

Women's and Men's Social Rights: Gendering Dimensions of Welfare States

Diane Sainsbury

Gendering welfare states – bringing gender into the comparative analysis of welfare states – has moved to the top of the research agenda. While the importance of this project is increasingly recognized, opinions differ about how to gender welfare states. The most obvious method would be to apply mainstream theories and frameworks to an analysis of welfare states that explicitly focuses on women and men. An objection to this seemingly straightforward approach has been that central concepts and assumptions of mainstream research often contain a male bias. A prerequisite then is to illuminate how these concepts and assumptions are gendered by clarifying their implications for women and men and to what extent the implications differ. An additional objection is that mainstream analysis has totally omitted gender but its centrality makes it necessary to avoid procedures that merely ‘add-on’ gender to existing frameworks (Lewis and Ostner, 1991). This position represents a second approach which argues that new models and typologies must be devised if gender is to be incorporated into the study of welfare states and policy regimes. A third stance is that the best course is to build gender into mainstream frameworks of analysis (Orloff, 1993).

The strategy adopted here has not been to build gender into existing mainstream typologies but rather to separate it out. On the basis of the feminist critique of mainstream theories and research, I identify a number of dimensions of variation that have been either marginalized or not included in the mainstream models and typologies. As a heuristic exercise these dimensions are presented as contrasting ideal types. The dimensions of the models are the variations that I am interested in comparing cross-nationally in an empirical analysis of women's and men's social rights. I do not assume, however, that the ideal types would be replicated in reality or that variations across countries necessarily follow the logic of the models. Quite the contrary, the analysis is exploratory. Its purposes

are to determine the usefulness of the framework, to discover eventual deviations, and to improve the models on this basis.

The first part of this chapter discusses feminist criticisms of mainstream research. Drawing on the major points of this discussion, I present two models of social policy. The dimensions of variation of the models are then employed to analyse policies and women's and men's social rights in four countries – the UK, the US, the Netherlands and Sweden – in order to delineate similarities and differences and to determine to what extent the countries cluster into types. The final section comments on the implications of the analysis for gendering welfare state analysis and refining the original models and other typologies.

The feminist critique

Although mainstream research has produced many significant insights, it has not been very informative about the differing consequences of welfare states for women and men. I believe the reason for this is that the mainstream perspective is fundamentally incomplete, and that it must be complemented by a new set of dimensions of variation with respect to gender. Feminist scholarship can help us establish what is missing in the mainstream models.

As distinct from the mainstream debate on the determinants of welfare state development that has stressed economic processes – especially industrialization – and more recently class politics, feminists have emphasized the interrelationships of the family, the state and the market. They have concentrated on the dynamics and the shifting boundary between the private and public spheres, that is, both their interdependence and separation. Feminist research has pointed to a significant change in state–family relations – the extent to which tasks of reproduction and socialization, formerly activities of the family, have become functions of the public sector. As aptly put by Helga Hernes, the issue is the degree to which caring tasks and reproduction work, previously done in the home, have gone public (Hernes, 1984, 1987a).

Feminists have also highlighted how ideological constructs shape women's lives, and this emphasis has informed feminist accounts of the welfare state. Contrary to mainstream analysis, feminist writings on the welfare state have dealt extensively with the influence of familial ideology in structuring social policies and reproducing the social division of labour between the sexes. Initially discussions focused on the breadwinner ideology which holds that the husband is responsible for earning a living and providing for the family. Eventually more attention was given to ideological prescriptions

concerning women and their role as caregivers. These prescriptions stress the wife's inherent domesticity and her duties in nurturing and caring for members of the family in the form of unpaid labour in exchange for the support of her husband.

In short, feminist theorizing on the welfare state makes it clear that even if mainstream models and typologies were gendered through explicitly including women and men in the analysis, such a step does not go far enough. Gendering welfare states requires specific attention to the interplay of the public and the private and a conceptualization of welfare provision in terms of a public-private mix (Hernes, 1987a; Leira, 1992). This dictates an examination of not only paid work but also unpaid work both inside and outside the home. Second, feminists have stressed the necessity of studying how the welfare state in providing employment and services affects the situation of women as workers, consumers, mothers and clients. Third, feminists have stressed the role of familial and gender ideologies in structuring welfare policies.

Gendering dimensions of variation

Implicit in the feminist critique are a number of dimensions of variation. These consist of the type of familial ideology; its influence on social policy in terms of the unit of benefits and contributions and the nature of entitlement; its influence in other policy areas reinforcing the actual division of labour within the family; the boundary between the public and private spheres; and the degree to which women's work is paid or unpaid. These dimensions of variation are summarized in Table 10.1 as contrasting ideal types: the breadwinner model and the individual model.

In the breadwinner model, the familial ideology celebrates marriage and a strict division of labour between husband and wife. The husband is the head of the household, and it is his duty to provide for the members of his family – his wife and children – through full-time employment. The duties of the wife are to make a good home and provide care for her husband and children. This division of labour shapes practice, and it is codified in family law, social and labour legislation, and the tax system. The unit of benefit is the family, and minimum benefits and pay embody the notion of the family wage. Entitlement is differentiated between husband and wife. Eligibility is based on breadwinner status and the principle of maintenance. Accordingly, most wives' rights to benefits are derived from their status as dependants within the family and their husbands' entitlements. As a result, married women may lack individual entitlement to benefits. The family or household is the unit of social insurance contributions and taxation. The family provider receives tax relief to

Table 10.1 *Dimensions of variation of the breadwinner and the individual models of social policy*

Dimension	Breadwinner model	Individual model
Familial ideology	Strict division of labour Husband = earner Wife = carer	Shared roles Husband = earner/carer Wife = earner/carer
Entitlement	Differentiated among spouses	Uniform
Basis of entitlement	Breadwinner	Other
Recipient of benefits	Head of household	Individual
Unit of benefit	Household or family	Individual
Unit of contributions	Household	Individual
Taxation	Joint taxation Deductions for dependants	Separate taxation Equal tax relief
Employment and wage policies	Priority to men	Aimed at both sexes
Sphere of care	Primarily private	Strong state involvement
Caring work	Unpaid	Paid component

compensate for the maintenance of his wife and offspring. The division of labour prescribed by familial ideology also affects wage and labour market policies – assigning priority to men's employment and earnings. The boundary between the private and public sphere is strictly enforced. Caring and reproduction tasks are located in the private sphere, primarily in the home, and this work is unpaid.

The familial ideology of the individual model prescribes that each spouse is individually responsible for his or her own maintenance, and that husband and wife share the tasks of financial support and care of their children. The unit of benefit, contributions and taxation is the individual with no deductions or allowances for dependants. Labour market policies are aimed at both sexes. The boundary between the private and public spheres is fluid. Many reproductive tasks are performed in the public sector. Care, even in the home, can be paid work and provide entitlement to social security benefits.

Admittedly this presentation is skeletal, but it seems to me that there are a number of advantages of using this sort of analytic construct at the present stage of gendering welfare state analysis. The dimensions of variation are clearly formulated. Earlier models have not always been very explicit on this point. For example, Jane Lewis and Ilona Ostner's typology seems to be based on a single underlying dimension – the strength of the male breadwinner model in terms of

the traditional division of labour between the sexes and its implications for social entitlements. The resulting typology is 'strong', 'modified' and 'weak' male breadwinner states (see Daly and Hobson, Chapters 7 and 11 in this volume); and the final category – weak male breadwinner states – is especially problematic. It seems to indicate what a country's policies are not rather than what they are.

A further advantage of the models is their potential applicability. In principle the dimensions of variation presented here can be used to analyse the policies of any country over time. A family of nations approach, or typologies based on the policies of specific countries, runs the risk of limited relevance to those countries.

Finally, by isolating dimensions of variation related to gender it is possible to examine the interaction between these dimensions and the welfare state variations designated as important by mainstream analysis. This possibility is more difficult, if not impossible, when the feminist and mainstream perspectives are compounded in single ideal types or policy regimes.

Women's and men's social rights

In analysing women's and men's social rights the dimensions of variation in Table 10.1 are applied to the policies of the UK, the US, the Netherlands and Sweden during the late 1960s. This is an important period to examine for a number of reasons. First these years offer an important benchmark because it was in the 1970s that equality of the sexes moved on to the policy agenda, resulting in major reforms in all four countries.¹ Second, since few gender equality reforms had been enacted one might expect to find less variation between the four countries during this period. Third, many feminists initially argued that the breadwinner model was encoded in the social legislation of the industrial nations, and that it was part and parcel of the welfare state. Gradually the breadwinner model has come to be viewed as varying in strength across countries. Typically, however, most variations are presented as fairly recent developments, coinciding with women's exodus into the labour market. The strength of Swedish women's social rights is seen as the result of their higher rate of labour market participation. The latter years of the 1960s, combined with digressions tracing policies back in time, allow us to probe assumptions concerning the recentness in the development of variations. The analysis also casts light on newer assumptions that the male breadwinner model had decisive influence in the formative period of welfare states, and that early welfare states were basically 'paternalist' in nature (Orloff, 1993: 323; Skocpol, 1992: 2, 8–10).

Applying the dimensions in Table 10.1 results in strong divergences in the policy patterns of the four countries, and the clustering of countries is quite different from the clusters produced by mainstream typologies. Using mainstream models the Netherlands and Sweden have often been bracketed together as ambitious or comprehensive welfare states scoring high on de-commodification (eliminating dependence on the market), while the US and the UK have been categorized as both less ambitious and less de-commodifying (Castles, 1978; Sainsbury, 1991; Esping-Andersen, 1990).²

An analysis using the dimensions of variation in Table 10.1 yields quite a different picture. Although social rights in all four countries were influenced by a traditional familial ideology in the 1960s, the Netherlands approximated most closely the breadwinner model, while Sweden least resembled it. The UK and the US occupied middle positions, but the policies of both countries bore much stronger similarities to those of the Netherlands than to those of Sweden. In the three countries social rights were tied to the principle of maintenance and tax benefits to the family provider, while Sweden differed in that motherhood and the principle of care exerted a much stronger influence on women's social rights. A second difference that further strengthened Swedish women's social rights was the extent of entitlements based on citizenship, and in these cases there were points of convergence with the individual model. Entitlement and benefits of pensions were uniform between spouses, and the recipient of benefits was the individual.

The Netherlands: the principle of maintenance and a family minimum

In the Netherlands the Catholic principle of subsidiarity and the Protestant doctrine of sphere sovereignty have assigned a central importance to the family in its traditional form. Religious teachings have sanctioned state action to protect the family from economic hardships and to aid the family provider in meeting his obligations of support (Borchorst, Chapter 3 in this volume). The principle of maintenance is firmly entrenched in social provision; and the construction of benefits and contributions has revolved around the family as the norm – and the notion of a family minimum.

During the 1960s minimum pension benefits were linked to the minimum wage, and the standard minimum was set for a couple, while single individuals received a smaller amount. Subsequently the social minimum was upgraded and extended to a wider range of benefits. The beneficiary has been the person responsible for maintenance, and benefits have been calculated on the basis of family

responsibilities. Accordingly, when fully upgraded, the social minimum was roughly equivalent to the net minimum wage for couples, 90 per cent for single parent families, with lower rates for single persons, and young adults living at home. This system contrasts with the UK and the US where the construction of benefits has been based on the individual, with supplements for dependants.

The unit of contributions to the national insurance schemes was also the household and was paid by the head of the household, based on family income. Compulsory health insurance automatically covered family members without an income with no additional contributions required (Roebroek and Berben, 1987: 689). *Because the household was the unit of benefits and contributions, married women lacked individual entitlement to 'national' insurance benefits.* The most severe discrimination against married women was their ineligibility for the basic old age pension, extended unemployment benefits, and later general disablement benefits when introduced in the mid-1970s.

The importance of family protection and the family as the norm can also be seen in the compulsory employee insurance schemes. Through relatively high replacement rates (generally 80 per cent of the daily wage) without special allowances for dependants, these schemes safeguarded the earnings of the breadwinner against the eventualities of sickness, unemployment and disability.

The principle of maintenance and the notion of the father as provider for his children influenced family allowances, which unlike in Britain and Sweden, are social insurance transfers and not a non-contributory benefit. Family allowances have been paid to the insured person responsible for maintenance of the child – usually the father. Furthermore, the responsibility of maintenance has extended to children in early adulthood (to the age of 27) with limited or no earnings or permanently ill. The amount of the allowance increased with the number of children, and older children (over 16) and children with special needs entitled the father to larger compensation, reflecting their financial burden on the family (ISSR, 1970: 48–9). In contrast to Britain and Sweden, family allowances were indexed, and they were more generous, especially compared to Britain. As a proportion of the standard wage the Dutch allowances were roughly twice as high as those in Britain in the late 1960s (Kaim-Caudle, 1973: 271–2, 283; cf. Wennemo, 1994). Finally the father received child tax exemptions. The combination of family allowances and tax exemptions meant that the Dutch father, regardless of his economic position, was aided in meeting his family responsibilities.

In conclusion, the costs of familyhood were socialized through

subsidies to the family provider. The guarantee of a minimum wage, a social minimum eventually pegged at roughly the same level as the minimum wage, the high replacement rates of employee insurance schemes, and indexed family allowances tailored to large families and reflecting the varying costs of children provided the breadwinner with a substantial buffer of security in supporting the family. These policies produced a situation which seems closer to the ideal of a family wage for the vast majority of wage-earner families.

The breadwinner ideology was also reflected in labour legislation and the tax system. Legislation privileged men as earners with respect to job opportunities, wages and tax relief. Marriage bans curtailed a wife's possibilities of employment. As noted by Siv Gustafsson (Chapter 4 in this volume), legislation prohibiting employers from firing a woman because of pregnancy, childbirth or marriage was not introduced until the early 1970s. Nor have married women without breadwinner status always been entitled to the minimum wage. Married couples' incomes were jointly taxed, without the option of separate taxation; and working wives received no tax allowance as they did in the other countries.

Overall, legislation was characterized by penalties and few rewards for married women entering the labour market, encouraging either no participation or marginal participation. In the mid-1960s only around 20 per cent of married women were economically active, and nearly half were family workers. In other words, as recently as 30 years ago only slightly over 10 per cent of Dutch married women held jobs outside the family (calculated from SYN, 1969–70: 284–6).

Clearly, women's place was in the home, and one is struck by the lack of benefits attached to motherhood in the Netherlands. Admittedly sickness insurance provided generous maternity pay. However, women did not have a statutory right to maternity leave beyond the relatively short duration of maternity benefits. Nor was there a maternity grant or benefits for non-working mothers. Entitlement to maternity benefits has been based on labour market status as an employee, and originally sickness insurance only recognized the pregnancy of married women as an illness (SZW, 1982: 31). Because of their low labour market participation rate, only a small proportion of all mothers received maternity benefits – a mere 5 per cent in the mid-1960s (calculated from SYN, 1969–70: 26, 315).

In the late 1960s the Netherlands was a prime candidate as the archetype of the breadwinner model inasmuch as social rights derived almost entirely from the principle of maintenance, and the recipient of benefits was the head of the household. The only benefit that could be ascribed to the principle of care, but is probably more accurately attributed to the absence of the male breadwinner, was the

widow's pension where a wife's duties in the home were assumed to have disadvantaged her re-entry into the labour market. The sphere of care was overwhelmingly private, and childcare outside the home was regulated by the Poor Law until the mid-1960s (Gustafsson, Chapter 4 in this volume).

The UK: discrimination against married women as choice

Several distinctive features of the postwar British welfare state have been associated with the ideas of William Beveridge; and as feminist scholars have documented, the breadwinner ideology was an integral part of Beveridge's thinking (Lewis, 1983: 33, 44–6, 67, 90–92). His ideas were especially important because it was the postwar reforms that incorporated all women into the British welfare state.

The breadwinner ideology left its imprint on postwar reforms – especially the national insurance scheme and the national assistance programme – in four ways. First, the national insurance scheme allowed married women to choose not to pay full contributions and instead rely upon their husband's contributions, but in the process they forfeited their claim to benefits in their own right. Because of the unified approach inherent in the national insurance scheme, the married woman's option operated to exclude them from *all* social insurance benefits – except the industrial injury benefit and the dependant's pension. Thus utilization of the option resulted in the loss not only of a full individual pension but also of other benefits, such as sickness benefit, invalidity benefit, unemployment benefit, and the maternity allowance. Second, married women who remained in the national insurance scheme paid full contributions but received lower benefits than married men and single persons unless they were the main breadwinner (Groves, 1983). A third feature of the national insurance scheme – adult dependant allowances – provided an incentive for women to stay in the home, thus reinforcing the traditional division of labour in the family. Unlike Dutch benefits, the system of dependant allowances took into direct account the wife's economic activity. The allowance was paid only for dependants without an income or with earnings less than the allowance. Furthermore, married women were not eligible to claim child additions. Fourth, in married couples only the husband could apply for means-tested assistance.

In Britain married women on the labour market were not entirely stripped of their rights to a pension and other benefits as in Holland. Instead they were denied equal rights, and the married woman's option encouraged them to renounce their rights. The option was widely used, and in the early 1970s three-quarters of married women had opted out of the national insurance scheme (Land, 1985: 56–7).

Given that the option was really between no individual rights and minor obligations (contributions) versus only half-rights and full obligations, it is hardly surprising that so many married women made use of the option.

Family allowances, as distinct from in the Netherlands, have been paid to the mother. However, the father retained the right of child tax exemptions, which was arguably the most generous form of family support (Land and Parker, 1978: 345) in terms of cost to the public purse. Beveridge's proposal also excluded the first child from the family allowance scheme, while tax exemptions could be claimed for all the children. Contrary to most other countries, the family allowance was subject to tax. One effect of this arrangement was a redistribution of resources within the family from the wallet to the purse.

The norm of the traditional family with the husband as the keeper of his wife's income and as the financial head of the household also influenced tax legislation. Joint taxation of spouses was obligatory. However, in contrast to her Dutch counterpart, the British working wife received a tax allowance which was identical to a single earner's tax relief. Furthermore, irrespective of whether or not he had a 'dependent' wife, the husband received a married man's allowance (Wilkinson, 1982), which has been roughly one and a half times the single earner's allowance.

Perhaps because of the married woman's earnings allowance, British women's labour participation rates have been considerably higher than Dutch women's. At the end of the 1960s nearly 50 per cent of married women were economically active (Lewis, 1992b: 65; Land and Parker, 1978: 338). On the whole, the tax system furnished incentives for married women to seek employment, while the structure of insurance benefits pulled in the opposite direction. If the married woman used the married woman's option, she received no benefits, and employment meant that her husband lost the adult dependant allowance.

A further obstacle to economic activity has been the poor availability of daycare facilities. Only in wartime has public childcare provision been regarded as a service that should be made available to all working mothers in Britain. Otherwise public childcare services have been targeted on the basis of need, and in the mid-1960s the number of places had dropped to one-third of the wartime figure (Cohen and Fraser, 1991).

At first glance, the UK seems to fit the breadwinner model less than the Netherlands. British policies deviated in three ways. Payment of family allowances was made to the mother, which can be interpreted as an initial recognition of the principle of care. Second,

British married women received a more generous tax allowance. Third, the unit of contributions and benefits in the UK has been the individual. As a beneficiary the husband received an adult dependant allowance, and his wife was entitled to a dependant's pension. Since benefits were tied to the individual, the wife's dependant pension was hers. In one respect, the British system was stricter than the Dutch. The husband collected an adult dependant allowance only when the wife had no earnings or when her earnings were less than the allowance, whereas the Dutch household received benefits irrespective of the wife's employment status. The British case was also stricter in that legislation of the 1970s reinforced the notion of the wife's duty to provide care and service in the home without remuneration. Married women were ineligible to receive the invalid care allowance, which had been introduced to compensate people for having to give up employment to care for the disabled and elderly. The housewives' non-contributory invalidity pension also imposed more rigorous qualifying conditions than the regular non-contributory pension.

The US: two tiers of welfare and women's dependency

The minimalist approach to public provision of welfare in the US might seem to suggest a smaller role for the breadwinner ideology. Nonetheless it has exerted a major influence on legislation affecting the two tiers of public provision of welfare and taxation. In the social security tier, married women's claims to benefits have been heavily dependent upon their husbands' rights and earnings, while women's claims in the welfare tier have often been based on their lack of social security benefits and their poverty.

The breadwinner ideology's most visible impact on the social security tier has been the spouse benefit of the Old-Age, Survivors and Disability Insurance (OASDI) programme. In the 1960s the spouse benefit corresponded to 50 per cent of the insured worker's old age or disability pension, and old age survivor benefits amounted to 80 per cent. As married women have entered the labour market, they have been covered by social security in their own right. Upon retirement, working wives have been able to choose between a spouse benefit or a benefit based on their own earnings – but not both, that is, the spouse benefit plus a benefit based on their own earnings. Married women with social security benefits based on their own earnings which were less than their spouse benefit have had dual entitlement. They have received a secondary benefit which has made up the difference.

The spouse benefit has generally worked to the advantage of the traditional family with a single breadwinner and to the disadvantage of the dual-earner family. In many cases when these two types of

families have had roughly the same earnings the family with the single breadwinner has received a larger pension, and the wife has ended up with more generous survivor benefits (Bergmann, 1986: 223. Cf. Miller, 1990: 122; Lopata and Brehm, 1986). The single-earner family has won additionally because the spouse benefit is a non-contributory benefit. In other words, the traditional family has often enjoyed a larger pension and survivor benefits but paid lower social security taxes.

A pattern of favouring the traditional family, particularly to the disadvantage of working wives and single parents, has characterized income taxation in three ways. First, although married couples have been able to choose between individual and joint taxation, the system has actually encouraged joint taxation of spouses. Joint returns have been subject to preferential tax rates, and tax relief has been less beneficial to dual-earner families in relation to families with a sole provider. Second, the single earner family has received the same tax exemptions as the dual-earner family, which virtually amounts to deduction for a dependent spouse. Third, single parent families have not enjoyed the same advantage as a sole provider with a spouse. These three features of the tax system have been aptly described as (1) the dual earner marriage penalty; (2) the housewife bonus; and (3) the single parent penalty (Bergmann, 1986: 218–20).

Despite the disincentives for the dual earner family, it needs to be stressed that the social security system provided incentives for women as individuals. Their social security benefits as workers in all likelihood would be greater than the spouse benefit. Married women's labour market participation rate was much higher than that of their counterparts in the Netherlands and approached that of the UK. In the mid-1960s 35 per cent of married women were working outside the home (SIT, 1968: 128), and the number of women entitled to social security benefits in their own right grew dramatically. Nonetheless, the majority of women still made their claims as wives (Polinsky, 1969: 15–16).

Finally, liberal tenets stressing individual responsibility and the sanctity of the private sphere – home and family – have held enormous sway in the US. As distinct from the other three countries, the US lacks a system of family allowances, although there are tax deductions for children. The major semblance of a programme related to family policy is Aid to Families with Dependent Children in the 'welfare' tier. Accordingly, it has all the disadvantages associated with this tier: meagre means-tested benefits, stigma and intrusive administration. In other words, women's dependency is differentiated in the two tiers of public provision. In the social security tier, entitlement has been based on the strength of one's

attachment to the labour market and contributions, benefits are earnings related, and claims for benefits have been heavily dependent upon men's earnings. In the other tier, need determines entitlement, and claimants have overwhelmingly been women (Sainsbury, 1993a).

Sweden: citizenship and the principle of care

A distinguishing characteristic of the Swedish welfare state has been a strong emphasis on entitlement to benefits and services based on citizenship or residence (Elmér, 1975: 252–8; Esping-Andersen and Korpi, 1987). This basis of entitlement has resulted in less dependency upon one's market position and a de-commodification of wants and needs (Esping-Andersen and Korpi, 1987: 40–1). Another aspect of de-commodification, not touched upon in the other chapters of this volume, has been the availability of a wide range of services which have largely assumed the character of public goods. The centrality of public services in the Swedish welfare state has given rise to its label as the 'social service state' (Siim, 1987a: 3).

Entitlement to benefits on the basis of citizenship has weakened the influence of the breadwinner ideology. In the area of social benefits the influence of the breadwinner ideology has mainly been limited to a wife supplement in unemployment insurance (1941–64) and widow benefits in the public pension schemes (Sainsbury, 1990). In contrast to the other three countries, married women were incorporated in major social insurance schemes with individual entitlement to benefits. Sweden's first national old age insurance, adopted in 1913, included all women irrespective of marital status. The importance of this arrangement in the long term was to establish the principle of individual entitlement to a pension regardless of sex, marital status or labour market status. When compulsory insurance providing sickness benefits was introduced in 1955 coverage was not restricted to the working population, as in the Netherlands and Britain. In addition, spouses at home and single parents at home with children under 16 years old were entitled to minimum cash benefits. In other words, the compulsory insurance system incorporated all women, and they were included as beneficiaries in their own right – and not as the *raison d'être* of benefit supplements for men, as in the UK. Furthermore, under the same programme, maternity benefits were not limited to working women but included a fairly generous flat-rate grant to all mothers. These measures can be interpreted as a modest recognition of the principle of care and that work in the home qualified for entitlement to social benefits.

The principle of care as a basis of entitlement to social benefits and the origins of the 'social service state' can be traced to the population

policies of the 1930s. The major breakthrough of the principle of care were means-tested child allowances and public maintenance allowances introduced in the late 1930s along with a series of other benefits attached to motherhood. Maternity grants (*moderskapspenning*) were introduced in 1937 followed by maternity assistance in kind (*mödrahjäl*) in 1938. These reforms extended coverage in relation to subsidized voluntary maternity insurance so that nearly all mothers received maternity benefits (Elmér, 1963; Abukhanfusa, 1987).

Population policy instruments consisted of both individual and collective benefits in kind as well as cash benefits. Collective goods in kind formed the nucleus of what was to develop into the 'social service state'. They consisted of free child delivery, pre- and postnatal medical check-ups, and free vitamins and minerals for mother and child. Collective goods aimed at families and children expanded during the 1940s to include free school lunches, school medical services, social services for families, and day nurseries. In retrospect, cash benefits and collective benefits in kind gradually supplanted individualized means tested benefits in kind, which were eventually phased out in the late 1950s and early 1960s.

The Swedish tax system, prior to the 1970 decision to eliminate joint taxation of spouses' earnings, combined aspects of the breadwinner model and the principle of care. Married couples, irrespective of the wife's employment status, were entitled to a tax allowance which was double the amount of that of a single earner. Accordingly, the Swedish single-earner couple enjoyed a larger housewife bonus than in the UK but comparable to that in the US. On the other hand, the Swedish tax system had traditionally allowed relief for families where the wife had her own income from employment (1919–38, 1947–86). The 1952 tax reform entitled working wives with children who were minors to a larger allowance than other working wives. This allowance was successively raised so that on the eve of the 1971 tax reform, a working wife with children received a standard tax allowance which amounted to nearly twice the amount that her husband received. Finally, tax reforms of the early 1960s benefited single parents by granting them the same conditions of taxation as a married couple – in effect a double tax allowance and the same preferential rate of taxation (Elvander, 1972; SOU, 1964: 25). In short, despite the generous housewife bonus, the Swedish tax system entailed neither a single parent penalty nor a dual earner marriage penalty (however, two-job marriages where each spouse had high earnings did confront a marriage penalty because of progressivity in the tax rates). Tax exemptions for children were abolished when universal family allowances for each child were introduced in the

1940s. Thus wives – and especially mothers – had more tax advantages and fathers had fewer, compared to their counterparts in the other countries.

The Swedish tax system offered incentives for married women to enter the labour market, but lingering influences of the breadwinner ideology on wage and employment policies worked in the opposite direction. Special women's wages had been widespread in manufacturing, but in 1960 labour and management reached a decision to abolish them over a five-year period, which eventually led to decreased wage differentials (Qvist, 1975: 28–9). The active labour market measures of the late 1950s and 1960s were primarily geared to men, who were the main participants in training programmes and recipients of mobility grants. Training allowances were also subject to an income test of a spouse's earnings. Married women's rate of labour market participation was roughly on a par with that in the US and the UK in the 1960s. A major difference, however, was a higher rate of employment among mothers with small children (Rainwater, 1979).

Social rights compared

To summarize this discussion of social rights and policy patterns, let us compare the countries using the dimensions of variation in Table 10.1. In the late 1960s the prevalent familial ideology reflected in legislation emphasized a traditional division of labour between husband and wife in all four countries. Swedish policies, however, diverged from those of the other countries in significant ways. First, the basis of entitlement to a number of benefits was citizenship or residence. This basis of eligibility resulted in uniform and personal entitlement within marriage. Married women had individual rights to a basic old age pension, disability and sickness benefits. By contrast, the basis of entitlement of married women and men in the other countries was highly differentiated. Married women's entitlements largely derived from their husbands' rights, and especially in the Netherlands and the UK they lacked individual rights. Second, as a result of social rights based on citizenship, the privilege status of the breadwinner was not translated into social legislation to the same extent as in the other countries. Third, the traditional division of labour in the family – with the mother as carer – shaped legislation through incorporating the principle of care in a way which did not occur in the other countries. In fact, around 1970 the Netherlands and Sweden represented polar opposites in terms of benefits attached to fatherhood and motherhood respectively. Dutch benefits were almost entirely attached to fatherhood; even family allowances and child delivery were covered by the father's insurance. The Swedish

reforms of the 1930s introduced maternity benefits paid to nearly all mothers. Similarly, child allowances were paid to all mothers – even unwed mothers, and advanced maintenance allowances aided single mothers. This contrasts with the Dutch experience, where unmarried mothers were originally not entitled to either family allowances (Roebroek and Berben, 1987: 692) or maternity pay. As distinct from the other three countries, the Swedish tax system also granted women workers with children, especially solo mothers, considerable tax relief. Fourth, benefits to single mothers ran counter to preferential treatment of marriage.

On the dimension of familial ideology, the other three countries are grouped together with respect to the breadwinner ideology and its effects on policy, although the policy constructions differed. In the Netherlands the family minimum has been the norm, and minimum benefits for single individuals have been calculated as a portion of the standard family benefits. In Britain and the US the *individual* was the unit of benefit but the principle of family maintenance resulted in supplements to cover the additional costs of family members – often both wife and children. In Britain the husband was entitled to the supplements with the exception of the dependant's pension, whereas in the US benefits were generally conferred upon the wife. The British adult dependant's allowance has been fairly generous in relative terms but not in absolute terms. The allowance has provided 60 per cent of the benefit of a single person. The US spouse benefit amounted to 50 per cent of the husband's benefit and in absolute terms has been quite generous, and the survivor's benefit was even more generous, totalling 80 per cent of the husband's benefit.

The husband's duty as family provider resulted in special tax relief in the form of a housewife bonus in all four countries. The treatment of wives' earnings, however, varied across the countries. As in the case of entitlement to social benefits, Dutch married women suffered the most inequitable treatment; they were not entitled to a tax allowance. British working wives received a tax allowance comparable to that of single earners – but one which was only around two-thirds of their husbands'. In the US a dual earner couple divided the marital tax relief equally between husband and wife. Finally, Swedish working wives received the same general allowance as their husband, and those with children were entitled to an additional allowance – the rationale being that an allowance would compensate for extra costs related to childcare.

A final dimension of variation which requires consideration is the sphere of care and family policy. In the US care has remained essentially in the private sphere. Liberalism has enhanced beliefs in the sanctity of the family and a doctrine of minimal intrusion by the

government. Public intercession has been condoned in the case of family break-ups and the absence of a family provider. The UK by virtue of its introduction of universal family allowances in 1945 seems markedly different. Yet the liberal traditions of the two countries have had a similar impact: family services have been targeted to families in need. Universalism has not pertained to services for families, reinforcing the norm of care in the private sphere for the vast majority of British families. Dutch 'family policy' has consisted of cash transfers, with the father rather than the mother as recipient, and as in the US and Britain daycare fell within the realm of poor relief. In all three countries, the division between daycare and preschool education has also hampered the expansion of public daycare facilities.

Swedish family policy has comprised not only cash benefits but also collective goods and services. As early as the 1940s the government through state grants encouraged the local authorities to provide services to families, and to do so by training and employing staff to assist in the home. In these instances care in the home was paid work performed by public employees. Although family services were in limited supply, the goal was that they should be available to all families. The services were not means tested but service fees were often graduated according to income, and certain categories of users had priority. In two respects, through benefits based on the principle of care and through transferring tasks in the home to public sector jobs, we can detect the beginnings of care being converted into paid work and the blurring of the boundary between the private and public spheres.

Conclusions

This concluding discussion deals with the implications of the preceding analysis for the original models outlined in Table 10.1 and places the analysis in the larger context of efforts to gender welfare states. The analysis suggests the need to revise the original models in two respects. First, although the breadwinner model strongly influenced the policies of the Netherlands, the UK and the US, the differences in policy constructions between the Netherlands with the family as the unit of benefit and obligations and the other two countries with benefits and obligations tied to the individual suggest two variants of the breadwinner model. The fact that benefits have been attached to the individual has had important consequences for married women. Even if their entitlement was based on their husbands' rights, pensions have been paid to women, providing them with a source of income which Dutch wives did not receive. On the

other hand, the Dutch policy construction may be more amenable to change through gender equality reforms and 'individualization' – changes in legislation making the individual the unit of entitlement and obligations (Sainsbury, 1993b).

Second, and more importantly for revising the models, Swedish policies in the 1960s deviated from the breadwinner model but did not fit the individual model either. Swedish women did have more individual social rights but several of these entitlements were rooted in a traditional familial ideology and a strongly gendered division of labour which is the antithesis of the individual model. To accommodate the Swedish case we can conceive of a traditional family model of social policy encompassing two types: (1) the breadwinner variant; and (2) the traditional roles variant.

Both variants share a familial ideology which prescribes a strict division of labour between husband and wife, and entitlement is differentiated. In the breadwinner model the principle of maintenance prevails and married women's social rights are via their husbands. In the traditional roles variant there are two bases of entitlement – the principle of maintenance underpinning men's social rights and the principle of care enhancing women's social rights. Both principles shaped social benefits and the tax system, whereas the principle of maintenance exerted considerable influence on labour market policies. The sphere of care was still largely private, but benefits based on the care principle altered notions of private and public responsibilities and set in motion a new dynamic of interdependence of the private and public spheres.

What are the implications of this analysis with respect to studying gender and welfare state variations? Let us initially contrast our analysis with the results of mainstream scholarship. Mainstream typologies have often distinguished between three bases of entitlement: need, market work performance, and citizenship. These bases of entitlement also underlie Esping-Andersen's regime typology. In the traditional family model two other bases of entitlement are central: the principles of maintenance and care. This model has allowed us to uncover variations between welfare states that mainstream typologies have not revealed. Mainstream scholarship has often emphasized the commonalities of the Dutch and Swedish welfare states, especially when using quantitative indicators, such as social spending, benefit levels, and de-commodification. Britain and the Scandinavian countries have also been grouped together as similar types of welfare states because of their emphasis on universalism and social citizenship. The analysis here discloses sharp divergences in women's and men's social rights between Sweden and the other three countries, calling into question earlier mainstream categorizations.

Turning to feminist scholarship, a major approach in the fledging efforts to gender welfare state analysis has been to devise alternative models and typologies. A key point of departure for these efforts has been the breadwinner model, and Jane Lewis and Ilona Ostner's work has been very influential. One of their important contributions has been to argue that the strength of the breadwinner model varies across welfare states (Lewis and Ostner, 1991; cf. Sainsbury, 1990, 1994), as distinct from earlier feminist writings which viewed the breadwinner model as an inherent feature of the welfare state. However, a major problem of the breadwinner model is its failure to come to grips with motherhood and mothering as a basis of entitlement.

A special difficulty in Lewis and Ostner's scheme is that they concentrate on primarily two bases of entitlement: as breadwinner or earner; and as the dependant of the breadwinner. For women this boils down to social rights based on either their dependent status as wives or mothers within the family *or* as workers. Lewis and Ostner further argued that 'it has been as wives rather than as mothers that women have qualified for benefits in most state social security systems' (1991: 25–6). What Lewis and Ostner see as the essential variation between welfare states is the extent to which women have also been recognized as workers (1991: 9; cf. Lewis, 1992a). They also downplay the principle of care by stating that 'no government has ever succeeded in attaching a significant value to the unpaid work of caring that women do in the family' (1991: 27).

These assumptions have important implications for their analysis. First they fail to explore social entitlements based on motherhood or the principle of care as a variation across countries. Second their emphasis on care as unpaid work causes them to depreciate the trend towards payment for care as an important welfare state variation, while others claim this trend is one of the major innovations of postwar welfare states (Daly and Scheiwe, Chapters 7 and 9 in this volume). Third, their concentration on the social entitlements of workers leads them to neglect entitlements based on citizenship and need. These omissions also result in a misreading of the history of women's social rights in Sweden. The contrast between Swedish women's social rights and those of women in other countries in the 1990s is interpreted as the effect of women's recent entry into the labour market in unprecedented numbers. According to Lewis, it was post-1970 governmental efforts to bring all adult women into the workforce which transformed the basis of Swedish women's entitlement from that of dependent wife to worker (1992a: 168–9). As this chapter has shown, before the 1970s social entitlements based on citizenship and the principle of care had already altered women's

social rights so that they were not derived from their dependent status within the family as wives.

In summary, the analysis here affirms that the breadwinner model is crucial to an analysis of gender and welfare states. It also makes clear that the task of gendering welfare states cannot be limited to a typology based on this model. Gendering welfare states requires that women's entitlements not only as *wives* and *workers* but also as *mothers* and *citizens* be built into the analytical framework and investigated as cross-national variations.

Notes

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1 For an assessment of the impact of gender equality reforms introduced since 1970 in the four countries, see Sainsbury, 1993b.

2 For a more detailed analysis of the four countries using mainstream dimensions of variation, see Sainsbury, 1991.