship with their children's mother ends (Arendell, 1995).
8. With the exception of Ireland, which has both a low activity rate and the highest fertility in Europe, at about two children per woman.
9. It may also happen, as in Finland with the introduction of Informal Care Allowances, that caring elderly spouses are *de facto* excluded from receiving cash allowances for care. Finnish regulations require that an "informal caregiver" shall be under 65 (Millar and Warman, 1996).
10. A first attempt at comparing European welfare regimes from the point of view of women's experience may be found in Lewis (1993).
11. Services for children under 3 years old are particularly lacking, although in some countries, such as Portugal and the United Kingdom, services for older pre-school children are also scarce. For instance, in Italy more than 80 per cent of pre-school children aged three years and above are in kindergarten, while less than 10 per cent of those under 3 years old are in day care; there are wide local variations (Saraceno, 1990).
12. In 1992, 59 per cent of women employed worked part-time in the Netherlands, 33 per cent in the United Kingdom (Commission of the European Communities, 1994).
13. It should be kept in mind that in Italy there is a wide geographical variation both in fertility rates and in women's labour force participation: the fertility rate is lowest, and the labour force participation is highest, in the Centre-North, where child-care services are most numerous.
14. The former East and West Germanies had very different approaches to women's work and support for families. Child-care places for under-threes were available for less than 3 per cent of children in former West Germany but for 56 per cent of children in former East Germany, largely provided by the employer. Following unification, child-care services in the eastern regions are being run-down, and the Western Germany model of child care for children under three – by the mother – is becoming predominant (Ostner, 1994).
15. It should be added that in some, at least, of these countries, totally disabled people receive an accompanying person indemnity which is not means tested, together with a means-tested public pension.
16. The same is true in some regions in Italy, if they formally renounce their rights to retrieve costs from "liable kin".
17. For example, social insurance benefits paid to care-receivers in Austria and Germany to allow them to buy support, or payments made to family care-givers in certain Italian regions on the condition they host an elderly relative.
18. For example, the case of the Swedish and Norwegian schemes, which employ family members, thus conferring rights such as pension contributions and sick leave, and where this recruitment of family members is integrated into a high level of service provision.
19. It is, for instance, the case of Italy, where in the late seventies the Constitutional Court declared it against the principle of equality that only male contributions could count towards building up survivors' benefits.
20. In Italy legally enforced financial obligations extend to adult children, parents, parents-in-law and siblings (including adult siblings).
21. Legally prolonged financial obligations towards children may be purely symbolic, if entrance to the labour market is not difficult and if the cost of higher education is low, *i.e.* heavily subsidised by local or central government. But when both youth unemployment and education costs are high, this obligation may increase substantially the cost of raising children. This seems to be the case, for instance, with Austria, Ireland, Italy, Portugal and Spain.
22. There is, however, some evidence that enforcing on principle joint custody may have perverse effects when one of the parents is abusive, or violent, thereby restricting the opportunity for the other parent to create a viable, independent life for (usually) herself and the children (Arendell, 1995).