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International Comparison of Tax Systems and their Impact on the Work-Family Balancing¹

Introduction

Taxation and social policy regulations, as well as family policy measures, may contain rewards or penalties for particular patterns of labour force participation and/or working-time preferences, particularly those of married women or of women with children. Researchers in the social sciences have identified various models of the welfare state and of welfare policy in Europe that can be distinguished from each other on the basis of the corresponding incentives and restrictions they contain and the attitudes towards labour market participation and family policy associated with them (cf. Schunter-Kleemann 1992; Ostner 1995; Ostner/Lewis 1994; Pfau-Effinger 1998). Two basic types of family and employment policy models have emerged from this research.

The first type provides support and safeguards for the traditional *male breadwinner model*. Its starting point is that each family has a male provider with a non-working wife who manages the household and brings up any children there may be more or less single-handedly. The associated taxation and social security systems are designed to maintain this model of labour

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force participation and of the family as the “norm” and therefore contain “rewards” or “incentives” for families to choose that model.

The second type promotes the so-called *individualised or egalitarian* model. Here, two-earner households are supported by a more or less equal distribution of paid work and family responsibilities between the two partners, which in practice allows mothers to participate fully in the labour market. Taxation and social security systems are also designed to support and encourage this individualised model (Sainsbury 1994 und 1996).

Most academic research to date has taken the broad view that the joint taxation of married couples has generally negative effects on the labour supply or labour force participation of married women, whereas the separate taxation of married couples is generally reckoned to have positive effects. The two types of taxation systems are accordingly associated unambiguously with the single breadwinner model, on the one hand, or the individualised or egalitarian model, on the other.

This view is examined here through an analysis of average taxation rates for various family patterns of labour force participation in the individual countries. In this analysis, the tax burdens on households with one partner in full-time employment and a non-working spouse are differentiated from those on households with two partners in full-time employment and from those on households with varying combinations of full-time and part-time employment (1). By comparing the structure of rewards or concessions contained in the various taxation systems with the frequency distributions of the various family patterns of labour force participation that can be observed in practice, attempts are then made to analyse whether the corresponding institutional support for the various models actually exerts a “shaping effect” (2). Further, the significance of the rewards offered by the taxation systems for particular family patterns of labour force participation are placed within the context of the welfare state as a whole (3). Finally, the consequences for family behaviour of the various forms of institutional support for different family patterns of labour force participation are outlined (4).

1 Taxation systems and the rewards for and obstacles to various family patterns of labour force participation

This section examines the tax systems of ten European countries (Austria, Belgium, Denmark, France, Germany, Great Britain, the Netherlands, Portugal, Spain and Sweden). The following forms of spouse or family-based taxation systems can be identified.

1. *Joint taxation systems* can be further subdivided into the spouse-based and family-based splitting systems.
 - a. In *spouse-based splitting systems*, the basic tax unit is the married couple. The income of both spouses is added together (household income) and then halved. The standard rate of income tax is then applied to each half of the joint income. The amount of tax thus calculated is then doubled to give the couple's total tax liability for the year. When there are differences in income between the partners, and particularly when one of them has little or no income, this method of assessment means that the total household income – in this case that of a single breadwinner – is subject to a significantly lower rate of progression than the earnings of single people or of married couples with more equal incomes. This is also called a “splitting effect”.
 - b. In *family-based splitting systems*, the number of children is taken into account in calculating the tax liability. The household income is divided by the number of family members, the relevant tax rate is applied and the resultant sum then multiplied by the number of family members. In some systems, the quotient for children is only 0.5, in contrast to the adult quotient of 1. For a couple without children, therefore, a family-based splitting system works in the same way as a spouse-based system. If there are children in the household, however, additional tax allowances are granted for each one, irrespective of the wife's employment situation.
2. In *fully individualised taxation systems*, the individual is the basis for the assessment of tax liability. In such systems, the tax assessment formulae ensure that the same rate always applies irrespective of marital situation and the employment status or income of any partner. In fully individual tax systems, therefore, there are no concessions for married sole earners; in other words, they are taxed in exactly the same way as single people, for example. The complete or partial withdrawal of one partner from the labour market is not rewarded by tax reliefs for the economically active partner. Rather, the lowest relative tax burden on a given household

income is obtained when that income is equally distributed between the two partners.

Individual national taxation systems usually extend these basic types by adding provisions that reduce the tax burden in accordance with marital status and/or the family pattern of labour market behaviour. The majority of countries with basically individualised systems grant sole breadwinners certain tax reliefs, albeit to varying extents. In general, these reliefs take the form of a personal tax allowance and/or a tax-free minimum living wage that still can be transferred from the economically inactive spouse to the other, economically active partner. As a result, the tax burden on the sole breadwinner is reduced relative to that on dual-earner households or single people. If the tax reliefs available to sole breadwinners are considerable, then we refer to such systems as “formally or partially individualised” tax systems² (see Table 1).

Another important regulation is the specific concessions granted in respect of so-called marginal part-time jobs. In Germany and Great Britain, in particular, part-time, short- hours jobs, providing little or nothing in the way of social protection, are encouraged by exemption from and/or the reduction of tax and/or social security contributions³. Such jobs are frequently taken by married women in these countries, in order to balance family responsibilities and paid work, but they can also be regarded as an extension of the male breadwinner model, since the women remain dependent on their marriage, in both financial terms and, particularly, in respect of their long-term social security (cf. Dingeldey 1998 and 1999b).

2 On the individual regulations in the national taxation systems, see the summary of the country studies at [www: http://iat-info.iatge.de](http://iat-info.iatge.de).

3 In 1999, the lower earnings limit for employees' contributions in Great Britain was £66 per week and £82.50 per week for employers' contributions. In Germany, jobs involving fewer than 15 hours' work per week and earnings of less than 630 DM per month (c. £208) are after legal reform in 1999 still partially exempted from employees' social security contributions and from income tax in the case of married women (Dingeldey 1999b).

Table 1: Types of taxation systems in the various countries

Individualised taxation systems		Splitting systems	
<i>Fully/virtually fully</i>	<i>Formally/partially</i>	<i>Spouse-based splitting</i>	<i>Family quotient</i>
Sweden (1971)	Belgium (1989)	West Germany (except from 1918-1934 and during WW 2)	France (tradition of family quotient)
Austria (1971)	Denmark (1970)		
Great Britain (1989)	Netherlands (1984)	East Germany (1990)	
	Spain (1989)	Portugal (1989)	

In brackets: year of the most recent tax reform relating to the unit of taxation; the options existing in the various countries for a different type of taxation have not been taken into account if they result in a higher tax burden for most couples and are therefore seldom chosen. This applies, for example, to the individual taxation option in Germany or the aggregated taxation of all family members in Spain (cf. www: <http://iat-info.iatge.de>).

Source: Dingeldey (1999a)

The state of research

Most of the studies that impute to splitting systems a negative influence on the labour force participation of married women are based on the assumptions of neo-classical economics. The main assumption here is that an individual does not enter market employment unless the wage to be earned is above the “reservation wage” (the income available to the individual if he or she does not work) (for a summary, see Killingsworth 1988:195ff). As far as taxation systems are concerned, it is inferred from this notion that a high tax burden – as incurred by a second job in families whose tax liability is calculated within the framework of a splitting system - exerts a direct negative influence on the labour supply of married women (ibid. p. 358).

In accordance with these neo-classical assumptions, finally, most comparative and national studies (comparative: Meulders 1986; Jepsen et al. 1997a+b; for the German context see Mennel 1988; Buchholz-Will 1992; Weck-Hannemann 1996) presume that spouse-based splitting systems have a strongly negative influence on the labour force participation of married women: “*The non individualisation of rights in areas of social security and taxation together with the gender inequalities in the labour market result in a situation in which women find themselves far more frequently dependent on*

their partner for their social insurance and are a lot more likely than their partner to withdraw from the labour market, or indeed never to enter it in the first place” (Jepsen et al. 1997a:232).

One problem these studies have in common is that the arguments they advance are not wholly consistent with the rising participation rates among married women, which can also be observed in countries with splitting systems. One of the reasons for this is that these studies draw exclusively on short-term cost-benefit calculations in order to simulate women’s decisions on labour force participation and fail to challenge the basic rationality of the assumed gender-specific division of labour, in which women are supposedly responsible primarily for the family while men go out to work (see for example the “New Home Economics” of Becker 1964;1991 and its critics Ott 1993; Becker, U. 1993). Furthermore, these studies are unable to break down female labour market behaviour into part-time and full-time work, a differentiation that may also be influenced by the tax system.

However, if it is accepted that women are becoming increasingly oriented towards paid work, and that the long-term risks of the break-up of partnerships and the need for women to have social insurance in their own rights should be taken into account, then there are increasingly good reasons why a decision-making model – and particularly one based solely on rational calculations – should assume that paid work might well be distributed equally between the partners and that more and more women are likely to remain in continuous employment (cf. Ott 1993). In this interpretation, those provisions of taxation law that support the sole breadwinner model artificially “inflate” the welfare gains of traditional arrangements compared with an equal distribution of paid work and domestic responsibilities between the sexes, thereby slowing down the rate of increase in female labour market participation or restricting the volume of their labour supply, without for all that choking it off completely.

This is a conclusion reached as well by empirical or econometric studies that make the household the starting point of their analysis. In a comparison of Sweden and Germany, Gustafsson (1992) showed that the household income of German couples with only one earner would be significantly lower if subject to Swedish tax law (and vice versa). If Swedish tax law had been applied in this way, then according to Gustafsson the participation rate among German women would have risen in the early 1990s from 50.3 per cent to 60 per cent; if German tax law had been introduced into Sweden, then the participation rate among Swedish women would have fallen from 80.2 per cent to 60.4 per cent (Gustafsson 1992:81).

More recent studies by Gustafsson largely confirm that the units of taxation defined in the various national systems are a major influence on the division of labour between marriage partners (Gustafsson 1996:831). However, an attempt by Gustafsson (1996:826f) to differentiate between the effects of taxation systems according to the rate of progression in each system points to a weakness in her approach. In splitting systems with a high rate of progression, not only is one partner encouraged to withdraw from the labour market but the attractiveness of the part-time option relative to full-time employment is also enhanced. Thus the corresponding effect on labour market behaviour or the target household income can no longer be gauged solely by means of the participation rate for married women, but is also reflected in the frequency of part-time/full-time combinations within households.

Moreover, the findings on the general effect of tax systems on labour market behaviour are not wholly unambiguous. Schettkat (1987) also used econometric procedures to calculate that the conversion of the Swedish taxation system from joint to separate taxation for married couples in 1971 had no effect on the participation rate among married women in the 1970s, which would have risen anyway. Only among married women aged between 35 and 44 could positive effects be detected (Schettkat 1987:206). Schettkat sees this result as corroboration for those approaches that link changes in economic behaviour to absolute income levels and factors that tend to make themselves felt over the long term. At the same time, they also refute the notion *“that changes of status from inactivity to labour market participation take place as real wages change. [...] Labour market participation becomes a matter of habituation which, as a result either of a permanent change in behaviour and/or of a permanent change in the environment, means that alternations between labour market participation and inactivity cannot be effected at will”* (Schettkat 1987:191).

Research design und results

Against the background of these partially contradictory findings and the critique outlined above, we will now take the country comparison as a starting point for investigating the ideal-typical tax burden on the household incomes of couples with different patterns of labour market behaviour and in different national taxation systems. We will begin by establishing the percentage tax

burden on the average income in each country⁴ for single people, married, two-earner couples (both full-time and full-time/part-time combinations) and for married sole breadwinners (*Table 2*). This procedure is based on a method used by the OECD (1995) to calculate the tax burden on certain family types. One important advantage of this method is that the basis for calculating the household tax burdens reflects not only (where applicable) the high tax burden on second earners in splitting systems (usually women) but also the reduced tax rates on primary earners (usually men) (cf. O'Donoghue/Sutherland 1999:592).

The results of the model calculations presented in *Table 2* show that in all the countries investigated, except for Sweden, tax reliefs continue to be granted for single-earner households (comparison of tax burden on single earners and two-earner households, both full-time). The highest reliefs for sole earners are granted in Germany, Denmark and Belgium. Since the German tax system is a splitting system and the tax burden on average incomes is also high, it corresponds to the "ideal type" of a system that rewards the sole breadwinner model. Since sole earners in Denmark and Belgium also benefit from a high level of tax relief, it is clear that no conclusions as to the concessions that are actually granted should be derived solely from the fact that the taxation systems in these countries are nominally individualised.

4 In line with OECD studies (1995:13; OECD 1997), the term "taxes" denotes the total burden of deductions on households, that is both income tax and social security contributions. This is a precondition for the international comparison, since the varying methods of funding social security benefits out of taxation and contributions would otherwise give rise to distortions in the total burden of deductions. On the source for average male earnings see Dingeldey (1999a: 78). The assumed income in the model calculations must be the same for men and women; otherwise, the country-specific effect of gender income inequalities would make itself felt, thereby rendering less clear the effects of the tax systems alone. Part-time employment is simulated as 50% of average income (on the method cf. also OECD 1995: 20 and Annexe 2).

Table 2: Tax rates
(income tax and social security contributions for various household situations on average incomes)

	Single	Married couple, one partner full-time, one partner...		Sole earner
	Full-time	Full-time	Part-time	Full-time
<i>1. Countries with extremely high and moderate tax burdens in which sole earners receive significant tax reductions</i>				
Germany	45.6	45.6	41.7	36.0
Denmark	44.0	44.0	41.4	36.8
Belgium	37.8	40.0	35.4	29.0
<i>2. Countries with moderate to high tax burdens in which sole earners receive little if any tax relief</i>				
Sweden	35.8	35.8	34.0	35.8
Netherlands	35.3	35.3	32.2	32.8
<i>3. Countries with relatively low tax burdens in which the tax reliefs for a particular family status are insignificant</i>				
France	29.2	29.2	26.7	22.9
Austria	29.5	29.5	26.1	28.1
Great Britain	27.1	26.4	23.8	25.7
Spain	22.6	22.6	20.0	18.3
Portugal	21.4	22.0	19.0	19.0

Average male earnings in the various countries are the basis for both male and female earnings. For information on individual taxation systems, see [www:http://iat-info.iatge.de](http://iat-info.iatge.de)

The full-time/part-time combination as a family pattern of labour force participation attracts tax relief in all countries. It can be more or less assumed that in all strongly progressive tax systems (female) part-time work is taxed relatively more lightly than full-time work. However, the reduction in the tax burden is particularly high in those countries in which sole earners also benefit from considerable tax relief, that is particularly in splitting systems with a high rate of progression. *Consequently, splitting systems also provide considerable rewards for those households whose patterns of labour force behaviour involve continuity of participation for both partners in various full-time/part-time combinations.*⁵

⁵ . As further or additional incentives for part time work the concessions granted for marginal part-time jobs in Germany and, particularly, Great Britain must also be taken into account (see above).

In the third group of countries, that is in Austria, Great Britain, Spain and Portugal (and France as well, providing there are children living in the household – not be indicated in the table here), the tax burden on average incomes is generally low. As a result, the tax systems in these countries can hardly be expected to offer specific incentives for particular patterns of labour force participation through the various forms of taxation for married couples (in respect of France and Portugal, see: O’Donoghue/Sutherland 1999:580; For Spain unfortunately only the aggregation option is considered in that study).

Taxation systems: between the male breadwinner model and egalitarian patterns of labour force participation

In order now to be able to depict the structure of the tax burden in the various taxation systems, the typology of welfare states developed by Diane Sainsbury, already mentioned at the beginning of this paper, will be used *solely* in order to characterise the taxation systems. The *male breadwinner model* and the *individual model* will both be regarded here as ideal types, representing more or less the end points of a continuum. Various hybrid types are located at different points on the continuum between these two end points. Limiting ourselves solely to a characterisation of taxation systems requires the individual countries to be ranked in a fundamentally different and, in some cases, surprising order from that found in Sainsbury’s typology (see Table 3).

In our sample of countries, Sweden represents the ideal type of a taxation system tailored to individualised patterns of labour force participation, while Germany constitutes the ideal type of a taxation system tailored to the male breadwinner model. The positioning of the various hybrid types is a difficult exercise, and there is considerable scope for minor inaccuracies. The proximity of Austria and the Netherlands to the ideal type of the individualised taxation system should be relatively uncontroversial. The positioning of Great Britain at some distance from this model is due primarily to the arrangement for marginal part-time employment relationships, which contains incentives for women to take part-time jobs offering very few hours’ work per week.

The positioning of Denmark and Portugal will surprise many people. Although it is one of the social-democratic Scandinavian welfare states, Denmark is placed relatively close to Germany because of the high tax concessions for sole earners. The positioning of the Portuguese tax system

Table 3: Financial rewards for particular family patterns of labour market behaviour in tax and social security systems

Types:	No financial reward for the male breadwinner marriage				Hybrid regulations				High financial rewards for the male breadwinner marriage			
	A	L	N	P	B	G	E	F	DK	B	D	
Countries	SWE											
- Last reform of the tax unit	1971	1971	1984	1989	1989	1989	1989	before 1945	1970	1989	before 1945	
- Tax units ⁶	I	I	I	S	I	S	S	F/S	I	I	S	
- Tax allowance for sole earners	No	Yes	Yes	----	Yes	----	----	----	Yes	Yes	----	
- Difference in the average tax burden on sole/dual-earner households ⁷	0	1.4	2	3.0	0.7	3.8	8	6.3	7.2	7.2	9.6	
- General level of tax burden	high	low	high	low	low	low	low	low	extremely high	extremely high	extremely high	
- Incentive for marginal part-time work	no	yes	yes	no	strong	no	no	no	low	no	strong	

⁶ I= individualised taxation; S= splitting system; F/S= family splitting;

⁷ in percentage points for average income without children; dual-earner household = 2 full incomes

⁸ varies more strongly than in other countries with the number of children because of family splitting

Source: Dingeldey (1999a)

relatively close to Sweden is attributable to the fact that, with the currently very low level of average earnings, there is no significant reward for the male breadwinner model, despite the splitting arrangement.

However, it must be noted - once again - that the positioning exercise undertaken here serves merely to describe the structure of the fiscal rewards and burdens provided by the tax and social security systems for certain types of households. It says nothing at all about the actual profiles of family patterns of labour force participation in the individual countries, since it is assumed, in line with Sainsbury (1996), that the ideal types merely represent "*models of social policy*". They do not necessarily depict the empirical reality of patterns of labour force participation in the corresponding countries: "*their influence on the actual division of labour between the sexes in the family and society is also a matter of empirical inquiry*" (Sainsbury 1996:43). In consequence, discrepancies between intention (in the form of regulation and/or the shaping of institutions) and effect, that is the actual influence exerted on household behaviour and decision-making, cannot be excluded. They are discussed in the next section.

2 Family patterns of labour force participation

In all ten European countries in our sample, with the exception of Spain, most households are dual-earner households⁹. The same applies to households with children under 15, although to a somewhat lesser extent. Thus the traditional male breadwinner model has clearly been relegated to the past, while the dual-earner household can now, at the beginning of the new millennium, be regarded as the dominant mode of family labour market behaviour. At the same time, however, it has to be assumed that traditional gender roles will persist. Women are still clearly underrepresented as sole earners or even as full-timers in the full-time/part-time household combination (see *Table 4*; for more details Eurostat Labour Force Survey; in: Dingeldey 1999a:40ff).

Against this background, we will now attempt to answer the question of whether the regulations in the various taxation systems exert particular controlling effects on family patterns of economic activity in the individual countries. In Germany (West) and Sweden, the two "ideal types" already identified, the rewards for the male breadwinner model and the egalitarian model contained in the respective national taxation systems are associated with a relatively high frequency of the corresponding family patterns of

⁹ Only couples of working age between 20 and 59 are taken into account here.

economic activity. Thus in Sweden, working time tends to be evenly distributed between the partners. Sweden has the highest share of dual-earner households in our comparison, even if only households with children under 15 years of age are taken into account. One third of Swedish dual-earner households follow the full-time/part-time model, although Swedish women in part-time jobs tend to be on contracts offering relatively long hours and a good level of social protection (Eurostat Labour Force Survey special analysis and interpretation; in: Dingeldey 1999a:46).

In Western Germany, the traditional male breadwinner model is still relatively common, particularly when there are children in the household; more than 40 per cent of households fall into this category. Nevertheless, in line with the structure of the tax burden, couples with children opt quite often for the so-called “modernised male breadwinner model” (Pfau-Effinger 1995), that is the full-time/part-time combination. On the other hand, the share of households (in all dual-earner households) with two partners in full-time employment is the lowest of all the countries in our sample, with the exception of the Netherlands and Spain.

In Great Britain, there seems to be a relatively high level of correspondence between incentive structures and labour market behaviour, with the latter reflecting in particular the incentives for marginal part-time employment. In 1996, virtually 15 per cent of the economically active female population, a total of 1.5 million women, were in part-time jobs offering short hours and pay under the lower earnings limit. The vast majority of these women had no social protection in respect of unemployment benefit or pension payments. These figures may be even higher now, since the “marginality” threshold was raised in 1999. Furthermore, Great Britain also has a deeply entrenched overtime culture, that is long average working hours, particularly for men (see Anxo et al. 2000, particularly Figure A2 in the annexe). Overall, therefore, the profile of family patterns of labour market behaviour in Great Britain is one in which the modernised breadwinner model plays a very important role, with a sharp polarisation of working times between men and women (Rubery 1998).

In the cases of Austria, France and Portugal, it is clear that the relatively low burden of taxation on households does not in itself reward or penalise any particular family pattern of labour market behaviour. In the case of Belgium, on the other hand, attention must be drawn to the ambivalence of the partially individualised taxation system, which here corresponds absolutely with a hybrid employment structure.

Table 4: National profiles of family patterns of labour market behaviour

Types:	Dominance of the dual-earner model			Dominance of the male breadwinner model								
	Tendency towards egalitarian patterns of labour market behaviour			Continuation in modernised form								
	S WE	P	D (E)	F	A	B	D (W)	G B	NL	E		
Countries DK												
<i>Household types (as % of all households)</i>												
- Dual-earner	68.9	74	6	65.	62.	4	63.	61.	59.9	7	60.	35.3
- Sole earner (male)	-----	21.1	3	25.	30.	30.	30.	34.	33.7	2	34.	59.2
- Dual-earner with children	-----	71	6	64.0	57.	60.	60.	61.	50.8	6	52.	32.7
		.1	7.1	3	6	6	6	6	1.0	4	4	
<i>Full-time profiles (as % of all dual-earner households)</i>												
- both full-time	43.0	38	5	45.	38.	0	37.	36.	30.2	3	13.	25.3
- both full-time	-----	38	5	45.	35.	33.	33.	36.	20.8	2	3.9	26.5
only households with children		.3	9.7	8	7	0	3	3	0.5			
<i>Part-time profiles (as % of all dual-earner households)</i>												
- Man full-time, women part-time	24.0	31.	5	14.	20.	5	20.	18.	24.2	3	37.	5.1
- Man full-time, women part-time, only households with children	1	.8	0	17.	20.	7	24.	28.8	1.6	6	43.	5.5
	1	.3	6	2	7	4	4	9.3	5	5		
<i>D, total</i>												
- Share of marginal part-time employment among women	9.5	4.	2	-----	4.3	3.5	3.7	7.7	1	23.	5.6	
- Share of long working hours/	moderate/yes	Moderate/yes	high/yes	moderate/yes	high/yes	low/w/yes	low/w/yes	low/w/yes	high/yes	high/w/yes	low/w/yes	

Source: Dingley (1999a)

In Spain and the Netherlands, there are relatively marked discrepancies between the recently individualised taxation systems and the actual patterns of labour market behaviour. The main reason for this is very probably the time required for the new tax arrangements to become “institutionalised” (cf. Schettkat 1987); a further factor in Spain is the low overall tax burden. Nevertheless, an increase in dual-earner households is becoming evident in both countries, and particularly among households with children. In dual-earner households in Spain, both partners tend to work full-time; in the Netherlands, on the other hand, households with children virtually never have two partners in full-time employment. It is also worth noting that the Netherlands is the only country in which the combination of two part-time employment relationships has gained any currency at all, with 4.2 per cent of households being in this situation (Eurostat Labour Force Survey special analysis and interpretation in: Dingeldey 1999a:44).

In Eastern Germany and Denmark, there are marked discrepancies between the structure of rewards and charges in the taxation system and actual patterns of labour market behaviour. Women in Eastern Germany have a marked inclination towards full-time work, even when they have children. Thus Eastern Germany has a strong tendency towards egalitarian family patterns of labour market behaviour, particularly in comparison with Western Germany. However, this cannot be attributed solely to the fact that the splitting system is, as yet, weakly institutionalised in the new *Länder*; rather, the main explanation lies of course in East Germany’s communist past. In the socialist system of the former GDR, both partners were encouraged to work full-time and there was a comprehensive network of public childcare facilities (cf. Gerlach 1996:247ff).

It is in Denmark that the divergence between the structure of tax concessions and patterns of labour market behaviour is most extreme. Despite the considerable tax advantages for sole earners, Denmark competes with Sweden for first place in the equal distribution of working time between men and women. The share of Danish households with full-time/part-time combinations is lower than in Sweden, but the share of those with two full-timers is considerably higher. The majority of couples work full-time, helped by the fact that weekly working times are relatively short (Eurostat Labour Force Survey in: Dingeldey 1999a:46).

The results of the broadly based country comparison documented here reveal, on the one hand, that taxation systems clearly have the potential to shape family patterns of labour market behaviour. On the other hand, it also reveals that the profiles of national patterns of labour market behaviour differ markedly even when taxation systems are based on similar principles. Thus it

would seem that the institutional entrenchment of the rewarding of the male breadwinner model or the egalitarian model through the structure of the overall tax burden, is a necessary but not sufficient condition for the emergence of a shaping effect on family patterns of labour market behaviour. Whether, and how, this shaping effect develops depends, therefore, on its interaction with other influences. We turn now to those factors that play a particularly important role in this respect.

3 Other influences on women's labour market behaviour

On the basis of a multivariate analyse of male and female participation rates in 18 OECD countries, Schmidt (1993) concluded that the absolute differences in the female participation rate across countries could be explained only by a diversity of variables such as the "scope and structures of the welfare state" and "support for childcare". The "structure of the taxation system" is, therefore, only one factor among many that influence labour market behaviour (1993:59).

Various other studies highlight the importance of individual variables or investigate their influence on female participation rates. The focus here is on factors linked to the integration into the labour market of women with children. Whether, and how, women with children are encouraged to be economically active, and what patterns of labour force participation are combined with motherhood, seems ultimately to be decisive in determining the level of national female participation rates and family patterns of labour market behaviour. By way of explanation, these studies point, among other things, to *maternal employment policy regimes* and the ensuing opportunities for balancing family responsibilities and paid work. Of fundamental importance here are state arrangements for parental leave (including financial support) and the provision of (public) childcare facilities (Fagan/Rubery 1996:354ff; see also *Thenner* 2000).

The diffusion and regulation of part-time employment is also closely linked to the various approaches to family policy and the differing patterns of labour market behaviour. "*Institutional forms of regulation concerning family, employment, and gender relations as well as labour law, social security regulations, and collective agreements*" (Maier 1994:159), together with tax legislation and social norms (Maier 1994:164; see also O'Reilly 1996:576), influence the decisions of women (in the main) to take up the part-

time option as one or even the only way of entering the labour market in a way that enables them to balance family responsibilities and paid work.

There is a close link between the various national institutions and family working-time preferences and the values and attitudes surrounding the family and the balancing of paid work and domestic responsibilities (Schulze Buschoff et al. 1998:23ff). Since these values and attitudes are neither static nor prescribed but are formed “adaptively”, that is by a continuous process of accommodation to the restricted range of possibilities made available by institutions and norms (Bothfeld 1997:36), it is not only the regulations enshrined in the taxation and employment system or the provisions of family policy that acquire particular significance, but also the cultural context or general attitudes towards women with children entering the labour market.

There ensue from this various cultural models of economic activity and/or child rearing that are relevant to Western Europe. These include the *male breadwinner marriage*, the *adapted or ‘accommodationist’ male breadwinner marriage* (a modernised version of the breadwinner marriage, in which part-time work is seen as the appropriate form of paid work for women with children), the *dual-earner model with state childcare* and the *dual-earner model with childcare shared between the partners*. The development and dominance of these cultural models in individual societies is seen as a fundamental factor in the development of the welfare state and in explaining the integration of women into the labour market (cf. Pfau-Effinger 1998:185).

From this perspective, therefore, it is the interaction of a number of factors that largely determines the various family patterns of labour market behaviour; these factors include, in addition to tax legislation, the regulations on maternal and parental leave, the (public) provision and organisation of childcare facilities (Sainsbury 1994:153) and the opportunities for part-time employment and men’s working times. However, if state policy is actually to have any shaping effect, if it is to produce a corresponding national profile of labour market behaviour, then the actions of numerous institutions and spheres of government have to be directed in a coordinated way towards supporting one particular family pattern of labour market behaviour: “*The impact of these policy packages is likely to increase through coordination with, or at least consideration of, the organization of school and shop opening hours, the income tax and benefit system and ‘gendering’ labour market policies designed to promote work-sharing*” (Fagan/Rubery 1996:373).

Thus the correspondence between the concessions provided by tax and social security systems and family patterns of labour market behaviour, which was established in section 2 above in the case of Sweden und Western

Germany, must be attributable to the fact that the egalitarian distribution of work or the male breadwinner model is encouraged by a multiplicity of institutions and regulations.

The importance of full-time/part-time combinations in both countries can be explained by the completely different incentives or motivations offered by the two systems. In Sweden, part-time jobs offering long hours are explicitly encouraged, to some extent by the tax system and to a greater extent by the parental leave arrangements. Parental leave can be taken over several years on a part-time basis, with income-related financial compensation being paid for the working hours lost. In Germany, on the other hand, where the institutional system is geared exclusively to the male breadwinner model, the full-time/part-time combination frequently offers the only opportunity to reconcile women's desire to work with their responsibilities for children in the home, or to coordinate school and nursery opening hours with the needs of the economically active population (on parental leave arrangements and the provision of childcare facilities see *Thenner* 2000).

In the case of those countries in which there is a marked discrepancy between the incentives offered by the tax and social security systems and actual patterns of labour market behaviour, it must be assumed that the structure of concessions and penalties in various policy spheres is inadequately coordinated. Alternatively, or additionally, there may be a discrepancy between the incentive structures mediated through the institutions and the preferences of families. One example here is Eastern Germany, where the high level of acceptance for working mothers and the highly developed childcare infrastructure are still geared towards the integration of women with children into the labour market that was encouraged in the former GDR, whereas the tax system "introduced" only ten years ago is responsible for the traditional promotion of the male breadwinner model in Western Germany.

In Denmark, the official political and social model encourages largely egalitarian family patterns of labour market behaviour. The combined effect of a wide range of regulations, for example on parental leave, and a highly developed public childcare system (see Table 3 and *Thenner* 2000) is to encourage both partners to enter the labour market; this also reflects the working time preferences of most women (Schulze Buschoff et al. 1998:16). Against this background, the tax concessions granted to sole earners are of no significance, or are interpreted largely as an aid to bridging the extremely short period of inactivity immediately following the birth of children, but not as an incentive for a permanent pattern of labour market behaviour.

Thus it can be concluded that, ultimately, the influence of tax and social security systems on family patterns of labour market behaviour does not depend solely on the rewards or penalties they offer for particular patterns of labour market behaviour and the institutionalisation thereof. What is of decisive importance, rather, is the coordination with other welfare state regulations, and particularly with employment and family policy, as well as the cultural environment and couples' working time preferences and attitudes to the balancing of family responsibilities and paid work.

However, if the whole package of social policy measures on the balancing of family life and paid work does have any influence on family patterns of labour market behaviour, then it is reasonable to ask whether there is also a connection with family behaviour.

4 The consequences for family behaviour

Tax regulations also act as incentives for particular family forms. The rewarding of the male breadwinner model, in Germany for example, continues to be linked to marriage. For many couples in countries with such arrangements, therefore, there is a strong economic incentive to get married, at least when one partner earns less than the other, which is very commonly the case because of the gender wage gap (see *Anxo et al.* 2000). Moreover, numerous social security functions, such as derived rights under the health or old age insurance schemes for economically inactive partners (or those in marginal part-time employment), are available only to married couples. In these countries, therefore, an unequal reduction in working time and earnings between partners, caused by the need for one of them to devote time to bringing up a family for example, makes it seem virtually obligatory for couples to get married for economic reasons and in order to protect the social security rights of the non-working partner (on the German situation see *Bäcker* 2000).

The only way of avoiding this bias in favour of marriage is to amend tax and social security legislation in order to place all the various family forms on an equal footing, as has already happened in Sweden, the Netherlands¹⁰ and Austria, where unmarried couples are treated in the same way as married couples (the same applies to Denmark only for homosexual couples). However, economic calculation is not, of course, the only reason that couples

¹⁰ Here, even derived rights to social security benefits can be transferred to cohabiting partners, without any need to present a marriage certificate.

decide to get married. In addition to personal motives such as love and togetherness, different national cultures and traditions, as well as religious attitudes, also play a part (Blossfeld 1995:11).

It is hardly surprising, therefore, that a comparison of marriage rates in the countries investigated here reveals that only in the ideal-typical welfare state models represented by Sweden and Germany is there a relatively clear correspondence between incentives and decisions for or against marriage. Thus the average number of marriages concluded in Sweden between 1986 and 1995 was 5.24 per 1000 inhabitants, considerably below the European average¹¹, whereas the corresponding figure for Germany, at 6.1 per 1000 inhabitants, is significantly above the average (see *Table 6*).

There are even clearer links between family patterns of labour market behaviour, or the associated tax concessions and burdens, and decisions for or against parenthood. In countries in which tax, social and family policy are exclusively or predominantly geared to the traditional male breadwinner model, institutions will tend to encourage a mode of child rearing located within marriage and based on the male breadwinner model. In other words, any financial support for child raising is intended predominantly or exclusively to compensate for the reduction or cessation of paid work by one partner, usually the woman. Despite this financial support, and any additional child-related financial benefits, parents in the countries in question still tend to be financially worse off than people without children (see *Anxo et al. 2000:89/90 Table A4*). They have not only to bear the direct costs of maintaining their children but also to accept a reduction in earned income and the resultant curtailment of entitlements to income substitution benefits from the social security system, particularly with regard to pensions (Kaufmann 1997:169f; Bäcker 2000)¹².

Yet even couples who adopt egalitarian patterns of labour market behaviour, with both partners working full-time, find themselves facing unusually high tax burdens in welfare states geared to the male breadwinner model. They have to try to balance domestic responsibilities and paid work, and their attempts to do so run counter to the path mapped out by the relevant institutions. In particular, the cost of childcare is a heavy financial burden for which the welfare state makes little if any redress. Account has also to be taken of the very considerable demands on the time and emotional and mental

11 More recently, the marriage rate in Sweden has fallen even below the 4 per cent mark (Eurostat 1997:69).

12 Even early attempts at reform that would allow the time spent raising a family to be included in the calculation of pension entitlements or the tax reliefs for the male breadwinner model already described cannot compensate for the financial burdens borne by parents compared to people without children.

resources of parents seeking to strike a balance between paid work and family life, as well as of the “bad conscience” caused not least by negative social attitudes to working mothers – some of which are shared by economically active women themselves.

Thus traditional family policy causes many people to decide that they have to choose between career and children. More and more people are deciding in favour of a career rather than children (on the German situation cf. Huinink/Mayer 1995:195). This produces a paradoxical effect: in those welfare states characterised by the male breadwinner model, such as Germany, birth rates are declining rapidly, with a sharp polarisation, moreover, between those couples with a relatively large number of children and those with none. This in turn leads to increasingly polarised household incomes and/or the risk of impoverishment as a consequence of having children (Kaufmann 1997:80; see also *Anxo et al.* 2000).

Table 5: Birth rates and marriage

	Consolidated birth rate			No. of marriages per 1000 persons
	1986	1990	1996*	1986-1995
Denmark	1.48	1.67	1.75	6.22
France	1.83	1.78	1.72	4.73*
Great Britain	1.78	1.83	1.70	6.34*
Sweden	1.80	2.13	1.61	5.24
Belgium	1.54	1.62	1.55	5.79
Netherlands	1.55	1.62	1.52	5.95
Portugal	1.66	1.57	1.44	7.04
Austria	1.45	1.45	1.42	5.97
Germany	1.41	1.45	1.30	6.11
Spain	1.56	1.36	1.15	5.46*
EU 15	1.59	1.57	1.44	5.69*

* = estimated

Source: Eurostat Yearbook 1997:68/69; own calculations

Conversely, in countries where there is institutional support for women wishing to enter the labour market and for households in which both partners seek to strike a balance between family life and paid work, more of the decisions tend to be made in favour of having children. This positive connection between moderate to high birth rates and “good conditions” for working mothers is substantiated in various studies (cf. Caldwell 1982; Pinelli 1995:93; Schulze 1997:47). As already noted above, the reconciliation of

family responsibilities and paid work is assisted by a highly developed (public) childcare system, as well as by arrangements for maternity leave, parental leave and for paid time off work if a child is sick (see *Thenner* 2000). The availability of part-time jobs obviously has a positive impact as well. Thus in those welfare states whose institutions have long supported egalitarian patterns of labour market behaviour, such as Sweden or Denmark, overall birth rates are relatively high, despite some declines. On the other hand, birth rates in the Southern European countries such as Spain and Portugal have declined drastically (cf. *Table 5*), a trend that may well have been decisively influenced by the interaction between rising female participation rates, a scarcity of part-time work and the inadequate provision of public childcare facilities.

Against the background of these figures, there can be no disagreement with Esping-Andersen's characterisation (Esping-Andersen 1996) of labour market and family policy. In respect of Sweden and Denmark, he observes that: "*Social policy has sought to harmonise women's family and work responsibilities, thereby securing stable and even rising fertility*". In the countries of Continental Europe, on the other hand, the following developments can be observed: "*With rising educational attainment women regardless decide to pursue careers. But since this occurs in a hostile environment from the point of view of harmonising careers and family responsibilities, the result is delayed family formation and declining and even record-low fertility*". He draws the following general conclusion: "*Paradoxically, in post-industrial society a pro-familialist policy may produce family dependencies but may also actively discourage family formation*" (Esping Andersen 1996c:619-620).

This underlines the failure of the institutional promotion of the male breadwinner model, not only in the light of demands for an equal distribution of paid work between the sexes and an individualised living income for women, but also as a family policy strategy, since it continues to restrict the options available to those seeking to balance family responsibilities and paid work.

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