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Family Policies in Western Europe: Convergence or Divergence

Annette Borchorst

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**FAMILY POLICIES
IN WESTERN EUROPE
- CONVERGENCE OR DIVERGENCE?**

by Anette Borchorst

Associate Professor
Institute of Political Science,
University of Aarhus,
Universitetsparken
8000 Aarhus C,
Denmark
tel: 45 89 42 12 89
fax: 45 86 13 98 39
E-mail: ifskab@ecostat.aau.dk

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Visiting Scholar, Center for Research on Women, Wellesley College.

Introduction

The position of women in the labour market and in the family has changed drastically in the West during the last 20-30 years. There are presently considerable differences in Western countries in the proportion of women working unpaid as housewives and the proportion of women in the labour force. Fertility rates, divorce rates and cohabitation patterns also vary considerably. These variations are the outcome of a complex mix of economic, political and ideological factors. In this paper the focus is on family policies in Western Europe, and how it affects the position of women, historically and today. The question is whether major differences can be found in relation to policies in Scandinavia and the Continental part of Western Europe and whether the trend is towards convergence or divergence.

The theoretical framework of the paper is the comparative welfare state research tradition which has devised a number of different typologies distinguishing between different welfare state models or regimes. The overall purpose of this tradition has been to explain the emergence and growth of welfare states and, above all, the focus has been on variations in the state - market nexus in different countries. The achievements in this regard have been considerable, but feminist scholars have pointed to two major weaknesses of mainstream welfare state research, i.e. the neglect of gender and the role of the family.

During the last decade feminist research has sought to bring the gender perspective into focus, arguing that major variations between welfare states have crystallized as differences in the situation of women and in family patterns. These differences are

linked to more or less deliberate policies concerning work and family in the different welfare states.

This paper briefly presents one of the most often applied typologies, namely the one developed by Gøsta Esping-Andersen and sums up the feminist critique of his theory and incorporates a gender perspective in this typology. It then explores, the historical origins of family policy in Western Europe and discusses whether family policies and the position of women have diverged into two welfare state regimes in Western Europe today. Finally the paper discusses, whether the Western European countries are heading towards convergence or divergence and what the role of the European Union (EU) is.

Gøsta Esping-Andersen's Typology of Welfare State Regimes

A focal point in the work of Gøsta Esping-Andersen has been the rejection of the functionalist view that welfare states are merely a product of the industrial revolution. He concludes that politics matters and that 'the history of political class coalitions is the most decisive cause of welfare state-variations' (1990: 1). In his study of eighteen Western welfare states, he clusters them into three different regimes: a conservative, a liberal and a social democratic (1990). Hence the typology is related to the different political ideologies which have been dominant in the countries involved. The three regimes differ substantially in their ideas about which mix of the three societal spheres, market, state and family is desirable.

The European Union was called the European Community (EC) until January 1994.

The three regimes have the following main characteristics:

The *liberal regime* is dominated by means-tested assistance; modest universal transfers predominate, and some social-insurance schemes exist. The sovereignty of the market is highly stressed. (Examples of this regime are the United States, Canada, and Australia).

The *conservative regime* is characterized by status differentiation and rights are connected to status and class. Compulsory labour market insurance is common. The church and the family play a crucial role. (This regime is found in Continental European countries such as Austria, France, Germany, and Italy).

The *social democratic regime* has many universal benefits rendered to citizens as rights and financed by taxes. Benefits are relatively high and the welfare states are extensive. Equality is highly stressed. (This regime is primarily found in the three Scandinavian countries, Denmark, Norway and Sweden).

Esping-Andersen's work has inspired many scholars and is often quoted, but also highly criticized. One major criticism which especially has been put forward by feminist scholars is that he largely ignores gender and implicitly applies a male norm (Bussemaker and Kersbergen, 1994; Borchorst, 1994a). In some cases, he mentions differences in women's position within the regimes, but since his theoretical framework does not conceptualize gender and only relates to the state-market nexus, he only describes gender differences; he cannot explain them. On this basis some feminists have

argued that new typologies should be developed, in order to grasp the differences in the situation of women, distinguishing for instance between weak and strong male breadwinner welfare states (Lewis and Ostner, 1994). Others have departed from Esping-Andersen's typology and have tried to systematically add the role of the family and the position of women to Esping-Andersen's analysis of variations between welfare states. This paper represents the latter position, because as a point of departure, some major differences between the regimes can indeed be identified in relation to the position of women.

Women's Position in Western European Welfare State Regimes

A brief overview of the position of women in the three regimes reveals the following differences:

In the *liberal regime* there has been a historical tradition of using women as a reserve army of labour in connection with the two world wars. There is a low political representation of women and women's labour market participation is medium. There is no, or a modest legislated maternal leave and a very modest public commitment to care of small children, sick and the elderly.

In the *conservative regime* there has also been a historical tradition of using women as a reserve army of labour in connection with warfare. The political representation of women and women's labour market participation is low. There

is some entitlement to maternal leave with or without economic compensation and a modest public commitment to care of small children and the elderly.

In the *social democratic regime* there has not been a tradition of using women as a reserve army of labour. The political representation of women in the Nordic countries (Scandinavia, Finland and Iceland) is the highest in the world, and labour market participation of women is also very high. Parents are entitled to parental leave with relatively high economic compensation. Public commitment to care for small children is high and old age care is relatively high.

In the following the historical origins of family policy in Western Europe will be explored, and differences in family policies with regard to the conservative and the social democratic regime will be analyzed in further detail.

The Historical Origins of Family Policy in Western Europe

Historically, the Western European countries witnessed changes in family structures with the advent of the industrial age in the latter part of the last century and the beginning of this century, and they were relatively similar. The family ceased to act as a production unit and men, women and to some extent children had to earn their livings outside the family setting. The work within the family became less visible and of much lower status than wage work. In the middle class, many women remained in the family setting and took care of this work; in many cases they had paid help in the form of housemaids, nannies or kitchen maids. In the working class it became very difficult to

provide care for small children, the sick and the old whilst at the same time ensuring the financial provision for the family.

The widespread misery in working class families became eventually the object of political concern and legislation limiting working hours and securing better working conditions was enacted in most countries. Policy measures directed towards social problems like unemployment and support for the poor and the elderly were also passed in many countries. In the first period most countries copied the compulsory insurance schemes which were launched by Bismarck in Germany. Family policies in a more narrow sense did not come on the political agenda until the 1930s. During this decade, birth rates started to decline all over Europe and caused much anxiety, and policies were enacted in most countries in order to raise the number of births.

From the very start, family policies in Western European countries diverged into two main strategies. One strategy prevalent in countries like Germany, France, Belgium, the Netherlands and Italy was based on a *quantitative population policy*, i.e. cash subsidies to families for every child. The Scandinavian countries were inspired by the Swedish couple, Alva and Gunnar Myrdal (1936) supporting a *qualitative population policy*. It was based on the idea of counteracting the declining birth rate by improving the conditions of families with children via housing legislation, child care institutions and health visitors. It is questionable, whether these ideas initially had major effects, but ideologically it appeared to have a significant influence for family policies in the coming decades.

Policies also diverged in terms of whether they were directed towards families or individuals. Policies are dominated by a principle of *familism* when the family is considered as the basic unit of society, rather than towards men, women and children as individuals, each with rights of their own. Historically familism has been combined with a tendency to consider the man as the head of the household and men gained rights of their own earlier than women. In most countries married women obtained legal authority over one's person much later than men. In family policy, familism has been embedded in policies aiming at maintaining a housewife-male breadwinner family model which has relied on the economic dependency of wives on husbands and marriage. One can distinguish between direct and indirect familism. *Direct familism* exists when legislation is explicitly based on the man as the head of household and where married women and men have different rights. *Indirect familism* exists when the housewife-male breadwinner family type is favoured by legislation, without explicitly differentiating between husband and wives. Familism was prevalent all over Europe in the beginning of the century, but direct familism was gradually removed throughout the century in Scandinavia, among other things due to an inter-Nordic effort to reduce it in the 1920s.

In the conservative regime, familism has been entrenched in the social doctrine of the Catholic Church and elaborated in different encyclicals (Leo XIII, 1891, Pius XI, 1931 and John Paul II, 1981, 1991). The social doctrine intrinsically links women to taking care of dependent persons like small children and the elderly. According to the *principle of subsidiarity* the family, the Church, and voluntary organizations are assigned a central role in solving social problems, whereas the state should not engage in social problems before the family, the Church or voluntary organizations have failed. If the

state or other institutions take over the responsibility, the encyclicals maintain that it will deprive the family of its functions and lead to an increase in bureaucracy (John Paul II, 1991: 69). Hence the social doctrine is highly opposed to public commitment to care for dependent persons. The principle presupposes a distinct hierarchy between the state, the market and the family. The encyclicals also recommend social and family policies to support families in 'bringing up children and looking after the elderly' (John Paul II, 1991: 70), and they strongly favour the *family wage* which implies that a married man gets a wage which is high enough to support himself and his family (John Paul II, 1991: 15).

In the Nordic countries the family wage has never played a major ideological or political role, only during shorter periods have married men received higher wages, because they were family providers. However, there are gender differences in incomes in all job categories.

Hence, from the very start family policies in the conservative and social democratic regimes have diverged; the question is whether these differences have survived till

This will be discussed in the following.

Family Policy in The Conservative Regime

In some of the countries belonging to the conservative welfare state regime Christian democratic parties have headed governments for longer periods in the post-war period. This is true for countries such as West Germany and the Netherlands. For these political

parties, the Catholic social doctrine has served as a major ideological foundation and their family policy has to a large extent been in accordance with the teachings of the Catholic Church.

The present Pope has devoted much effort to condemning abortion as well as to limit access to divorce and contraception and he praises motherhood as women's natural and holy vocation

The lengthy dominance of the housewife-male breadwinner family model in the major Christian democratic countries indicates that the social doctrine has indeed been influential. This family model has been supported by tax systems favouring women's family work and by supporting families with many children. These countries have also kept state involvement in provision of care for the elderly and small children at a minimum.

Presently many Christian democratic parties officially support the integration of women into the labour market. In this sense there is a certain distance between the Catholic Church and these parties, but most of them are in accordance with the Church on the abortion issue. Abortion is, however, legalized in all EU countries except for Ireland.

The social doctrine of the Catholic Church is, accordingly, not decisive for the balance between state, market and family and for the actual content of family and social policies in the conservative regime. Neither do Catholics necessarily follow the teachings of the

Church in their every day practices. Hence catholic countries, such as Italy and Spain presently have the lowest fertility rates in the West.

Countries differ considerably in relation to the provision of public child care facilities (see table one), and especially in relation to small children age 0-3, there are still major differences in public commitment. The differences for provisions for children age 3-6 in the Scandinavian countries and countries like France, Belgium and Italy are more qualitative than quantitative (European Commission's Child Care Network, 1990, Borchorst, 1993).

Parental leave is an important step towards reconciling work and family, but the consequences of a long maternity leave can be ambiguous, because it can also work in the direction of marginalizing women from the labour market. The entitlement of fathers and economic compensation during the leave are steps which can work in the direction of extending women's options. In the conservative regime there are considerable differences in the duration of maternity and parental leave as well as in economic compensation. Paid leave is generally shorter than in the Nordic countries, and fathers are only entitled to leave in some countries and this without economic compensation (Borchorst, 1993).

Direct familism has been on the decline in the Conservative regime in recent decades, and tax policies have changed recently in many Continental European countries. However, the tax system in Germany, France, Luxembourg and, to some extent, Belgium continue to support the housewife-male breadwinner family type (Dumon, 1991).

Indirect familism continues to be widespread, since the social welfare and health systems are based to a large extent on compulsory labour market insurance schemes which do not cover housewives or part-time workers.

The question is whether it is appropriate to operate with just one regime in Continental Western Europe, or whether others should be added. Supposedly religion and the position of the Church is equally or even more important as a differentiating factor as political ideologies. The social doctrine seems to support a restriction of women's options much more fundamentally than Christian democracy accepts today, but the political influence of Catholicism seems to be very different in the Continental European countries. In Germany and until recently, in the Netherlands, this influence has been much more pronounced than in France. Direct and indirect familism is also much more widespread in the two former countries than in the latter.

Family Policy in the Social Democratic Regime

In Sweden and Denmark the housewife-male breadwinner family model was only prevalent in the 1950s; in Norway a couple of decades more. After this, the dual income family model and the single parent family have become the predominant family models. Family policies have actively supported these changes. The social democratic regime is characterized by comprehensive welfare states modifying market forces and much less importance has been ascribed to the family. The Protestant church which is recognized as the official church, has never obtained the same political influence as the Catholic Church has had in the conservative regime. Neither has it developed a political ideology

of its own. In addition especially Denmark and Sweden presently appear to be very secularized countries.

In Scandinavia, abortion became fully legalized in the 1970s, and there is currently very little controversy over women's right to abortion in Denmark and Sweden. In Norway, where religion seems to play a far more important role, it is still a controversial issue.

The expansion of the welfare states in Sweden and Denmark took place in the 1960s at the same time as the large-scale entry of married women into the labour force and this integration was explicitly supported by family policies. The political solutions for reconciling labour force participation with motherhood have, however, been different in the different countries in this regime. Only during a short period did Denmark enact explicit family policy measures. Since the 1980s the stress has been on what has been termed children's policies, and the public commitment to child care is among the highest in the world. Sweden has pursued a more explicit family policy and has tried more to support to parents' responsibility for the care of small children. Hence, paternal leave with relatively generous compensation has been prolonged more than in any other country and entitlements for parents to stay home with their children in case of sickness and other special needs has been enacted. Norway has not supported the integration of women into the labour market as much as the other two countries.

The extensive commitment to human care in Denmark and Sweden contributed to the high participation rate for mothers with small children in these countries. In Norway, the entry of women into the labour market on a large scale started in the 1980s, but without

a major expansion in publicly provided day care. Subsequently, this area to some extent challenges the idea of Scandinavia belonging to one regime.

Indirect familism has been more outspoken in Norway than in Sweden and Denmark, but as long as women have the main responsibility for small children and have a more marginal attachment to the labour market than men, indirect familism will not be completely eradicated in the two other countries, either.

Feminist scholars have concluded that a partnership exists between women and the welfare state in the social democratic regime. Some feminist scholars argue that the Scandinavian welfare states have been woman-friendly in the sense that they have increased women's options (Hernes, 1987), others concludes that the effects have been ambiguous (Siim, 1988; Siim, 1993; Borchorst, 1994b). Women have indeed become more economically independent of husbands and marriage, but a distinct gender hierarchy is still existent. The involvement of men in family work and caring of small children has gradually been extended, but they are still much less involved than women are. The integration of women into the labour market did not dissolve the gender hierarchy, it is still women who takes care of small children and the elderly as public employees. Women occupy the lower and less privileged positions, and wage gaps between the sexes persist in almost all occupational groups. The increasing economic independence and political influence which women have gained has enhanced their control of their options. The relatively high political representation of women in the Scandinavian (and Nordic countries) (Borchorst, 1994a) has been interpreted both as a cause and an effect of the welfare state policies enhancing women's options. Women may not agree as to

which solutions should be chosen to reconcile motherhood and labour market participation, but they make sure that the issue comes up on the political agenda.

Convergence or Divergence?

Presently the Western welfare states all seem to be in a process of restructuring. The questions is where they are heading in terms of the gender based division of labour and the mix between state, market and family. Are they heading towards divergence or convergence between the regimes. If they converge, are the difference between the regimes dissolving, or is one regime becoming more dominant?

In the case of family policies in the two regimes, I have argued that initially they diverged visibly, according to the regime clusters. During recent decades, some major differences between the social democratic regime and the conservative have remained, on the other hand visible differences exist within the two regimes, clustered by Esping-Andersen.

Most recently, demographic factors strongly point towards convergence between the countries involved. Family patterns have become remarkably similar in Western Europe, in the sense that they have become more dynamic. Marriages are not to the same extent as previously a lifelong phenomenon; divorce rates have also increased and so has the number of single parents, who are mainly women. The housewife-male breadwinner family model is on the decline, because there is a marked trend towards increased integration of mothers of small children into the labour market in all Western countries

(OECD, 1990, European Commission Network on Child Care, 1993). In fact the increase seems to be greatest in the countries where the rates were previously lowest (Maruani, 1992) and in most countries, the traditional housewife-male breadwinner family model is dissolving, and women's attachment to the labour force over a life span becomes very similar to men's (Bonke, 1995).

Fertility rates also seem to reflect the new patterns. They started to decline in the Scandinavian countries in the 1960s and 1970s, and are now declining in the countries belonging to the Conservative regime. Presently, the Swedish and Danish fertility rates belong to the highest in Western Europe.

One could anticipate that the Continental European countries will witness a development similar to the Scandinavian situation 30 years ago. The increasing activity rates of women imply that it will no longer be possible to rely on the family or housewives to take care of dependent persons. This increasingly puts the question of reconciling work and family on the political agenda in the conservative regime, but it does not necessarily imply that the solutions in the social democratic regime will become prevalent in the conservative.

My suggestion is that it is not likely that the public commitment to care will be substantially increased, because this will be interpreted as a conflicting goal to the attempts to increase the competitiveness of the European economies. Neither is an increased involvement of men in caring likely in the short run. The two solutions interfere too fundamentally with cornerstones of the division of work in these societies.

The market based solutions and women's individual coping strategies, like part time work or "pauses" from the labour market after child births, will probably become the most common solutions, but there will and is already considerable differences between the Continental European countries in this regard.

At the same time, the Scandinavian welfare states are under reconstruction, and many attempts are made to reduce public expenditures, which are high in these countries compared to most other countries. Presently this process is most pronounced in Sweden, whose economy is in a relatively bad state. This has already implied cutbacks in some of the family benefits which were introduced during the 1970s. The growing internalization of the economy will probably cause an intense debate on which public benefits and services should be given priority. In the field of family policy one can anticipate that these countries will converge with other European countries.

The European Union

Increased European integration could be a force driving in the direction of convergence and harmonization. More and more policies have been subjected to regulation at the super national level, and it is hardly likely that the member states can uphold national policies of their own in very many areas. So far, social and family policies have not been at the core of this regulation, but it is conceivable that services and income transfers of the member states in the future will be affected both directly through directives and recommendations on social and family policies, and indirectly through the effects of the political and economic union and the single market. The question is then,

whether European Union regulation will favour the principles of one regime more than others?

The European Community was formed by leading Christian democrats from the conservative regime, and the overwhelming number of the present member states belong to this regimes. Britain is the only country with liberal elements, but is not included in the liberal regime by Esping-Andersen, because it also has elements from the other regimes. Until recently, Denmark was the only Scandinavian country which was a member of the EU, and therefore the only member state which belonged to the social democratic regime, but now Sweden has also become a member.² It could therefore be anticipated that European Union regulations were influenced by Catholic social doctrine, and that a strong emphasis was given to the family and to principles embedded in the conservative regime.

EC/EU regulations have, however, rejected central elements of the social doctrine. One example of this is that equal pay and not family wage has been an explicit objective of the Community. Directives on equal treatment in social insurance schemes have also aimed at achieving parity between women and men. A directive on equal treatment in the labour market prohibited discrimination on the basis of sex, and the general policy of the Community seems to support the integration of women into the labour market. The Commission has also recommended that the contradictions between family life and working life should be lessened, but this has mainly been in the form of very general

2. Finland has also become a member state, but it does in many respects differ from the Scandinavian countries in terms of welfare state policies.

statements without much effect. In 1992 child care provision was included in EC policies. It was originally suggested to be in the form of a directive, which is binding for the member states, but due to resistance in the Council, it was passed as a recommendation, which has much less effect, and the role of the public sector was down played in the final version. The most far reaching step so far has been a directive, which calls on the national states to provide 14 weeks of paid maternity leave with the right to draw benefits from 1993.

The EU regulations will presumably further the integration of women into the labour market, but it will not support the public commitment to care, which has been characteristic of the Scandinavian countries, because this will not be accordance with the economic policy goals of the EU. I also anticipate that the implementation of the internal market and the Economic and Monetary Union will add to the internal pressure on the social democratic regime towards reducing public expenditures and limit universal benefits. On the other hand the increasing integration of women into the labour force in countries like Germany, the Netherlands, Belgium and Italy will necessarily imply that family policies must respond to the changing family patterns.

Hence, the conclusion is that historically, family policies and the position of women did indeed diverge considerably in the social democratic and the conservative regime, but today there is a very visible trend towards convergence. Presumably none of the regimes seem to survive in tact, but there is no clear cut conclusion as to which particular balance between state, market and family will become predominant. The EU seems to support the trend toward convergence, but the small number of women in the major

decision making bodies of the Community indicates that the issue of reconciling motherhood and the labour market will not receive high priority in the integration process.

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Table 1. Coverage ratios of public-financed childcare provision (%)

Country	Year	Children under 3	Children 3-school age	School age
Germany	1990	14%	77%	6-7 years
France	1988	20%	95%	6 years
Italy	1986	5%	85%	6 years
The Netherlands	1991	4%	50-55%	5 years
Belgium	1988	20%	96%	6 years
Luxembourg	1989	2%	55-60%	5 years
UK	1988	2%	35-40%	5 years
Ireland	1988	2%	55%	6 years
Greece	1988	4%	65-70%	5 1/2 years
Portugal	1988	6%	35%	6 years
Spain	1988	?	65-70%	6 years
Denmark	1989	48%	85%	7 years
Finland	1988	22%	53%	7 years
Norway	1989	10%	55%	7 years
Sweden	1989	29%	81%	7 years
Iceland	1987	26%	56%	6 years

Source: The European Commission's Childcare Network, 1990, *Yearbook of Nordic Statistics*, 1991