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Is What's Best for Dads Best for Families? Paternity Leave Policies and Equity Across Forty-four Nations

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In a global economy, paternity leave policies represent one of the most significant expansions of the welfare state that seek to help fathers respond to socio-economic pressures on their work and families. Policy makers who strongly promote socio-economic equity may respond to these global changes with new policy formulae meant to encourage involvement of fathers in their families. Nevertheless, scholars have limited understanding of who benefits from paternity leave policies and what these benefits mean to families. The present study is a comparative analysis of paternity leave policies across forty-four countries. This paper first presents a typology of paternity leave policies. This typology consists of seven criteria that range from duration of benefits to amount of benefits to employment security. This typology is then applied to forty-four countries. The present study demonstrates that a surprisingly small number of countries are devoted to family equity.

Key words: *paternity leave, welfare state, family*

Who benefits from paternity leave policies? Globalization has not only placed pressures on governments and businesses, families are responding to changes in workplaces and communities. While people juggle multiple roles, such as parents and employees, many societies are struggling with unfavorable demographic conditions. In response, some governments offer support so that parents can spend more time with their young children. Governments have instituted a wide variety of policies that differ in the ways that they emphasize financial support, ability to balance career and family involvement, and

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in particular, equity in terms of encouraging both fathers and mothers to become involved parents. These policies include comprehensive programs for fathers provided by governments that include elements such as parent training (McLanahan & Carlson, 2002) and funding of organizations that provide similar services (e.g., Gillies, 2009). The most direct and far-reaching policy to encourage fatherhood involvement, though, is paternity leave. This is a clear example of policy directly targeted towards helping fathers meet family care needs.

Across the world, rapid changes in social policies influencing the intersection of work and family have left us with limited understanding of who benefits from expanded paternity leave. While there has been research on changes that occur when policies are instituted within a single country, few attempts have been made to explore these changes from a global perspective. The present study is a comparative analysis of paternity leave policies across forty-four countries. After presenting a typology of paternity leave policies, this study compares individual countries' policies to the paternity leave typology. Through this comparison, we aim to understand the ideologies that drive both family policy and ideologies around parenting. A bottom line of the present study is that some governments seem to achieve gender equity while promoting family stability, which some research suggests is unlikely. On the other hand, most countries do not seem to achieve either objective.

Government Intervention into Families: Models of Paternity Policies

Government interventions aimed at increasing fathers' involvement in childrearing have generally followed two distinct models (Gregory & Milner, 2011). In the first model, men are encouraged to contribute more time to family activity in the interest of supporting increased rates of women in the workforce and eventually increasing the level of gender equity. This change can be slow, especially when cultures within workplaces do not adjust to policies set forth by the government. Studies that examine fathers' slow uptake of policies often cite enduring expectations that work responsibilities should not shift regardless of changes in parental status (e.g.,

Humberd, Ladge, & Harrington, 2014).

Encouraging companies to embrace flexibility in work-life balance for both men and women expresses a motivation on the part of those creating policy to spread the burden of raising children. This change is needed to compensate a workforce that is increasingly made up of women, and is likely to be nearly equal in terms of gender participation in the future (OECD, 2012; U.S. Bureau of Labor Statistics, 2014). In fact, recent research suggests that policies offering employees options to manage their own time can promote the retention of skilled workers who would otherwise opt out of high level positions due to work spill-over (e.g., Moen, Kelly, & Hill, 2011). With employee turnover a growing concern for many businesses, there is a growing interest in the ways in which supporting families can help reduce the cost of training new workers and increasing worker satisfaction.

Internationally, countries have attempted to address paternity leave in terms of equity between parents. For example, in Sweden, a quota has been introduced to give fathers access to two months of paid paternity leave that must be used in order to receive full government parenting benefits. This legislation has been clearly documented as an attempt to strengthen women's bargaining position in the workplace and increase overall gender equity (Almqvist & Duvander, 2014). Evidence suggests that, especially in couples in which both parents are well-educated, fathers who take longer leaves demonstrate attitudes that reflect a strong value for shared parenting responsibility (Klinth, 2008), increased levels of father-child engagement (Brandth & Gislason, 2011; Hosking, Whitehouse, & Baxter, 2010), and more equal distribution of childcare tasks (Almqvist & Duvander, 2014). Data collected in the United States shows that when fathers take company-sponsored paternity leave, the vast majority (over 90%) spend time providing direct care to children, and over 80% spend some of their time helping with the household (Harrington, Van Deusen, Fraone, Eddy, & Haas, 2014).

Countries that offer leaves of multiple week duration only to fathers (e.g., father quotas) are associated with significantly higher rates of father involvement in childcare later in the child's first year (Boll, Leppin, & Reich, 2014). Further research

has shown that while leaves of greater duration increase involvement in childcare and housework activities, those fathers who take any leave at all are significantly more involved in childcare than fathers who take no leave (Bygren & Duvander, 2006).

While trends toward involved fatherhood are increasing within married couples, less clear is the extent to which men are truly exhibiting involved parenting behaviors. In a second model of paternity policy creation, governments shift focus from equity between parents to fathers who are not at all involved (Gregory & Milner, 2011). Researchers note the growing number of women who give birth in non-marital relationships or with absent spouses, making involved fatherhood an increasingly middle-class phenomenon (LaRossa, 1988). From this standpoint, fathers are seen as yet another resource for solving family-related problems.

In the United States, legislation was passed in 2000 to encourage fathers to contribute both financially and emotionally to their children's upbringing (McLanahan & Carlson, 2002; Nepomnyaschy & Garfinkel, 2010). Evidence suggests that fathers who become involved with their children immediately upon birth are likely to remain involved in the future, with stronger relationships shown between fathers and three-year-old children (Cabrera, Fagan, & Farrie, 2008). Further, among non-resident fathers in general, involvement with children seems to drop off over time (Carlson & Berger, 2013). Various pilot programs were developed that attempted to teach parenting skills, improve employment opportunities and skills, and to ensure access to children. Findings suggested that these programs were most effective when specifically targeted to interested fathers immediately following the birth of their children (McLanahan & Carlson, 2002). Despite the efficacy of these programs, paternity leave policies are most likely to impact middle class families in which fathers are employed full-time.

Outside of these two models, paternity leave has also been proposed as a piece of more comprehensive family leave to improve overall work-family balance. Cultural differences can lead to viewing childrearing as either an individual responsibility or as a responsibility of the society as a whole.

For instance, France provides citizens with state-subsidized childcare, flexible work arrangements, and shortened work weeks to help parents adequately serve their employers and spend time with their children (Fagnani & Letablier, 2004). Even though fathers in France have access to generous leave, evidence suggests that they spend less time in childcare than fathers in other countries (Craig & Mullan, 2010), though this may be because their children are being cared for outside of the home in quality daycare centers.

Regardless of whether father-involvement is seen as a way to increase gender equity, improve the economic status of single-parent families, or as a part of more comprehensive family policy, tapping into fathers as a means to share the burden of child-rearing is an increasingly popular expansion of the welfare state. The focus of this paper is to consider whether certain constellations of policies map together along ideologies for family care.

General Family Policy and the Changing Welfare State

There is a rich history of utilizing typologies to compare constellations of policies cross-nationally. Using this methodology allows the sorting and classification of various nations in order to make sense of a great deal of complex data. Perhaps the best known example of this approach is Gøsta Esping-Andersen's (1990) model of welfare regimes. In this model, three ideal types of welfare states are described according to institutional characteristics. While no countries perfectly match the arrangements of a liberal, conservative, or social-democratic regime, Esping-Andersen ranks each country according to the degree to which decommodification and defamilialisation are expected. Decommodification is the degree to which an individual can enjoy a socially-acceptable standard of living independent of the paid labor market (Esping-Andersen, 1990, p. 37). Likewise, defamilialization is the degree to which an individual can enjoy a socially-acceptable standard of living independent of the family (Esping-Andersen, 1990).

Social democratic welfare states are generous and spend a great deal to decommodify and defamilialize their citizens.

According to Esping-Andersen, Sweden's welfare state circa 1990 was a social-democratic welfare state. In contrast, conservative welfare states spend a great deal, but their efforts tend to decommodify rather than defamilialize. Due to traditional family values, the state only intervenes when a family's ability is exhausted. An example of a conservative welfare state circa 1990 was Italy. A liberal welfare state is characterized as not decommodifying, but it does defamilialize. For Esping-Andersen, a 1990 example was the United States.

Feminists, however, have offered significant criticisms of Esping-Andersen's work (e.g., Crompton, 1999; Orloff, 2009), noting that gendered division of labor is not well-accounted for in this characterization of nations. In fact, feminist scholars have noted that leave policies have primarily been designed by men and therefore exhibit biases in terms of goals, such as maintaining a continuous and full-time connection to the workforce (Baker, 1997). Policies differ strongly not just in the degree to which they decommodify and defamilialize, but also in the degree to which they encourage some forms of caregiving and choices in family arrangements over others (Orloff, 2009). For instance, a policy that provides inexpensive childcare might encourage working mothers, while a policy that pays stipends for extended maternity leaves would push mothers to care for children at home.

An extensive analysis of gender across welfare regimes in the late 1990s by Diane Sainsbury showed that countries rarely clustered together along Esping-Andersen's original model, whether exploring childcare provisions, care of the aged, gender biases in taxation, women's labor force participation, or women's earnings (Sainsbury, 1999). Nonetheless, conclusions from Sainsbury's research suggest that understanding prevailing gender ideologies within a country is not enough to fairly classify welfare regimes. She suggests, instead, that welfare states can best be understood as interactions between gender ideologies and the decommodifying and defamilializing of Esping-Andersen's original model.

Though paternity policies were not nearly as pervasive when this research was conducted, it is not surprising that paternity policy may not follow the ideals espoused in the original classification of welfare regimes (O'Brien, 2013). In

addition to exploring whether countries fit into a particular typology based on paternity leave policy, this article attempts to place paternity policy into more general parental leave policy.

Paternity leave policy was selected for review for several reasons. First of all, there is no set international standard by which countries can measure potential paternity policies; therefore nations have a wide range of statutes in place (O'Brien, 2013). Second, since many nations have adopted paternity leave policies within the past five years, little evaluation has been done on the overall range of policy. Finally, and perhaps most importantly, when paternity policy has been evaluated, it seems to create a feedback loop. Once policies have been implemented over a period of time, individual attitudes are changed, bolstering general beliefs in equity.

Compared to women, there have been very few changes in patterns of men's employment in the recent past. Some have suggested that policy which directly attempts to change the ways that men provide care could be the most influential in changing the dynamic of gender equity (Kershaw, 2006). Paternity policies, more so than any other efforts of the welfare state, are geared toward this very target (O'Brien, 2013).

For example, couples in Norway who experienced the designated month of care for fathers (often referred to as a "daddy's quota") reported fewer disagreements over housework than those who did not have a month of fathers providing care (Kotsadam & Finseraas, 2011). In contrast, a study conducted in the United Kingdom (Miller, 2011) found that fathers conveyed desires to participate in daily care activities, but by one-year follow-ups, fathers had reverted to traditional gender roles. These fathers, who did not engage in full-time childcare at any point in their children's lives, had relinquished many of their caregiving responsibilities to their spouses, citing work responsibilities that kept them from their initial plans, despite their best intentions.

Generally, countries distinguish between three types of leave policies for parents. The most common type of policy is aimed only at mothers. Maternity leave is compulsory in some nations for the weeks leading up to and immediately following childbirth. Though paternity leave is less common

than maternity leave, paternity leave policy is specifically designed for fathers. It is usually shorter in duration than maternity leave, and no examples were found in which fathers could take leave prior to childbirth. Most countries specified a restricted period following the birth in which the allocated days could be used. A third type of policy, parental leave, is provided in many countries for a longer duration, and often at a lower wage or as an unpaid leave from work. This leave was found, in general, to be available to either fathers or mothers, but because of the constellation of other policies, was found to be utilized much more frequently by women. Countries vary in the implementation of these policies such that leaves can sometimes be taken by both father and mother simultaneously, and sometimes a single parent can be home at a given time. This paper concentrates on specific types of paternity policies implemented in many countries. However, it also references parity with maternity leave policy and whether parental leave policy uptake is affected by paternity policies.

A Comparison of Paternity Leave Policies

Forty-four nations were evaluated based upon the typology. Selection of these countries was made to present diversity across welfare state types, as well as diversity across future research plans, which are discussed below. The countries of Moldova, Saudi Arabia, and Syria were added to the list to make certain that the instrument would be valid for countries with different forms of government.

Methods: Typology

The policies for all countries were collected from the TRAVAIL legal databases of the International Labour Organization (ILO, 2014). In cases in which a policy was listed as updated more than three years ago, was unavailable through this website, or when the text of the policy was written in an unclear fashion, the original laws were located from each nation's website to confirm the policy. Policies were coded by two reviewers for six countries. When complete agreement was achieved, the remaining countries were each coded by a single reviewer. Throughout the coding process, a

lower code is representative of a more gender-equitable policy and a higher code is representative of a country that does not consider or encourage fathers in parenting decisions.

Duration. Duration of paternity leave was coded to represent the number of days of leave from work guaranteed to fathers by the national government upon the birth of a child. For the purposes of this category, these days could be provided as paid or unpaid days. Countries were given a code of 1 if they provided greater than 10 days of leave for fathers, a code of 2 if they provided 8-10 days of leave, a code of 3 if they provided 2-7 days of leave, and a code of 4 if they provided less than two days of leave.

Parity. Parity of paternity leave was coded to represent whether paternity leave and maternity leave provided by a country were the same. As many countries distinguished between a parental leave for the care of children and paternity and/or maternity leave for the recovery from childbirth, the parity variable differentiates between the types of leave available to parents upon the birth of children. Countries were coded with a 1 if they offered the exact same leave to men and women in terms of both days and pay. A code of 2 designates countries that provided the same number of days and pay for a parental leave, but offered differences between what men were eligible for in terms of paternity leave and what women were eligible for in terms of maternity leave. A code of 3 gave the same in terms of paternity and maternity leave, but distinguished men and women differently for a parental leave after birth. Countries were coded with a 4 if they had different policies for men and women across the board.

Incentive-parental leave. This category was developed to determine if countries implemented any push factors to encourage men to participate in leaves and become involved in childcare. Incentives were coded primarily if they were used to push men toward parental leaves, as there did not appear to be any countries that incentivized paternity days separately. Countries were given a code of 1 if they required a man to take a compulsory leave upon the birth of a child (as some countries do with maternity leaves). A code of 2 was given for what is termed a "father quota," or a set period of time that does not interfere with the mother's time and provides extra

benefits to the family when a father utilizes the leave (Kotsadam & Finseraas, 2011). Countries that kept mothers' and fathers' leaves independent from each other were coded with a 3. Finally, in countries in which there was a shared leave, such that fathers taking leave would reduce the time available to mothers, as well as those countries that offered no parental leave at all, were given a code of 4.

Wage replacement. Wage replacement was coded purely for paternity leave policy. It should be noted that many of the nations examined had separate formulae for compensating individuals absent from work for paternity versus maternity or parental leave. Interestingly, since paternity leaves were frequently extremely short in duration, the wage replacement structure was often most beneficial for paternity leave as compared to any other form of leave. Countries were given a code of 1 if a father was guaranteed his full salary for the full duration of the paternity leave. Countries were coded with a 2 if fathers were given between 51 and 99 percent of their salary for the duration of their leave. There were four exceptions to this rule. Denmark, France, and Spain offered a full salary, but capped the salary level. Belgium provided three days fully compensated, then followed this with seven days compensated at 82 percent of a father's salary. A code of 3 was given if a country paid fathers at the national minimum wage during their paternity leave. Finally, countries were coded with a 4 if they offered no paternity leave or only an unpaid leave.

Job security. Fathers taking leaves have reason to believe that their employment positions may not be held for them. The degree to which countries explicitly stated that jobs must be held were coded as follows. A 1 was assigned to countries that stated that the same job must be held for those who took leave. A code of 2 was assigned to those countries that stated that, at a minimum, some job must be held for fathers who took leave. A code of 3 was assigned if a country stated that money could be provided in place of holding a job, and a code of 4 was assigned to countries that did not explicitly state that jobs would be held.

Qualifying conditions. Countries were also coded as to the conditions that individuals needed to meet in order to receive the paternity benefits described. For countries that identified

no qualifying conditions, a code of 1 was selected. Countries that required only citizenship or residence were given a code of 2. A code of 3 was assigned if benefits were only available to those who had paid into a social insurance system through employment for a specified amount of time, and a code of 4 was given to any country that stated that benefits were only available for individuals who had salaries under a certain level.

Limits on leave. Countries were also appraised on whether they placed limits on the number of leaves that fathers could take over the course of their lifetime. If countries allowed fathers to take as many leaves as they had children, they were coded with a 1. Countries who listed a limit that was greater than four were coded with a 2, limits between one and four were coded with a 3 and countries that either provided no leaves or allowed only one leave were coded with a 4.

Total. The total score across the previous categories was summed for each country, giving each nation a total score. Countries that ranged from a total score of 9 to 13 were grouped as the equitable policy nations. Those nations that ranged from 14 to 19 were categorized as having mid-range policy, and those countries with scores ranging from 21 to 28 were considered not equitable. While there was a clear demarcation between the mid-range category and the high score category, other data about the countries involved helped to inform the decision as to an appropriate dividing line to separate the most equitable nations. For example, with scores of 14, the policies of Colombia and Denmark were carefully examined. While each exhibited some important signs of valuing the contributions of fathers to families, Colombia did not provide any shared leave (ILO, 2014) and Denmark showed very low uptake of shared leave by fathers (Bloksgaard & Rostgaard, 2014), especially when compared to other Nordic countries. This evidence suggested a strong difference between these two countries and for example, France, where a range of family friendly policies combine with eleven days of paternity leave.

High Equity Countries

The countries found in our analysis that exhibit high gender equity provide generous paternity leave policies that

Table 1: Paternity Leave Typology

Country	Duration	Parity	Incentive- parental leave	Wage Replacement	Job Security	Qualifying Conditions	Limits on leave	Total
Code 1	> 10 days	Same	Compulsory	Salary replace (100%)	Same job	No conditions	No limit	Range (9 exhibits equity to 28 exhibits little equity)
Code 2	8-10 days	Same parent Diff pat/mat	Father quota	Salary replace (51-99%)	A job	Citizenship/ Residence	> 4 leaves	
Code 3	2-7 days	Same pat/mat Diff parent	Leaves independent	Minimum wage	\$ in lieu of holding job	Paid into SI	1-4 leaves	
Code 4	< 2 days	All different	Only shared/ no par leave	Unpaid leave	No guarantee	Salary limits/no paternity	1 leave/ no paternity	
Australia	2	2	4	3	2	3	1	17
Austria	4	2	4	4	2	4	4	24
Belgium	3	2	3	2	1	3	1	15
Brazil	3	2	4	1	1	3	1	15
Canada	3	2	4	1	1	3	1	15
China	4	2	4	4	1	4	4	23
Colombia	2	2	4	1	1	3	1	14
Czech Republic	4	2	3	4	4	4	4	25
Denmark	1	2	4	2	3	1	1	14
Estonia	1	2	3	1	2	2	1	12
Finland	1	2	2	2	1	2	1	11
France	1	2	3	2	1	3	1	13
Germany	4	2	2	4	1	4	4	21
Greece	3	2	3	1	1	3	1	14

Guatemala	3	2	4	1	2	1	1	14
Hungary	3	2	4	1	1	3	1	15
Iceland	1	1	3	2	1	3	1	12
India	4	4	4	4	4	4	4	28
Ireland	4	2	3	4	1	4	4	22
Israel	4	2	4	4	4	4	4	26
Italy	4	2	2	1	1	4	1	15
Japan	4	2	4	4	2	4	4	24
Luxembourg	4	2	4	4	2	4	4	24
Mexico	4	4	4	4	1	4	4	25
Moldova	4	2	4	4	4	4	4	26
Netherlands	3	2	4	1	1	3	1	15
Norway	1	1	1	2	2	1	1	9
Peru	3	2	3	1	1	1	1	12
Poland	1	2	3	1	1	1	1	10
Romania	3	2	4	3	1	3	1	17
Russia	4	4	4	4	4	4	4	28
Saudi Arabia	4	2	4	1	4	3	1	19
Slovak Republic	4	2	4	3	1	4	4	22
Slovenia	1	2	3	2	1	3	1	13
South Africa	3	1	3	1	1	4	4	17
South Korea	3	2	3	1	1	1	1	12
Spain	1	2	3	2	1	3	1	13

(continued next page)

Table 1: Paternity Leave Typology, continued from previous page

Country	Duration	Parity	Incentive- parental leave	Wage Replacement	Job Security	Qualifying Conditions	Limits on leave	Total
Code 1	> 10 days	Same	Compulsory	Salary replace (100%)	Same job	No conditions	No limit	Range (9 exhibits equity to 28 exhibits little equity)
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Code 3	2-7 days	Same pat/mat Diff parent	Leaves independent	Minimum wage	\$ in lieu of holding job	Paid into SI	1-4 leaves	
Code 4	< 2 days	All different	Only shared/ no par leave	Unpaid leave	No guarantee	Salary limits/no paternity	1 leave/ no paternity	
Sweden	1	1	2	2	1	1	1	9
Switzerland	4	4	4	4	4	4	4	28
Syria	4	2	4	4	4	4	4	26
Taiwan	3	2	3	1	1	1	1	12
United Kingdom	1	2	3	2	1	3	1	13
United States	4	1	3	4	1	4	4	21
Uruguay	3	2	3	1	4	3	1	17

emphasize parity and encourage use by fathers. These countries include Estonia, Finland, France, Iceland, Norway, Peru, Poland, Slovenia, South Korea, Spain, Sweden, Taiwan, and the United Kingdom. It is not surprising that the typically progressive Scandinavian nations of Finland, Iceland, Norway, and Sweden appear on this list. Policies in these countries encourage fathers to participate in leaves with financial bonuses and with longer leaves when both parents take leaves. In Sweden, for example, both parents receive a sum of money for each day that they share equally of leave. As Kotsadam and Finseraas (2011) find, cultural norms seem to support these policies. Fathers in these nations have relatively high levels of uptake for leaves, and take longer leaves on average than fathers in other countries (Brandth & Kvandt, 2014; Duvander 2014; Salmi & Lammi-Taskula, 2014).

In France (Fagnani, Boyer, & Thévenon, 2014), Poland (Michon, Kotowska, & Kurowska, 2014), Slovenia (Stropnik, 2014), Spain (Escobedo, Meil, & Lapuerta, 2014), and the United Kingdom (O'Brien, Koslowski, & Daly, 2014), fathers took advantage of the very generous paternity policies at high rates as well. These well-paid, relatively long leaves were eleven to fifteen days in duration. In contrast, though, to the Scandinavian countries on this list, the parental leaves in these countries were shared with mothers, and not incentivized for fathers. In these countries, as well as in Estonia (Pall & Karu 2014), where fathers enjoy a fourteen day paternity leave, but no parental leave, fathers tended to take paternity leave only.

Leaves in Peru (four days), South Korea (three days), and Taiwan (three days) were relatively short for the high equity countries, but still high across nations overall. A paucity of data was available about the remainder of the policies in these nations, but Peru offers no parental leave, South Korea a shared parental leave with only minimal pay, and Taiwan offers an independent but unpaid leave (ILO, 2014).

Midrange Countries

These countries take steps to encourage fathers' involvement, but did not provide as much motivation as the first set of countries. Leaves were either shorter, or lower in pay than the previous set of countries. Australia (10 days), Colombia

(8 days), and Denmark (14 days), for example, provide long leaves, but Australia provides only minimum wage as reimbursement. Colombia, on the other hand, specifies workers have to pay into the social security system for a significant time to receive benefits (ILO, 2014). Denmark provides a full salary, but only if a person's earnings are below a figure about equal to \$36,000 (USD) per year, the maximum benefit amount paid to an individual (Bloksgaard & Rostgaard, 2014). None of these countries incentivize leaves for fathers. Australia has a shared unpaid leave, while Colombia has no parental leave available. Uptake data for Australia showed that less than half of fathers took the paternity leave, and those who did often used less than the two weeks offered (Whitehouse, Baird, Alexander, & Brennan, 2014). In Denmark, only about a quarter of the fathers took paternity leave. No uptake data were available for Colombia or Saudi Arabia (Bloksgaard & Rostgaard, 2014; ILO, 2014).

Most of the countries in this category offered between two to five days of paternity leave, including Belgium, Brazil, Canada, Greece, Guatemala, Hungary, Netherlands, Romania, South Africa, and Uruguay (ILO, 2014). Saudi Arabia offered the shortest paternity leave, at only one day in duration, with no supplemental parental leave (The World Bank Group, 2015, p. 6). Some of these countries, notably Belgium, Hungary and Greece, offered flexible work schedules to both mothers and fathers to help balance work and family. Belgium is the only one of these countries to offer an independent, paid leave (Merla & Deven, 2014). Both Greece and the Netherlands offer independent, unpaid leaves (ILO, 2014).

Hungary offers a number of different options for parents to collect allowances to help with child support, whether working or not. Options, though, are shared by the family and not particularly aimed at fathers staying at home, though some might encourage mothers to work (Korintus & Gábos, 2014). Romania has a well-paid shared leave, but evidence shows that it is primarily mothers who collect the funds. Canada's policies differ depending on the province or territory, but federal policy is a shared, unpaid leave (Doucet, Lero, McKay, & Tremblay, 2014). There are no parental leaves offered in Brazil, Guatemala, South Africa, or Uruguay (Moss, 2014, pp. 19-21).

Non-equity Countries

Some countries offered minimal to no paternity leave, and if offered, parental leave is poorly incentivized. Not surprisingly, when these countries offer parental leave, it is rarely the fathers who take the leaves, placing the full burden of childcare upon the mother. In fact, in Israel, unused portions of maternity leave can only be used by fathers if a mother signs over a portion officially, or in the case of her death. Not surprisingly, the majority of the countries in this category had no parental leave, or a leave that was shared with mothers (Moss, 2014, pp. 19-21).

China (ILO, 2014), India (Moss, 2014, pp. 13-14), Mexico (Moss, 2014, pp. 13-14), Switzerland (Moss, 2014, pp. 13-14) and Syria (The World Bank Group, 2015) did not provide any paternity or parental leaves. If fathers want to spend time away from work when their children are born in these countries, they need to have vacation time available.

In the countries of Austria, the Czech Republic, Germany, Israel, Luxembourg, Moldova, Russia, and the Slovak Republic, there is not a paternity leave, but there is shared parental leave. In all of these countries, the nature of the leave lends itself well to mothers taking the vast majority of time (Gornick & Meyers, 2008). The leaves are paid at a minimal rate, not related to prior salary, and would be unlikely to meet the needs of the primary wage earner of the family. Moreover, since mothers are offered maternity leaves, they are more likely to continue their separation from the workplace than to switch with a partner after a short leave, especially given cultural norms surrounding men and childcare (ILO, 2014; Moss, 2014, pp. 18-21).

Ireland, Japan, and the United States offer no paternity leave, but offer independent leaves that do not draw from the mother's leave. Italy offers one day of fully paid paternity leave, but this was just introduced in 2013 (Addabbo, Giovannini, & Mazzucchelli, 2014). Parental leaves in Ireland (Drew, 2014) and in the United States (Gabel, Waldfogel, & Haas, 2014) are unpaid, while in Italy (Addabbo, Giovannini, & Mazzucchelli, 2014), parents receive thirty percent of their salary while on parental leave, and in Japan (Nakazato & Nishimura, 2014) parents receive forty percent of their salary. Fathers in these

nations do not take leave at high levels upon the birth of their children.

Discussion

This comparative study addressed the diversity with which governments support families, in particular, fathers and their children. The study first examined the unique attributes of paternity leaves across a wide range of countries, and then compared how these paternity leaves fit into a constellation of legislation aimed at addressing the needs of working families. With equity at the center of concerns around responsibility for care work, it is important to place even the most comprehensive paternity leave policies in the context of parity with programs offered to mothers. This approach allows for an understanding of the orientation toward fathers of each country examined, though true motivations must be sought through direct investigation of those who created these policies.

It is not surprising that findings showed few similarities with the clustering of welfare regimes originally proposed by Esping-Andersen (1990). In the twenty-five years since publication of his conceptualization, many of the critiques of this seminal work have centered around the ways in which this model insufficiently accounts for differences in the ways families are formed and cared for (e.g., Orloff, 2009). While many of the social democratic countries (exemplified by Scandinavian countries in Esping-Andersen's model) remained clustered together due to the high value placed on equity within these nations, countries like Denmark did not score highly based on this typology. Data on uptake seemed to support this, suggesting that Denmark lagged behind other Scandinavian countries in terms of fathers taking leaves, and in terms of the cultural values of involved fatherhood (Bloksgaard & Rostgaard, 2014).

In a second example, Esping-Andersen identified France as a conservative welfare state. According to this typology, the extremely generous leave afforded to fathers along with high wage replacement outweighed the lack of parity to mothers in France to place this nation among the highest equity nations. Nonetheless, fathers in France were found to take their ten day leave and return to work, providing little residual help in the

care of children according to prior studies (Fagnani et al., 2014). Since France was originally classified, however, significant changes have been made to organization of its welfare state. Legislation has been passed to establish a shorter work week, in part motivated by a desire to increase the total number of jobs available. Thus, in France there is greater parity between women who have more access to part-time jobs and men who work shorter weeks (Fagnani & Letablier, 2004).

Table 2: Countries Grouped by Type

Equity Countries (Score 9-13) All have at least 3 days of paternity leave	Midrange Countries (Score 14-19)	Non-Equity Countries (Score 21-28) All have at less than 2 days of paternity leave
Estonia	Australia	Austria
Finland	Belgium	China
France	Brazil	Czech Republic
Iceland	Canada	Germany
Norway	Colombia	India
Peru	Denmark	Ireland
Poland	Greece	Israel
Slovenia	Guatemala	Japan
South Korea	Hungary	Luxembourg
Spain	Italy	Mexico
Sweden	Netherlands	Moldova
Taiwan	Romania	Russia
United Kingdom	Saudi Arabia	Slovak Republic
	South Africa	Switzerland
	Uruguay	Syria
		United States

Findings regarding France stood in stark contrast, for example, to Germany. In Esping Andersen's study, these two countries shared much in common. In our research on paternity leaves, though, Germany lags far behind France in terms of equity. Germany offers no paternity leave and only offers a shared parental leave, to which mothers often enjoy a stronger claim. Recent reforms have included the addition of a two

month leave extension for families in which fathers take part in the parental leave. This has increased the number of fathers who engage in parental leaves significantly (Blum & Erler, 2014). Nonetheless, the low wage reimbursement for this leave acts as a deterrent.

Classified as a liberal country, the United States' corresponding minimal policies and lack of federal involvement in paternity leaves led to classification as a non-equity country, despite the complete parity between mothers and fathers. Despite the government's lack of involvement to this date, recent trends suggest growing interest in paternity leave within this country. A summit on working families was held in 2014 in which the U.S. President and U.S. Secretary of Labor both spoke about parental leave policy. At this summit, initiatives to fund feasibility studies on the introduction of state-level leave policy were introduced (The White House, 2014). In addition, research shows that younger fathers, particularly those of the millennial generation, value paid paternity leave and may be more likely to choose employers who share these values (Harrington et al., 2014). With new emphasis on developing paternity leave policy, this classification could soon change.

While Sainsbury (1999) suggests that gender-based policy follows a different regime, analysis suggests that care-related policy follows several different typologies. The categorization of this particular typology did not fit perfectly with Sainsbury's (1999) categorization of childcare policy, eldercare policy, maternity policy, or other gendered workplace legislation. This suggests that paternity leave policy stands independent from other policies. This research provides additional evidence that gender-based policy falls outside the realm of other issues welfare regimes tackle, and that these gender-based issues do not necessarily follow one consistent message. A large number of the paternity policies studied were implemented within the past two years, and could potentially be modified as countries respond to utilization data and other feedback from citizens. This is in part why uptake data from fathers are not available from all countries. It is also important to note that within this typology two weeks of paid leave was considered as a comparatively generous policy. This further highlights the low

standards for equitable policy across nations.

This typology does more than comment on welfare regimes and expectations for father involvement in carework. This typology offers a tool for future research on the ways in which policy that promotes equity in families could affect family well-being in other ways. Future studies may employ this typology to compare income, health, and family balance across countries with differing paternity leave policies. By focusing on which types of countries value equity most strongly, in the future we hope to determine if equity-related policy influences other aspects of family well-being.

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