# Luxembourg Income Study Working Paper Series

Working Paper No. 304

Children, Social Assistance and Outcomes: Cross National Comparisons

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June 2002



Luxembourg Income Study (LIS), asbl

# Children, social assistance and outcomes: cross national comparisons

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### ABSTRACT

The prevalence of low income for children, especially for children in lone-parent families, varies considerably across countries. This paper considers five sets of hypotheses that may explain this cross-national variability of child poverty. The tentative conclusion from this analysis in 20 countries is that reducing child poverty, and in lone-parent families in particular, requires several approaches. Provisions that would discourage teenage childbearing would have their importance, as would opportunities for lone mothers to work. More important is the generosity of social expenditure applying to individuals and especially to families. The present analysis also shows the advantages of encouraging joint custody, along with special provisions for lone parents, and child support through advance maintenance payments.

10 June 2002 23 April 2002

The authors are indebted to the Luxembourg Income Study, which was used as the source for much of the data. We are also thankful to Bruce Smyth and Anne Gauthier for very useful comments, and to the various informants listed in Appendix A. All errors are the responsibility of the authors.

## Children, social assistance and outcomes: cross national comparisons Roderic Beaujot and Jianye Liu University of Western Ontario

The prevalence of low income among children, especially for children living in lone-parent families, varies considerably across countries. Many authors have pondered over the differences showing that the rates of low income for children in lone-parent families are under 10 percent in countries like Belgium, Finland, and Sweden, while the rates are over 40 percent in Australia, Austria, Canada, Germany, United Kingdom, and the United States. Several questions have been analysed in seeking to explain these differences: the extent to which mothers are considered to be employable (Baker, 1996; Gornick et al., 1996; Millar, 1996; Lewis, 1993), the relative economic status of women (Kilkey and Bradshaw, 1999; Solera, 1998; Bianchi, 1996), the generosity of social assistance provisions (Phipps, 1999, 2001; Kenworthy, 1998; Smeeding et al., 1997; Baker, 1996), or the extent of compliance to support obligations from non-resident parents (Kunz et al., 2001; Garfinkel et al., 1998). Many studies focus on lone motherhood rather than on children in lone-parent families (e.g. Kiernan et al., 1998).

The purpose of this paper is to compare the relative importance of various possible factors in understanding the variation in these child poverty outcomes. While other studies make reference to the demographics (Nichols-Casebolt and Krysik, 1995; Rainwater and Smeeding, 1995; Gornick and Pavetti, 1990), we will systematically consider the demographics associated with the prevalence of lone parenthood, the teenage fertility rate or the percent male in lone-parent families. After considering the average per capita income, the next second set of variables considers the generosity of social transfers, and the transfers toward families in particular. The next set of considerations relates to women's labour market status, particularly for lone parents. These explanatory factors are compared to three specific policy orientations: the extent of state involvement in ensuring child support, the extent of differential state support for lone parents, and the extent of joint custody.

### THEORETICAL CONTEXT

The broad theoretical context is that of the relative priority given to the welfare of children by adults and by states. The economic well-being of children has been the focus of considerable attention, including the all party proposition in the Canadian Federal Parliament to end child poverty by the year 2000. The intentions are good both from parents and at the level of the society. For instance, the demographic transition has been interpreted as a focus on quality rather than quantity of children. In a recent survey on orientations to having children, there was a rather prevalent norm to the effect that one should not have children if one cannot properly care for them (Beaujot and Bélanger, 2001). Asked why they would not have more than a given anticipated family size, the reasons were often described in terms of the time and energy that children take from you, given other things that you also want to do, and given that you want to do the very best for each child.

At the societal level, fewer children also allows more resources to be allocated for each child. Given smaller numbers, there is a need to ensure that these "precious" human resources are not wasted. Of course there are other needs both in families and at the societal level. At the societal level, one can argue that other needs have been heard more strongly. As a former Canadian Minister of Health from the 1980s, Bégin (1987) observed that among the three main client groups for social spending priority, the elderly have been most successful, women have had intermediate success, and children have been the least successful.

Within families, the other needs include the well-being of adults themselves, which do not necessarily overlap with those of children. If the first demographic transition can be read as a move from child quantity to child quality, the second transition involves a series of family changes that have loosened marital relationships, as seen especially in the altered forms of entry and exit from relationships. While there are structural and institutional bases for this greater looseness in relationships, the interpersonal side is that of giving more priority to one's own satisfaction. The existential revolution in intimate relationships, that Giddens (1991) has seen in "pure relationships" and "reproductive individualism," has meant that conflicts between the interests of the group and those of the individual are more legitimately resolved in terms of one's own interests over those of the family group. The logic has certainly changed from a time when mothers not working was justified in terms of the best interests of the child. Keyfitz (1994: 7) observes that the presence of children, once the main reason not to divorce, no longer plays that role. In talking about the gender side of demographic change over the past century, Folbre (2000) also speaks of the greater legitimacy for women to make decisions based on self interest. These various changes, that demographers have associated with the second demographic transition, have meant that women's parental roles have become increasingly separated from marital relationships, and men have become more likely to be informal parents of their partner's children. For instance, in the 1994-95 Canadian Longitudinal Survey of Children and Youth, 96.7% of all children under 12 were living with their mothers and 80.5% with their fathers (Beaujot, 2000: 271).

These theoretical considerations suggest that there are tensions at both the family and societal level. That is, there are good intentions to focus on the well-being of children, but there are other priorities that can conflict with the priority given to children, both for parents and for states.

Various factors appear relevant to explaining the extensive variability across countries in the poverty rates of children, in particular for children in lone-parent families. The generosity of social transfers needs to consider the overall level of social expenditure, but also the extent to which this transfer benefits children in comparison to other priorities, and the extent to which there are special provisions for lone parents. Also important are the market income of parents; this includes the extent to which parents, and mothers in particular, are working and the relative incomes of women. For children in lone-parent families, the labour market status of mothers would be particularly important, as are the transfers from the non-custodial parent. These transfers from the non-resident parent may in turn be partly a function of policies regarding custody and child support. For instance, might there be better transfers when joint custody is

promoted and the state is involved in ensuring child support. Given the needs of lone-parent families, the demographics may play a role, especially the relative numbers of children in twoparent and lone-parent families, the extent of teenage childbearing, and the proportion male among lone parents.

## THE CANADIAN CASE

The proportion of children in lone-parent families has increased markedly in Canada as in other countries. Between 1971 and 1996, the proportion of children in lone-parent families has increased from 9.6% to 18.9% of all children at home (Statistics Canada, 1975a, 1975b, 1997). Over the period 1975 to 1992, Zyblock (1996) shows that the proportion with low income has declined in both two-parent and lone-parent families, but the changed composition toward a greater predominance of lone parenthood has resulted in either stable or increased levels of low-income for all children. In particular, children with lone parents represented a third of poor children in 1975, compared to over half by 1992.

Using market incomes, that is pre-tax/transfer, in age group 0-14, Picot et al. (1998: 14-15) show that the proportion below 50% of median income increased from 1981 to 1995. However, the post-tax/transfer poverty has been stable. That is, the tax and transfer system has had to counter market trends that are producing higher levels of poverty for children. This is documented by looking at the relative share of income from earnings and transfers. For persons with low income at age group 0-14, there has been a cross-over of the relative importance of earnings and transfers, so that by 1995 some 70% of the income was from transfers. Looking at the income package of the lowest quintile of children, Bradbury and Jantti (2001: 28) find that 50% or more of their income is due to transfers for Canada, the United Kingdom, Australia, Ireland, France and the United States. At the other extreme of the distribution, 25% or less of the income package of the lowest quintile of children is due to transfers in Italy, Finland, Spain and Germany. These authors conclude that market incomes are more important than transfers for reducing poverty.

Other observations on inequality can be taken from the Canadian dispersions in family income (Rashid, 1999). In 1970, lone parents comprised 9.3 percent of families, compared to 14.6% in 1995. By 1995, lone-parent families comprised 44.2% of the lowest decile in family income (idem, p. 13). Increasingly over this period, the top decile of families is made up of husband-wife families where both are working, and the bottom decile is made up of female lone-parent families. Thus the transfer system has had to work against both an increased inequality in market incomes at the family level, and changing family configurations, including a higher proportion of persons over age 65. In 1970, over a quarter of the bottom decile were families aged 65 and over, but this was reduced to 6.4% by 1995. For all families, the proportion of income from government transfers was 5.4% in 1970 compared to 12.0% in 1995. Government transfers now comprise over half of income in the two bottom deciles of family income.

That is, the transfer system has been active, but it has not reduced the levels of child poverty.

Taking children aged 0-17 in one-parent families, there has not been a large change in the percent poor before transfers, but the percent receiving transfers has increased from 63.0% to 96.2% from 1973-81 to 1988-93 (Lefebvre et al., 1996: 356-357). For all children, the percent poor before transfers has increased from 20.2 to 23.2 percent, but the percent receiving transfers has increased much more, from 39.2% to 79.1%, which has nonetheless produced stability in the percent poor after taxes and transfers.

### INTERNATIONAL COMPARISONS IN CHILD POVERTY

Poverty rates are here largely taken from the Luxembourg Income Study (2002). A relative measure is used that considers as poor those who are 50 percent below the median income. The measure is first determined at the household level, taking into account size and composition, then attributed to individuals in the household. While there are advantages to using measures of poverty that are based on the consumption of resources, international comparisons are easier when using a relative income measure. These relative measures are closely related to the consumption of resources and to various welfare outcomes. We have adopted here the measure of 50 percent below the median income since it is the most common measure, and we are using the terms poverty and low income interchangeably. Data are presented for both two-parent and lone-mother families. Unfortunately, systematic data are not available for lone-father or total lone-parent families. Also, it is not possible to separate never married and ever-married lone-mothers. The data on lone mothers are based on households where there is no spouse present.

We will largely use the poverty levels post-taxes and transfers, but have reproduced Table 1 that compares child poverty rates before and after government taxes and transfers (Smeeding et al., 1995). These data from the late 1980s to early 1990s indicate considerable variability especially in the post-transfer poverty rates for children living with lone mothers. Before transfers, these poverty rates are uniformly high, ranging from 32% in Italy to 80% in the Netherlands. However, there is a larger variation after transfers, from 60% poverty for children living with lone mothers in the United States, to 4% in Germany. This is the variability that needs to be explained. How is it that countries like Belgium, Denmark, Finland, Germany, Luxembourg, and Sweden had poverty rates for children with lone mothers of 10% or less, while these rates were above 40% in Australia, Canada, Ireland, and United States. It can be seen that the transfer system reduces the proportions poor by over 35 percentage points in Belgium, Denmark, Germany, Luxembourg, Netherlands, New Zealand, Norway, and Sweden and United Kingdom, but by less than 20 percentage points in the Australia, Italy, Switzerland and the United States.

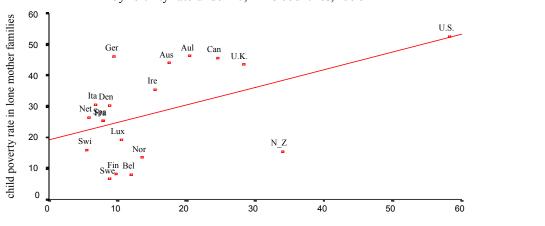
Considering now only the post-transfer poverty rates, Table 2 presents the latest available data along with data from an earlier date. For Canada, these data confirm the results cited earlier (Zyblock, 1996) indicating that poverty declined in both two-parent and lone-mother families, but the increased predominance of one-parent families has meant that the poverty rate for all children has increased. Poverty levels have declined for children in two-parent families in Canada, Luxembourg, and Sweden. It has declined in lone-mother families in Australia, Belgium, Canada, France and Norway. For France, Norway, Sweden, Switzerland, United Kingdom and the United States, poverty levels have declined for total children.

# **DEMOGRAPHIC INDICATORS**

In each of the set of indicators being considered, a first table presents the indicators, while Table 7 shows correlations of these indicators with three measures of child poverty. Our first set of hypotheses relates to demographics. In particular, might the level of child poverty of given countries be related to the relative predominance of children living with a lone mother, the fertility rate at ages under 20, and the percent of lone parents that are male?

The percent of children living with lone mothers has increased in all countries except Austria and the Netherlands. In the latest data, this proportion varies from 3.0% in Japan to 21.5% in the United States (Table 3). Leaving aside Japan on which we do not have comparable poverty data, the proportion of children living with lone mothers is lowest in Spain, Italy, Ireland and Netherlands, while it is highest in Sweden, United Kingdom, New Zealand and United States. On the other hand, the set of countries where child poverty rates are lowest include Sweden, Norway, Finland and Luxembourg, while they are highest in United States, Italy, United Kingdom and Australia. As would be expected from these distributions, there are only low correlations between the predominance of lone-mother families and the child poverty rates (Table 7). These correlations are nonetheless positive for the poverty rate among all children. There is slightly higher child poverty in single-mother families, along with lower poverty in two-parent families, when there are higher proportions of lone-mother children in given countries. It would appear that there is some relevance to the basic demographics to the effect that higher proportions of lone-mother families make it harder to reduce child poverty, especially in one-parent families. Bradbury and Jantti (2001) drew a similar conclusion: children have a greater likelihood of being poor when they are with a lone mother, but compared to other factors this is not an important reason for variation across countries.

The percent of lone parents who are male varies within a narrow range, from 9.5% in Australia



5

Figure 1. The poverty rate for children in lone-mother families

by fertility rate under 20, in 18 countries, 1996

fertility under 20

to 20% in Luxembourg. Nonetheless, the higher this proportion the lower the rates of child poverty.

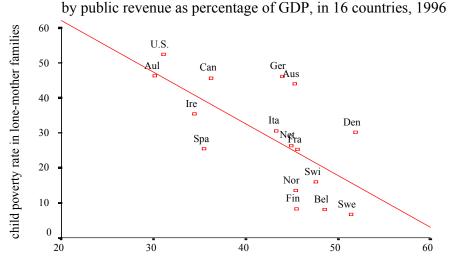
Among the demographic indicators that were collected, the bi-variate correlation of child poverty is strongest with the **fertility rate under age 20**. These fertility rates vary extensively, from 58 per 1000 women aged 15-19 in the United States to under 10 in Denmark, Finland, France, Germany, Italy, Japan, Netherlands, Spain, Switzerland and Sweden. The fertility rates for Canada and the United Kingdom are intermediate at about 25 per 1000 women aged 15-19. The correlation with child poverty is illustrated in Figure 1, where New Zealand is an outlier having relatively high fertility under age 20 but low poverty for children in lone-mother families, while Germany is an outlier in the other direction, with low fertility under 20 but high lone-mother poverty rates. While the relations are clearly not systematic, the demographics of teenage childbearing are more highly correlated with child poverty than the demographics of lone parenthood.

# PER CAPITA INCOME, SOCIAL EXPENDITURE AND TRANSFERS TO FAMILIES

Our next set of hypotheses relates to economic and social expenditure indicators (Table 4). We wish to see if the per capita income, the level of social expenditure, and the distribution of this expenditure, are associated with child poverty for all children and for children in lone-mother families. While these are relative measures of income, richer countries would have more potential to reduce the proportion of children who are 50% below the median income. Higher **GDP per capita** is associated with slightly lower poverty in two parent families, but not for children in lone-parent families nor for all children. As other research indicates, higher national income does not produce lower real poverty (Bradbury and Jantti, 2001: 29).

The correlations are much higher, and always in the expected direction, between child poverty and **levels of social expenditure**. Measured as a percentage of GDP, the higher the public revenue, the higher the transfers to households and the higher the social security expenditure, the lower the child poverty levels (Table 7, Figure 2).

As would be expected, a higher proportion of family benefits (cash and service) in the total



6

Figure 2. The poverty rate for children in lone-mother families

public revenue as % of GDP

social security expenditure also reduces child poverty, however the correlation is stronger for two- parent than for lone-mother families. On the other hand, when health and pensions comprise a higher proportion of social expenditure, there is more child poverty. This can be further seen in the ratio of family cash benefits over pensions and health, which correlates with lower child poverty. Thus there appears to be some conflict of interest between transfers to families and those to health and pensions. Family cash benefits are more important in comparison to health and pensions in Australia, Finland, Luxembourg and New Zealand, while they are lower in Spain, United States and Italy.

At the same time, there are positive correlations between levels of poverty for children and the elderly. There are also particularly high correlations between child poverty and poverty levels for the entire population. Thus the mechanisms for reducing poverty in the various parts of the population must be similar, and they largely involve higher levels of taxes and transfers. Nonetheless, the relative priority of transfers toward families, as contrasted with health and pensions, also benefits children in terms of lower rates of poverty. There is not evidence here that these mechanisms operate differently in two-parent and in lone-mother families, although family benefits through cash and services have more impact on poverty in two-parent families.

## LABOUR FORCE STATUS OF WOMEN

Especially in lone-mother families, one would expect child poverty to be lower when women are more involved in the labour market. Bradshaw and Bjornberg (1997: 273) show that in eleven countries the poverty rates of lone mothers is invariably higher, and often much higher, if they are not working than if they are working. Millar (1996) makes the case that various structures of the labour force are relevant to poverty in lone-parent families, in particular employment rights, services supporting employment, opportunities for education and training, and the relative availability of full-time and part-time jobs. She then classifies countries according to the employment rates of lone mothers and all mothers, and basically concludes that the treatment of all mothers is key to the position of lone mothers.

Table 5 shows various labour market indicators of the relative status of women. The **percent female in the labour force** in 1995 varies from under 40% in Ireland, Italy, Luxembourg and Spain, to the range of 45 to 47% in Canada, Denmark, Finland, Norway, Sweden, and the United States. Higher proportions women in the labour force are related to lower poverty, but that is more so in two-parent than in lone-mother families (Table 7). The percent of labour force participation among married or cohabiting mothers is especially related to lower child poverty in two-parent families, while this participation in lone-mother families is associated with lower child poverty in corresponding families. In the latter comparison, New Zealand is an outlier with relatively low child poverty in single-mother families while also low labour force participation for lone mothers; in contrast, United States, Canada and Australia are outliers with intermediate lone-mother labour force participation but high poverty for children in lone-mother families (Figure 3).

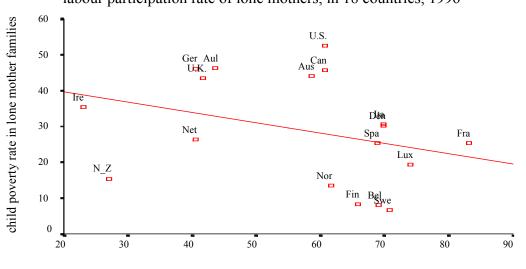


Figure 3. The poverty rate for children in lone-mother families by labour participation rate of lone mothers, in 18 countries, 1996

% of labour participation of lone mothers

The proportion female among part-time workers is also negatively correlated with child poverty. The percent women among full-time workers is negatively related to child poverty in two-parent families, but shows minimal relation to child poverty in lone-mother families. An index confirms these results. Multiplying the percent female in the labour force by the proportion female in part-time workers, this index shows a negative relation to child poverty especially in two-parent families, but also in lone-mother families. In the wage rate comparison, female earnings as a percent of male earnings slightly reduce child poverty. Although these labour market indicators show lower correlations with child poverty than the indicators of social expenditure, most of the results are in the expected direction. Two results are nonetheless surprising: the percent female among part-time workers reduces child poverty, and the percent female in full-time workers has no effect on child poverty in lone-mother families. Also, the earnings ratios show rather slight relationships; that is, female earnings as a percentage of male earnings only show a slight negative correlation with child poverty. It would appear that labour force participation, and proportions working full-time are particularly important to reducing poverty in two-parent families, while a larger proportion female among part-time workers also reduces child poverty.

Factors associated with the labour market status of women and their relative incomes were investigated by Baker (1996) when comparing two countries that tended to encourage young mothers to work (United States and Sweden) and two that encouraged them not to be employed (Australia and the Netherlands). As with Baker, we find that this variable is of limited importance in explaining the poverty levels of children in lone-mother families. The correlations are typically lower than with the indicators of social expenditure. The labour force participation rate of lone mothers does reduce associated child poverty, but other indicators of labour market show only weak relationships with child poverty in lone-mother families.

# CHILD CUSTODY AND STATE INVOLVEMENT IN CHILD SUPPORT

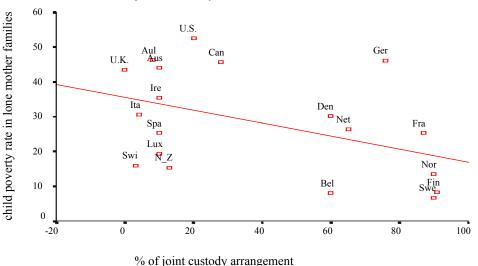
This section considers three qualitative measures that pertain to child support, child custody and special provisions for lone parents. For the most part, the information was obtained through expert informants from given countries (see also Appendix A). It is hypothesised that child poverty, especially in lone-parent families, would be reduced through greater state involvement in child support, greater prevalence of joint custody, and more generous provisions for lone-parents. These measures would result in better transfers from the non-custodial parent, and from the state when the non-resident parent is in default or unable to pay child support. Table 6 shows these indicators and the codes that were adopted.

These indicators are highly correlated to child poverty. In effect, child poverty is lower with greater **state involvement in child support**, especially through advance maintenance payments, along with **differential state support for lone parents**, and greater orientation to **joint custody**. For all children, these three indicators show a similar correlation with child poverty as the extent of public revenue as a percentage of GDP (Table 7). As with most other correlations, these measures show a stronger association with child poverty in two-parent than in lone-mother families.

There has been a prevalent orientation for mothers to have child custody, given their closer involvement in day-to-day care (Fine and Fine, 1994). However, there is also a recognition that non-resident fathers can be important to child well-being in ways that go beyond child support. Joint custody has increased, and certain countries have made joint custody the default condition in the case of separating parents (Garfinkel et al., 1998; Pearson and Thoennes, 1998). Various concepts have been adopted. In New Zealand and Australia, the concept of "guardianship" has been used, which is similar to the French "autorité parentale". This is separate from the day-today residence of children, which remains more often with mothers. For instance, in the 1996 divorces in France, there was joint parental authority in 87% of cases, but 86% of children resided with their mothers (Belmokhtar, 1999). Other countries use the single concept of "custody," but the distinction can still be made between the overall custodial responsibility which may be joint, and the day-to-day living arrangements, or physical custody, which is rarely equally shared by parents. Since 1996, Australia has the default condition of shared parental responsibility. Joint guardianship is the default condition in New Zealand and shared parental authority in France, while joint legal custody is the default in Austria, Belgium, Denmark, Finland, Germany, Netherlands, Norway and Sweden (Table 6). Except for Australia, Austria and Germany, these countries typically have lower child poverty; in the case of Austria joint custody is a recent provision (see Figure 4). In Sweden, research suggests that joint custody has increased parental involvement with children (Bernhardt, 1996). Using data from Wisconson in 1986-94, Cancian and Meyer (1998) find that shared physical custody increases with parental income and with father's share of total income.

State involvement in **child support** typically takes one of two forms that are related to the degree of social responsibility for children (Client Research Unit, 2001; Corden, 1999). The state can be involved in reinforcing private responsibility, by establishing the appropriate level of child support and helping custodial parents to collect the child support payments. The other model has

#### Figure 4. The poverty rate for children in lone-mother families by



the extent of joint custody, in 19 countries, 1996

generally been called advance maintenance, with the state providing the support and collecting as much as possible from the non-custodial parent. In some countries like Belgium, France, Germany, Ireland and Netherlands, the advance maintenance only applies to custodial parents who are on welfare. In effect, this becomes a system for states or municipalities to pay welfare to lone parents, then attempting to collect from the non-custodial parent. In other countries like Denmark, Finland, Norway and Sweden, advance maintenance at a set level applies to all lone parents, although non-custodial parents can be required to directly pay further amounts to the custodial parent (Baker, 1995).

Compliance is a key question in child support, and reform efforts to increase compliance show mixed results (Kunz et al., 2001, Meyer and Bartfeld, 1996). Based on a 1995-96 survey of British fathers living apart from their children, Bradshaw et al. (1999) find that fathers are more likely to make child support payments if they have more contact with the child and had a longer relationship with the other parent, which would also be correlated with longer involvement with the child prior to parental separation. The most common reasons for not paying were unemployment and inability to afford the payments. About half of fathers never had formal arrangements, but the proportion who were current payers was slightly higher among those with no formal arrangements (idem, p. 134). In Canada, the payments are also higher when there is no formal arrangement (Marcil-Gratton and Le Bourdais, 1999). Some cases that are without formal arrangements may represent de facto joint custody. Cooperation may be easier when there are more resources, while scarcity can provoke conflict and state involvement.

When the state involvement in child support takes the form of advance maintenance payments, there is lower poverty on average (Figure 5). Germany and Ireland are exceptions with relatively high child poverty, but the advance maintenance provisions in these two countries are minimal. On average, poverty is higher when state involvement takes the form of enforcement of child

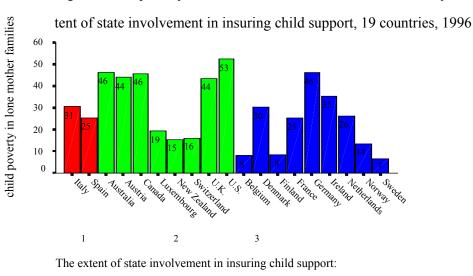


Figure 5. The poverty rate for children in lone-mother families by ex-

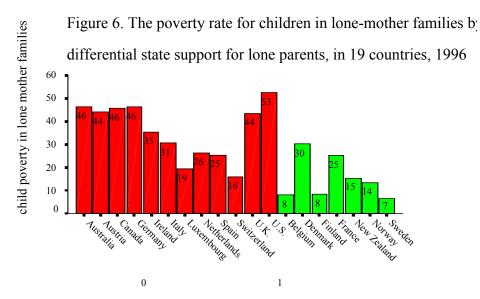
1=minimal;2=enforcement of child support;3=advance maintenance payments

support. In this case the outliers are Luxembourg, New Zealand and Switzerland which have low child poverty in lone-mother families along with state involvement through enforcement of child support.

Countries also differ considerably in the extent of differential state support for lone parents (see Gauthier, 1996: 90). Besides the provisions available to all families, and to low-income families in particular, some countries have additional provisions for lone parents. In Austria, lone parents have access to a tax credit, but this is also available to two-parent families where one partner is not gainfully employed. Canada uses an "equivalent to married" tax deduction wherein the first child of a lone-parent family receives the same tax deduction as a dependent spouse. Other countries have more generous provisions for lone parents. In France, this takes the form of Allocation Parent Isolé, while New Zealand has a Domestic Purposes Benefit, and Australia has a Single Parent Payment (Goodger, 1998). Norway pays family allowance for one more child than the actual number of children, in the case of lone parents, while lone parents in Finland receive higher family allowance. Belgium and Denmark have various tax provisions, along with access to social housing, that are beneficial to lone parents. With its universal advance maintenance system. Sweden has also been included in the list of countries with special provisions for lone parents. These countries all have relatively low child poverty (Figure 6). At the same time, Luxembourg, and Switzerland have low levels of child poverty in lone-mother families without these special provisions. In Luxembourg, the overall child benefit package is judged to be "high" (Millar, 1996: 102).

### DISCUSSION

Comparisons across countries are difficult, in part because data may not be systematic, and in part because there are probably alternate ways to achieve a given result. Nonetheless, this analysis of 20 countries suggests that several societal features are correlated with the level of child poverty. The demographic variables are of lesser importance, but nonetheless higher



Differential state support for lone-mother families:

0 = minimal; 1 = significant

proportions of lone-mother families is correlated with lower levels of poverty in two-parent families and higher levels of poverty in lone-mother families. The fertility rate at ages under 20 shows a somewhat stronger correlation with child poverty, especially in lone-mother families, while the percent male among lone parents is related to lower child poverty, especially for all children but also for children in lone-mother families.

The labour market characteristics of women are not strongly correlated with poverty rates of children in lone-mother families. The proportion female in the labour force and women's relative wage rates have weak relations to child poverty in lone-mother families, but poverty rates are also slightly lower in countries where women comprise a larger proportion of part-time workers. On the other hand, a higher labour force participation among lone mothers is related to lower child poverty rates in lone-mother families. It may be that the opportunities to work and women's wage rates are not particularly relevant unless there is also good access and affordability in childcare, or unless there are policies for full employment (Baker, 1996). It can also make a difference whether women are pushed or pulled into the labour force. The encouragement to work, especially by labour market and family-friendly provisions, provides a different context in comparison to stipulations that push women to work through such things as the removal of welfare support when young mothers are considered to be "employable" (see Smeeding et al., 1997).

The generosity of social programs, as indicated through social security expenditures as a percent of GDP, and the transfers to households as a percent of GDP, are more strongly correlated with child poverty than the labour market characteristics. In effect, there is a strong positive relation between the overall rate of poverty and that of children in lone-mother families. There is also indication that a higher concentration of social expenditure on family benefits, in contrast to old

age and health benefits, is more efficient in reducing child poverty. While various typologies of welfare states have been used, it may be possible to develop a typology in accordance with the relative priority given to benefits for children and young families in contrast to elderly benefits.

There is evidence that the policy context of custody, child support and the specific provisions for lone parents is also related to child poverty. State involvement through enforcement of child support obligations is less effective than advance maintenance payments. Sweden was a pioneer in the area of advance maintenance, with the collection from the non-resident parents representing about 78% of what the state pays to lone parents (Millar, 1996: 104). In addition, provisions aimed specifically at lone mothers can reduce child poverty. In Norway, for instance, lone parents receive family allowance for one more than their actual number of children, in the amount of 9,948 NOK (\$1750 CAN) per year. Child poverty is also lower on average when joint custody is defined as the default condition, possibly encouraging the continued involvement of both parents in the well-being of children.

In several ways, family change has benefited children. In particular, smaller family sizes, later ages at childbearing, and two-income families have permitted more transfers to children. At the same time, on average, children have been disadvantaged by looser marital bonds and the greater likelihood of living with only one parent or a step parent. In the Canadian case, the total of these changes was reducing the likelihood of child poverty over the period 1973 to 1988, but was increasing this prevalence over the period 1988-95 (Picot et al., 1998: 20). This is because the positive changes have largely run their course, but there is continued increase in the likelihood of living with a lone parent. In "Divorcing children: roles for parents and the state," Richards (1994: 249) observes "that parental divorce often damages the life chances of children and the State could, and should, act more firmly to head off some of this damage." Reflecting on the Swedish case, Bjornberg (2001) observes that laws do not seek to protect "The Family," but to protect the interest of the weaker parts within families, especially the children.

Children will be less vulnerable if there are more state provisions for children and if both parents continue to give priority to their well-being. We would argue that the latter is more likely to occur if the care of children is better shared between women and men (Beaujot, 2000). Stated differently, better sharing would reduce the cost of children to women. There is limited scope for policy involvement in regard to promoting the better sharing of child care by women and men in and out of marriage, but the default condition of joint custody may signal this orientation, and may encourage better involvement on the part of the non-resident parent. We also need better statistics on men's involvement with childcare. For instance, there are various compilations on lone-mother families, but we could not locate any basic international comparisons on lone-father families. In many instances, one-parent families are only tabulated as lone-mother families, and treated as a women's issue (e.g. United Nations, 2000).

From the point of view of women, another policy issue is whether to treat all mothers the same or to treat lone mothers separately (Kilkey and Bradshaw, 1999; Millar, 1996). Taking the point of view of children, the main thrust of provisions needs to refer to all children, and to children

living in low-income families in particular. However, our analysis suggests that child poverty is on average lower if there are special provisions for children living in a lone-parent family, and if advance maintenance is used instead of enforcement of child support. Another question regards the extent to which special provisions for lone parents and advance maintenance should apply only to lone parents who are on welfare, or to all lone parents. While welfare provisions can be effective in reducing the depth of child poverty, they do not compensate for the disadvantages of living with one parent, especially when the other parent is unable or unwilling to parent.

Our conclusion is that reducing child poverty, and in lone-parent families in particular, requires several approaches. Provisions that would discourage teenage childbearing would have their importance, as would opportunities for lone mothers to work. More important is the generosity of social expenditure applying to individuals and especially to families with low income. Besides, this analysis makes a case for provisions such as joint custody that encourage involvement on the part of the non-resident parent, and particular arrangements like advance maintenance payments when the other parent is incapacitated, along with special provisions for lone parents.

Canada does have some such provisions, especially the equivalent to married deduction in income tax, which treats the first child of a lone-parent family as a dependent spouse for purposes of tax deduction. There are also provisions that apply to low-income families, and thus more often to lone-parent families, such as child tax benefits, greater access to subsidized day care, and higher replacement rate in employment insurance for low-income families who also receive child tax benefits. There are also enforcement provisions to collect child support payments from non-custodial parents who are in default. However, these provisions are pale in comparison to advance maintenance payments, or paying higher benefits to lone-mother families (see also Freiler and Cerny, 1998, Desrosiers et al., 1997, and Hunsley, 1997). Collecting from non-custodial parents does not solve the problem when they are unable to pay.

As a society we have found means of accommodating for the death of parents, through life insurance and adoption, and for the economic incapacity of parents if that incapacity occurs at work, through worker's compensation, employment insurance, and the disability provisions of the Canada Pension Plan. However, we have not found means to accommodate when the incapacity occurred in other circumstances. The provisions for low-income families solve part of this problem, but advance maintenance and provisions for lone parents have the advantage of state support regardless of the circumstance that makes the non-custodial parent unable or unwilling to provide.

# Tables

Table 1

Child poverty rates	before and after government	t taxes and transfers, 1	8 countries, about 1990

	Pre-trans	fer child pover	ty rates	Post-tran	Percent lone mothers in total families		
	All children	Two-parent households	Lone mothers	All children	Two-parent households	Lone mothers	
Australia 1989	19.6	11.5	73.2	14.0	7.7	56.2	12.4
Belgium 1992	16.2	13.1	50.7	3.8	3.2	10.0	8.1
Canada 1991	22.5	14.9	68.2	13.5	7.4	50.2	13.4
Denmark 1992	16.0	10.6	45.0	3.3	2.5	7.3	14.3
Finland 1991	11.5	8.6	36.3	2.5	1.9	7.5	9.5
France 1984	25.4	22.8	56.4	6.5	5.4	22.6	6.5
Germany 1989	9.0	5.2	43.9	6.8	2.3	4.2	9.9
Ireland 1987	30.2	28.0	72.6	12.0	10.5	40.5	5.3
Israel 1986	23.9	21.6	61.3	11.1	10.3	27.5	5.1
Italy 1991	11.5	10.6	31.7	9.6	9.5	13.9	4.4
Luxembourg 1985	11.7	8.4	55.7	4.1	3.6	10.0	6.8
Netherlands 1991	13.7	7.7	79.7	6.2	3.1	39.5	8.4
New Zealand 1996	30.0	20.9	79.1	7.8	6.4	15.4	21.0
Norway 1991	12.9	4.4	57.4	4.6	1.9	18.4	15.4
Sweden 1992	19.1	12.5	54.9	2.7	2.2	5.2	14.6
Switzerland 1982	5.1	1.9	33.7	3.3	1.0	25.6	6.9
U. K. 1982	29.6	22.1	76.2	9.9	8.4	18.7	13.0
U. S. 1991	25.9	13.9	69.9	21.5	11.1	59.5	21.2

Note: Date shown by country is date of latest data.

Source: Smeeding, Danzinger, and Rainwater, 1995. For New Zealand, estimates were made based on data from Bob Stephens.

#### Table 2

Total, elderly and child poverty rates by family type, and percent of children living in single-
mother families in 20 countries, around 1986 and 1996

Country		/	Around	1986					-Aroun	d 1996	)	
	1	2	3	4	5	6	1	2	3	4	5	6
Australia (94)	11.9	24.3	14.0	9.8	62.2	8.4	14.3	29.4	15.8	12.0	46.3	10.6
Austria (95)	6.7	18.5	4.8	9.3	29.8	13.0	10.6	10.3	15.0	12.9	44.0	10.8
Belgium (96)	4.5	10.9	4.0	3.2	19.9	4.7	7.4	15.1	6.3	6.1	8.0	8.9
Canada (97)	11.4	10.8	14.8	11.6	50.3	9.9	11.9	5.3	15.7	10.9	45.7	14.8
Denmark (97)	10.1	31.5	4.7	4.3	7.3	12.0	9.2	6.6	8.7	5.1	30.2	14.1
Finland (95)	5.4	11.9	2.8	2.4	6.9	9.0	5.1	5.2	4.2	3.9	8.3	11.0
France (94)	8.9	14.7	8.3	6.0	29.9	8.9	8	9.8	7.9	6.0	25.3	9.3
Germany (94)	6.5	10.3	6.4	5.5	37.6	4.8	7.5	7	10.6	6.5	46.2	10.9
Ireland (87)							11.1	14.4	13.8	14.4	35.4	5.3
Italy (95)	10.4	13.1	11.4	11.1	18.6	5.1	14.2	12.2	20.2	20.3	30.6	5.2
Japan (95)												3.0
Luxembourg (94)	5.3	12.7	5.2	3.6	17.6	8.0	3.9	6.7	4.5	3.3	19.3	9.6
Netherlands (94)	4.7	0.3	5.2	4.8	9.8	11.0	8.1	6.4	8.1	6.3	26.4	7.6
New Zealand (96)			6.7	6.1	13.8	14.0			7.8	6.4	15.4	21.0
Norway (95)	7.2	21.7	4.3	2.0	23.1	10.3	6.9	14.5	3.9	2.1	13.5	15.2
Spain (90)							10.1	11.3	12.2	12.5	25.4	4.9
Sweden (95)	7.5	7.2	10.0	13.5	3.5	3.2	6.6	2.7	2.6	1.5	6.6	19.2
Switzerland (92)	9.3	8.4	24.4	6.9	10.0	9.1	9.3	8.4	10.0	9.1	16.0	8.9
U.K. (95)	9.1	7	26.0	9.5	12.5	11.9	13.4	13.7	19.8	13.9	43.5	20.7
U.S. (97)	17.8	23.5	52.1	21.6	25.0	15.9	16.9	20.7	22.4	14.0	52.5	21.5

Note:

- 1. Total population poverty rate
- 2. Elderly poverty rate
- 3. Poverty rate for all children
- 4. Poverty rate for children in two parent family
- 5. Poverty rate for children in single mother families
- 6. Percent of children living in single-mother families

Date shown by country is date of latest data.

Source: "Relative Poverty Rates for the Total Population, Children and the Elderly," LIS Key Figures. "Poverty Rates for Children by Family Type," LIS Key Figures.

From Web site: <u>lisweb.ceps.lu/keyfigures/childpovrates.htm</u> and lisweb.ceps.lu/keyfigures/povertytable.htm For New Zealand, estimates were made based on data from Bob Stephens. For Japan, census data are shown.

Country	Percent of children in single mother family (1986)	Percent of children in single mother family (1996)	Percent of lone parents that are male (1996)	Fertility (<20) (1996)	TFR (1996)
Australia	8.4	10.6	9.5	20.5	1.82
Austria	13.0	10.8	12.7	17.5	1.40
Belgium	4.7	8.9	17.3	11.9	1.55
Canada	9.9	14.8	16.9	24.5	1.64
Denmark	12.0	14.1	11.1	8.8	1.80
Finland	9.0	11.0	15.5	9.8	1.81
France	8.9	9.3	12.5	7.9	1.70
Germany	4.8	10.9	16.6	9.5	0.84
Ireland	5.3	5.3	12.8	15.4	1.84
Italy	5.1	5.2	13	6.8	1.20
Japan		3.0	13.5	3.9	1.39
Luxembourg	8.0	9.6	20	10.5	1.69
Netherlands	11.0	7.6	15	5.8	1.53
New Zealand	14.0	21.0	15	34	2.01
Norway	10.3	15.2	10	13.6	1.87
Spain	4.9	4.9	15	7.8	1.18
Sweden	3.2	19.2	16	8.8	1.73
Switzerland	9.1	8.9	14.5	5.5	1.48
U.K.	11.9	20.7	10	28.3	1.71
U.S.	15.9	21.5	14.9	58.2	2.02

Table 3 Demographic indicators on lone parenthood and family, in 20 countries

Source:

1. UN Demographic Year-Book, 1995, 1996, 1997, 1998, table 11.

2. Recent Demographic Developments in Europe 2000, Council of Europe Publishing

3. "Poverty Rates for Children by Family Type," LIS Key Figures. From Web site: http://lisweb.ceps.lu/keyfigures/childpovrates.htm

(Note: Ireland in "1986" and "around 1996" is data from 1987; Spain in "1986" and "around 1996" is data from 1990; Switzerland in "1986" and "around 1996" is data from 1992.)

4. Information from various respondents (see appendix)

country	1	2	3	4	5	6	7	8	9
Australia	393886	30.2	11.0	15.1	5.54	56.1	14.70	16.01	0.26
Austria	169981	45.3	17.7	26.2	6.38	62.0	7.26	9.12	0.12
Belgium	221497	48.6	21.3	26.9	7.30	53.6	8.06	8.54	0.15
Canada	666957	36.2	12.7	18.6	6.74	59.8	4.38	N/A	0.07
Denmark	119924	51.9	20.7	30.8	6.79	40.6	6.04	12.6	0.15
Finland	96342	45.5	22.3	31.1	5.69	42.8	8.74	13.16	0.20
France	1200066	45.6	21.0	29.7	7.46	61.0	7.42	8.64	0.12
Germany	1744059	43.9	16.5	27.5	7.96	65.8	4.38	7.17	0.07
Ireland	63956	34.4	13.5	19.1	5.38	44.6	8.09	8.74	0.18
Italy	1143390	43.3	19.0	23.7	5.39	69.1	1.82	2.24	0.03
Japan	2842472	28.8	13.4	14.0	5.64	80.2	1.46	3.07	0.02
Luxembourg	13842	N/A	N/A	23.9	5.82	53.7	9.96	11.67	0.19
Netherlands	328096	45.0	22.5	26.6	6.45	48.5	3.71	5.02	0.08
New Zealand	62218	N/A	N/A	18.9	5.64	58.8	10.93	11.44	0.19
Norway	101613	45.4	15.8	27.6	6.65	45.0	8.18	13.53	0.18
Spain	597064	35.5	15.1	20.7	5.49	65.4	1.24	1.62	0.02
Sweden	169571	51.4	22.5	33.0	7.19	42.6	6.45	11.67	0.15
Switzerland	180841	47.6	11.1	21.0	6.97	63.6	5.01	N/A	0.08
U.K.	1096228	N/A	5.9	22.5	5.90	54.2	8.32	10.46	0.15
U.S.	7038400	31.1	12.2	16.1	6.26	74.2	2.11	4.09	0.03

Table 4 Measures of GDP per capita, government receipts and social expenditure, 20 countries, 1995

- 1. GDP per capita in US \$ PPP
- 2. Public revenue as percentage of GDP
- 3. Transfers as percentage of GDP
- 4. Social security expenditure percentage of GDP
- 5. Public expenditure on health, percentage of GDP
- 6. Percentage of old age and health in social expenditure
- 7. Family cash benefit percentage of social expenditure
- 8. Percentage (family cash + service) in social expenditure
- 9. Family cash benefit/(old age + health)

Source: OECD HEALTH DATA 2000. A COMPARATIVE ANALYSIS OF 29 COUNTRIES. Organization for Economic Cooperation and Development. Paris, France. OECD publications. 2000

Country	1	2	3	4	5	6	7	8
Australia	39.5	42.7	69.2	2955	43.2	56.6	43.5	82.0
Austria	39.4	42.7	84.2	3595	42.8	46.7	58.7	79.0
Belgium	40.5	43.4	82.3	3572	41.9	61.7	69.0	75.0
Canada	42.5	45.0	68.8	3096	45.4	64.5	60.7	82.0
Denmark	46.4	45.7	68.1	3112	45.5	85.2	69.8	85.0
Finland	46.2	47.1	64.2	3024	48.0	70.9	65.8	73.0
France	42.1	44.6	79.1	3528	44.4	68.9	83.2	79.0
Germany	39.0	42.6	86.3	3676	42.5	41.5	40.6	73.0
Ireland	30.8	37.7	72.4	2729	37.9	32.2	23.0	71.0
Italy	35.6	36.6	70.8	2591	35.3	41.4	69.8	79.0
Japan	39.8	40.5	70.2	2843	40.5	54.7	88.3	45.0
Luxembourg	50.0	36.3	89.2	3238	36.2	45.4	74.1	56.0
Netherlands	34.5	41.4	76.5	3167	40.9	52.6	40.5	75.0
New Zealand	43.8	44.2	74.7	3302	44.3	58.5	27.1	68.0
Norway	42.9	45.7	80.7	3688	46.5	77.9	61.6	87.0
Spain	N/A	38.0	77.1	2930	34.8	38.4	68.8	67.0
Sweden	47.7	47.9	76.8	3679	48.3	81.1	70.8	89.0
Switzerland	37.1	40.9	83.9	3432	40.6	N/A	N/A	N/A
U.K.	41.0	43.8	81.8	3583	44.9	62.8	41.7	68.0
U.S.	43.8	45.7	68.7	3140	46.1	64.5	60.7	68.0

Table 5 Labour market status of women in 1986 and 1995, and fertility measures in 1995, 20 countries

- 1. Percentage of female in labour force, in 1986
- 2. Percentage of female in labour force, in 1995
- 3. Percentage of female in part-time\* labour force, in 1995
- 4. Index = product of 2 and 3
- 5. Percentage of female in full-time labour force, in 1995
- 6. Percentage of labour participation of married cohabiting mothers
- 7. Percentage of labour participation of lone mothers
- 8. Female earnings as percentage of male earnings

\* Part-time employment refers to persons who work lass than 30 hours per week in their main job. Data include only persons declaring usual hours worked.

#### Sources:

- 1. OECD, Labour Force Statistics, 2001, Pp 23, 39
- 2. From OECD Historical Statistics 1970-1999, 2000
- 3. OECD HEALTH DATA 2000
- 4. Bradshaw and Bjonberg, 1997: 275-276
- Evelyne Huber, Charles Ragin, and John D. Stephens. Comparative Welfare States Data Set. Northwestern University and University of North Carolina, 1997. For details, see: http://www.lisproject.org/publications/welfaredata/welfareaccess.htm

Country	А	В	С	D	Е	F	G
Australia	5	2	0	69	19	8	4
Austria	5	2	0	75	15	10	0
Belgium	5	3	1	NA	NA	60	NA
Canada	3	2	0	61	11	28	0
Denmark	5	3	1	NA	NA	60	NA
Finland	5	3	1	8	1	91	0
France	5	3	1	11	2	87	0
Germany	5	3	0	22	2	76	1
Ireland	2	3	0	NA	NA	10	NA
Italy	1	1	0	91	5	4	1
Japan	1	1	0	80	16	0	4
Luxembourg	NA	2	0	NA	NA	10	NA
Netherlands	5	3	0	NA	NA	65	NA
New Zealand	5	2	1	74	13	13	0
Norway	5	3	1	9	1	90	0
Spain	1	1	0	NA	NA	10	NA
Sweden	5	3	1	9	0.4	90	0.6
Switzerland	2	2	0	85	11	3	1
United Kingdom	1	2	0	90	10	0	0
United States	3	2	0	68	12	20	0

Table 6 Indicators of child custody, state involvement in child support, 20 countries

- A. Extent of joint custody:
  - 1 = not permitted or under 5%;
    - 2 = 5 14%;
    - 3 = 15-34%;
    - 4 = 35-59%;
    - 5 = 60% or higher, or default condition.
- B. Extent of state involvement in ensuring child support:
  - 1 = minimal;
  - 2 = enforcement of child support;
  - 3 = advance maintenance payments.
- C. Extent of differential support for lone parents (see text):
  - 0 = minimal.
    - 1 = significant
- D. Custody arrangements: percent mother only
- E. Custody arrangements: percent father only
- F. Custody arrangements: joint
- G. Custody arrangements: other

#### Sources:

- 1. Information from various informants (see appendix)
- 2. Joint custody has been estimated by the author based on other information for Belgium, Denmark, Luxembourg and Spain.

Table 7 Correlations of child poverty with various indicators, about 1996

Correlation (Pearson's r)	1	2	3
Percentage of children living in single-mother families	0.138	-0.193	0.209
Fertility under 20	0.553*	0.309	0.495*
Total Fertility Rate	-0.112	-0.233	-0.158
Percent of lone parent families that are male	-0.335	-0.303	-0.288
GDP per capita in US\$	-0.078	-0.227	0.061
Public revenue, percentage of GDP	-0.705**	-0.620*	-0.665**
Transfers to households, percentage of GDP	-0.663**	-0.533*	-0.590*
Social security expenditure, percentage of GDP	-0.658**	-0.624**	-0.533*
Public expenditure on health, percentage of GDP	-0.350	-0.500*	-0.092
Old age and health, percentage of social expenditure	0.632**	0.591**	0.492*
Family cash benefit, percentage of social expenditure	-0.304	-0.321	-0.163
Family cash and services, percentage of social expenditure	-0.451	-0.543*	-0.243
Ratio of family cash benefit to old age and health benefits	-0.423	-0.424	-0.284
Elderly poverty rate	0.514*	0.460	0.419
Total population poverty rate	0.945**	0.850**	0.747**
Labour force: percentage female	-0.243	-0.484*	-0.113
Part time: percentage female	-0.263	-0.241	-0.141
INDEX = product of last two rows	-0.406	-0.568*	-0.205
Full time: percentage female	-0.209	-0.466*	-0.053
Labour participation rate of married/cohabiting mothers	-0.372	-0.571*	-0.337
Labour participation rate of lone mothers	-0.247	-0.238	-0.326
Female earnings as percentage of male earnings	-0.141	-0.162	-0.082
Extent of joint custody	-0.672**	-0.739**	-0.446
Default condition or 60% or higher	-0.688**	-0.732**	-0.365
Not permitted or under 5%	0.472*	0.592**	0.131
Extent of state involvement in ensuring child support from absent parent (Spearman's rho or rank correlation coefficient)	-0.607**	-0.603**	-0.355
Minimal	0.308	0.530*	-0.008
Enforcement of child support	0.422	0.262	0.411
Advance maintenance payments	-0.607**	-0.585**	-0.402
Extent of differential state support for lone parents	-0.679**	-0.676**	-0.686**

1. Percentage of child poverty

Percentage of child poverty in two parents families
Percentage of child poverty in single mother families

4. \* Correlation is significant at the .05 level (2-tailed).

5. \*\* Correlation is significant at the .01 level (2-tailed). Source: see Tables 2-6

#### **APPENDIX A**

Information on custody, state involvement in ensuring child support, provisions for lone parents, and proportion male among lone parents, 20 countries.

**Australia**: Joint custody mostly the case (default) for guardianship (major decisions like education). Since 1996, "guardianship" has been replaced by the notion of parental responsibility, "custody" by "residence" and "access/visitation" by "contact." For the most part, where child lives is not decided by courts, residence can be joint if worked out by parents. Child support assessed on the basis of level of income of both parents. Parents on social assistance must take reasonable action to collect child support and this is deducted from the welfare payments so that welfare payments for children are only a top-up to child support payments. In June 2001, 9.5% male payees from Australian Child Support Scheme, covers 85-95% of all sole parent families. (Peter McDonald, Colin Matthers, Allan Shephard, Margaret Harrison, Bruce Smyth).

**Austria**: Joint custody is permitted as of 1 July 2001, since then it is the normal form but in the first six months of operation, it seems that joint custody is still not very common; if parents do not agree the judge decides (Maria Steck). In 2000, among all children living with a lone parent, 12.7% were living with father (Statistics Austria). The state enforces child support by collecting from the absent parent; if the parent is out of the country or incapable of paying, the parent can collect from the state. Some two or three years ago, probably at least 75% of custody was granted to the mother (Astrid Deixler-Hubner). Lone parents have access to a tax credit (negative income tax), also available to two-parent families where one partner is not gainfully employed (Helmut Wintersberger).

**Belgium**: Joint custody is the default condition; the courts may but rarely do deviate from this arrangement. Child support is collected from absent parent but they may escape. There is an "embryo" of state advance in the form of commune level social services; they sometimes advance payments to be collected later from the absent parent. The targeted schemes for lone parents include extra tax cuts, priority in social housing; also the general tax and social security system is favourable for single parents. There are no centralized judicial statistics to obtain data on custody arrangements. The 17.3% male among lone parents is from the 1991 census; it is slightly over-estimated because it includes some cases where a lone-parent family lives with their own parent who may be listed as head of the family (Johan Surkyn).

**Canada**: Joint custody has increased from 1.2% in 1986 to 27.6% in 1997, but this is just for court orders (Statistics Canada, 2000). State is involved in enforcing child support, on the bases of a formula. Minimal additional support for lone parents besides that offered to low-income families; this takes the form of an "equivalent to married income tax deduction" where the first child of a lone-parent family receives the same deduction as a dependent spouse (Rod Beaujot).

**Denmark**: Joint custody is the default condition, even for couples who were cohabitants rather than married. Housing subsidies are such that lone parents have advantages, based on income

level and number of people in the household, parts of the curve benefit lone parents to the point that there is a debate regarding people who still live together but divorce in order to declare a lone-parent family. The majority are joint custody but the figures are not known because the courts do not register this information. On 1 January 2001, for children under 18 living with one parent, 11.1% are living with the father (Jens Bonke).

**Finland**: A 1984 law launched the definition of joint custody, 91% joint in 2000, 1999 law has advance maintenance of 702 FIM (118 EUR) which the state then seeks to collect from absent parent. Family allowance is increased by 33 EUR for children of single parents (Muuri Anu)

**France**: Parental authority is supposed to be joint. State may pay food pension directly to mother and collect from father, but they are reluctant because this is aggressive to father (Laurent Toulemon, Brigitte Munoz-Perez with booklet). There are two benefits for lone parents: Allocation Soutien Familial benefit for families with no second parent, and Allocation de Parent Isolé which is means tested (Client Research Unit, 2001: 12). The 1990 census shows 12.5% male among lone parents with children under 20. The 1994 survey gives 9.2% living with father among children living with only one parent.

**Germany**: Only one parent has legal custody, other arrangements are private. Advance maintenance payments which is then collected (demand of payment) from the absent parent (Birgit Fix). In 2000, the mother had custody in 21.6% of cases, father in 1.5, joint for 75.5 and other in 1.4%. There is a male head in 16.6% of lone-parent families (Htrud Beyer).

**Ireland**: Joint custody is allowed on a case by case basis, as the court determines is in the best interest of the child; when there was no marriage, the father can petition for guardianship. But joint custody is probably under 10%, the majority are mothers; even with joint custody the mother is typically responsible for day to day questions. Parents are liable to support their children; for lone parents on welfare the state pays the benefit and seeks to collect from the absent parent, assessed on the means of the absent parent, up to the full amount of the welfare. For lone parents who are not on welfare, the courts can order payments which can be taken from earnings. The "one-parent family benefit" is available regardless of how the parent got to be a lone parent, to lone parents on welfare. This pays allowable receipted child care costs to parents on welfare where the lone parent is working and receiving a certain level of welfare. These childcare costs are allowed within a means test, with gradual reduction in the amount received on welfare when the lone parent returns to work. Childcare costs are not allowable for tax deduction for lone parents not on welfare. According to the last quarter of 2001, there were 22,400 male and 152,600 female lone-parent families with children under 18. When it is men lone parents, the majority (73%) have all children over age 15 (Valerie Richardson).

**Italy**: Divorce requires three years of separation, both are low, joint custody permitted as of 1970, 3.9% joint custody in 1998 (Rossella Palomba)

Japan: Joint custody is not allowed, most divorces are not through the court, minimal state

involvement in collecting child support. In 1995 census, 3.0% of children under 18 are living with a lone-mother, 13.5% of lone parents are male and 13.2% of children under 18 living with a lone parent are living with a lone-father (Kiyosi Hirosima).

**Luxembourg**: There are some joint custody in fact, but does not know how this is handled legally, no advance maintenance payments, minimal specific support for lone parents (some things with taxation), custody allocation not available. In the 1991 census, there were 11,497 (7.9% of households) lone parent households, of which 20% were fathers with children (Irene Zanardelli). Generosity of child-benefit package judged to be "high" for lone parents (Millar, 1996: 102).

**Netherlands**: Client Research Unit (2001: 14-15) says that there are no special benefits for lone parents; child support system has only been operational since 1997, no system of advance maintenance. Since 1998, joint legal custody ("joint-parental authority") is the default condition, both parents stay responsible for the education and upbringing of the child, a given parent can petition for sole custody but the court is not inclined to grant these requests unless the parents have such serious communication problems that the welfare of the children is in danger. In 1999 some 62% were joint at that is higher now. If there is a conflict, one parent can petition the court for sole custody. Mothers on welfare receive child support from the state and the state collects if possible from the absent parent. No other special provisions for lone parents. (Erik Nicolai). On 1 Jan 2001, in 85% of lone-parent families the parent is a woman (Marloes Lammerts)

New Zealand: Under the Guardianship Act 1968, both biological parents have guardianship over their child (the right to make decisions regarding education and well-being, regardless of the custody arrangements (day-to-day living arrangements of the child). State enforces child support which is assessed on the income of the non-custodial parent; parents on social assistance are required to name the liable parent for collection of child support, with a financial penalty for noncompliance. Child support is paid directly to custodial parent if they are not on social assistance, and retained by the government if they are on social assistance and the amount is less than the rate of benefit payable. The Domestic Purposes Benefit has varied over time but it was established as a statutory benefit for lone parents in 1973 (Goodger, 1998). The data on custody arrangements by parents date from 1990; they are no longer collected (Kay Goodger). For children under 18 who are not in full-time employment in 1996, 12.5% of those living with only one parent lived with a father. The child poverty rates (disposable income) in 1996 were 15.4% for children living with one parent, 6.4% with two parents and 7.8% for all children. The Domestic Purposes Benefit is just around the 50% threshold, and it is good at keeping sole parents out of extreme poverty, but not good at removing less extreme poverty or hardship (Bob Stephens). In 1996, 21% of dependent children under 18 lived with a lone mother, 3% with a lone father, 24% overall (Kay Goodger).

**Norway**: There is a child support advance of NOK 13,440 per child per year, lone parents entitled to child benefit for one child more than they actually have (National Insurance Administration, 2000). Default condition is joint custody, unless the parents agree differently; if

parents have never married, mother has sole custody unless the parents have agreed differently. About 10 percent of lone parents are male (Marit Ronsen, Randi Kjeldstad). The courts can decide on joint legal custody, but not on joint physical custody; 90% of married couples choose to have joint legal custody after divorce, there are not statistics on the unmarried couples. About 10% of children under age 18 who live with a lone parent, lives with the father (Birgitte Gulbrandsen). A sample survey done by Jensen and Clausen in 1997 shows that 88% of children live with their mother, 8% with their father and 4% stay 50% with each parent, that is joint physical custody after separation of both married and unmarried couples.

**Spain**: Custody is practically always allocated to the mother, fathers rarely have custody, joint custody does not exist. The courts can order non-paying fathers to pay child support. Until 1999, there were no special provisions for lone parents, but now they have a personal minimum tax deduction of 5410 euros compared to 3305 for others.

**Sweden**: Joint custody is the default option for married and previously married parents, and it can be invoked by parents who are not married. This refers to legal custody, not actual physical custody; parents are to make joint decisions in matters that deal with the child, for example with whom the child should reside, visitation rights, which school the child should attend. After separation, 84% of children co-reside with their mother and 16% with their father. Advance maintenance, with the state paying the resident parent and collecting as much as possible from the absent parent. Of children whose biological parents separated in 1999, 9% have mother only, 0.4% father and 90% joint custody. For all children 1-17 not living with both parents it is 12% mother, 1% father and 87% joint. (Eva Bernhardt, Elisabeth Landgren-Moller).

**Switzerland**: According the former law as well as according the revised divorce law (in force since 2000), custody has to respect the children's well-being. Empirically, more than 4 out of 5 children co-reside with their mother. The proportion of joint-custody is increasing. However, there exist hardly any valid data, due in part to the fact that cantonal jurisdiction has a wide room to interpret the federal law. A huge heterogeneity between cantons is the result (Beat Fux).

**United Kingdom**: Custody is defined as parental responsibility rather than custody; residence orders are 90% with the mother, 10% with the mother, "joint and other" are not used. The state sets levels of child support and collects these through Child Support Agency, mothers on benefit must use this system, this is then largely deducted from their benefits. Lone parents get a small supplement to welfare payments and to the universal child benefit. (Mavis Maclean, Jane Lewis)

**United States**: States are required to withhold child support obligations from wages of nonresident parents who are delinquent. Joint custody authorized in 43 states (Garfinkel et al., 1998: 23, 222). There is no family allowance and minimal differential support for lone parents. After the 1996 welfare reform, lone mothers can only receive five years of welfare in their lifetime (Chien-chung Huang). Among custodial parents of children under 21 living in families that had a parent not living in the home in 1998, 19.7% had a joint custody agreement, and 14.9% of custodial parents were fathers (Table B of Current Population Reports, October 2000, P60-212).

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