

ORIGINAL ARTICLE

Open Access



Access to parenting leaves for recent immigrants: a cross-national view of policy architecture in Europe

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Abstract

Parenting leaves play a crucial part in supporting women's labour force participation as well as men's participation in infant care. A major question is who has access to such leave policies and earlier research has pointed out large variations in eligibility. This article focuses on the leaves that are available to recently arrived immigrants, parents who are in a specific situation of being in transition between systems. Using information from the database of leave policies, the *International Review of Leave Policies and Research 2021* (leavenetwork.org), we map eligibility and entitlements in Belgium, Germany, Italy, Spain, Sweden and the UK, all countries with tiered systems of parenting leave entitlement as well as relatively large recent immigrant populations. Our findings indicate that the leave policies available to recent immigrants can be patchwork in nature and of a very different generosity to the benefits available to many other parents. In addition, the benefits available to this group are often (even) more gendered and perhaps suggest a fall back to a policy logic of maternalism. We discuss how parenting leave may facilitate (or not) an exit from the early vulnerable stage that many immigrant parents face during the first few years in a new country.

Keywords: Parenting leave, Parental leave, Immigrants, Eligibility, Entitlement, Parental benefit

Introduction

In recent years, there has been an increasing political awareness in Europe of the role that family policy plays in supporting women's labour force participation as well as men's participation in infant care, in which parenting leaves play a crucial part. Parenting leave is an umbrella term for policies that provide parents with the time to care for their infants whilst enjoying employment protection and (sometimes) financial benefits and includes maternity, paternity and parental leaves (O'Brien & Moss, 2020). Parenting leave is now an established government policy practice and non-controversial across Europe, although there is much cross-national variation in policy design and implementation (Koslowski et al., 2021). Some countries have multiple types of leave available to parents, while some have only one, primarily parental leave.

Much research in the field has focused on the development of the scope of parenting leaves in terms of a satisfactory level of payments and duration (e.g. Baird & O'Brien, 2015; Moss et al., 2019). There has also been a strong focus on gender equal and gender sensitive leave policy design, which in practice aims to encourage fathers to use the leave to which they are entitled (e.g. Eydal & Rostgaard, 2014). Indeed, a lot of positive reform has taken place over the past decade and the EU directive on Work–Life Balance (2019/1158) is driving yet further change.

Recent work has started to focus on those parents who might not be eligible for either full leave benefits or in some cases any leave at all (McKay et al., 2016; O'Brien, 2009). Parents may experience restrictions in access to parenting leaves due to their employment status, their family situation, or their residency status in a country (EIGE, 2021). In this case, they may have recourse to what we might describe as a second tier of benefits. This article focuses on the least favourable entitlements, which range from no provision at all to lower benefit levels as compared to other groups who fulfil certain eligibility criteria to parenting leaves. In particular, we focus on a group of parents who are likely to be experiencing these least favourable parenting leave conditions: recently arrived immigrant parents. Recently arrived immigrants are least likely to have acquired the conditions of eligibility required for full leave benefits (e.g. Duvander & Mussino, 2021; Mussino & Duvander, 2016). As such, in this article, we focus on the policy arrangements for recently arrived immigrants who may be in a space of in between, without completely having left an old situation or fully arrived in a new situation. We argue that the usual categorisations used to determine eligibility and benefit level such as formally 'employed' or 'unemployed' might not yet be relevant to this group of parents, potentially leaving them at a relative disadvantage with other parents.

Considering the policy architecture in 2021, we see that many high-income countries have developed tiered parenting leave systems with (often much) lower benefits for parents who do not meet the requirements for employment income related benefits. Such benefits may be simply a lump sum at birth not linked to a specific duration of leave, or low flat rate benefits for a usually shorter period of leave duration than might be available to parents who meet more stringent eligibility criteria. The parenting leave systems may thereby address both the parental needs of time and financial benefits for much of their population but are often more generous on both aspects for those parents eligible for the higher tier of benefits. Such a tiered design can be considered inclusive in so far as it is better to offer something rather than nothing (Dobrotić & Blum, 2020; Doucet, 2021), but a tiered design is also likely to exacerbate social inequalities between parental groups.

The dynamics of gender, employment and parenthood have shifted over time in most higher income countries so that parenthood no longer automatically equates to female withdrawal from the labour market (Crompton, 1999; Marynissen, 2022). The complementing idea in the (incomplete) gender revolution (Goldscheider et al., 2015) that fathers should participate more fully in childcare, has not seen the same degree of change. In countries where leave is similarly available to both mothers and fathers, there has been a steady increase in fathers using the leave, but mothers use more leave than fathers in all countries. In other countries, where fathers have much less entitlement to

leave than mothers, they logically take less leave as compared to mothers (Koslowski, 2021).

Not so much is known about the tiered systems and we seek to investigate how gendered such systems might be. We suspect that for those parents only eligible for the 'lower tier' benefits, the gendered aspect of their entitlements may look different to those parents in the same jurisdiction who are fully eligible for the most generous benefits on offer. Indeed, such lower tier support may only be there for mothers. In addition to the direct and gendered economic consequences of this, there are also probable long-term consequences for female labour force participation, as well as fertility decisions.

We consider the parenting leave related support available to recently arrived immigrants in order to better understand the situation for this specific parental group. By discussing the policy logic behind different policy designs, we point to the inconsistent treatment of different groups of parents within a country. We focus on aspects such as: length of employment, whether a tiered system grants some benefits for both the unemployed and those not yet looking for a job, what the level of such benefit is (e.g. the sum of any flat rate in the first 12 months), and the gender gap at the lower end of entitlements. We use the database of leave policies, the *International Review of Leave Policies and Research 2021* (leavenetwork.org) to map the situation in six countries chosen as European countries with tiered parenting leave systems. These countries are Belgium, Germany, Italy, Spain, Sweden and the UK and we focus on the leave policies as they are in April 2021. The analysis sets out the first steps for cross-national analysis of leave entitlements for recently immigrated parents, thus addressing a gap in the literature.

Recently arrived immigrants

By focusing on recently arrived immigrants, we are mainly considering those who have changed their country of residence during the past 2- to 3-year period, but the absolute period of time that it takes to become established and 'within the new system' may be longer than this. For those who arrive with children or become parents soon thereafter, it is likely that this transition phase is particularly challenging, and so how leave policy is constructed for these parents is worthy of further investigation. While immigrants of different origins have different fertility behaviours (Kulu et al., 2019), most immigrant groups tend to have higher levels of childbearing during the first years in a country (Andersson, 2004; Milewski, 2007). There are a number of hypotheses regarding immigrant fertility put forward in the literature (Mikolai & Kulu, 2022) and one explanation of higher childbearing which finds support is that fertility has often been postponed (an unwanted postponement) and that upon their arrival immigrants are often in the ages where fertility is the highest.

However, Alderotti et al (2022) found that in both Italy and Sweden the fertility of recently arrived immigrants declined in the beginning of the 2010s, presumably as a consequence of the preceding economic crisis. Thus, both period and country variation in the fertility of recently arrived immigrants is to be expected. Also, fertility patterns are not stable across generations and the descendants of immigrants may show a changed pattern (Mikolai & Kulu, 2022; Mussino et al., 2021).

Of those recently arrived immigrants who become parents soon after arrival in a new country, female labour force participation is often lower than for native born mothers

and it is therefore likely that a traditional division of labour takes place. It is sometimes argued that immigrants may have more traditional attitudes or ideologies towards parenting practices (see Milewski & Mussino, 2019), but before making such assumptions, we must fully examine the different structural constraints which may play a determining role for the behaviour of parents with regard to divisions of labour. Entitlement to parenting leave is likely to be an important factor.

In Sainsbury's (2019) study on immigrants' social rights and gender, she starts with the concepts of entitlement and eligibility, and she frames these two dimensions of access to family policy with the concept of policy regime. Policy regimes refer to the norms and principles that shape the underlying logic of policy in a particular area. Regarding immigrants she points to the following dimensions of importance: (1) whether the form of immigration yields specific rights (or not); (2) the role of the incorporation regime of immigrants; (3) the welfare regime and the (4) gender policy regime. The consequences of the combination of such regime aspects may lead to stratifying effects of a universal policy. Sainsbury takes the example of Sweden and regarding the gender policy regime she shows the gendered dimension of access to be more uneven among immigrants than native born Swedes. For instance, while almost all immigrant mothers use leave in Sweden, almost half of them in some origin groups would have been without access if there were no flat rate available for those outside the labour market. The equivalent figure for native born mothers is only a couple of percent (under 3 percent in 2019). Sainsbury considers the situation of all immigrant parents whilst our focus in this article is on recently arrived immigrant parents. Mussino et al., (2018a, 2018b) find that time in the new country matters for fathers' leave use (it generally increases over time). Most importantly, recently arrived immigrants have in most cases had less time to achieve the employment status that is required for the more generous leave policies available in a country.

Of course, immigrant parents are hugely heterogenous in terms of their countries of origin and other socio-economic characteristics. Furthermore, the immigrant populations are differently heterogenous groups across our chosen countries by origin and reason for migration. Every cohort of recently arrived immigrants may exhibit varied composition according to time and place. The group includes such different subgroups as return-migrants, cross-border workers, refugees, labour market migrants, and family migrants. In some countries, return-migrants are a substantial group and given the mobility within the European context such immigrants may increase and benefit from using the parenting leave in the country of their choice. In certain border areas, it can be quite common to be employed in one country whilst being a resident of a neighbouring country. In this case, within the European Union, the country where you work (rather than where you live) is responsible for any social security benefits.¹ Refugees may have a very different situation as compared to labour market migrants and family migrants, sometimes with more explicit general support for integration, but also in many cases finding themselves in a much more vulnerable situation including being unable to work (legally).

¹ See <https://ec.europa.eu/social/main.jsp?catId=851&langId=en>. Accessed 23 March 2022.

It is likely that immigrant groups are only visible to parenting leave systems if they ‘fit’ with the categories usually applied to native born populations, they can get lost between ‘policy-relevant identities/categories’ which we find in parenting leave systems (e.g. being employed) and the policy-relevant identities used in systems which might support immigrants (e.g. refugees, asylum seekers). We find it pertinent to make this situation of potentially falling through gaps between systems more visible.

Precarity, parenting leaves and recent immigration status

We take our starting point for our analytical framework from the recent and growing literature on the social inclusiveness of parenting leaves (Blum & Dobrotić, 2021; Dobrotić & Blum, 2019, 2020; McKay et al., 2016). Blum and Dobrotić have developed a typology of who is included in parenting leaves across different welfare states and how such inclusiveness might develop over time. They have cautioned that, despite the increasing scope of parenting leave rights, the structure and in particular the threshold to attain employment-based rights in many countries make it increasingly difficult for parents to attain eligibility to these leave rights. In the case that leave policy has been anchored in a strong attachment to the labour market, often to discourage male-breadwinner/female carer families and to rather encourage both mothers and fathers to participate in the labour market, this has often been accompanied by stringent employment-based criteria for leave. For example, parents might need to have worked with the same employer for a period of 12 months before being eligible to take leave. Such employment-based criteria serve to exclude some groups from leave benefits, and the groups excluded are often the ones in the most precarious situation. Blum and Dobrotić point to the group of women with a low level of education, and we want to add the situation of recently arrived immigrants to scholarly consideration of precarity and access to leave benefits.

Recent research focusing on eligibility to leaves (Blum & Dobrotić, 2021; Dobrotić & Blum, 2019, 2020; McKay et al., 2016) highlights how the intended outcome of a policy is likely to affect coverage in a population. Dobrotić and Blum (2020) note that as parental leave (as distinct from maternity and paternity leaves) became part of the general paradigmatic change at the European Union level towards employment-related benefits (sometimes referred to as the social investment perspective), this may have led to other aspects such as social equity and child well-being being side-lined. In setting up a conceptual framework for ‘inclusive’ parental leave Dobrotić & Blum start with the three dimensions of the framework of social rights (see Clasen & Clegg, 2007): (1) entitlement principles, (2) eligibility criteria and (3) benefit scope. These dimensions lead to the questions in the case of parental leave of who is entitled to leave and under which conditions. Dobrotić & Blum from here come up with four ideal types of parenting leave policies. The first one is the *universal parenthood model* where leave rights are inclusive to all parents residing in the country, but may follow the child and the mother and thus exclude the father. The second one is the *selective parenthood model* with stricter eligibility criteria and where leave is exclusively for those in a specific status group, for example within a specific activity, such as stay at home parents. It may also indicate different programmes applying to different groups of parents, based on status, citizenship or for instance be means-tested. The third model is the *universal adult-worker model* where leave rights are based on employment and include all parents who are working. The last

one is the *selective adult-worker model* where rights are also based on employment and in addition apply criteria such as length of service with an employer before childbirth. In practice, parenting leaves within countries do not map on perfectly to the ideal types but rather show a mix of types.

In this article, we first compare the two parenthood models. A universal parenthood model will aim for easy access to all, which in turn may reduce stigmatisation of low-income parents. It is likely to be administratively simpler to deliver, and so possibly easier to access for newly arrived immigrants. However, a universal benefit is likely to be a lower amount than a selective benefit. In contrast, the selective parenthood model is likely to be administratively more complicated and possibly more difficult to navigate. It may also be stigmatising to receivers. The model will target those who are in need of the policy but preferably not anyone else and policy-makers may—or may not—include recently arrived immigrants in this target group.

The rationale of the universal parenthood model can be said to reflect an understanding of child well-being based on no more than a safety net and some support towards poverty alleviation. Such policies may be very important for recently arrived immigrants if we assume that such immigrants have a lower rate of access to the social insurance system than to the social assistance system. Policies in this model are often gendered, excluding fathers from benefits. In the selective parenthood model on the other hand, the reach of the policy is reduced in that only certain groups of parents are eligible; in particular means-tested or unemployed (but not non-employed) parents. Recently arrived immigrants may not meet the criteria especially if they have not formally entered the social insurance system, have not formally been employed or been registered as unemployed. In addition, information about benefits may not be as likely to reach recently arrived immigrants due to language barriers and lack of interaction with the relevant state systems.

The adult worker models, in contrast to the parenthood models, explicitly link entitlement to leave policies to (previous) participation in the labour market. The universal adult worker model is usually based on individual social insurance contributions and is likely to prioritise reducing inequality between workers. Thus, employed and self-employed workers will be covered. It is based on pooling the risk of work interruptions caused by childbirth and infant care. The universal adult worker model incentivises social insurance related benefits and disincentivises informal work. An underlying logic is to bring people into the system which would be advantageous to them (including recently arrived immigrants). According to Dobrotić and Blum (2019), this is the most likely model to be degendered.

The selective adult worker model is usually associated with a policy focus on women's stable and long-term attachment to the labour market, which is perceived as a positive goal, for gender equality and child well-being, including a lower household poverty risk. It usually implies an incentive to work before childbirth, with the aim of a stronger attachment to the labour market. The aim may also be to reduce the risk for employers of long and unforeseen costs accompanied by work interruptions. Some groups of immigrants that are not yet established on the labour market are much less likely to be eligible for these benefits. By design, the selective adult worker model will raise the barriers to accessing the policy.

Much leave policy research has focused on the rights for those parents who are in the labour market, and how leave is divided (or not) between the mother and the father. Dobrotić and Blum (2020) also note that many countries have different access to leave rights for women and men and in this respect the countries range from completely gendered access to de-gendered access where there are gender-neutral rights to all parents. A key difference between the parenthood models and the adult worker models is how gendered they tend to be in their implementation. Parenthood models do not base the entitlement on labour market attachment and the aim is to ensure mothers (rather than parents) have the basic means required to care for their infants. There is no aim to match employment income during leave periods. Both types of adult worker models are more likely to be degendered in that they have the rationale to support labour market attachment on an individual (rather than family) basis. Some groups of recently arrived immigrants may benefit from the adult worker model as they are already attached to the labour market, but others without attachments will not be able to benefit in such a system. Families relying on the parenthood model are more likely to experience the reinforcement of a gendered household division of caring (and paid work). Studies on how immigrant parents (not only recently arrived immigrants) are using leave—or not (e.g. 2018b; Marynissen et al., 2021; Mussino et al., 2018a) show lower uptake by immigrant groups, in particular in contexts such as the Netherlands, Belgium or Spain, where eligibility criteria are related to labour force participation (Kil et al., 2018; Lapuerta et al., 2011).

Categorising the situation of recent immigrants

We focus on six European countries with relatively high levels of recent immigration in the European context: Belgium, Germany, Italy, Spain, Sweden and the UK. By selecting these countries we aim to show the variation within Europe in leave policy design that exists today, and the variation of support that recent immigrants might be entitled to, using data from 2021. The choice of countries is also motivated by these countries having differently tiered systems of parenting leave entitlement. In addition, the recently arrived immigrants in these countries show large heterogeneity in origin and also in fertility patterns versus the native population (see for example Wood and Neels (2017) for Belgium; Milewski (2007) for Germany; Alderotti et al (2022) for Italy and Sweden; Ortensi (2015) for Italy; Castro-Martin and Rosery-Bixby (2011) for Spain; Mikolai and Kulu (2022) for the UK). Given the extant literature for these countries on recently arrived immigrants' fertility, on parental leave policies in general and in some cases the use of leave policies by subgroups, we aim to build on and add to this initial knowledge base.

Using information from the database of leave policies, the *International Review of Leave Policies and Research 2021*, as well as reference to other databases (e.g. Europa.eu and others²), we compile the leave entitlements available in the six countries. In particular, we map the levels of entitlement and levels of benefit for parenting leaves in 2021

² Sources: www.leavenetwork.org see separate country notes; <https://settlinginbelgium.be/en/social-security/child-benefits>; <https://www.kidslife.be/en/key-moments/my-baby-has-been-born>; <https://www.expatica.com/de/healthcare/womens-health/having-a-baby-in-germany-107643/#Parental-leave-in-Germany>; <https://ec.europa.eu/social/>; <https://www.inps.it/prestazioni-servizi/indennita-per-congedo-parentale-per-lavoratrici-e-lavoratori-dipendenti>; www.expatica.com

with the focus being on the first 12 months after birth. The International Review of Leave Policies and Research 2021 (Koslowski et al., 2021) is an open access collection of country level information about leave policies and other support available for parents and cross-national tables. It is compiled by multiple contributors who are country experts. We use this information to map the entitlements and to categorise them according to our discussion above of the four types of models for parenting leaves (universal parenthood, selective parenthood, universal adult worker and selective adult worker). We then reflect upon the likely situation of recently arrived immigrant parents in the six chosen countries in light of this analytical mapping exercise.

It is likely that immigrant groups are only visible to parenting leave systems if they 'fit' with the categories usually applied to native born populations. They can get lost between 'policy-relevant identities/categories' which we find in parenting leave systems (e.g. being employed) and the policy-relevant identities used in systems which might support migrants (e.g. refugees, asylum seekers). We find it pertinent to make this situation visible and to acknowledge the heterogeneity that exists within it.

Findings: review of parenting leave policies from the perspective of recently arrived immigrants in Belgium, Germany, Italy, Spain, Sweden and the UK in 2021

In this section, the initial mapping of leave policies is presented for each country for the year April 2020 to 2021 (the census period used in the database). We consider how much leave is available to parents in the first year of a child's life under which conditions, as well as the benefit level. We then map this information according to the ideal types described above and this is presented in Table 1. Finally, we consider the likely consequences for recently arrived immigrants.

Belgium

Employees are in the strongest position in Belgium as regards parenting leave and benefits. Employed fathers have a first day right to 15 days paternity leave but in order to qualify for up to four months parental leave, they need to have completed 12 months employment with their present employer (during the last 15 months). Self-employed fathers are entitled to 10 days paternity leave. There is no provision for unemployed fathers. Employed mothers and mothers on unemployment benefits are eligible for up to 15 weeks maternity leave with an earnings-related benefit payment. To be eligible, a mother must have been working as an employee for a minimum of 120 days, plus paying social security contributions. For temporary workers, the minimum is 400 hours of work across 6 months. Self-employed mothers can take 12 weeks and receive a fixed amount. Employed mothers are then also eligible to four months parental leave, but as for fathers, they need to have completed 12 months employment with their present employer (during the last 15 months). These traits all belong to the selective adult worker model. In terms of payment, parental leave had the associated benefit of €765.33 per month³ after

³ There is some regional variation reflecting the governance structures in Belgium.

Table 1 Parenting leave entitlement components for tiered systems

Country	Universal parenthood/universal safety net	Selective parenthood/means-tested safety net	Universal adult worker/labour market attachment and child's entitlement to care by both parents	Selective adult worker/strong labour market attachment, focus on women's work and care
Belgium (federal state level)	Yes All resident mothers (one off payment)	No	No	Yes Maternity entitlement more extensive than paternity (self-employed and unemployed fathers excluded) Parental leave is degendered and available to employees after 12 months
Germany	Yes Parental leave widely available on lower rate benefit (asylum seekers eligible after 3 years). All resident mothers have access to maternity leave	Yes Resident mothers may apply for benefit if not otherwise eligible	Yes Lower benefit if working for less than 12 months previously to leave	No
Italy	Yes All resident mothers (one off payment)	Yes Maternity allowance for unemployed women	Yes Earnings and contract related maternity, paternity, parental leave and benefits	No
Spain	No	Yes Non-contributory means tested family benefits available	Yes Birth leave available to all workers but earnings related benefit has qualifying period	Yes (Unpaid) parental leave only available to employees
Sweden	Yes All resident parents are eligible to leave and flat rate	No	Yes Available to all workers but earnings related benefit has qualifying period	No
UK	No	Yes Means tested family benefits available	No	Yes Maternity leave (include transferable maternity leave/shared parental leave), paternity leave, (unpaid parental leave)

Sources: See individual country notes in Koslowski et al., 2021 (Addabbo et al., 2021; Atkinson et al., 2021; Duvander & Löfgren, 2021; Fuseller & Mortelmans, 2021; Meil et al., 2021; Reimer et al., 2021)

taxation. Paternity leave is paid at 100% pay for three days and then 82% pay for the remaining 12 days with a ceiling of €120.52 per day.

In addition, all mothers (employed or otherwise) with a national register number can apply for a one-off maternity allowance payment which is higher for the first child.⁴ In addition, every child domiciled in Belgium is entitled to family benefits. These are traits belonging to the universal parenthood model and we find that they are gendered.

Germany

In Germany, leave entitlement and financial benefit are considered separately in the policy design. Individual leave entitlement is longer in duration than the benefit. Leave can be extended beyond the first year after birth and part time options are also possible with varying levels of financial support. The benefit, if only one parent uses it, is 12 months, with two extra bonus months if both parents use the entitlement. If parents are employed, then they received 65% of the preceding year's net earnings, with a minimum of €300 per month and a maximum (ceiling) of €1800 per month. If parents are unemployed but have worked before birth for a qualifying period, they received the minimum rate of €300 per month on top of any unemployment benefits. These are traits that belong to a universal adult worker model (with varying rates of benefit according to employment history). For parents who are non-employed or unemployed without having worked for the qualifying period, they received the minimum rate of €300 per month for 12 months. This includes all those with a permanent residence permit (or who live in Germany according to EU legislation). Asylum seekers are eligible after having lived in Germany for at least three years. Thus, the German system can be also said to show traits of a universal parenthood model.

In addition to the parental leave benefit, there is also a separate 14 weeks (six weeks before birth and eight obligatory weeks after) maternity leave paid at 100% earnings for those in employment (no ceiling). Mothers on a low income (below €390 per month or unemployed) are covered by public health insurance to match their prior earnings or unemployment benefit as long as they are insured. Self-employed and non-employed women do not receive this benefit if they do not have public health insurance. However, anyone meeting the requirement of residency (including students and school pupils, voluntary workers, self-employed, asylum seekers) may apply for up to €210 per month from state social security. In addition, asylum seekers may not be deported during pregnancy and maternity. Thus, there are components of both the universal and selective parenthood models.

Italy

In Italy, leave entitlements are conceptualised in a gendered way. Mothers' access to leaves is largely via social security membership, which is mandatory and means that most of the employed and self-employed are covered, including mothers enrolled in *Gestione separata*. As the Italian system is particularly complex, we are most simplify

⁴ <https://www.kidslife.be/en/maternity-fee-demand/all-you-need-to-know-about-maternity-allowance>

Accessed 9/02/23.

somewhat in summary, but all leaves are first day entitlements (there is no duration conditionality) so we refer to the universal adult worker model. Mothers (employees and the self-employed) must take five months (it is obligatory). For this, salaried workers receive 80% earnings with no ceiling. This is frequently topped up to 100% earnings by collective agreements. There are other agreements for other types of workers which vary in benefit. Fathers (only employees with social security membership) must take ten days paternity leave (it is obligatory) which is paid at 100% earnings (no ceiling). In addition, parental leave is an individual entitlement for workers and the self-employed. Employees (excluding domestic workers and home helps) are individually entitled to six months parental leave (per parent), but are then limited to a maximum of 10 months per family. If the father takes three months, the maximum is increased to 11 months. Leave can be taken at any time until a child is 12 years old, with a maximum single period of six months at a time. This is paid at 30% earnings if the child is under six, otherwise it is unpaid. Self-employed workers enrolled with *Gestione separata* are entitled to three months which can only be taken during the first year of a child's life.

Mothers who are registered as unemployed are eligible to the maternity allowance granted by the national social security office for five months in place of unemployment benefit. There is no provision for fathers. For the non-employed, there is a one-off lump sum of €800 available to mothers (delivered as a voucher for future mothers). There is no provision for unemployed or non-employed fathers. There are thus traits of both the universal and selective parenthood models and we find that they are gendered.

Spain

Access to leaves in Spain is also linked to social security contributions and thus available to the employed and self-employed as a first day right. Both mothers and fathers are entitled to 16 weeks birth and childcare leave. Payment varies according to the contributions period but can be 100% pay up to a ceiling of €4070 per month, tax free. For those receiving contributory unemployment benefit and to those not meeting eligibility requirements for the earnings-related benefit, there is a flat rate benefit of €564.90 per month for 42 calendar days. In addition, up to three years unpaid parental leave is available per parent for employees (but not for the self-employed or the unemployed). This means that there are both universal and selective adult worker model traits but we do not find that they are gendered.

There are also some non-contributory benefits available for children with parents resident in Spain, with a low income. Those are means-tested and thus belong to the selective parenthood model.

Sweden

All parents in Sweden with a residence permit are eligible for at least 6.5 months parental leave and thus there is a universal parenthood model aspect to the system. All workers are eligible for leave but in order to get the earnings-related benefits for the first six months of leave, parents need to have worked for eight months with an income above 250 SEK/day. This is an obvious selective trait to an otherwise universal worker model which affects mothers more than fathers as mothers are almost always using the leave first. If eligible, the earnings-related benefit is just under 80% of earnings and most

employed parents also received top-ups from the employer via collective agreements. After the first six months the leave benefit is based on the income at the time. Employed fathers are eligible for a two week paternity leave with earnings-related benefits and this is a first day right.

If parents want to extend the 6.5 months, they are able to take another 1.5 months each at 180 SEK per day. All except three months can be transferred between the parents. In practice, mothers often take longer leaves. There is also the right to extend leave with unpaid days, which is also common practice.

For those parents not qualifying for the earnings-related benefit, parental leave is paid at 250 SEK/day for 6.5 months and then another 1.5 months at 180 SEK/day. Until August 2022, all 'flat rate' leave could be transferred to any parent so that one parent, usually the mother, could take 16 months.

United Kingdom

Leave in the UK is heavily gendered and only available to certain groups of employees. Maternity leave is available for six weeks on 90% pay, followed by 33 weeks on a flat rate (€177), followed by 13 unpaid weeks. If the mother is eligible, up to 50 of the 52 weeks can be transferred to the father, but not the 90% pay benefit which is only available to mothers. Maternity leave is a first day right. Some non-employees may be eligible to maternity allowance (€177 for 33 weeks) if they have made some social insurance contributions.

Employed fathers are eligible for a two week paternity leave at the flat rate of €177 per week. This is not a first day right. Fathers must have been continuously employed by their present employer for at least 26 weeks before the week when they must tell their employer of their intention to take leave (which is 15 weeks before the birth). All parents are also eligible for four weeks unpaid leave in the first 12 months of a child's life, but the qualifying period for this is 12 months with the employer. These traits belong to the selective adult worker model.

In the UK, given the particularly low level of statutory payment for leave periods it is increasingly common for employers to top up and in some cases provide up to six months full paid leave per parent.

There is no provision for self-employed or unemployed fathers. Asylum seekers are not normally allowed to work and so would not be eligible to these benefits. If claiming social assistance benefits, mothers may be eligible for a one-off maternity payment (£500). All families under a certain earnings threshold can claim child benefit.

We have seen that all six countries have what could be described as tiered systems of support. The selective adult worker aspects are likely to be associated with the highest benefit levels for those eligible, but many workers are likely to be excluded. Table 1 illustrates the variation in how the tiered systems can be configured and how the categories are not mutually exclusive. Belgium has a selective adult worker model in place, with a universal parenthood aspect safety net (for mothers only). Germany in contrast provides benefits on a universal framework (universal worker and universal parenthood models), but there is also a means tested aspect to the safety net available to mothers, which is a selective parenthood model trait. Italy has both selective and

universal parenthood models aspects, and also a universal worker model component as leave benefits are a first day right. Again, benefits vary according to prior earnings and also according to contract type. Spain also has a mixed system. Birth leave can be said to match the universal adult worker model, again with earnings related benefits. The parental leave corresponds with the selective adult worker model as it is only available to employees. Then there is a means tested safety net which matches the selective parenthood model. Sweden has universal parenthood aspects through the universal flat rate and universal adult worker model aspects but benefits vary according to prior earnings and a qualifying period. The UK is selective on both the parenthood and adult worker aspects.

Discussion

In this article, we focus on the entitlement basis to leave in a policy analysis based on the typology of who is included in parenting leaves developed by Dobrotić and Blum (2019, 2020). The mix in practice between the four ideal types is reflected when investigating the parenting leaves for recently arrived immigrant parents. We cannot consider any of these six countries as fully belonging to either the universal parenthood model, the selective parenthood model, the universal adult-worker model or selective adult-worker model. Rather, the six countries demonstrate different combinations of the four ideal types in their policy landscape.

There seems to be little specific attention in the design of parenting leaves to the incorporation of recently arrived immigrants; rather we see a mix of eligibility as based on residence, payments to the health or social insurance schemes and employment of different durations. We see that the situation of recently arrived immigrants has not received full attention and rather their situation would be conflated with the situation of non-employed groups. This means that recently arrived immigrants are more likely to be recipients of the lower tiers of benefit available in a country, which also means that access to benefits is more likely to be gendered.

The way the policy is constructed may have direct effects, such as who is eligible and what the benefit will be, but also indirect effects. A longer leave duration may be associated with a relatively long period of potentially reduced labour market integration in the beginning of the time in a new country of residence as the (usually mother) is not actively seeking employment or training, including language training. Such unintended consequences have been shown in relation to the generous leave duration for immigrant parents who arrive with preschool children in Sweden (Duvander & Mussino, 2021). Long-term poverty may be another unintended consequence, as well as whether and when childbearing continues (Korsell & Duvander, 2019). It may be that a double disadvantage for immigrant women is the unintended consequence of some policy set-ups; they may be disadvantaged if they experience more difficult access to the labour market and also disadvantaged by gendered policy and cultural expectations that they are the primary carers of children (Rajiman & Semyonov, 1997).

It is important to remember that in addition to legislation, comes an implementation process. Entitlements can be complicated to convert from theory into practice and we frequently see implementation gaps. If a person is employed, then it is likely that they will have some support from the employer to complete some of the bureaucracy

associated with parenthood. However, those who are not in this situation may need to engage with the ‘street level bureaucracy’ of applying for benefits. Depending on this process, this can be a very real barrier to parents accessing the benefits to which they are, in theory, entitled. Here, we limit ourselves to analysing the parenting leave policy in the chosen countries, but acknowledge that the next steps of implementation and usage are at least as important and should be given equal attention in research.

The transitional space of being new in a country in combination with becoming a parent may potentially extend for a long period of time and run the risk of becoming a permanent transition or half-integration. We suggest that how parenting leave is constructed for this group could be given explicit attention by policy-makers. Is the purpose of parenting leave to provide income replacement at the same level of earnings for those already in the labour market and/or to provide an economic safety net for all families with children? Many parenting leave systems are tending towards insurance systems where benefits are paid according to contributions, that is earnings and duration in the system. The tiered systems combine this set-up with a general basic economic safety net often with a strongly gendered aspect. But this second aim of an economic safety net is less well-known, less coherent and thus less transparent. We suspect that when the goals of parenting leave are two-sided it will be easier for recently arrived immigrants to be overlooked in policy design. Furthermore, ensuring that this group are aware of their entitlements may be more challenging and the structure of street level bureaucracy even more important. Potentially the long-term consequences of a divided population of insiders and outsiders will be exaggerated. For policy-makers and researchers alike, we emphasise that this group of recently arrived immigrants requires coherent attention within family policy.

We end with the acknowledgement that there are no easy answers as to the ideal solution for parents in the liminal space in which immigrant parents are likely to find themselves. When making such judgement calls, both the direct and indirect consequences of different policy choices, long and short-term, should be considered by policy-makers. Parenting leave may facilitate (or not) an exit from the early vulnerable stage that many immigrant parents face during the first few years in a new country of residence.

Acknowledgements

We are grateful to earlier comments by the guest editors of the special issue.

Author contributions

The authors have equally contributed to the article, in all its parts. All authors read and approved the final manuscript.

Funding

Open access funding provided by Stockholm University. There was no funding for the work with this article.

Availability of data and materials

The article is theoretical and only builds on publicly available data and materials. Not applicable.

Declarations

Competing interests

The authors declare that they have no competing interests.

Received: 7 April 2022 Accepted: 16 March 2023

Published online: 03 April 2023

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