Article

Who cares? assessing generosity and gender equality in parental leave policy designs in 21 countries

Rebecca Ray*

Center for Economic and Policy Research Washington, DC

Janet C. Gornick

City University of New York - Graduate Center

John Schmitt

Center for Economic and Policy Research, Washington, DC

Summary Parental leave laws can support new parents in two complementary ways: by offering job-protected leave and by offering financial support during that leave. This study assesses the design of parental leave policies operating in 21 high-income countries. Specifically, the study analyzes how these countries vary with respect to the generosity of their parental leave policies; the extent to which their policy designs are gender egalitarian; and the ways in which these two crucial dimensions are inter-related. The study finds that public policies in all 21 study countries protect at least one parent's job for a period of weeks, months, or years following the birth or adoption of a child. The availability and generosity of wage replacement varies widely, as does the gendered nature of policy designs. Four countries stand out as having policies that are both generous and gender egalitarian: Finland, Norway, Sweden and – unexpectedly – Greece.

Keywords caregiving, comparative, employment, family leave, gender equality, maternity, OECD, parental leave, paternity, social insurance

Introduction

During the last half century, a voluminous body of research has assessed and compared social policies across high-income countries. In the three decades following World War II, many scholars sought to explain variation in welfare state developments, both across countries and over time. The main aim of this research was to identify the antecedents of

variation in social policy (the dependent variable), with social policy typically measured as the share of a nation's economy devoted to various categories of social spending (e.g., Wilensky, 1975). A subsequent generation of comparative studies followed, which the Norwegian sociologist Jon Eivind Kolberg characterized as the 'institutional studies', because they focused on the qualitative, or architectural, features of social policies. In much of this research, the core

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^{*}Author to whom correspondence should be sent: Rebecca Ray, Center for Economic and Policy Research, 1611 Connecticut Ave NW, Suite 400, Washington, DC 20009, USA. [email: ray@cepr.net]

questions concerned the effects of social policy (the independent variable) on diverse social and economic outcomes (for a review, see Kolberg, 1990).

Throughout the 1980s and 1990s, mainstream welfare state research shifted in several new directions, including analyses of retrenchment and restructuring, globalization and supranational decision-making, social exclusion and immigration, and policy feedback loops and legacies. Those years also brought a flood of studies that aimed to incorporate gender into welfare state research in a sophisticated and systematic way, first theoretically and later empirically. A substantial feminist literature developed throughout the 1980s - Helga Hernes' influential Welfare State and Woman Power was published in 1987 - but the major growth spurt took place in the early 1990s, by most accounts catalyzed by the 1990 publication of Gøsta Esping-Andersen's The Three Worlds of Welfare Capitalism (Esping-Anderson, 1990).

While feminist scholars adopted much from this latter stage of mainstream scholarship – especially the focus on policy architecture and policy impacts – they also criticized core components. Many argued that decommodification - the process of protecting workers and their families from the vagaries of the labour market, a concept popularized by Esping-Andersen – applied poorly to many women's social and economic circumstances and needs and, thus, it provided an incomplete framework for assessing welfare state variation. As a group, women were not sufficiently commodified to benefit from a loosening of their commodity status. Several feminist scholars proposed alternative dimensions that would replace or augment decommodification as the central dimension along which welfare states would be compared. Julia O'Connor suggested supplementing decommodification with the concept of personal autonomy, noting that 'the level of personal autonomy depends on the range of services that insulate individuals from involuntary personal dependence on family members and/or public dependence on state agencies' (1996: 62). Ann Orloff (1993) argued that the extent to which states provide access to paid work and enhance women's capacity to form and maintain autonomous households should constitute new dimensions of welfare state variation. Jane Lewis and Ilona Ostner (1991), Diane Sainsbury (1994, 1999), and others called for comparing welfare states according to the extent to which they assume, and reinforce, the traditional male breadwinner model.

As this new scholarship called for 'bringing gender in' to welfare state theory and research, two somewhat distinct perspectives emerged. One perspective, sometimes referred to as the women's employment perspective (see Gornick and Meyers, 2003; Gornick et al., 2009), drew heavily on the critiques of decommodification, and argued that mainstream welfare state theory failed to recognize that substantial numbers of women would benefit from stronger (not weaker) ties to paid work. A second crucial strand of feminist social policy scholarship, sometimes referred to as the care (or caregiver parity) perspective (see Kilkey and Bradshaw, 1999), argued that Esping-Andersen and other mainstream welfare state scholars failed to recognize and conceptualize women's distinctive connection to caring work (especially for children) and their unpaid work more generally. These critics argued that most social policy scholars undervalued care and neglected to theorize a role of the state visà-vis the woman caregiver. Many care feminists argued that, like their mainstream counterparts, employment feminists tended to link citizenship (and thus social policy entitlements) to employment, neglecting women's distinct contributions as caregivers. Arnlaug Leira (1992) concluded that 'what is lacking is a concept of citizenship which recognizes the importance of care to society' (p. 171). The discussion between employment and care feminists paralleled a longstanding debate between so-called sameness versus difference feminism. While employment feminists generally called for a convergence in men's and women's labour market behaviour and outcomes (the sameness paradigm), many care feminists sought support for women's role as caregiver – a role that was seen, for the most part, as unique to women (an embrace of difference).

At the heart of these complex normative debates lay the question, what constitutes the 'woman-friendly welfare state' (a term coined by Hernes in the 1980s)? Not surprisingly, the tension between feminists who emphasized support for paid work and those who stressed support for caregiving was most evident when discussions turned to policy prescriptions. Feminists who stressed employment argued that women's emancipation requires strengthening female employment until gender equality in the labour market is achieved. From this vantage point, a core goal of the woman-friendly state is to support women's employment opportunities and

achievements. The care perspective, in contrast, emphasized that the ideal role of the state is to grant women 'the right to time for care' and to remunerate women for care work performed in the home – in essence, to render 'women's difference costless' (Fraser, 1994: 611). While the care perspective has focused primarily on *women*'s rights, many careoriented feminists also have emphasized the value of care for those who receive it – first and foremost, children. As Trudie Knijn and Monique Kremer, two leading care theorists, noted, 'Of course, to receive informal care from a relative [who] has the right to time for care is often a good solution for both the person in need of care and the caregiver' (1997: 333).

In the last decade, several feminist welfare state scholars have aimed to resolve the tension between these two strands of feminist analysis. A blended social model has emerged that largely closes the underlying divide. The so-called 'dual-earner/dual-carer' model, with some variations, has been developed and clarified mainly by feminist welfare state scholars in Europe (e.g., Crompton, 1999; Lister, 1997; Pfau-Effinger, 1999; Ellingsaeter, 1999; Sainsbury, 1999) as well as by Gornick and Meyers (2003) in the United States. The 'earner-carer' model envisions a society in which men and women engage symmetrically in both paid work and unpaid caregiving (consistent with the gender egalitarianism at the heart of the employment perspective); its proponents call on the state to strengthen women's ties to employment and men's to caregiving. The 'earnercarer' model also envisions that parents will take primary responsibility for the care of their own very young children (consistent with the care perspective's call for valuing and rewarding unpaid caregiving); this requires state interventions that support parental caregiving during children's earliest years.

Parental leave

This rich and evolving literature on the woman-friendly welfare state has pushed the study of parental leave¹ to the forefront of comparative social policy scholarship concerned with gender equality. Intense and growing interest in parental leave is not surprising given that leave policies have the potential to shore up women's employment *and* to engage both women and men in caregiving – possibly with far-reaching consequences.

Parental leave rights and benefits have, in fact, attracted researchers for several intertwined reasons.

First, parental leave policy designs are unusually complicated and multidimensional – simultaneously incorporating complex rules about financing, coverage, eligibility for both mothers and fathers, benefit structures, duration, and flexibility vis-à-vis intermittent and part-time take-up. In some countries, leave policies are coordinated with policies concerning non-parental child care, such that parents can choose to either take leave or to utilize a public child care slot. In some countries, job-protected leaves coincide with periods of wage replacement; in others, rights to job protection and to payment are only minimally coordinated.

Second, parental leave policies vary dramatically over time and across relatively similar countries. Even within Europe, stark differences in leave designs are evident, despite the fact that the 1992 EU Pregnant Workers Directive required that all new mothers be granted maternity leave of at least 14 weeks (eur-lex. europa.eu, 2009a) and that the subsequent 1996 EU Parental Leave Directive required that all workers be granted an individual right to parental leave for at least three months (eur-lex.europa.eu, 2009b); these two together imposed floors under individual member states' leave policies.²

Third, the behavioural consequences of leave schemes are complex. Unlike the provision of formal child care, for example, which (fairly unambiguously) raises the prevalence and stability of mothers' employment, leave schemes have less clear-cut effects. Like child care, paid leave schemes (especially of shorter duration) strengthen women's ties to paid work, by raising women's employment rates (Ruhm, 1998; Rønsen, 1999), reducing new mothers' labour market exits (Joesch, 1997; Smith et al., 2001; Hofferth and Curtin, 2003), decreasing their job turnover (Glass and Riley, 1998), and lessening the pay gap between women with and without children (Waldfogel, 1997).

At the same time, leave provisions also enable women to take time away from paid work, albeit temporarily, potentially eroding their human capital (Bergmann, 2009) and, some argue, making them less attractive (than their male counterparts) to employers (Shalev, 2009). Concerns about possible harmful effects on women's employment outcomes are most often expressed in relation to policies granting relatively long leaves – that is, leaves of a year's duration or more (e.g., Morgan and Zippel, 2003). However, when leave rights and benefits are

extended to men, these same schemes enable many men to take time away from work as well. The net effect of most leave schemes on women's and men's employment outcomes, and on gender equality overall, remains a debated question. In the introduction to their widely cited volume on parental leave in Europe, Peter Moss and Fred Deven (1999) characterize the central conundrum - whether parental leave mitigates or worsens gender inequality – as a Catch-22: 'If parental leave were equally taken by women and men, it might promote or consolidate gender equality. But to be equally taken requires gender equality to be achieved already, or to be further advanced than at present. If gender equality is not already advanced, then parental leave may retard or even reverse progress towards its achievement' (p. 14).

A substantial body of research has compared the generosity of parental leave schemes across countries, with generosity usually captured through a combination of benefit levels and benefit duration (e.g., OECD, 1995; Gornick et al., 1997; Gornick and Meyers, 2003; Gornick et al., 2009; International Labour Organization, 1999; Moss and Wall, 2007; Moss and O'Brien, 2006). Most of this literature has focused on high-income countries, although some studies have taken a more global approach (e.g., Heymann et al., 2007; Öun and Pardo Trujillo, 2005).

Some of these scholars, and others, have also argued that policy leave designs have gendered impacts, especially on gendered divisions of labour in both paid and unpaid work (Bruning and Plantenga, 1999; De Henau et al., 2007; Moss and Deven, 1999; Moss and Korintus, 2008; Duvander and Andersson, 2006; Eriksson, 2005; Eydal and Gíslason, 2008; Folbre, 2001; Gornick and Meyers, 2003; Hayghe, 1993; Jónsdóttir and Aðalsteinsson, 2008; Leira, 1999; O'Brien, 2005; Pylkkänen and Smith, 2004; Rose and Hartmann, 2004). Arnlaug Leira (2000) highlighted the importance of nontransferable ('use or lose') leave entitlements for men, describing them as 'fatherhood by gentle force' (2000). However, very few empirical studies have systematically assessed or quantified the extent to which parental leave schemes are gender egalitarian by design, leaving a substantial gap in the cross-national literature on leave policies.

Gwennaele Bruning and Janneke Plantenga (1999), in a study of the interplay between leave policy designs and equal opportunities in eight countries, compared leave rules as well as men's and

women's take-up and usage rates. They concluded, 'Parental leave regulations are flexible and can also provide real support in policy aimed at equal opportunities for men and women. However, this kind of development demands special attention when structuring concrete leave developments' (p. 208).

Janet Gornick and Marcia Meyers (2003) directly assessed the gendered structure of leave rules across countries, meaning the extent to which leave rights and benefits are granted to men (as well as to women) and the nature and strength of the incentives for male take-up. Gornick and Meyers analyzed the parental leave laws in twelve countries, scoring each on a six-point gender equality scale that combined three factors: the presence of paid leave for men, the structure of the entitlement (with a focus on non-transferability of leave between parents), and the level of wage replacement. They concluded that, while generosity (measured as the benefit level weighted by the duration) and genderegalitarian policy features were correlated, they were two distinct dimensions.

This study

Our current study builds on this rich literature by assessing the generosity and the gendered structure of parental leave policies in place in 21 high-income countries. As we have noted, welfare state scholars concerned with the interplay between 'earning' and 'caring' have long puzzled over parental leave policies, as it is widely recognized that these policies can have complex and even contradictory effects on both employment and caring practices. The generosity of leave policies, captured by their duration and benefit levels, can shape the time that employed parents have to care for family members at home. In addition, leave policies can strengthen or weaken women's labour market attachment, depending, to a large degree, on their design. Likewise, leave policies can influence men's share in family caregiving, as policy rules affect the availability of leave for men and shape their incentives for take-up (Moss and Korintus, 2008: 79).

In this study, we establish a series of metrics, and some aggregate indicators, that enable scholars (including ourselves) to compare leave policies more precisely than most earlier studies have allowed. Our aim is to provide policy measures that will allow other welfare state scholars, and social scientists more generally, to better understand the ways in

which welfare states shape gender relations in the labour market and at home, and how that varies across countries.

Our key research questions are:

- How do our study countries vary with respect to the generosity of their parental leave policies?
- How do they vary with respect to the extent to which their policy designs are gender egalitarian?
- To what extent, and how, are these two crucial dimensions inter-related?

In answering these questions, like Gornick and Meyers (2003), we treat generosity and gender equality as separate, albeit overlapping, elements of policy design. We also elaborate on Gornick and Meyers' gender equality scale, extending it from a 6-point index to a 15-point index, and applying it to a larger set of countries. We refer to this new index as the Gender Equality Index.

This study focuses on the legal structure of each country's parental leave programmes. We acknowledge that discrepancies may exist between these *de jure* policy environments and *de facto* conditions experienced by workers, due to uneven coverage and enforcement. This discrepancy is likely to be sharper in countries with higher levels of informal employment. However, an exploration of whether and to what extent these differences exist is beyond the scope of this article. We leave this important area to future research.

The layout of the rest of this article is as follows. The next section introduces our data sources and summarizes our methodological approaches to measuring, first generosity, and second the extent to which policy designs include gender egalitarian elements. Following this, we present our results on the generosity of parental leave schemes, separately for mothers, fathers, and couples, across 21 high-income countries. The subsequent section presents our assessment of the degree of gender equality in the leave schemes across these countries. In the final section, we comment on directions for future research.

Data and measurement

Data sources

We first constructed an original database capturing the parental leave policy rules in 21 high-income countries.³ The countries include 14 European Union member countries (Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, the Netherlands, Portugal, Spain, Sweden, the United Kingdom); two non-EU European countries (Norway and Switzerland); and five non-European countries (Australia, Canada, Japan, New Zealand, the United States). The policy data are current as of January 2009.⁴

Our primary data sources were linked to individual countries' social insurance programmes, including online and published manuals for employers and potential beneficiaries. We also used data compiled by the European Commission, the Organization for Economic Co-operation and Development (OECD), and the International Labour Organization. Further information, including an appendix to this report, an earlier version focused on US audiences, and an in-depth presentation of each country's policies, is available online (http://www.cepr.net/index.php/publications/reports/plp/).

Measuring and comparing generosity

Parental leave laws can support new parents in two complementary ways: by offering job-protected leave and by offering financial support during that leave. In this study, we consider both the number of weeks of job-protected leave guaranteed in each country and the share of those weeks that is paid.

Because the countries that provide paid leave vary widely with respect to both the number of paid weeks available and the level of financial support provided, we converted each country's paid parental leave into 'full-time equivalent' (FTE) units. FTE paid leave is calculated as the wage replacement rate multiplied by the duration of leave. For example, during Switzerland's 14 weeks of maternity leave, mothers receive 80% of their usual earnings, or the equivalent of 11.2 weeks of full-time wage replacement. For countries that offer flat-rate benefits (Belgium, France, Germany, Sweden and the United Kingdom) or impose income ceilings (Belgium, Germany, Norway, Spain, Sweden, Switzerland and the United Kingdom), we calculate the benefit as a percentage of the most recently available average wage figures for the country.5

In order to effectively compare a wide variety of parental leave policies, we employed several simplifying rules. All of these rules derive from one

underlying principle: where there is more than one possible arrangement of parental leave, we use the least generous arrangement for our cross-national comparison. This is a necessary principle in order to adequately compare legal guarantees, even when more generous arrangements are possible in certain circumstances. In some cases, for example, parents may choose between an extended leave at a low benefit rate and a shorter leave at a higher rate; in these cases, we report the shorter estimate of leave. In other cases, parental leave policies vary by parents' employment sector. Danish parents, for example, receive more generous benefits if they are manual workers, as do Greek workers if they are in the public sector. In some cases, mothers can draw longer total periods of leave by starting their prepartum leave earlier, without losing leave rights and benefits during the postpartum period. In each of these instances, we report the least generous benefit allotment.

Because we are concerned with both the overall level of support and the implications of policy design for gender equality, we analyze the national parental leave policies in three different dimensions. First, we assess the level of provision available to couples; in this analysis, we combine all forms of support, regardless of whether they are earmarked specifically for the mother or the father.6 Second, we examine the leave available to mothers, under the assumption that fathers transfer all of their transferable leave to these mothers. This assumption is consistent with strong cultural norms that place primary responsibility for child care with mothers, not fathers; underlying economic incentives whenever mothers earn less on the job than fathers; and the empirical pattern of take-up in countries where some portion of benefits are transferable between mothers and fathers. (For the same reasons, when making international comparisons, we assume that mothers transfer none of their transferable leave to fathers.) Third, we survey the leave available exclusively to fathers. (Several countries have instituted non-transferable leave to fathers in recognition of the issues mentioned in connection with the preceding assumption.)

Measuring and comparing gender equality

The gender equality implications of a nation's parental leave policies depend on two main factors:

(1) the portion of leave available for fathers or reserved exclusively for fathers; and (2) the percentage of earnings replaced during periods of leave. We have developed a 15-point Gender Equality Index to compare how effectively various leave policies promote gender equality, primarily through encouraging fathers to participate in leave-taking.⁷

Our index is made of three components: the portion of a couples' leave that is available to fathers (worth nine points), the wage replacement rate during the fathers' leave (worth five points), and additional incentives or disincentives for fathers to take parental leave (worth one point, positive or negative).

The nine points allocated for the distribution of leave between parents is the most important element in the index, and also the most complex. Countries offer two types of leave for fathers: time reserved exclusively for fathers, and time that fathers can transfer to mothers if fathers choose not to use it. Leave that is reserved exclusively for fathers is more consistent with a gender-egalitarian parental leave policy. Transferable leave creates a financial incentive for mothers to take any available transferable leave whenever, as is usually the case, the mother earns less than the father, reinforcing gender roles that already encourage mothers rather than fathers to be caregivers. Therefore, the Gender Equality Index gives more weight to the non-transferable portion of leave for fathers than to the transferable portion; see Table 1.

We allocate five additional points for the wage replacement rate during fathers' parental leave (including both leave reserved for fathers' use and transferable leave). As fathers are still likely to earn more than mothers, unpaid or low-paid parental leave creates a strong incentive for fathers to forgo their leave allowances. The five points are reported in Table 2.

Wage replacement is averaged during all periods of leave available to fathers. For example, if half of a parent's leave is paid at 80% and half is unpaid, the overall wage replacement rate is 40%. Where benefits are paid at a flat rate or there is an earnings-related benefit ceiling, we use the most recently available average salary figures, as reported in the OECD's *Benefits and Wages*, to estimate the percentage of average salaries represented by the flat rate benefit or benefit ceiling.

Finally, countries can earn one positive or one negative point for incentives for fathers to either take

Table 1 Gender Equality Index: allocation of points for fathers' portion of leave

Portion of a couple's leave that is reserved for the father's use	Portion of a couple's leave a father has if he takes his reserved leave, and all additional transferable leave	Resulting score
0	0	0
0	Less than 16.7%	1
0	At least 16.7% but less than 33.3%	2
0	At least 33.3%	3
Less than 16.7%	Less than 16.7%	4
Less than 16.7%	At least 16.7% but less than 33.3%	5
Less than 16.7%	At least 33.3%	6
At least 16.7% but less than 33.3%	At least 16.7% but less than 33.3%	7
At least 16.7% but less than 33.3%	At least 33.3%	8
At least 33.3%	At least 33.3%	9

Source: Authors' analysis, Ray (2008), and Ray et al. (2008).

Table 2 Gender Equality Index: allocation of points for wage replacement rate during fathers' leave

Average wage replacement	
rate during fathers' leave	Resulting score
None: all leave for fathers is unpaid	0
Some payment but less than 16.7%	
of fathers' usual wages	1
At least 16.7%, but less than 33.3%	
of fathers' usual wages	2
At least 33.3%, but less than 50%	
of fathers' usual wages	3
At least 50%, but less than 66.7%	
of fathers' usual wages	4
At least 66.7% of fathers' usual wage	s 5

Source: Authors' analysis, Ray (2008), and Ray et al. (2008).

their permitted leave or transfer it to the mother. Austria, Finland, Germany, Portugal and Sweden each earned one point in this category. Austria's parental allowance for low-income families is extended from 30 to 36 months if both parents take some of the shared parental leave. Finland allows two additional weeks of parental leave if the father takes at least two weeks. Germany has instituted recent reforms that dramatically shifted its parental leave policy toward gender egalitarian usage; the current policy allows two additional months if these are taken by the father. Portugal offers full payment during the first two weeks of parental leave, but only if they are taken by the father. Sweden has long had a policy of 'daddy days', which reserve a portion of parental benefits for fathers, and in July 2008 instituted additional financial benefits for families that share parental leave. Japan earns one negative point. In Japan, one parent must take all of the family's parental leave, which has the effect of dramatically reducing fathers' incentive to take leave (additional country-specific decisions that merit attention are summarized in the Appendix).

Results: the generosity of parental leave policy designs

Parental leave for couples

The amount of unpaid and paid parental leave available to couples with a new child is reported in Figure 1.8 (The totals here reflect the combined legal entitlements for both mothers and fathers, under the assumption that both parents take all available leave.) These results demonstrate that total job-protected leave, captured as the joint availability for couples, varies widely across these 21 countries, from only 14 weeks in Switzerland to over 300 weeks (about six years) in France and Spain. The United States, with 24 weeks of combined protected job leave for a two-parent family, ranks 20th (out of 21); Switzerland provides fewer weeks of protected job leave (14), but provides financial support of 80% of a mother's usual earnings during that leave.

In addition to France and Spain, four countries grant a total of at least two years of protected leave for a two-parent family: Germany (170 weeks),

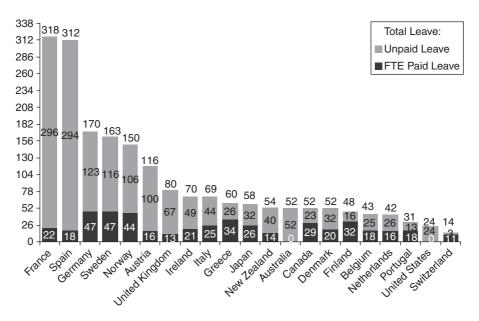


Figure 1 Total and FTE paid parental leave for two-parent families, in weeks *Source*: Authors' analysis, Ray (2008), and Ray et al. (2008).

Sweden (163 weeks), Norway (150 weeks), and Austria (116 weeks). Six countries offer over one year: the United Kingdom (80 weeks), Ireland (70 weeks), Italy (69 weeks), Greece (60 weeks), Japan (58 weeks), and New Zealand (54 weeks). Australia, Canada, and Denmark each guarantee one full year. Among the six remaining countries, four provide over six months' leave: Finland (48 weeks), Belgium (43 weeks), the Netherlands (42 weeks) and Portugal (31 weeks). Only the United States (24 weeks) and Switzerland (14 weeks) offer less than six months to care for a young child.

A second key dimension of parental leave is whether it is paid and, if so, how generously. For many low- and middle-income families, unpaid leave is not particularly helpful because these families cannot afford the time away from work. The Unites States provides a striking example. According to a 2000 U.S. Department of Labor survey, for example, over a 22-month period in 1999 and 2000, 3.5 million people in the United States needed leave for family or medical reasons but did not take it; almost 80% of those who did not take the leave said they could not afford to do so.¹⁰

Figure 1 also displays the total number of weeks of paid parental leave available jointly to couples. To simplify comparisons across countries, the figure

converts benefits in all countries to a full-timeequivalent (FTE) basis. Most countries provide between three months and one year of FTE paid leave. Denmark falls right at the middle of the paidleave scale, guaranteeing about 20 weeks of FTE paid leave. No country provides more than one year of FTE paid leave, but Sweden and Germany each offer 47 weeks. Five other countries offer at least six months of FTE paid leave: Norway (44 weeks), Greece (34 weeks), Finland (32 weeks), Canada (29 weeks) and Japan (26 weeks). Nine countries have between four and six months of FTE paid leave: Italy (25 weeks), France (22 weeks), Ireland (21 weeks), Denmark (20 weeks), Belgium (18 weeks), Portugal (18 weeks), Spain (18 weeks), Austria (16 weeks) and the United Kingdom (13 weeks). Four countries guarantee some paid leave, but fewer than four months: the Netherlands offers 16 weeks: New Zealand has 14 weeks; and Switzerland, 11 weeks of FTE paid leave. Finally, Australia and the United States grant no paid leave whatsoever.11

Mothers in couples

Where Figure 1 reports the combined leave granted to *couples*, Figure 2 reports the maximum entitlements

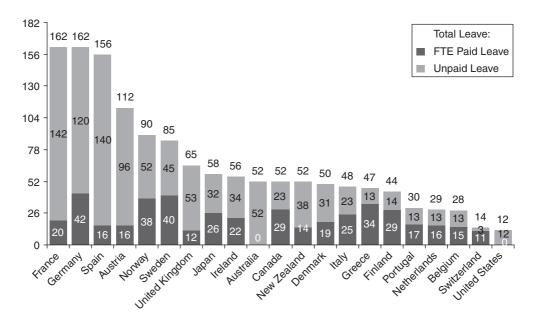


Figure 2 Total and FTE paid leave for mothers in couples, in weeks *Source*: Authors' analysis, Ray (2008), and Ray et al. (2008).

for *mothers* in couples, under the assumption that they take all of the leave to which they are specifically entitled, plus all of the fathers' leave that can be transferred to them. Our results on the entitlement of mothers in a couple, together with corresponding results for fathers (below), shed light on the extent to which national parental leave policies include gendered components.

The generosity of national policies looks somewhat different when we focus exclusively on mothers. All countries provide mothers with at least some protected job leave - from a low of 12 weeks in the United States (in the case of mothers who are employed in establishments with 50 or more employees and who have been on the job for at least one year) to a high of 162 weeks in both France and Germany. France, Germany and Spain (156 weeks) provide mothers with at least 3 years of total parental leave. Austria (112 weeks) grants more than two years. Five additional countries grant over one year: Norway (90 weeks), Sweden (85 weeks), the United Kingdom (65 weeks), Japan (58 weeks) and Ireland (56 weeks). Australia, Canada and New Zealand (52 weeks) each require employers to provide mothers one full year of total leave. Denmark (50 weeks), Italy (48 weeks), Greece (47 weeks), Finland (44 weeks), Portugal (30 weeks), the Netherlands (29 weeks) and Belgium (28 weeks) provide mothers with between six months and one year of total leave. The two least generous countries are Switzerland (14 weeks) and the United States (12 weeks).

The duration of paid leave for mothers, expressed in FTE units, is substantially shorter than total leave. Only seven of the 21 countries provide mothers six months or more of FTE paid leave: Germany (42 weeks), Sweden (40 weeks), Norway (38 weeks), Greece (34 weeks), Finland (29 weeks), Canada (29 weeks) and Japan (26 weeks). Sixteen of the 18 remaining countries provide mothers with between 11 and 26 weeks of FTE paid leave. Australia and the United States guarantee mothers no paid time off after childbirth.

Fathers in couples

Our results on leave entitlements to fathers in couples are reported in Figure 3. Here, we have assumed that fathers take only the portion of leave earmarked exclusively for them. Given the social and economic pressures acting on fathers, these 'use it or lose it' days are often the only ones that fathers take.

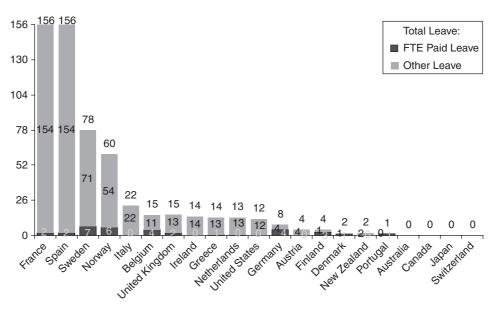


Figure 3 Total and FTE paid leave for fathers in couples, in weeks *Source*: Authors' analysis, Ray (2008), and Ray et al. (2008).

The contrast between mothers' maximum entitlements and fathers' minimum entitlements is stark. A handful of countries offer 'use it or lose it' jobprotected leave in excess of one year: Spain (156 weeks), France (156 weeks), Sweden (78 weeks) and Norway (60) weeks. The vast majority of countries, however, offer substantially less 'use it or lose it' leave, and four countries offer fathers none at all (Australia, Canada, Japan and Switzerland). The United States (12 weeks) falls near the middle of the international distribution.

Paid 'use it or lose it' leave for fathers is remarkably limited. Sweden offers fathers the most paid 'use it or lose it' leave: seven weeks. Norway, with six weeks, is the only other country to offer at least one month. Ten countries, including the United States, have not established any paid 'use it or lose it' leave for fathers.

The contrast between the maximum entitlements for mothers (Figure 2) and the minimum entitlements for fathers (Figure 3) underscores the ways in which parental leave policy – even generous parental leave policy – can act to undermine gender equality. Policies that allow families to allocate paid and unpaid leave heavily or even exclusively for mothers can reinforce traditional gender roles and women's disadvantage in the labour market.

Leave generosity for couples, mothers, and fathers – summing up

Our final presentation on the generosity of paid leave, Table 3, summarizes leave entitlements for couples, mothers, and fathers. Because this table highlights the stark differences in generosity by gender, it provides a bridge to the next section, where we report the results of our Gender Equality Index. Given that fathers' earnings are generally higher than mothers' earnings, unpaid or poorly paid parental leave can reinforce social and economic pressures against gender equality. If parental leave does not replace a substantial portion of fathers' earnings, most families will bear a greater financial burden when fathers take leave than when mothers take leave. Spain, for example, has the second-longest total parental leave policy of the 21 countries analyzed here (312 weeks per couple, see Figure 1) but offers a relatively small number of FTE paid weeks of leave (18 weeks per couple, see Table 3) - that is, the benefit level is low - which does little to counteract the effects of traditional gender roles and genderwage differentials that push women to be the main leave-taker and push fathers out of caregiving. Finland grants far less total leave (48 weeks per

Table 3 Minimum and maximum parental leave allotments, in weeks of FTE paid leave

		Mothers' F7	E paid leave	Fathers' FT	E paid leave
Country	Couples' FTE paid leave	Minimum	Maximum	Minimum	Maximum
Australia	0.0	0.0	0.0	0.0	0.0
Austria	16.0	16.0	16.0	0.0	0.0
Belgium	18.0	13.9	13.9	4.1	4.1
Canada	28.6	9.4	28.6	0.0	19.3
Denmark	19.6	9.0	18.6	1.0	10.6
Finland	31.7	11.7	29.0	2.7	21.3
France	21.8	16.0	19.8	2.0	5.8
Germany	46.7	14.0	42.0	4.7	28.0
Greece	34.1	17.0	33.5	0.6	17.1
Ireland	20.8	20.8	20.8	0.0	0.0
Italy	25.1	17.3	25.1	0.0	7.8
Japan	26.0	8.4	26.0	0.0	17.6
Netherlands	16.4	16.0	16.0	0.4	0.4
New Zealand	14.0	0.0	14.0	0.0	14.0
Norway	44.0	9.0	38.0	6.0	35.0
Portugal	18.0	6.0	17.0	1.0	14.0
Spain	18.0	16.0	16.0	2.0	2.0
Sweden	46.9	6.9	40.0	6.9	40.0
Switzerland	11.2	11.2	11.2	0.0	0.0
United Kingdom	13.0	12.6	12.6	0.4	0.4
United States	0.0	0.0	0.0	0.0	0.0

Note: For Finland and Portugal, the sum of mothers' minimums and fathers' maximums are greater than couples' total FTE paid leave lengths. In Finland, if fathers take the last two weeks of parental leave, they receive two additional weeks, raising their total FTE paid leave from 31.7 weeks to 33.0 weeks. Similarly, in Portugal, if the fathers take two weeks of parental leave, that leave is paid (although it is unpaid if mothers take it). Thus, if fathers take their maximum leave, it raises the total FTE paid leave from 18 weeks to 20 weeks.

Source: Authors' analysis, Ray (2008), and Ray et al. (2008).

couple, see Figure 1), but a large portion of the leave is paid (32 weeks, see Table 3) and only one third of this is earmarked for mothers, giving Finnish families greater latitude for higher-earning fathers to take time to care for infants. Experience suggests that providing paid parental leave can go some distance toward encouraging fathers to take leave. For example, in Portugal in the last year that parental leave was unpaid (2000) fewer than 150 men took parental leave; three years later, after Portuguese law was changed to give fathers two weeks of paid parental leave ('daddy days'), the number of men who took up the leave rose to 27,000 (OECD, 2002).

Results: the Gender Equality Index and the generosity/equality association

We report the results of the Gender Equality Index, across our 21 study countries, in Figure 4. These results indicate that Sweden earns the highest score

on this index, with 14 points. Finland, Greece, and Norway each earn 12 points, and Belgium follows with 11 points. France, Italy, Portugal, and Spain each receive 10 points. Germany and the United States fall at the median of nine points. Denmark, The Netherlands and the United Kingdom trail closely behind at eight points. Austria, Ireland and Canada each earn seven points. Four countries scored fewer than seven points: New Zealand (6), Japan (5), Australia (1), and Switzerland (0).

The highest Gender Equality Index scores are found in three Nordic countries (Sweden, Finland and Norway) and in Greece. These four countries achieve high index scores through quite different routes. Finland reserves the least amount of time for fathers (approximately eight percent of a couple's total leave, although fathers can access up to 65% if mothers transfer time to them), but gives fathers a strong incentive to take transferable leave, including a wage replacement rate of two-thirds of their usual

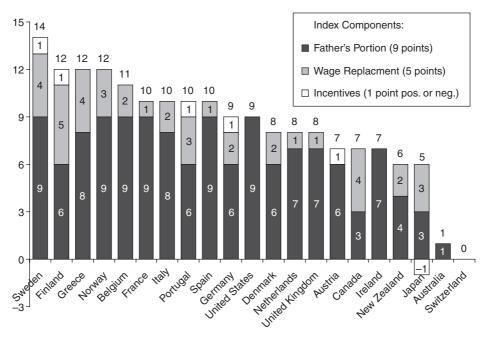


Figure 4 Gender Equality Index Source: Authors' analysis, Ray (2008), and Ray et al. (2008).

salary (the highest wage replacement rate for fathers of any country examined in this report). In contrast, Norway offers fathers less than half of their usual income during parental leave (approximately 40%), but also reserves 40% of the family's total leave for fathers' use. Greece and Sweden fall between Finland and Norway in their distribution of fathers' benefits between leave and pay. In Greece, fathers can take between 22% and 50% of a couple's total leave, and receive over half of their usual earnings (approximately 57%). Swedish fathers have approximately 48% of a couple's parental leave reserved for them (with no additional transferable leave), and receive about half of their usual earnings (51%) during their leave.

While a large body of prior literature has reported that the Nordic countries have social policies in place that support gender equality, earlier research has not painted Greece as a high performer in this area. At the same time, it is important to stress that, while Greece's *law* has gender-egalitarian design elements, its impact may be comparatively limited. Greece has much higher shares of self-employment and informal employment than do these three Nordic countries and a higher share than most of the rest of the sample

as well (see Schmitt and Lane, 2009, for a comparison of small-business employment across OECD countries). High rates of self-employment and informality will reduce the effective coverage rates for parental leave policies. Our focus here, however, is on the legal policy framework, not the *de facto* coverage or take-up rates.¹³

At the other end of the spectrum lie Switzerland and Australia. Fathers in Switzerland have no access to parental leave whatsoever, either reserved or transferable. Australian fathers have no reserved parental leave, and may access only one (unpaid) week out of a couple's total year-long allotment, if mothers choose to transfer that week to them.¹⁴

Next, we consider our Gender Equality Index results in conjunction with the generosity results in the prior section. One clear conclusion is that generosity and gender equality are distinct features of leave designs – not just in theory but in practice. In any given country, leave policies can be generous, or gender egalitarian, or both, or neither. A simple comparison of Figures 1 and 4 demonstrates that generosity and gender egalitarianism are different dimensions and comprehensive policy analyses ought to account for both.

At the same time, there is some association between these two overarching dimensions as we have operationalized them. The correlation between the generosity of countries' total leave available (Figure 1, total length of the bars) and their Gender Equality Index score (Figure 4) is 0.348, indicating that there is a modest positive association. There is a stronger association between countries' leave generosity, with respect to paid leave (Figure 1, FTE Paid Leave portion), and their Gender Equality Index score. Here the correlation is 0.618. This stronger correlation is not surprising, because the presence and generosity of *paid* leave is a component of the Gender Equality Index.

Finally, our analysis allows us to identify which of these 21 countries are comparatively strong on both generosity and gender equality - that is, which countries have adopted policies most in line with the 'earner-carer' social model. In short, four countries fall among the five most generous with respect to paid leave (see Figure 1, FTE Paid Leave) and among the five most gender egalitarian (see Figure 4). These four countries include three Nordic countries -Finland, Norway and Sweden - plus Greece. 15 Each of these countries provides couples with six months or more of fully paid leave and scores twelve or more points on our Gender Equality Index. Taken as a group, then, these four countries have policy features that appear to go the farthest in promoting both generosity and gender equality.

Directions for further research

We see two crucial directions in which our research could be extended in the future.

First, while we constructed comprehensive measures of generosity and gender equality in policy design – as reported in this article – we did not address at least three other consequential policy elements. These additional policy design dimensions clearly matter for assessing the overall performance of parental leave designs, including their expected gendered effects, and they should be incorporated into future comparative studies:

- the scope of policy coverage that is, how universal the policy is;
- the underlying financing structure; and
- the forms in which, and the extent to which, parents are permitted flexibility when drawing leave rights and benefits.

Across countries, leave policies vary in terms of the scope of *coverage*. National legislation may exclude some or all of these groups of workers: domestic workers (who are overwhelmingly female); members of the employer's family or women working in family undertakings; agricultural workers; workers in the armed forces and/or police; managers/business executives; workers earning over a certain ceiling; certain groups of civil servants; and/or non-standard workers including part-time, casual, and temporary workers (Öun and Pardo Trujillo, 2005). These exclusions are likely to be more numerous, and more consequential, in lower-income countries where informal labour markets are larger and agricultural employment is more prevalent.

The financing mechanisms underlying leave policies are also consequential. Financial designs affect the political and economic viability of leave programmes and they have important behavioural consequences, especially vis-à-vis employer behaviour. Social insurance financing allows risk to be shared across all employers, greatly reducing the financial burden for individual employers and minimizing incentives for discrimination against women of child-bearing age. Again, capturing the financing structure in policy comparisons is especially important when considering countries at all levels of economic development. While the European systems nearly all rely on social insurance, leave systems in other parts of the world – especially in Asian/Pacific and African countries - typically mandate that employers pay cash benefits for their own workers on leave (Oun and Pardo Trujillo, 2005). Unfunded employer mandates are widely understood to have problematic consequences for women's employment prospects.

Scheduling *flexibility* also matters. In many countries, families are granted considerable leeway in choosing a temporal arrangement that fits their needs. In some cases, a leave allotment can be 'ticked down' over an extended period of time; in many cases, leave can be stretched out and combined with part-time employment. Systems that allow workers to exercise more options for controlling the timing of their leave-taking have the potential to raise leave take-up among both women and men, and to increase women's labour supply as well. The extent to which parents are permitted flexibility in their leave-taking varies markedly across countries (Gornick and Meyers, 2003; Hegewisch and Gornick, 2008).

Further studies of leave policy designs across countries would be enriched by including measures that capture these other dimensions – coverage, financing, flexibility – along with comprehensive measures of generosity and gender equality.

Second, remarkably little empirical research has been carried out that directly links leave policy designs to the outcomes that these policies are believed to affect. The focus here has been on legal rights, not on implementation. An evaluation of the implementation of these rights, including de facto coverage and take-up rates, should be a precursor to further research into the effects of parental leave on families and workers. As we noted earlier, many studies find that maternity/parental leave policies, especially those that provide shorter and more highly-paid leaves, have gender-equalizing employment effects. This body of research concludes, for example, that leave policies can increase women's labour supply, raise the continuity of their employment, and decrease the 'mommy tax' on earnings that is associated with childbearing (Glass and Riley, 1998; Hofferth and Curtin, 2003; Joesch, 1997; Ruhm, 1998; Rønsen, 1999; Smith et al., 2001; Waldfogel, 1997). At the same time, other scholars argue that parental leaves will always be disproportionately taken up by women and, as a result, public provision of leaves rights and benefits will inevitably deepen some forms of gender inequality and create new gender inequalities. Specifically, it is argued, ample leave policies deepen gender divisions in caregiving at home and worsen employers' incentives to discriminate against women (Bergmann, 2009; Shalev, 2009). More empirical research is needed that directly addresses these competing perspectives - and that research requires the availability of, and the use of, policy indicators that account for the multi-dimensional nature of parental leave policy designs.

Parental leave policies lie at the heart of longstanding policy and research debates on the future of the welfare state. Parental leave is especially central to the parts of that debate that concern the nature of the 'woman-friendly welfare state', both in theory and in practice (Gornick et al., 2009). In recent years, feminist scholars have sought to resolve the tensions between the 'women's employment' perspective and the 'caregiver parity' perspective by envisioning social models – such as the dual-earner/ dual-carer model – that are consistent with both gender equality in employment and public support for caregiving. Recent policy developments demonstrate that these debates are neither merely academic, nor are they debates of the past. In 2009, after a thirty-year political battle, Australia passed a law providing 18 weeks of paid leave per year for mothers, but the new law provides no benefits for fathers. In several countries – from the United States to Germany to Japan to the Nordic countries parental leave policies have recently been reformed or are now under consideration. Some of these reforms and debates are centred on the generosity of leave provisions, while several are focused on the balance of public entitlements between women and men. These developments demonstrate that questions about the ways in which parental leave policies can and should influence 'who cares' remain very much on the public agenda.

Notes

1. There is remarkable variation in terminology across countries and across studies; the terminology is further complicated by the need to translate national terms into English. In this article we use the term 'parental leave' as an *umbrella term* to encompass several types of leave - in particular, maternity leave, paternity leave, and also what is often referred to, in a narrower sense, as parental leave. Maternity and paternity leaves refer to short-term leaves available around the time of childbirth or adoption - respectively, for mothers and fathers. In the narrower sense, 'parental leave' refers to leave granted to mothers or fathers for longer-term care of young children after an initial spell of maternity or paternity leave. In this article, where appropriate, we also use the term 'parental leave' in this narrower sense. (We focus here implicitly on birth parents. However, most of the countries in our study provide substantially similar benefits to new adoptive

Terminology with respect to leave policy is especially varied regarding the umbrella term used to capture all of these types of leave. Various over-arching terms are in circulation, including 'family leave', 'childcare leave', 'parental leave', or simply 'leave'. Here, we use the term 'parental leave' as the umbrella term, in order to clarify that we mean to exclude leaves intended for the care of aging or ill family members (often included in 'family leave'), as well as leaves for caring for older children who may be ill or require at-home care for other reasons. The OECD's report series *Babies and Bosses – Reconciling Work and Family Life* takes the same approach (OECD 2002, 2005, 2007).

- 2. EU Directives are binding for member countries.
- 3. By high-income, we refer to the World Bank classification system that annually ranks the world's economies, with respect to per capita GDP, as high-income,

- upper-middle income, lower-middle income, and low income. Our sample corresponds to what is generally referred to as the 'major OECD economies'.
- 4. In May 2009, the Australian government announced that, beginning in 2011, Australia will provide 18 weeks of maternity leave paid at the Australian national minimum wage, to all families with an annual income of less than AUS\$150,000. This future policy change is not reflected in our policy comparisons.
- 5. We use the OECD's Benefits and Wages, Annex A. Where benefits are paid as a flat rate, the FTE value of paid benefits will be higher for low-wage workers than what we report here for the average worker.
- 6. Not all parental benefits are limited to married, heterosexual parents of young children. The Netherlands, New Zealand and the United Kingdom extend benefits to unmarried and/or same-sex couples, and Greece guarantees parental benefits for grandparents in some cases. However, in order to focus on the gendered divisions of labour, we have limited the scope of our analysis to heterosexual couples.
- 7. For a recent discussion of the factors affecting take-up rates for fathers, see Moss and Korintus (2008: 79).
- 8. The data for couples in Figure 1 reflect the summation of three kinds of parental leave: leave available exclusively for mothers; leave available exclusively for fathers; and leave that can be divided, at couples' discretion, between mothers and fathers.
- France and Spain allow both parents to stay at home and return to their prior job or a comparable one – until their child's third birthday.
- The survey allowed respondents to cite multiple reasons for not taking leave. The next most important reason for not taking leave was 'work too important' cited by 53% of respondents. See U.S. Department of Labor (2000).
- 11. The US data exclude state-level paid parental leave programmes. California, Hawaii, New Jersey, New York, Rhode Island and Washington state all offer at least some paid leave to eligible parents. These state programmes, however, do not affect the median worker in the United States. For more detail on these state-level programmes, see Ray (2008).

Australian parents, however, were arguably better able to take leave because the country has a 'Baby Bonus' that gives a lump-sum payment of AUS\$4,258 per child, or U\$\$3,085 (conversion to U\$ dollars using purchasing-power-parity exchange rates). In 2009, the Australian government announced a paid maternity leave benefit that will go into effect in 2011.

With respect to paid leave for new mothers, Australia and the United States stand out not just among high-income countries, but globally as well. A 2005 International Labour Organization report on 166 countries found that 97% provided some payment to women on maternity leave. Only five exceptions were found: Australia and the United States – and Lesotho, Papua New Guinea and Swaziland.

12. Switzerland is an example of a country that offers a high wage replacement – but limits it to mothers, thus diminishing its gender egalitarian effects.

- 13. We also note that the paid leave law in Greece allows the self-employed to opt-in to social insurance for paid leave.
- 14. The paid maternity leave plan that will go into effect in Australia in 2011, which provides no paid paternity leave, will not improve Australia's Gender Equality Index score.
- 15. Germany also provides paid leave in this range of generosity, but lags in gender egalitarian features. Belgium received eleven points on the Gender Equality Index, but falls short in terms of generosity.

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Country	Leave reserved for mothers	Leave reserved for fathers	Shared leave	Total
Australia ¹	51 weeks of maternity leave, unpaid		1 additional week of maternity leave can be transferred to fathers.	52 weeks 0 FTE weeks paid
Austria²	16 weeks of maternity leave, fully paid, beginning 8 weeks before childbirth	Nothing reserved, but the distribution of the shared leave effectively reserves one month.	Until the child's 2nd birthday, unpaid, for either parent. One month can be taken simultaneously, so if the mother takes all of the time, 1 month is still reserved for the father.	116.3 weeks 16 FTE weeks paid
Belgium	15 weeks of maternity leave, paid at 82% for the first 30 days and 75% thereafter. 3 months of parental leave, paid at a flat rate of ε 547.37 per month (2005), or about 18% of average wages.	10 workdays of paternity leave, paid at 100% for the first 3 days, and 82% thereafter. 3 months of parental leave, paid at a flat rate of €547.37 per month (2005), or about 18% of average wages.		43 weeks 18 FTE weeks paid
Canada³	17 weeks of maternity leave, paid at 55%		From the end of maternity leave until the child's first birthday, paid at 55%	52 weeks 28.6 FTE weeks paid
Denmark	18 weeks of maternity leave, paid at 90% (for manual workers) or 50% (for non-manual workers)	2 weeks of paternity leave, paid at 90% (for manual workers) or 50% (for non-manual workers)	32 weeks of parental leave, paid at 54% (for manual workers) or 30% (for non-manual workers)	52 weeks 19.6 FTE weeks paid
Finland ⁴	17.5 weeks of maternity leave, paid on a sliding scale.	4 weeks of paternity leave, paid on a sliding scale.	26 weeks of parental leave, paid on a sliding scale.	47.5 weeks 33 FTE weeks paid
France ⁵	16 weeks of maternity leave, beginning 6 weeks before birth, fully paid. Unpaid parental leave for each parent until the child's 3rd birthday.	2 weeks of paternity leave, fully paid. Unpaid parental leave for each parent until the child's 3rd birthday.		318 weeks 21.9 FTE weeks paid
Germany ⁶	14 weeks of maternity leave, fully paid, beginning up to 6 weeks before birth (and thus lasting 8–14 weeks after birth)	Parental leave is shared, but the distribution of the shared leave effectively reserves 8 weeks for fathers. Also, fathers can take up to 2 months of parental leave benefits without them being deducted from the couple's 12-month allotment.	Shared parental leave until the child's 3rd birthday, paid at 67%, but which actually averages 53.85% of wages due to a benefits ceiling.	170 weeks 46.7 FTE weeks paid

Appendix: parental leave policies

Appendix: (Continued)	trinued)			
Country	Leave reserved for mothers	Leave reserved for fathers	Shared leave	Total
Greece ⁷	17 weeks of maternity leave, paid fully. 13 weeks of parental leave for each parent, unpaid.	3 workdays of paternity leave, paid fully. 13 weeks of parental leave for each parent, unpaid.	16.5 weeks of child-care leave, paid fully	60.1 weeks 34.1 FTE weeks paid
Ireland	42 weeks of maternity leave, paid at 80% for the first 26 weeks and unpaid thereafter. 14 weeks of parental leave for each parent, unpaid.	No paternity leave. 14 weeks of parental leave for each parent, unpaid.		70 weeks 20.8 FTE weeks paid
Italy	5 months of maternity leave, paid at 80%. 6 months of parental leave per parent (with a maximum of 11 months for the couple), paid at 30% for the first 6 months and unpaid thereafter.	6 months of parental leave per parent (with a maximum of 11 months for the couple), paid at 30% for the first 6 months and unpaid thereafter		69.3 weeks 25.1 FTE weeks paid
Japan ⁸	14 weeks of maternity leave, paid at 60% beginning 6 weeks before childbirth.		Child-care leave until the child's first birthday for one parent, paid at 30%. If the parent returns to work thereafter, they receive an additional lump sum raising the replacement rate to 40%.	58 weeks 26 FTE weeks paid
Netherlands ⁹	16 weeks of maternity leave, fully paid. 13 weeks of parental leave per parent, unpaid.	2 days of paternity leave, fully paid. 13 weeks of parental leave per parent, unpaid.		42.4 weeks 16.4 FTE weeks paid
New Zealand ¹⁰		2 weeks of partners' leave, unpaid.	52 weeks are transferable: 14 of maternity (fully paid) and 38 of parental leave (unpaid).	54 weeks 14 FTE weeks paid

163 weeks 0.74 FTE weeks paid 14 weeks 11.2 FTE weeks

paid

80 weeks 12.4 FTE weeks paid

150 weeks 44 FTE weeks paid 31 weeks 18 FTE weeks paid 312 weeks 18 FTE weeks paid

0 FTE weeks paid

24 weeks

12 weeks of FMLA leave, unpaid

12 weeks of FMLA leave, unpaid

United States¹⁵

Appendix: (Continued)	ontinued)		
Country	Leave reserved for mothers	Leave reserved for fathers	Shared leave
Norway ¹¹	9 weeks of maternity leave, paid at either 80% or 100% (see 'shared' section). 1 year of parental leave per parent, unpaid.	6 weeks, paid at either 80% or 100% (see 'shared' section), and 2 weeks, unpaid, paternity leave. 1 year of parental leave per parent, unpaid.	Flexible leave to split between maternity and paternity: 44 weeks paid at 100% or 54 weeks paid at 80% (including the 9 weeks reserved for mothers and 6 weeks reserved for fathers).
Portugal ¹²	6 weeks of maternity leave, fully paid	1 week of paternity leave, fully paid	11 additional weeks of paid maternity leave can be transferred to the father. In addition, 3 months of shared parental leave, unpaid.
Spain ¹³	16 weeks of maternity leave, fully paid, starting up to 10 weeks before birth. Unpaid child-care leave until the child's 3rd birthday.	2 days of family-birth leave and 13 calendar days of paternity leave, fully paid. Unpaid childcare leave until the child's 3rd birthday.	
Sweden 14	14 weeks of maternity leave, beginning 7 weeks before birth. Parental leave until the child is 18 months old. Benefits are shared, except for a 60-day quota reserved for each parent.	10 workdays of paternity leave. Parental leave until the child is 18 months old. Benefits are shared, except for a 60-day quota reserved for each parent.	Shared benefits: the first 480 calendar days of all child-based leave per couple are paid, with a 60-day quota reserved for each parent. Of these 480 days, the first 390 are paid at 80%, and the rest at SEK 180 per day (~18% of average wages).
Switzerland	14 weeks of maternity leave, paid at 80%		
United Kingdom	52 weeks of maternity leave, paid as follows: 1st 6 weeks at 90%, then 33 weeks at the lesser of 90% or £123.06 per week (~21.79%)	2 weeks of paternity leave, paid at the lesser of 90% or £123.06 / week (~21.79% average wage).	

average wage), and unpaid thereaf- leave.

ter. Additionally, 13 weeks of unpaid parental leave.

- 1 Australia grants each set of new parents a 'baby bonus' of AUD\$5,000 per child. This benefit may allow parents who could not otherwise afford to take leave Pherefore, even if the mother takes all of the transferable leave, there will be one month available for the father. We reflected this by showing one month of 2 Austria provides parental leave, for either parent, until a child's second birthday. However, parents may take one month of this parental leave simultaneously. to do so. However, because parents receive this benefit regardless of whether they take parental leave, we treated Australian parental leave as unpaid.
- Scanadian parental leave varies by province. We report the median of the provincial allowances. Also, mothers can start maternity leave up to 17 weeks before birth, which increases the total leave by up to 17 weeks. That option is not shown here. parental leave reserved for fathers.
- weeks (these four weeks are called the 'father's month'). We do not show this option in the comparative tables, keeping to our pattern of reporting the most 4 In Finland, sliding-scale benefits offer between roughly 30% and 70% wage replacement, depending on the parent's usual wage level. We use a 65% rate, capturing the OECD (2005) assessment of average worker benefits. Also, if fathers take the final two week of parental leave, they have access to two additional restricted arrangement in each country. However, we do include it as an additional incentive for gender equality, in our Gender Equality Index.
 - 5 France pays a parental leave allowance of £530.72 per month (approximately 21 percent of average wages) during the leave period. However, parents who do not take parental leave may still receive an allowance of £171.06 (approximately 6.73% of average wages). Like Australia's baby bonus', this payment is not related to leave, and therefore, we exclude this amount and report only the financial support available for the leave itself: €359.66 (approximately 14.14%)
- partum portion of the mothers' maternity leave, that parental leave is forfeited to the couple. Because there is a minimum of eight weeks of this postpartum maternity leave, fathers effectively have those eight weeks reserved for their use. Also, German families can access two additional months of parental leave if fathers take them, but these are not deducted from the families' 12-month benefit. For both of these reasons, we count these two months as reserved for fathers. 6 Germany offers three years of parental leave, beginning immediately after childbirth, for either parent. If fathers do not take parental leave during the post-7 Greece offers new parents nursing breaks, as do several other countries. However, Greece allows parents to save up this time and use them as continuous leave. We added this amount into their total parental leave: 16.5 weeks of fully paid leave.
 - 8 Japan offers parental leave until the child's first birthday, and fathers technically may take parental leave during the mother's maternity leave. However, only one parent must take the entirety of parental leave. If fathers take any parental leave, mothers forfeit all leave after maternity leave. Thus, we do not show fathers as having any time reserved for them.
 - 9 In addition, the Netherlands guarantees all workers the right to request part-time schedules after every 2 years of employment.
 - 10 In New Zealand, all of the leave is fully transferable, except the partner's leave.
- 11 In addition, all parents in Norway have the right to reduce their work hours until their child's 10th birthday. Because of the choice between more time and greater wage replacement (with a roughly equivalent overall benefit), we show the shorter leave option here.
 - 12 Portugal offers three months of parental leave, two weeks of which are paid if fathers take them. As in the case of Finland, we have not shown those weeks as reserved for the fathers, but we have counted them as an additional incentive in the Gender Equality Index. Mothers may also choose to take a longer maternity leave at a lower pay (5 months total instead of 4, paid at 80%). Finally, parents who have used parental leave may also suspend their contracts for an additional period of 6 months to 2 years. We have not shown those cases here.
- 13 Spain allows mothers to begin maternity leave up to 10 weeks before childbirth, which would increase total parental leave by 10 weeks. Also, parents have 14 Sweden offers a Gender Equality Bonus', a tax credit of 50% of wages (up to SEK 100 per day, ~10% of average wages), per couple during 270 days of the shared parental leave, if the parents split the leave equally. We have not shown this option here, in keeping with our pattern of taking the most conservative arrangement in each country. However, we do include it as an additional incentive for gender equality, in our Gender Equality Index. In addition, parents of paid nursing/feeding breaks if they forfeit some leave and return to work before the child is nine months old. We do not include these options in our measure. children under age 8 may reduce their work schedule by 25%. These options are not shown here.
 - 15 The United States offers no national parental leave policy, but three states have developed programs: California, New Jersey, and Washington. Because the median of the state policies (including the majority without programs) is still zero, we have shown no parental leave benefits for the United States.