

INTERNATIONAL EXPERIENCE ON CHILDCARE LEAVE PRACTICES FROM A GENDER-BASED PERSPECTIVE¹

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In contemporary society, women express more often the desire to be active in the labour market than in previous centuries. At the same time, in addition to the status of employees or entrepreneurs, as a rule, throughout the life they also acquire the status of mother. The need to care for the child during its early life by the mother, in particular, but also by the father of the child, is recognized in society by both the state and the business environment, although to a different extent, which, besides the possibilities that these entities can offer to the mother and to the father, but also to other people who have a role in the care of the child, determine a wide variety of schemes of measures in this regard. The purpose of this article is to analyze the international experience of different countries and companies in offering such measures in terms of gender. The research methods used are: analysis, synthesis, induction, deduction, statistical indices, etc. In addition to paternity and maternity leave, as well as shared parental leave and other types of childcare leave, such as grandparental leave, were identified. After highlighting the practices of various companies that take seriously the need to help parents with childcare, it is clear that successful companies are much more generous in this regard than the state in developed economies, an inverse situation compared to weaker economies such as those from Africa or those from Eastern Europe or Central Asia.

Keywords: *childcare leave; gender equality; maternity leave; paternity leave; grandparental leave; international experience; shared parental leave.*

EXPERIENȚA INTERNAȚIONALĂ PRIVIND CONCEDIUL DE ÎNGRIJIRE A COPILULUI DIN PERSPECTIVA DE GEN

În societatea contemporană femeile exprimă mai frecvent dorința de a fi active piața muncii decât în secolele precedente. Totodată, pe lângă statutul de angajate sau antreprenoare ele, de regulă, de-a lungul vieții capătă și statutul de mamă. Necesitatea îngrijirii copilului în perioada incipientă a vieții acestuia de către mamă, în special, dar și de către tatăl copilului, este recunoscută în societate atât de către stat, cât și de către mediul de afaceri, deși în diferită măsură, ceea ce, pe lângă posibilitățile pe care aceste entități le pot oferi mamei și tatălui, dar și altor persoane care au un rol în îngrijirea copilului determină o varietate mare de scheme de măsuri în acest sens. Scopul acestui articol este de a analiza la nivel internațional experiența diferitor țări și companii în a oferi astfel de măsuri sub aspect de gen. Metodele de cercetare utilizate sunt: analiza, sinteza, inducția, deducția, indici statistici etc. Au fost identificate pe lângă concediul de paternitate și maternitate, precum și cel parental partajat și alte tipuri de concedii de îngrijire a copilului, precum cel de grandparentalitate. După evidențierea practicilor de la diverse companii care iau în serios nevoia de a ajuta părinții pentru îngrijirea copilului, este evident că companiile de succes sunt mult mai generoase în această privință decât statul în economiile dezvoltate, o situație inversă în comparație cu economiile mai slabe precum cele africane sau cele din Europa de Est sau Asia Centrală.

Cuvinte-cheie: *concediu de îngrijire a copilului, egalitate de gen, concediu de maternitate, concediu de paternitate, concediu de grandparentalitate, concediu parental partajat.*

JEL Classification: D6, H53, I38, J13, J16, K36.

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Introduction. Family can be considered the basic cell of the society, the continuity of which through reproduction or adoption it traditionally ensures. On a side, to get the means of livelihood the members of the family need to work, on another side they need to take care of their children. Since in the first years of the life the presence and the care of, at least, the mother are crucial. To maintain a balance between these two sides of the family activity were developed a number of paradigms. In a patriarchal system the breadwinner is the father of the children and the mother takes the role of the housewife and is the main caretaker of the children. With the growth of the social and economic opportunities for the women other family paradigms developed, like female breadwinner model, when the principal source of income for the family is obtained by the woman and dual-breadwinner model, in which the both parents of the children contribute significantly to the income of the family.

With regard to caretaking dual-breadwinner models can be classified in: dual-carer, male-carer and female-carer types [4]. A summarization of the classification of childcare leave models can be seen in the *Figure 1*.

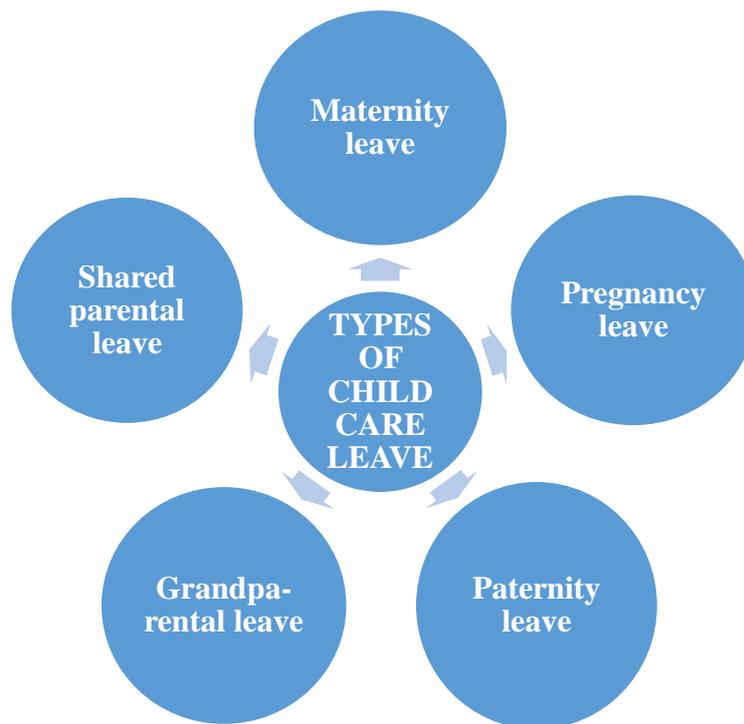


Figure 1. Types of childcare leave

Source: Elaborated by authors.

Childcare leave practices are very diverse between countries [1-19]. Scandinavian countries are hailed to have very generous practices with regard to childcare leave. For example, in Finland mothers before births as early as 7 weeks can start the maternity leave before due date of birth. Regardless of the status of the mother (unemployed, student, self-employed) she can get a maternity grant of 16 weeks of leave, while the state gives 8 weeks of paternity leave that is paid. Parents have the possibility to get a partial care leave when the child gets 3 years old, splitting the time between work and home. This can last until the child is in the second grade of the school.

In Denmark, mothers can receive 18 weeks of maternity leave, before the birth of the child 4 weeks (less than in Finland) and 14 weeks after the childbirth and all these weeks are fully paid. Fathers can get leave, but only after the childbirth and the duration is 2 consecutive weeks. Parents can get additional 32 weeks of leave, which can be split, at their whim. In the case of child or parent sickness parents can get additional 14 weeks. Even though the state offers 52 weeks of paid leave, but not always at the full salary.

In Sweden, parents can get up to 480 days of leave, but at the amount of 80% of normal payment. Besides that, mothers can get 18 weeks of leave, but after this period the leave can be split between parents at their own choice. Fathers can receive 90 days that are paid. The reason behind this long paternity leave is

for the bonding between the child and the father, when mothers get the majority of attention.

In Belgium women who are mothers can have maternity leave with a maximum of 15 weeks, but for the first month after birth they get payment in amount of 80% of their salary and 75% for the time after this. Fathers can get 10 days, but only 3 of them are paid in the amount of 100% of their salary, the other days are paid at 82%, but only if they use such a measure in the first 4 months after the birth of the child. At the choice of mothers the leave can be extended to 8 months, but if it's part-time.

In Iceland the new parents can split the leave of 9 months after the birth of the child. Mothers can receive 3 months, and fathers receive 3 months, too, and the remaining 3 months is left at the couple's choice how to split. Neither parent has the right to transfer a part of their 3 months, though. This measure is meant to ensure that both parents can work and that both they have time to spend with the child. Each parent gets 80% of their salary when they are on leave.

In Serbia the mothers can get 20 weeks of leave after the birth that is paid in full. Also, they receive an additional year, but the compensation decreasing with time (first 26 weeks - 100%; the next 13 weeks – 60% and the last 13 weeks – 30%). In the case of fathers, they receive 1 week that is fully paid.

In Norway the system of childcare has flexibility and is generous. Maternity leave is 35 weeks long fully paid or 45 days, but paid at 80%, while paternity leave can get up to 10 weeks in dependence of the income of the wives. The parents can receive additional leave of 46 weeks fully paid or 56 weeks paid at 80%.

In Hungary mothers can receive 24 weeks of leave paid at 70%, which can begin up to 4 weeks before birth. Paternity leave is 1 week long fully paid. After these 24 weeks parents can get other 156 weeks and can be split between them. First 104 weeks are paid at 70%, while the rest - at a flat rate.

In Estonia the pregnancy and maternity leave are fully paid for 140 days, the pregnancy leave may begin as early as 30-70 days before birth. Paternity leave is 2 weeks long paid. After the end of the maternity leave parents can receive supplementary 435 days off which can be split, the compensation being calculated at the average of their two earnings.

In Lithuania mothers can receive a fully paid leave of 18 weeks, while fathers can receive 4 weeks, with additional 156 weeks that can be shared between parents. The parents have the choice to get paid 100% first 52 weeks or 70% first 104 weeks, while the rest of the weeks are unpaid.

With regard to policies in the area of childcare leave for equal opportunities the basic models of policy mix can be classified in 4 types: time or Austrian/German model (offering to parents time for primary care, with less focus on child care); sequential or Swedish model (facilitating full-time care, after which the focus is on the child care); parallel model (offering parents to choose between services of child care and time); services-oriented or Danish/French (facilitating child care services and less focus on parental leave) [5, pp. 207-208].

Fathers getting parental childcare leave can be seen to have a positive association with continued childbearing, at least in some Scandinavian countries, but this doesn't necessarily mean that there is a cause-effect relationship between gender equal behaviour and couple fertility [9, p.55]. The frequent use of paternity leave may be far from indicating true gender equality, because unbalanced distribution of the childcare leave uptake between parents can indicate that a higher-order childbearing is based on a gender equality deficit in the time of the parents used for care and work. Also, the childcare cash benefit may reduce the use of paternity leave.

The unequal gender distribution of parental leave has been attributed to a few aspects, including the one that fathers frequently earn the most in a couple, as well as the norms about who is the most suitable to take care of children [12, p.3].

An issue in ensuring gender equality is the use of shared parental leave and paternity leave. Financial implications are strong factors in making leave decisions [16]. That is one of the reasons why fathers don't actively use the paternity leave or if they use it, they do it for a short time. Also, gender norms and cultural traditions still present serious barriers to fathers taking childcare leave. There are some countries in which fathers are entitled to receive a long paternity leave like Korea (53 weeks) and Japan (52 weeks), which is practically 2 times or even more than in countries like France (28 weeks), Luxembourg (26 weeks) or Scandinavian countries.

The benefits of childcare leave offered to employees vary greatly between countries. This also includes the duration of statutory maternity and paternity leave. In the *Table 1* is shown the Statutory maternity, paternity and shared parental leave duration by world regions in percents of the number of countries. It shows that practically half of the world countries have no statutory paternity leave. Even

between developed countries a third of them doesn't have such a provision. The world regions where there are in a bigger proportion countries with no statutory paternity leave include Asia and Eastern Europe, Latin America and the Caribbean.

It can be remarked that in half of the countries from Africa fathers are given some short paternity leave (of up to 10 days). This can be explained that the society and culture on this continent views the childcare as the work of the woman, though things are changing. That also explains why there is a small share of countries with a statutory paternity leave with a duration from 11 to 15 days and none with a duration of 16 days and more.

In the Middle East only one of the five countries has a statutory paternity leave, even though it's short (no more than 6 days) and no country has more than this. In this region also the majority of the countries have a statutory maternity leave period less than 12 weeks. This can be seen as a result of the patriarchal cultural background as in the case with Africa.

A bigger share of countries who have a longer statutory paternity leave (11 days or more) are developed economies. That is also the case with regard to statutory maternity leave; the majority of developed economies have a leave with a duration of 14 weeks or more. The region where there is the biggest share of countries with the longest duration of statutory maternity leave (18 weeks and more) is the Eastern Europe and Central Asia. In other regions in the majority of the countries the duration of maternity leave varies mainly between 12 and 17 weeks.

The regions where most countries do not have a statutory parental leave are in Africa, Asia, Latin America and the Caribbean. While half of the Middle East countries have no parental leave, another half of them have such a leave with the duration up to 52 weeks. While half of the developed economies have such a leave of up to 52 weeks, in a fifth of them the leave is 156 weeks or more. Diametrically oppositely, half of the countries from Eastern Europe and Central Asia have a statutory parental leave of 156 weeks or more, while in a fifth of them such a leave is no more than 52 weeks long.

Table 1. Statutory childcare leave duration by world regions, % of the number countries*

	All regions	Africa	Asia	Eastern Europe and Central Asia	Developed Economies	Latin America and the Caribbean	Middle East
Statutory paternity leave (185 countries) by duration, % of the number countries							
No paternity leave	53	43	72	64	33	61	80
1-6 days	21	29	12	7	17	26	20
7-10 days	15	24	16	21	8	10	-
11-15 days	8	4	-	7	28	3	-
>=16 days	3	-	-	-	14	-	-
Statutory maternity leave (185 countries) by duration, % of the number countries							
<12 weeks	15	17	23	-	-	3	92
12-13 weeks	32	35	58	-	5	74	-
14-17 weeks	30	48	15	11	45	15	8
>=18 weeks	23	-	4	89	50	9	-
Statutory parental leave (185 countries) by duration, % of the number countries							
No parental leave	64	90	88	16	17	94	58
<=52 weeks	22	8	8	21	55	6	42
>=78 weeks and <=104 weeks	3	2	-	5	7	-	-
>=156 weeks	11	-	4	58	21	-	-

Source: Elaborated by authors based on the information from [1]

*Note: Since it's a summarized table of schemes of childcare leave in various countries, it leaves out some specific details, that couldn't be generalized.

In *Table 2* there is shown the number of countries in various regions of the world by statutory paternity, maternity and shared parental leave in function of payment amount, mainly in percents meant to be from the previous earnings, if it's not stated otherwise. It can be seen that in the majority of the countries the governments don't have provisions of paternity leave, though the ones who have such a provision in the

most cases is paid in the amount of 100% from the previous earnings. Only a few countries have unpaid statutory paternity leave, flat rate benefits, or a paternity leave for which the amount paid from the previous earnings in percents is less than 100%. In the case of the maternity leave the in the majority of the countries regardless of the world region is paid in the amount that from the previous earnings in percents is between 90% and 100%. Also, there are a few countries in which this type of leave is unpaid, cannot be established generally or has a flat rate benefit. In the case of (shared) parental leave most of the countries do not have such a provision, but for the ones who do have such a measure in most cases it's unpaid.

Table 2. Statutory childcare leave in world regions by payment amount, number of countries**

	All regions	Africa	Asia	Eastern Europe and Central Asia	Developed Economies	Latin America and the Caribbean	Middle East
Statutory paternity leave (185 countries) by payment amount, number of countries							
No paternity leave	106	24	19	14	18	21	10
Flat rate benefit	2	-	-	-	2	-	-
Unpaid	8	1	1	2	2	1	1
50%-70%	2	1	-	-	1	-	-
80%-90%	4	-	-	-	4	-	-
100%	63	26	6	3	15	12	1
Statutory maternity leave (185 countries) by payment amount, number of countries							
Unidentified	1	1	-	-	-	-	-
Flat rate benefit	5	1	-	1	3	-	-
Unpaid	2	-	1	-	1	-	-
25%	2	-	2	-	-	-	-
>=50% and <60%	10	5	1	1	1	1	1
>=60% and <70%	14	3	3	1	2	5	-
>=70% and <80%	8	1	1	-	4	2	-
>=80% and <90%	16	1	2	1	12	-	-
>=90% and <=100%	127	40	16	15	19	26	11
Statutory parental leave (185 countries) by payment amount, number of countries							
No parental leave	122	47	24	5	7	32	7
Unpaid	27	5	1	5	11	-	5
Flat rate benefit	9	-	-	2	7	-	-
20% of minimum wage	1	-	-	1	-	-	-
Partially paid	2	-	-	2	-	-	-
30%-40%	3	-	1	1	1	-	-
50%-60%	4	-	-	-	3	1	-
70%-80%	8	-	-	-	7	-	-
90%-100%	9	-	-	-	6	1	-

Source: Elaborated by authors based on the information from [1]

**Note: Since it's a summarized table of schemes of childcare leave in various countries, it leaves out some specific details, that couldn't be generalized. The amount of percents are meant to be from the previous earnings if it's not stated otherwise.

A childcare leave measure, which is promoted recently, is the grandparental leave. It has some useful advantages for mothers and fathers who work. This type of leave can enhance their productivity because of longer hours at work or when taking work at home. Also, companies don't have supplementary costs since grandparental leave is often unpaid, while maternity leave is in the majority of cases paid and paternity leave is sometimes paid. This type of leave extends the possibilities of working (flexitime, telecommuting, part-time), thus elaborating advantageous work schedules not only for the company, but also for the mothers and/or the fathers. Another advantage consists in the essential reduction of the cost of the enterprise, because often the ones who use part-time work don't receive full benefits. Plans to implement such a measure were in the United Kingdom in 2015, but it wasn't still implemented because additional research is needed to substantiate the benefits.

Recognizing the crucial importance of helping the employees in caring for newborns or adopted

children various companies across the world offer generous childcare schemes. The multinational technology corporation Cisco Systems, Inc. is, probably, the first company to offer parental childcare leave for grandparents and for others caregivers since 2016. Even though such a measure was seen as "a bold initiative", a culture and an environment focused on inclusion and familial and background diversity bring out employees' talents. Thus, they employ a policy that isn't gender-biased towards mothers or towards fathers, but is gender-neutral and focuses on caregiver relationship instead of the biological one. Cisco also divides caregivers in two types: the main caregiver and the supporting caregiver. The reason behind this division lies in the length of caregiving. The most responsibility of caregiving is assumed by the main caregiver, without regard to gender. The supporting caregiver offers support to their spouse/partner, including in the bonding with the child. The main caregiver can get a minimal paid duration of 13 weeks, which may differ between countries. The duration is 4 paid weeks for the supporting caregiver, but there's a condition – it can be used in the first 6 months after the birth/adoption of the child.

In USA where parental childcare leave is not mandatory a number of companies offer various schemes. The American company of media services and production Netflix, Inc. introduced in 2015 the unlimited family leave, the fathers and mothers can take time off to care for their newborn or adopted child, having the possibility to return to work on a full-time or part-time basis, after returning to work also having the option to take another leave when needed. This measure is used for salaried employees, thus, the ones who get a fixed or regular payment. The hourly workers, i.e. the ones who receive wages (hourly payment) also have the right to get paid childcare leave, but the benefits are less generous. Employees in DVD department can get 12 weeks of leave, the ones from customer service – 14 weeks and the employees in the department of streaming – 16 weeks of not only maternity paid leave, but also paternity paid leave.

The Swedish competitor, the media services company Spotify Technology S.A. policies with regard to childcare leave are more generous. The mothers and fathers, regardless of employee status (hourly or salaried workers), or the child being born or adopted can get 6 months of paid family leave.

The multinational company Deloitte Touche Tohmatsu Limited specialized in fiscal consultations and auditing and other professional services introduced in September 2016 paid leave for male and female employees of maximum 16 weeks not only for childcare, but also for the care of another family member, like a spouse, an aging parent. Mothers can get maximum 6 months of paid leave in the case of short-term disability.

The hospitality industry company Hilton Hotels & Resorts offers 10 weeks of paid childcare leave, including lower-wage, hourly workers.

The American multinational computer software company Adobe Inc. has 4 types of leaves for it's employees: paid medical leave of 10 weeks in case of childbirth, surgery, adoption, surrogacy, illness or medical urgency; paid parental leave of 16 weeks for primary caregivers like mothers and fathers that are parents as a result of birth of a child, adoption, surrogacy or foster care; paid maternity leave of 26 weeks; paid family care leave of 4 weeks for the care of a sick member of the family.

The British multinational telecommunications conglomerate Vodafone Group plc offers to mothers at least 16 weeks of fully paid maternity leave, which is followed by a period of 6 months during which the mothers can work 30-hour weeks and get their salary in full.

The social news aggregation, web content rating, and discussion website business Reddit besides giving parental leave to parents it also offers comfortable on-site breastfeeding rooms, a stipend for the childcare when parents return to work and also access to services on 24/7 basis support for the early childcare development, a hotline phone, consultations on lactation, estate planning, adoption assistance and payment for egg freezing, fertility testing and gene testing, a resource library for childcare.

The Google company gives 22-24 weeks of paid leave for mothers who give birth and 12 weeks for non-birthing parents. It also has Mothers' Rooms in all its offices, backup childcare, internal parent support groups, parent gurus and peer mentoring from other parents.

After listing the practices from diverse companies who take seriously the need to help the parents for the childcare it's obvious that successful companies are much more generous in this regard than the government in developed economies, an inverse situation if compared to weaker economies like African ones or those from Eastern Europe or Central Asia.

Conclusions. The childcare leave practices vary greatly between countries and between companies. Developed economies, especially Scandinavian countries offer more generous childcare leave schemes, including longer paternity leaves and paid in a larger amount. Countries that are less developed, like the

ones from Eastern Europe focus more on maternity leave, even though recent developments show interest in introducing or extending paternity leave. Countries with weak economies like many from Africa even though recognizing the need of childcare and focusing on helping mothers due to their cultural traditions and weakly developed socioeconomic institutions the measures for childcare are less generous, but slow developments show potential for change in this direction. The relationship between offering various childcare leave schemes and moving towards gender equality is a complicated one. Even though such measures are necessary, because they can be very helpful to women, there are still many factors which influence the impact of childcare schemes on gender equality and need further research.

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