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Maternity Protection in the context of work-life reconciliation for men and women

Comparative analysis of three European
countries' maternity protection systems



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UNITED NATIONS DEVELOPMENT PROGRAMME

INTERNATIONAL LABOUR ORGANIZATION

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Foreword

Gender equality is at the heart of Decent Work for all women and men. Work-family and maternity protection laws and policies are core elements of gender equality at work. Work-family measures are policy solutions intended to facilitate all workers' access to decent work by supporting their unpaid family responsibilities. In particular, work-life reconciliation policies support women's continued participation in labour market as well as provide equal opportunities for both women and men to share family responsibilities. Maternity protection at work aims to protect the health of mother and child as well as women's economic and employment security.

Despite the current global trends in women's employment, which are challenging traditional assumptions about gender divisions of labour, the reality of work environments is often not conducive to real work-family balance. The situation is particularly difficult for women workers due to the existing gaps in laws and policies, which are often insufficient in protecting maternity rights, or the lack of their effective implementation related to socio-political and economic reasons. In addition, there is also a concern that current maternity protection legislation might be shaped by deeply-rooted gender stereotypes, which emphasize women's role as mothers and overlook fathers' care responsibilities. Adequate policy design has a significant role in ensuring effective gender equality at work and a healthy share of work and family responsibilities for both women and men. The degree of the integration of the various gender equality principles in maternity protection related laws and policies vary greatly from country to country. A comparative analysis of existing laws and policy frameworks from countries with more advanced level of integration of internationally agreed gender equality principles in maternity protection laws and policies are expected to provide a conceptual framework and a range of good practices to inform social dialogue and policy design on this topic.

In this context, UNDP and the ILO came together to develop an analysis of existing maternity protection laws and policies to demonstrate good practices and guidance for future strategies to be further referred in Eastern Europe and CIS countries. The study is intended to illustrate a diverse range of policy options highlighting the varied degree of the integration of gender equality principles in the laws and policies related to maternity protection in three European countries: Iceland, Czech Republic and France. The study has also revealed how

the lack of integrated, comprehensive and gender-sensitive work-family policies could lead to discrimination against women and undermine social and economic benefits for families, business and society. The study presents policy recommendations for the development of work-family and maternity protection policies that are both gender equality and employment-centred.

This publication is intended to reach to the wider audience, including policy-makers, social partners, civil society and the academics. We hope the study provides a useful platform to build social policies for progressive promotion of more balanced work-family reconciliation for both men and women through maternity protection policies and legislation.

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List of acronyms

API	Allocation de parent isolé
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CEE	Central and Eastern Europe
CESU	Chèque emploi service universel
CIF	Crédit d'impôt famille
CIS	Commonwealth of Independent States
CLCA	Complément de libre choix d'activité
COLCA	Complément optionnel de libre choix d'activité
CZK	Czech Koruna
DCOMM	Department of Communication and Public Information
ECEC	Early Childhood Education and Care
EEC	European Economic Community
EU	European Union
EU-SILC	European Union Statistics on Income and Living Conditions
GDP	Gross Domestic Product
ILC	International Labour Conference
ILO	International Labour Organisation
ISK	Icelandic Krona
OECD	Organisation for Economic Co-operation and Development
RSA	Revenu de Solidarité Active
USD	United States Dollar
WHO	World Health Organisation

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Introduction

Maternity protection and family-friendly policies allow women and their partners to make decisions about their babies and the reconciliation of their employment and family lives without fear of discrimination or the loss of employment. Thus, maternity protection and family-friendly policies are key pre-conditions for women's and men's participation in employment on a basis of equal opportunities and non-discrimination. They are an important element contributing to the realisation of women's fundamental human right to live free of discrimination and harassment and of children's right to be cared for by both parents who share the responsibility for the upbringing and development of a child.

While special measures directed at women at the workplace, in particular pregnant and breastfeeding women, have been established around the world, in recent decades the scope of maternity protection and family-friendly policies has widened. Rather than exclusively focusing on protective policies addressed at women, the equal participation of women and men, and the promotion of equal sharing of family responsibilities between women and men have assumed a high policy priority, as have measures to ensure and promote a safe and healthy work environment for all workers, regardless of their sex, including pregnant women.

This study offers a comparative analysis of existing laws and policies related to maternity protection and family-friendly policies in three countries: France, Iceland, and the Czech Republic. All three countries set different priorities in their laws and policies on maternity protection and family-friendly childcare policies. The differences are particularly obvious when analysed from a gender equality perspective: To what extent do national policy frameworks prioritise the promotion of gender equality, in the labour market, but also with respect to a more equal sharing of care responsibilities between women and men outside of the workplace?

Iceland, a representative of the group of Nordic countries, offers a relatively short maternity leave (13 weeks) at 80 per cent wage replacement (the same replacement rate as during parental leave), focusing literally on the time of recovery of mothers from giving birth. However, a lot of emphasis is on gender equality by offering a significant amount of non-transferable leave for fathers: Both parents are entitled to non-transferable parental leave quotas of 3 months each, with 3 additional months to be shared between them. In addition, each parent has the right to 13 weeks unpaid parental leave. Benefits are paid from social security.

The **Czech Republic**, as a representative of a new EU Member State from Central Europe, offers a long maternity leave (28 weeks) at full wage replacement. Until recently, maternity leave was followed by an extended parental leave period of a maximum of four years. However, the country has recently introduced greater flexibility in the parental leave scheme, with the objective of easing work-family related pressures. Different combinations of length of leave and benefit level are now offered. Yet the available schemes are taken up in a large majority by women, a reflection of the little emphasis on offering incentives to fathers to take on more caring responsibilities. For example, there is neither paternity leave nor a “daddy quota” in parental leave. Consequently, the negative impact of extended leaves on women’s employment became high, and only new data will show if the recent reform has improved the situation.

France, a representative of the “old” EU, offers 16 weeks maternity leave at full wage replacement. Eleven days of statutory paternity leave are also offered. Since the 1990s, France offers a parental leave of one year, which can be renewed three times, and a compensatory benefit to go with it, financed from social security. Conditions of parental leave are flexible, allowing for full absence from work or part-time leave. While the measures were initially aimed at facilitating the reconciliation of family and professional life, they have been shown as having a tendency to negatively impact on the employment rate of women, putting them at a disadvantage on the job market after leave. French parental leave has not been conceived as a deliberate measure toward gender equality at work and home.

The study is organised as follows: Section 2, which follows this introduction, offers an overview of key international conventions and policy frameworks on maternity protection, with a view on their implications for work-family reconciliation. The relevance of ILO Conventions, as well as the EU legal framework and CEDAW for maternity protection and family-friendly policies is highlighted in this part.

Section 3 discusses national laws, policies and programmes in France, Iceland and the Czech Republic comparatively, focusing on maternity leave/benefits, paternity and parental leave, in the light of important socio-demographic developments. Selected aspects of other family-friendly policies and services are also discussed.

Section 4 considers available evidence regarding the implementation of existing maternity protection and family-friendly policies and discusses challenges to implementation. In particular, the challenges of monitoring compliance and gaps in coverage of maternity protection policies are addressed. Practice examples to improve the implementation of existing legislation and to increase choice and flexibility of parents, including through the practices of part-time employment, and part-time care leave are highlighted.

Policy implications emerging from the comparison of the three country cases, as well as from other research are discussed in section 5, followed by concluding remarks in section 6.

Overview of international conventions / policy frameworks on maternity protection and work-family reconciliation

International, particularly European, policy and legal frameworks on maternity protection and family-friendly policies to promote gender equality have seen a significant expansion in recent decades, including through the adoption of a new ILO Convention on Maternity Protection, as well as the European Union's legal framework on gender equality and the basic foundations grounded in the CEDAW Convention. Over time, the scope of legislation and benefit entitlements have been broadened progressively in most industrialised countries, and spending on family benefit has increased; the connections between maternity protection, family support and the promotion of gender equality have been strengthened.¹ To the contrary, however, declining state support to families, including maternity protection in some cases, has been observed in the CEE/CIS region (Fultz et al. 2003, Rostgaard 2004, Sirovátka 2004, Steinhilber 2010).

Basic elements of effective maternity protection include the prevention of exposure to health and safety hazards during and after pregnancy; in-kind benefits for medical care, an entitlement to paid maternity leave; entitlement to breastfeeding breaks and other support to breastfeeding mothers; protection against discrimination and dismissal; and a guaranteed right to return to the job after maternity leave.²

State interventions in the area of family-friendly policies have the goal to facilitate the reconciliation of work and family life through increased parental choice, promote gender equality in employment and family life, and support families by ensuring financial resources and enhancing child development (ILO 2010).

¹ See sections 4 and 5 of this paper.

² Importantly, protection from dismissal as well as a guaranteed right to return to one's job should not only be granted during maternity but also during and after child care leave.

Improving maternity protection and family-friendly policies is a task for a wide range of social actors, including governments, employers' and workers' organisations. National bodies for gender equality and civil society organisations have been important in many countries both in the development of appropriate legislation as well as in the monitoring of implementation.

Box 1. What are family-friendly policies?

Family-friendly policies are those policies that facilitate the reconciliation of work and family life, ensure the adequacy of family resources, enhance child development, facilitate parental choice about work and care, and promote gender equity in employment opportunities. Family-friendly policies include improved access to affordable and quality child-care, financial support for children, arrangements that allow working parents to take leave to care for children, and flexible workplace practices that allow a better reconciliation of work and care commitments. They also include financial incentives to work for families with children and employment support for jobless parents.

Source: (OECD 2008): 13

ILO experience over decades of work on improving maternity protection has provided ample evidence that good maternity protection is not just a question of national income and subsequent expenditure on health, but also of national priority and commitment. To ensure effective implementation, the active involvement of employers' and workers' organisations is essential. While it cannot be denied that women's absences on maternity leave or for longer periods of parental leave creates organisational problems for employers and in some cases also the financial burden of paying salaries during such leave of absence, it should also be clear that maternity protection can assist employers to maintain experienced, skilled and valued women employees (ILO 1998). Moreover, it highlights the need for support for a more equal division of caring labour between women and men, so that more men take absences from the workplace for caring.

ILO Conventions

The ILO Conventions on maternity protection as well as on workers with family responsibilities constitute the international legal foundations for maternity and

family-friendly workplace policies. Historically, the first international Convention on maternity protection (Convention No. 3) was adopted at the first International Labour Conference (ILC) in 1919. It was followed by two others: Convention No. 103 in 1952 and Convention No. 183 in 2000. While the core concern throughout was to ensure that women's work does not pose risks to the health of the woman and her child and to ensure that women's reproductive roles do not compromise their economic and employment security, Convention No. 183 – today promoted for ratification – formalises the expansion of the overall scope and entitlements to maternity protection at work over time.³

Convention No. 183 regulates the scope of maternity protection, health protection, maternity leave, leave in case of illness or complications, cash and medical benefits, employment protection and non-discrimination, and concerns of breastfeeding mothers. The Convention is complemented by Recommendation No. 191 which suggests measures for higher protection, such as a longer duration of leave and higher benefits. Also, the Recommendation is more precise about certain aspects of maternity protection treated in the Convention, such as how to ensure health protection, and adds some additional aspects related to types of leave and financing of benefits. The main aspects covered in the Convention and the Recommendation are summarised in Table 1.

Table 1. Main aspects covered in ILO Convention No. 183 and Recommendation No. 191

Scope	<p>Convention covers all employed women, including those in informal employment who have an employer and those in atypical forms of dependent work (e.g. domestic work).</p> <p>Categories of employed women can be excluded if employers, workers, governments agree. But periodic reports are required to show what is done to extend coverage to excluded groups.</p> <p>Specific provisions on health protection of pregnant and breastfeeding women (not in previous Conventions).</p>
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³ A table illustrating the progress of Convention 183 over Convention 103 is provided in Annex 2.

Length of leave	<p>Convention: 14 weeks minimum leave.</p> <p>Recommendation: 18 weeks recommended leave.</p> <p>6 weeks compulsory post-natal leave.</p> <p>Provision may be changed if workers, employers, and governments agree to shorten compulsory leave or have none at all.</p>
Protection from dismissal	<p>Dismissal during and (for a period) after maternity leave is allowed for reasons unrelated to maternity.</p> <p>If a breastfeeding woman is fired and files a complaint, her employer has the burden of proving that breastfeeding was not the cause of her termination.</p>
Breastfeeding breaks	<p>Breastfeeding recognised as a woman's right: on paid time, counted as work time.</p> <p>One or more daily breaks for breastfeeding, or daily reduction of hours worked, but specific entitlement left up to national law and practice.</p> <p>Combining breastfeeding breaks to shorten workday allowed.</p> <p>Longer or more frequent nursing breaks upon medical certificate.</p> <p>Recommendation: alternative to medical certificate for more frequent nursing can be "other appropriate certification as determined by national law and practice".</p>

Globally, the highest rates of conformity on all three standards of maternity protection (leave duration, level of payment and source of payment) are in the Central and South-Eastern Europe (non-EU) and CIS and the Developed Economies and European Union countries.

ILO Convention No. 156 (1981) and the corresponding Recommendation No. 165 regulate the principles of non-discrimination against workers with family responsibilities. Covering the rights of both women and men, the Convention defines family responsibilities as responsibilities in relation to dependent children and other immediate family members in need of care or support. National policy shall enable workers with family responsibilities to combine both without becoming a subject of discrimination and without conflict, to the extent possible, between their employment and family responsibilities (ILO 2010).

Other legal frameworks: EU law and CEDAW

In addition to the ILO Conventions, other points of reference for policy reforms in the area of maternity protection and family-friendly policies include the European Union *acquis communautaire* as well as the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).

The European Union possesses a significant body of legislation promoting compliance with the principle of equality of treatment for men and women in employment, goods and services. This includes legislation on maternity protection and family-friendly policies.⁴ EU legislation enforces equal pay for women and men for same work and work of equal value; equal treatment in employment and vocational training, promotion and working conditions; equal treatment in social security (statutory and occupational schemes). It protects workers in cases of pregnancy and maternity (paternity in Member States recognising such rights) and promotes specific rights for parental leave for fathers and mothers. Protection is ensured against direct and indirect discrimination based on sex, including marital or family status, as well as protection against sexual harassment. Victims of discrimination can go to Court and are protected by measures against retaliation. Legislation ensures the reversal of the burden of proof (the presumed author of discrimination must prove that he/she did not make any discrimination) and sanctions for those who perpetrated the discrimination, as well as compensation for the victims. The EU promotes preventive measures against discrimination by employers and positive actions for under-represented groups. Equality plans in companies are encouraged and the role of social partners and dialogue with non governmental

⁴ The EU *acquis communautaire* consists of various Treaty provisions and Directives concerning access to employment, equal pay, maternity protection, parental leave, social security and occupational social security, the burden of proof in discrimination cases and self-employment, as well as the case-law of the European Court of Justice.

organisations emphasised. Moreover, EU legislation establishes a requirement to have bodies for the promotion of equality between women and men in every Member State.

Two EU directives deal specifically with maternity and family-friendly policies: Council Directive 92/85/EEC of 19 October 1992 regulates measures to encourage improvements in the safety and health at work of pregnant workers and workers who have recently given birth or are breastfeeding. It stipulates a right to at least 14 weeks leave in connection with the delivery and the right to retain their wages or other forms of remuneration. In addition, Council Directive 2010/18/EU of 8 March 2010 implementing the framework agreement on parental leave concluded by the European social partners stipulates that both women and men should have the right to at least four months parental leave. Member States are to implement it by 8 March 2012 (in some cases, an additional year will be granted).

New developments in EU maternity protection

Women's organisations as well as the European Parliament Women's Rights and Gender Equality Committee have consistently called for improvements to the existing European legislation on maternity and paternity leave. Consequently, in 2010, the European Council adopted a directive (2010/41/EU, 7 July 2010) saying that EU Member States should grant at least 14 weeks of maternity leave to self-employed women and for partners of self-employed workers, two groups of women that had been found particularly vulnerable.

A further expansion of maternity protection standards in the EU is in the law-making process: In autumn 2010, the European Parliament by a large majority passed a Resolution in favour of substantially increasing European minimum standards for maternity and paternity leave provisions.⁵ In what supporters are lauding a great victory for the women and men living in Europe, the Parliament approved an increase of maternity leave provisions from 14 weeks to 20 weeks and the introduction of two weeks of non-transferable leave for new fathers, both fully paid. The first six weeks of maternity leave after birth are also non-transferable (to be used exclusively by the mother), but a couple can request to share the remaining 14 weeks.

⁵ The revision to the so-called 'Maternity Leave Directive' was first tabled in 2008.

The duration of leave and the costs of remuneration have been highly controversial, in particular with business groups and employers' organisations. Because of the resistance coming from Member States, the European Commission has to develop a compromise that will be acceptable to the Member States as well as the European Parliament.

CEDAW and maternity

In addition, CEDAW is a basic legal point of reference for national efforts to ensure equal treatment and opportunities for women: Article 11 of the Convention stipulates that women have the right to equal treatment in matters of employment (including, equality in hiring, promotion, job security, benefits and conditions of service, equal remuneration etc.).⁶ Crucially, Article 11 also stipulates women's right to protection of their health and to safety in working conditions, including the safeguarding of their reproductive function.⁷ Discrimination on the ground of maternity shall be prevented, including through protection against dismissal, maternity leave with pay or comparable social benefits. The Convention also mentions the need for supporting social services to enable parents to combine family obligations with work responsibilities and participation in public life, and mentions in particular the need for a network of child-care facilities.

Global trends in maternity protection and reconciliation policies

Globally, some trends in maternity protection and reconciliation policies can be highlighted for the last decades (International Labour Office 2010, OECD 2008, Mareš 2004):

- Over the last 15 years, globally, there have been noticeable improvements in maternity protection legislation, with a shift towards longer rest periods at the time of childbirth, and movement away from employer liability systems of financing maternity leaves. In turn, in the CEE/CIS region, parental leave was introduced in many countries as a leave entitlement following the period of maternity leave. Parental leave was introduced as an entitlement of mothers and fathers and often

⁶ <http://www.un.org/womenwatch/daw/cedaw/text/econvention.htm#article16>

⁷ Interestingly, the specific needs of breastfeeding mothers are not specifically addressed under CEDAW.

came at the expense of the extended maternity leave entitlement previously available to mothers only. Parental leave has been important to establish the idea that, in principle, leave cannot only be taken by mothers (in practice, however, leave is still mostly taken by mothers). At the same time, parental leave and benefits are not necessarily offering the same benefit level and protection as maternity benefits – de facto, the introduction of parental leave and benefits has contributed to a feeling of reduced maternity protection among many women in the region.

- The scope of family-friendly policies and spending on family benefits has increased in numerous countries, particularly in Western Europe. Countries allocate spending on family services, cash benefits and tax breaks in very different ways. In all systems, however, gaps remain in family support, for example at different points in a child's lifetime, and for some categories of families, for example single-headed family households (OECD 2008).
- In many countries, effective access to maternity protection of vulnerable groups of women is not always fully guaranteed: Women at the margins, or outside, of the regular labor market, or women in occupations or with contracts that ensure only limited access to social security schemes like part-timers, domestic or migrant workers often have no access to maternity protection, including leave, medical benefits, or cash benefits. As the number of women pushed out of employment or into precarious employment relations has been increasing in many countries, not least as an effect of the economic crisis, their lack of access to maternity protection is a matter of serious concern.⁸
- Awareness has increased among governments and social partners that men should also be targeted by initiatives to improve maternity protection and work-family reconciliation. This is sometimes achieved through linking maternity protection with family-friendly policies in general, thereby addressing the challenge of reconciling employment and family life. Other initiatives focus directly on enhancing men's responsibility and involvement in family care.
- In many countries globally, maternity protection legislation is not fully and effectively implemented. This underscores the importance of social

⁸ Improved maternity protection, including as a part of social health protection, is therefore considered an important component of the UN's Social Protection Floor Initiative

dialogue and tripartite action involving government, employers and workers, as well as other social actors such as national machineries for gender equality and civil society organisations. It also highlights the importance of monitoring and enforcement mechanisms and of collecting information on maternity protection in practice, to ensure that the principles and goals of maternity protection are realised.

- In many European countries, childcare services have become a matter of public concern. Affordable and good-quality childcare services have moved to the centre of policy attention because they may improve the reconciliation of work and family life, foster labour market participation and gender equality. Childcare facilities are also considered a remedy for declining fertility rates, because they lower the cost of childbearing in terms of labour market and career opportunities. Finally there is a tendency to see childcare services from a child-centered and social pedagogical perspective: childcare services have a positive impact on child development and socioeconomic integration (Mareš 2004).

Overview of national laws, policies and programmes related to maternity protection and family-friendly policies in Iceland, France and the Czech Republic

3.1. Socioeconomic and demographic characteristics of the three countries

In terms of population size, employment rates and other basic socio-demographic indicators, Iceland, France and the Czech Republic show interesting differences, as well as some important similarities. A general overview, with mostly 2009 data, is presented in Table 6 (Annex 1). A few points should be highlighted to illustrate the overall background of maternity protection and family-friendly legislation in the three countries, before moving on to the comparative overview of legislation and policies.

Of the three countries, Iceland is by far the smallest, with a population of roughly 320,000, followed by the Czech Republic with about 10,470,000, and France with 65,367,000 inhabitants. Iceland, however, has the highest fertility rate (2.23 in 2009), followed by France (2.00) and the Czech Republic (1.49), which is among the countries around the world with the lowest fertility rates. As Table 2. shows, all three countries have experienced declining fertility rates between 1980 and 2000, with the steepest decline in the Czech Republic. Between 2000 and 2009, fertility rates in all three countries have increased a bit.

Table 2. Total fertility rates in Iceland, France, Czech Republic (1980 – 2009)⁹

Year	Iceland	France	Czech Rep.	Source
1980	2.48	1.95	2.1	OECD
1990	2.31	1.78	1.89	OECD
2000	2.08	1.87	1.14	OECD ¹⁰
2009	2.23	2.00	1.49	eurostat ¹¹

When measured in terms of purchasing power parity (2008 PPP, US\$), the gross national income per capita in Iceland and France is roughly the same: 33,422 in Iceland, and 33,103 in France; and somewhat lower in the Czech Republic, at 24,419 USD.¹²

Striking differences characterise employment rates in the three countries, in particular women's employment rates: While Iceland has a women's employment rate of 76.5, France's is 60.1, and that of the Czech Republic is only 56.1. The difference between women and men's employment rates is also significantly larger in the Czech Republic than in both other countries (73.8 for men, 56.7 for women), and is smallest in Iceland (80.0 for men, 76.5 for women). In this context, the maternal employment rate is one indicator of support available to parents in combining employment with parenthood.¹³ Maternal employment is lowest in the Czech Republic (61.5 per cent), and highest in Iceland (84.8 per cent), with France in the middle (72.8 per cent) (Eurostat, <http://epp.eurostat.ec.europa.eu/>).

Part-time employment is a common strategy in many countries as to how parents attempt to solve the challenge of reconciling employment and family life. The rate of part-time employment differs significantly between the three

⁹ The total fertility rate is defined as is the average number of children that would be born to a woman over her lifetime if (1) she were to experience the exact current age-specific fertility rates through her lifetime, and (2) she were to survive from birth through the end of her reproductive life (http://en.wikipedia.org/wiki/Total_fertility_rate).

¹⁰ OECD Factbook 2010, Economic, Environmental and Social Statistics, 25 May 2010 (years covered: 1970-2008), (Table: Total fertility rate)

¹¹ http://epp.eurostat.ec.europa.eu/portal/page/portal/population/data/main_tables (Table: Total fertility rate)

¹² <http://hdr.undp.org/en/data/profiles/> (accessed 29.3.2011).

¹³ The maternal employment rate is defined as the percentage of mothers in employment as a percentage of the population of mothers with at least one child aged under 15 living at home (OECD Family database www.oecd.org/els/social/family/database).

countries: it is 24.1 per cent in Iceland, 13.3 per cent in France, and only 3.9 per cent in the Czech Republic, highlighting that part-time employment is quite uncommon in the Czech Republic. In other words, most Czech women who are employed continue to work full-time even when they have children. Yet, their numbers are increasing: In 2007, 24 per cent of employed Czech mothers with children younger than 4 years worked part-time (Kuchařová et al. 2003). In all three countries, women outnumber men by large in part-time employment, the highest rate of all three is in France (79.8), followed by Iceland (72.6) and the Czech Republic (68.7).¹⁴

Prior to the economic crisis, statistics on children and families with children living at risk of poverty¹⁵ (EU-SILC data from 2006) showed that Iceland was one of the countries with the lowest child poverty rate in Europe. While the Czech Republic has low at-risk-of-poverty rates in general, it is noteworthy that those for children are significantly higher than among the adult population and much higher than in Iceland and France. However, child poverty rates in France and Iceland are also a bit higher than the rates for the working age population (Lelkes, Zólyomi 2008).

In terms of household characteristics, it is interesting to observe that the overall percentage of single parent households is roughly the same in all three countries at about 30 per cent. More than 80 per cent of those are headed by a woman in **France** and the **Czech Republic**, while more than 90 per cent of single-headed Icelandic households are headed by a woman.¹⁶

Single-headed households with children, a majority of them headed by women in all countries, face a high risk of poverty and specific challenges in reconciling employment and family life. Statistics show, for example, that in **France** one out of three children living in lone parenthoods face a greater risk of poverty than children in traditional families.¹⁷ According to EU SILC data, in **Iceland**, single headed households also face a significantly higher risk of poverty

¹⁴ Eurostat data <http://epp.eurostat.ec.europa.eu/> (accessed 29.3.2011).

¹⁵ Children in the EU-SILC database are defined as those between 0 and 15 years of age. The indicator of poverty is the so-called "At-risk-of-poverty rate", which is part of the portfolio of indicators adapted by the Laeken European Council. It shows the share of persons with an equivalised disposable income below the at-risk-of-poverty threshold, which is set at 60 per cent of the national median equivalised disposable income after social transfers (Lelkes, Zólyomi 2008: 15)

¹⁶ OECD Family Database,

http://www.oecd.org/document/4/0,3343,en_2649_34819_37836996_1_1_1_1,00.html (accessed 29.3.2011)

¹⁷ EU SILC data used by Laura Alipranti at public hearing organized by the Women's Rights and Gender Equality Committee on the situation of single mothers, 31 January 2011

than families with two adults, but slightly lower than in France. However, the at-risk-of-poverty rate of a single parent household with children in the **Czech Republic** is four times the risk of a household with two adults and two children (above 40 per cent vs. 10 per cent) and is among the highest in Europe (Lelkes, Zólyomi 2008).

3.2. Public spending on family support and financing maternity protection

A comparative look at the structure of public spending for family support clearly illustrates the differences in approach of the three countries in prioritising various types of family support: Cash benefits, spending on services, or spending on tax measures for family support. A first noteworthy difference is that the overall level of spending is significantly higher, at roughly the same overall level of about 3.6 per cent of GDP in **Iceland** and **France**, as compared to the **Czech Republic** (where it is just below 2.5 per cent of GDP).¹⁸

Family support through the income taxation system is common in many European countries (de Henau et al. 2009). However, if a government decides to offer family benefits through the tax system, this raises important redistributive questions. Tax benefits tend to benefit different types of households differently: Depending on household income and a country's overall tax system, tax measures tend to work to the relative advantage of higher income households. Instead, those households that pay fewer, or no, taxes, because of a low income do not benefit to the same extent as middle and higher-income households from tax breaks. Among the three countries studied here, **Iceland** does not make extensive use of tax measures for family support. There are child tax credits and taxation is individually based, but couples can ask for joint taxation combining their personal deduction (Eydal, Arnadottir 2010). In contrast, tax measures are a significant proportion of family support in **France** and the **Czech Republic**, with greater importance, relatively, in the latter. In France, not only income taxes are used to promote family-friendliness: There is also a family tax credit to encourage enterprises to become family-friendly (see Box 2.).

Box 2. Encouraging companies to become family-friendly through tax credit in France

The French 'family tax credit' (Crédit d'impôt famille, CIF) was introduced in 2004. It provides a financial incentive to companies to develop family-friendly measures for their employees. The CIF stipulates that 25 per cent of related expenses are deductible from taxes paid by the company up to a ceiling of 500,000 Euro per year and per company (Finance Law of 2004, art. 98). Eligible expenses can include training programmes for employees on parental leave, or supplements paid to employees taking various forms of leave (Fagnani, Boyer 2010).

Five types of expenses are eligible for the company family tax credit (Fagnani 2008):

- Expenses linked to training programmes for employees on parental leave.
- Supplements paid to employees on maternity/paternity leave or on child-sick leave.
- Creation of company crèches or contribution to the running of crèches with places reserved for the employees' children under three years of age.
- Getting employees a refund on expenses related to exceptional childcare costs pertaining to unpredictable professional obligation outside the normal work schedules.
- Companies can grant their employees pre-paid service vouchers ("Chèque emploi service universel, CESU), which they can use to buy family-related services.

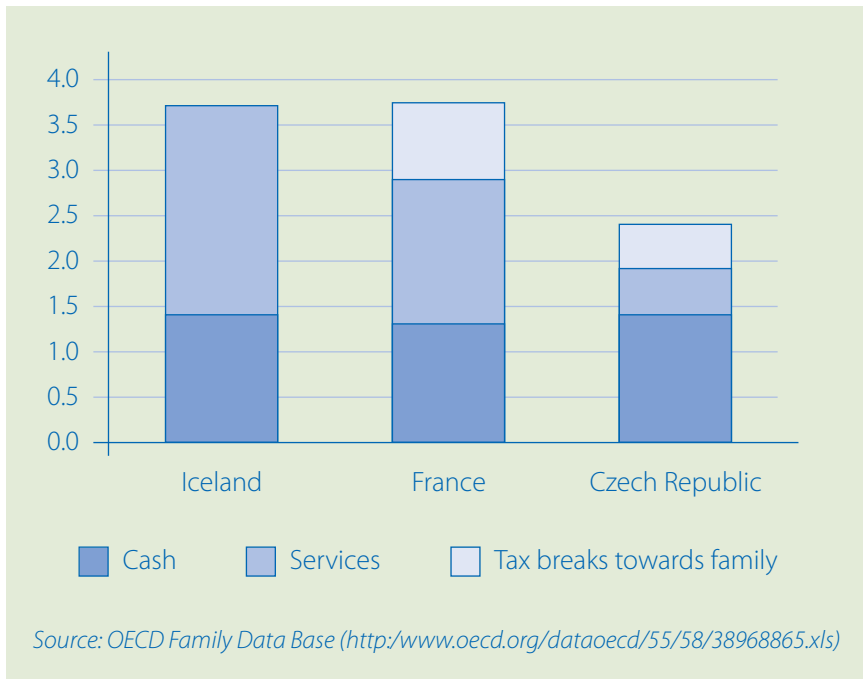
Very few companies use the CIF so far (Fagnani 2008).

It depends strongly on the entitlement criteria who benefits from family support services and cash benefits: Entitlement could be more or less restrictive on the basis of income testing or other access criteria, or could be ensured universally. Moreover, countries assign different priorities to the various spending categories. The comparison between spending patterns in the three countries clearly highlights the relative importance assigned to services in family support in **Iceland**, both in comparison with spending on cash benefits in the country and in comparison with both other countries. While spending on serv-

ices is also the largest part of family spending in **France** (in comparison with cash benefits and tax breaks), it plays a much less important role in the **Czech Republic**.

Spending on cash benefits is the highest in the **Czech Republic**, in absolute and relative terms. It is at a slightly lower level in **Iceland** and at an even slightly lower level in **France**. It is noteworthy, however, that the overall differences between countries with respect to spending on cash benefits are not very large.

Table 3. Public spending on family benefits (cash, services, tax measures), in per cent of GDP, 2007



The financing of maternity protection and family-friendly policies can be a contested issue in national policy-making: If employers are individually liable for financing these benefits, they may, directly or indirectly, refrain from hiring women, in particularly young women who may decide to have (more) children in the foreseeable future (Brown 2008).

In all three countries covered here, maternity benefits are financed from social security. The arrangements in Iceland, France and the Czech Republic thus reflect the provisions in ILO Convention No. 183, which maintains that employers should not be individually liable for the cost of maternity benefits payable to women employed by them, and that benefits should be provided through social insurance or other public funds. The Convention allows employers to be individually liable for maternity benefits in cases where they have given their specific agreement, where this was determined at the national level before the adoption of Convention No. 183 in 2000, or where it is agreed upon at the national level by the government and the social partners (International Labour Office 2010).

3.3. Maternity protection and family-friendly leave policies and benefits

The three countries offer different provisions in their maternity protection legislation in all key aspects of the legislation, including length of the leave, scope of the protection, level of benefits, and financing of benefits. Similarly, with respect to paternity leave and parental leave, as well as other family-friendly policies, different approaches are found. To date, none of the three countries has ratified ILO Convention 183, or Convention 103. While Table 6. (Annex 1) provides a detailed overview of the key provisions in all three countries, the main aspects are highlighted comparatively here.

Length of leave

The length of maternity leave differs significantly between the three countries: In **Iceland**, leave directly related to the birth of a child is less generous than in the **Czech Republic**. By international standards, the Czech Republic offers a long maternity leave of 28 weeks, of which six weeks after birth are mandatory. In **France**, the length of maternity leave is in the middle between the two other cases: women are entitled to 16 weeks maternity leave, eight of which are mandatory, including six after the birth of the child. In Iceland, women are entitled to 13 weeks “birth leave”, with no mandatory leave period.

As a rule, after birth women in the three countries enjoy nine weeks leave in **Iceland**, ten weeks leave in **France**, and 22 weeks in the **Czech Republic**. (In all countries, leave periods are longer for multiple births, and adoption leave is

available, as specified in the table.) The different approaches are illustrated also in a country's recommendations about the length of the leave: While the Labour Code in Iceland recommends two weeks after the birth, the Czech Labour Code stipulates that leave shall never be shorter than 14 weeks.

Box 3. Practice example: Women with more than two children are entitled to longer maternity leaves in France

For the third and each subsequent child (in other words, if the woman already has two or more children or if her household is in charge of two or more children), the duration of the maternity leave is extended to eight weeks before and 18 weeks after the expected birth. For these women, the eight weeks' period of prenatal leave may be extended by two weeks with a corresponding reduction of postnatal leave.

France allows women to preserve their maternity leave if a newborn is hospitalised for a long period. If a child is hospitalised until the sixth week after confinement, mothers may postpone taking their remaining leave until the child leaves the hospital. (ILO 2010)

Scope of the legislation

While the specific categories of employment relations covered by maternity protection legislation are not strictly comparable, in general, the scope of maternity protection legislation is the same in **all three countries**: All employed, and those self-employed women who are covered by the social security systems. Domestic workers – internationally a group of employees with limited access to maternity benefits – are explicitly included in the French and Czech legislation.

It is interesting to note that in the **Czech Republic** a child's "substitute caregivers" are explicitly mentioned as beneficiaries of maternity benefits. This category of persons may also include men.

Level of benefits and financing

Cash benefits are one of the core components of maternity protection. They replace lost income during the time that mothers are absent from their workplaces for reasons related to a pregnancy or recent childbirth. The replacement

level of maternity benefits is highest in **France**: Beneficiaries are entitled to a full replacement of their daily wages up to a ceiling. The preceding three monthly wages are taken as the basis for calculation. The benefit calculation works better for lower and medium income earners than for high income earners, as the maximum monthly earnings used to calculate the benefit are 2,885 Euro (after social security contributions). The maximum daily benefit is about 77 Euro.

Box 4. Practice example: Maternity benefits for job-seekers and the unemployed in France

As the level of the maternity benefit is linked to a woman's previous income, the basis for benefit calculation for those currently unemployed is crucial. Their last income from employment was significantly higher than their income from unemployment benefits. In France, female job seekers who are currently receiving, or who have received, an unemployment benefit during the last 12 months or who have ceased work within the last 12 months are eligible for the cash maternity or adoption benefit based on their last wage (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration).

In **Iceland**, the benefit amounts to 80 per cent of the average wage or income during the last two years, up to a ceiling of about 1,890 Euros/month.¹⁹ Basing on an estimate average of 21 working days per month, the maximum daily benefit would be roughly around 90 Euro/day. There are minimum benefits for part-time employees (ISK 65,227 – about 410 Euro – for those working between 25 and 49 per cent of the regular working time²⁰), and a minimum benefit for beneficiaries working less than 25 per cent of regular working hours (ISK 49,702 – about 313 Euro). The benefit for parents attending full-time education is ISK 113,902 (about 716 Euro) per month.²¹

¹⁹ Eighty per cent of earnings are replaced for earnings lower than ISK 200,000 (about € 1,260) per month. Seventy-five per cent of earnings for earning over ISK 200,000 up to a ceiling of ISK 300,000 (about € 1,890) per month (International Network on Leave Policies & Research, 2010: Iceland).

²⁰ At least ISK 91,200 (about € 575) for those part-timers working more than 49 per cent of the regular working time.

²¹ Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration.

In the **Czech Republic**, the daily benefit is calculated as 60 per cent of a daily base, a calculation that works to the advantage of lower income earners. The maximum daily benefit is about 32 Euro.

In **all three countries**, maternity benefits are paid from the social security systems. In the case of France and the Czech Republic, they are covered from the health insurance fund, in the case of Iceland, they are covered from a separate maternity/paternity leave fund. For additional information on the financing of benefits and on contributions to the health insurance and family leave fund, please refer to Table 8 in Annex 3.

In addition to cash benefits, women's entitlement to benefits in kind, i.e. medical care, is a crucial component of maternity benefits. In **France**, medical benefits during maternity are provided to women who are insured, and to the spouses, daughters or daughters-in-law of insured males.²² The claimant must notify their local Health Insurance Fund as soon as possible, and submit to various compulsory pre- and post-natal medical examinations. Entitlement to benefits, determined at the estimated date of conception (or if there was no entitlement at that date, at the date of pre-natal leave) is governed by the same conditions as applicable for health insurance. All compulsory pre-natal examinations are covered with no co-payment payable. Between the first day of the sixth month of pregnancy and the twelfth day following birth, all pregnancy-related costs are covered, also with no co-payment. The mother is also exempted from the €1 charge and the flat charge for medicines, paramedical services and travel. Regular and permanent French residents who do not qualify for maternity/sickness benefits in kind as insured persons or dependants, are nevertheless entitled to receive such benefits under the Universal Health Insurance Coverage (CMU) programme. Depending on their earnings, these persons may or may not have to pay a contribution for such benefits (Centre de Liaisons Europeennes et Internationales de Securite Sociale).

In **Iceland**, medical care during maternity is covered from the health insurance system (while cash benefits for mothers and fathers are covered from the maternity/paternity leave fund). All women with health insurance in Iceland are entitled to free maternity care.²³ Hospitalisation is ensured for as long as necessary, along with medical care, required medicines and other hospital services (Sjúkratryggingar Islands).

²² This applies to all persons covered under the general scheme – 89 per cent of the population. Supplementary health insurance is available.

²³ Everyone who has been legally resident in Iceland for six months automatically becomes a member of the Icelandic social insurance system (including health insurance), regardless of nationality.

In the **Czech Republic**, in-kind benefits, i.e. medical care during maternity, are covered from the Health Insurance System, which is disconnected from the Sickness Insurance (responsible for cash benefits). Persons with permanent residence or employment in the Czech Republic are required to take out health insurance, but enjoy free choice among state regulated Health Insurance Funds. Care during maternity and birth is covered by health insurance, but the details depend on the doctors and maternity hospitals under contract with the respective Health Insurance Fund (Bryndová et al. 2009).

Health and safety provisions

In **Iceland** the law stipulates that if the safety and health of a pregnant woman, a woman who has recently given birth or a woman who is breastfeeding is considered in danger, according to a special assessment, her employer must make the necessary arrangements to ensure the woman's safety by temporarily changing her conditions and/or working hours. Such a transfer should not entail loss in benefits or pay.

In **France**, employers must assess any risks in the workplace that might influence a workers' safety or health and define measures to be taken. For pregnant and breastfeeding women, special supervision by the occupational health practitioner is asked for. If a pregnant woman or new mother is exposed to risk, her employer is required to transfer her temporarily to a safer position. In France, pregnant women or new mothers can request reassignment to daytime work.

In the **Czech Republic**, it is mandatory to train employees and apprentices to minimise the risks to which employees are exposed, including risks for pregnant women. The health and safety of pregnant employees, employees who are breastfeeding and female employees with children up to nine months of age are protected explicitly from working in unhealthy conditions. In enterprises with more than 500 employees, there has to be a competent person in charge of risk prevention, including risks for the abovementioned groups of women workers.²⁴ Women workers who are usually exposed to health risks are entitled to be transferred to other work. A pregnant employee may request that her working time be reduced. The employer cannot require her to work overtime.

²⁴ In smaller enterprises, the employer can take over this responsibility, qualifications permitting. Act on Further Requirements on Occupational Health and Safety, 309/2006 Coll. ACT of 23rd May 2006.

Protection of employment rights during pregnancy and maternity leave

Protection from discrimination because of pregnancy and employment protection of pregnant women and new mothers are central aspects of maternity protection. The French Labour Code explicitly includes also the recruitment process under the protection from discrimination because of maternity (see Box 5.).

In all three countries, the employment relationship is protected by law during the pregnancy and maternity leave (as well as during parental leave, for women and men in all countries). In addition, **French** law specifies an extended employment protection for four weeks after the end of the maternity leave or adoption leave. In **Iceland**, it is not be permitted to dismiss an employee due to the fact that he or she has given notice of intended maternity/paternity leave or parental leave, or during his or her maternity/paternity leave or parental leave, without reasonable cause. In such a case, the dismissal shall be accompanied by written arguments. The same rule shall apply to pregnant women and women who have recently given birth.²⁵ **Czech** law protects parents having to care for a child under three years of age from dismissal.²⁶

Box 5. Practice example: Prohibition of pregnancy testing in France

No employer may take into consideration the fact that a woman is pregnant as a ground for refusing to recruit her, for terminating her contract of employment during any period of probation or for ordering her transfer. It is therefore unlawful for an employer to seek to obtain any information relating to her pregnancy or instruct others to obtain such information. No woman applying for, or employed in, any job may be required to reveal the fact that she is pregnant, except where she requests to benefit from any law or regulation governing the protection of pregnant women. In the event of a dispute, the employer should communicate to the judge all the elements taken into consideration to reach a decision. The benefit of the doubt is given to the pregnant worker.

Labour Code §§ L1225-1, L1225-2, L1225-3²⁷

²⁵ Act on Maternity/Paternity Leave and Parental Leave §30

²⁶ Czech Labour Code, Section 48 (1) d)

²⁷ http://www.ilo.org/dyn/travail/travmain.sectionReport1?p_lang=en&p_countries=FR&p_sc_id=2000&p_year=2009&p_structure=3

In **all three countries**, employees on maternity leave are entitled to return to the same or a comparable position after their leave. The **French** law stipulates specifically, that workers are entitled to any wage adjustments that are granted during their leave.

Provisions for breastfeeding mothers

The return to the workplace is often a main reason for women to stop breastfeeding. The right to breaks for breastfeeding, as well as other provisions such as breastfeeding rooms or extended possibilities for home or telework are therefore key elements influencing the ability of mothers of small children to return to their workplace while continuing to breastfeed. Considering the length of maternity leave offered by law, it is not easy to meet the World Health Organisation's (WHO) recommendation for six months exclusive breastfeeding.²⁸ Women's preferences regarding breastfeeding depend on numerous factors beyond the length of leave. But legal provisions regulating the responsibilities of employers in support of breastfeeding mothers, workplace policies about breastfeeding, the provision of special facilities for breastfeeding or for expressing and cooling milk, as well as flexibility about working hours can be important measures to support breastfeeding mothers.

Box 6. Practice examples: Nursing breaks in the Czech Republic & breastfeeding rooms in France

Nursing breaks after a mother's return to her workplace are an important measure to ensure that a woman can continue to breastfeed her child, if she chooses to do so. In the **Czech Republic**, after a maternity leave of 22 weeks, maternity protection legislation provides for two paid half-hour breaks per child until the child is one year old. Thereafter, one half-hour paid break is provided for in the following three months. In addition, breastfeeding mothers can request to reduce their working time. Employers cannot ask them to work overtime. Rest areas at the workplace are to be provided.²⁹

²⁸ The World Health Organization's Global Strategy on Infant and Young Child Feeding (WHA55 A55/15, §10) states that after the first six months, infants should receive complementary foods while breastfeeding continues up to two years of age or beyond. It is unclear which implications this recommendations should have on the workplace. There are no legal provisions in any country going beyond the Czech case.

²⁹ Czech Labour Code, Chapter V

In **France**, employers with more than 100 employees can be asked to install special breastfeeding rooms in the company's premises (International Labour Office 2010). However, as breastfeeding rates in France are very low by international standards, it is uncommon to find such premises in French enterprises.

The **Czech** legislation provides for two half-hour nursing breaks per working day until the child is one-year-old, and for one break in the following three months (see Box 6.). The **French** law provides for a total of one hour paid break during the work day until the child is one-year-old. The **Icelandic** legislation, however, does not specify nursing breaks or any other special provisions for breastfeeding mothers at the workplace.

Birth grant

In some countries in Europe, birth grants (in cash or in kind, after the birth of a child or as one-time allowances during the pregnancy) are paid to support parents to cover extra costs related to the birth of a child, or as incentives for mothers to undergo medical exams or counselling during the pregnancy.

In **Iceland**, no birth grant exists. In the **Czech Republic**, a mother receives a means-tested lump sum of 13,000 CZK (about 529.33 Euro) for the first child, and 19,500 CZK (about 794 Euro) in the case of multiple births.³⁰ In **France**, a means-tested lump sum of 903.07 Euro is paid for each child at the 7th month of pregnancy. To qualify, the expectant mother must prove that she has submitted to the first routine prenatal examination performed during the first 14 weeks of pregnancy. A family receives a grant of 1,806.14 Euro for an adopted child.

Paternity leave

In recent years, legislation providing for a special leave for fathers around the time of the birth of a child has become more common globally. Paternity leave thus can be considered an illustration of the increasing efforts to develop state

³⁰ Families are entitled to the birth grant provided the family income in the calendar quarter prior to the birth of the child does not exceed 2.4 times the family's living minimum.

policies that promote fathers' involvement in childcare matters and thereby promote gender equality. In most countries, this takes the form of a number of days of paid leave for fathers to spend time with their newborn and its mother.

Of the three countries, only **France** offers this kind of leave: New fathers are entitled to eleven consecutive days of paternity leave. In addition, the law provides for three additional days of paid leave for family reasons which may be taken in relation to the birth of the child or other family-related events. The scope of paternity leave is the same as for maternity leave, and the benefit is also the same as the maternity benefit: 100 per cent of the daily wages up to a ceiling; the benefit is covered from the Health Insurance Fund. Self-employed enjoy the same entitlement and benefit, if they are ensured in the social security scheme for the self-employed. In all cases, the beneficiary needs to be the child's natural father. About 60 per cent of French fathers take paternity leave (Fagnani und Boyer 2010).

In **Iceland**, no special paternity leave is granted for the birth of a child. Instead, paternity and parental leave are combined, and are available for all employed and self-employed workers: Fathers are entitled to thirteen weeks of leave which is non-transferable to the mother. It can be taken directly at childbirth – in the form of a paternity leave – or after the mother's leave expires, in the form of parental leave. About 88.5 per cent of Icelandic fathers take some paternity/parental leave (Einarsdóttir, Pétursdóttir 2010). The benefit is the same as the maternity benefit, 80 per cent of one's average wage/income during the last two years, with a ceiling. The father's right is conditional on the fact that he has the full or joint custody of the child.

The **Czech Republic** in turn does not offer any paternity leave by law.³¹ Fathers are entitled, however, to paid time-off to take a mother to the hospital when the birth is imminent, as well as to unpaid time-off to attend the birth. In addition, the mother can transfer part of her maternity leave entitlement to the father from the seventh week after the childbirth, thereby shortening her entitlement. No data is available about the numbers of fathers who take advantage of the above provisions (Kocourková 2010).

³¹ In 2008, the then-government had agreed on a new package of family policy measures which included the introduction of a one-week statutory paternity leave. The subsequent fall of the government, however, led to a suspension of legal procedures (Kocourková 2010).

Box 7. Practice example: Ensuring that children enjoy the care of both parents in Iceland

Since 2000, the Icelandic policy on paid maternity/parental leave ensures that both parents have the same individual entitlements to paid maternity and paternity leave – three months to each parent. An additional three months can be shared by the parents at their own discretion until the child is three years old. (It used to be 18 months, but was extended in 2009). The family as a whole thus is entitled to a total of nine months leave time (Eydal, Arnadóttir 2010).

The aim of the 2000 Act was to ensure that children enjoy the care of both parents and that both women and men are able to coordinate family life and employment. While on leave, parents are entitled to a monthly payment which equals 80 per cent of their average income prior to the birth. When the bill was enacted, it emphasised that in order to make it possible for fathers to take paid parental leave, there should be no upper limit to the benefit. However, in 2004, a limit was placed on the amount of money that a parent can receive. The ceiling was further reduced in 2009 (see text below). Parents who are not employed at the time when they take parental leave receive a flat-rate payment.

The majority of Icelandic fathers use their individual leave entitlement of three months leave. In 2007, fathers used on average 101 days of parental leave. Furthermore, studies show that Icelandic parents divide paid work and the care of their young children more equally after the policy came into effect. Observers have therefore argued that the Icelandic schemes have in fact been able to fulfill its goals (Eydal, Gíslason 2008).

It should be noted, however, that the total period of paid leave in Iceland is shorter than in the other Nordic countries. In combination with the recent cuts to the benefits introduced as a consequence of the economic crisis, Icelandic parents receive less public support than parents in the other Nordic countries (Eydal, Arnadóttir 2010).

Parental leave and allowances

Parents often would like to enjoy more time with their babies after the end of maternity leave, or find childcare services for small children inaccessible, unaffordable, or of questionable quality. Provisions for parental leave are there-

fore a key feature of family-friendly state policies. Parental leave and associated cash benefits are state legislated measures in relation to the birth and care for a small child. Parental leave and benefits can be targeted at mothers, fathers, or both parents. Special benefits targeted at single parents may be available to support them in their particular situation and address the high risk of poverty of single parents. The leave and benefit systems of the three countries under study here clearly illustrate the various policy priorities that can be embodied in different benefit schemes.

When considered from the vantage point of a more equal division of parental leave between women and men, **Iceland** has the most innovative scheme: Mother and father individually get the months leave, and both can share an additional three month as they choose. In total, the family has a right to nine months paid leave; mother and father can also take leave at the same time. In Iceland, about 88.5 per cent of fathers took parental leave (in 2007). Men took about one third of the overall leave days, which means that the majority of leave is still taken by mothers (Einarsdóttir, Pétursdóttir 2010). While on leave, parents get a cash benefit equal to 80 per cent of their average income during the last two years prior to the birth (Eydal, Arnadottir 2010). There is an upper limit to the income taken into account for the benefit calculation.

In the interest of reductions in social expenditures, the income ceiling for benefit calculation was progressively reduced by subsequent Icelandic governments – thus making it more likely, once again, that mothers will take a greater portion of the leave available. When the benefit was introduced, the ceiling was 480,000 ISK. It was reduced to 400,000 ISK in 2008; as a consequence of the severe economic crisis, from 2010 the ceiling was further reduced to 300,000 ISK. In addition, parents with an income higher than 200,000 ISK receive a benefit that replaces only 75 per cent instead of 80 per cent of their previous income.

The **Czech Republic** boasts a parental leave and allowance system that prioritises flexibility and choice of parents: Both parents are entitled to parental leave until the child's third birthday, and can take the leave simultaneously. In 2006, however, a mere 1.4 per cent of fathers took parental leave (Kocourková 2010). Only one parent is entitled to the parental benefit, but she/he does not necessarily have to be on parental leave while receiving the benefit. From 2008 a three-tier system of parental benefits was introduced (Kocourková 2010) (see Box 8). A parent may choose to draw parental allowance for a period of up to two, three or four years from the child's birth, and the level of the benefit depends on the pay-out option chosen.

Box 8. Practice example: Flexible parental allowance in the Czech Republic

Since 1 January 2008, a Czech parent may choose to draw a parental allowance for a period of up to two, three or four years of age of the child (note that the parental leave with employment guarantee is only up to the child's third birthday).

By selecting the period of support, the parent also selects the amount of the allowance: Option 1 allows to receive the highest benefit (11,400 CZK) until the child is 24 months old. Option 2 (the standard option) entitles to a basic benefit (7,600 CZK) until the child is 36 months old. Option 3 gives a parent the basic rate (7,600 CZK) until the child is 21 months old and a reduced benefit (3,800 CZK) until the child is 48 months old. Once the parents have chosen one option for benefit payout, they cannot change their mind, and benefits may not be paid retrospectively.

Critics have argued, however, that the greater flexibility may actually have increased social injustice, because the choice depends on the mother's income before birth. Only recipients with a prior high income can benefit from a payment option of a high benefit over a short time, whereas others have to stay on leave for longer periods (4 years) in order to benefit from the total sum of benefit (Wóycicka 2003).

While Czech parents receive the parental benefit, their income is not tested; the parent may carry out work for pay without losing their entitlement to parental allowance. However, during their paid work, parents must ensure that the child is in the care of another adult. They can place a child in a childcare institution for no more than five days per month without losing their benefit entitlement.

A particular feature of the Czech leave/benefit scheme should be highlighted, as it appears to have negative effects on women's economic security. Women are 98.6 per cent of the recipients of the parental allowance. As has been pointed out, there is a possibility to collect the parental allowance up until the child reaches the age of four – while the employment protection that comes with parental leave is only three years. The extended benefit entitlement and the disconnect between benefit entitlement and employment protection, alongside the low availability of childcare services, has been criticised

for creating a potential poverty trap for women (and their children), in particular for single mothers (Wóycicka 2003, Steinhilber 2010).

In **France**, the system of parental benefits places a high priority on the support of large families (a reflection of the relatively strong pronatalist tradition in French family policy). In addition, and more recently, parental choice about returning to the workplace or staying at home has become a stronger policy objective. In general, however, there are still strong incentives for a quick return to the workplace for smaller families. Parental leave is granted until the child reaches three years of age. Leave is an individual entitlement of parents, regardless of their marital status, which means that mother *and* father can take leave until the child is three years old. However, only 2 per cent of French fathers take any parental leave (Fagnani und Boyer 2010). Parents on leave may work between 16 and 32 hours per week

A flat-rate childcare benefit of 553 Euros per month (*Complément de libre choix d'activité*, CLCA) is paid by the National Family Allowance Fund. It is available to all families who meet the eligibility condition whether or not parents take parental leave. Eligibility is based on the number of children: Parents with one child need to have worked for two years without break. With two children, a parent has to have worked for two out of the four years preceding birth, with three children for two out of the five years preceding birth. The length of the benefit payment also depends on the number of children: If a family has only one child, the benefit is paid until six months after the end of the maternity leave. In other families it is paid until the child reaches three years of age. The benefit is reduced if the parent works part time (see full information in Table 6, Annex 1).

Another benefit (*Complément optionnel de libre choix d'activité*, COLCA) is paid to families with at least three children. If one parent stops working completely, a flat-rate benefit of 790 Euro is paid for one year. Large families can choose between the CLCA and the COLCA.

A minimum income is ensured through the earned income supplement (*Revenu de Solidarité Active*, RSA). The RSA is a means-tested benefit available to all persons who are 25 years of age or older, or are pregnant and/or are caring for at least one child.³²

³² The RSA was introduced in 2009, replacing the previously available single parent allowance (*Allocation de parent isolé*, API).

To facilitate the reconciliation of employment and child care once both parents have returned to their workplaces, a supplement for child care (*Complément de libre choix de mode de garde*) is paid. It supports the expenses of parents who employ an accredited care giver or home worker. The benefit covers families with children under six years of age. The benefit amount depends on the parent/couple income and on the age of the child. For instance, for a single parent, the minimum income required is approximately 400 Euro/ month. Moreover, the parents' contribution to the child caregiver's salary must not be less than 15 per cent (Fagnani, Boyer 2010).

3.4. Childcare services as a family-friendly measure

Childcare services have gained increasing policy attention over the last years throughout Europe, as a remedy against declining birthrates, as an instrument to support child development and social integration, and as a main avenue toward work-family reconciliation (Mareš 2004). Access to affordable and high-quality child care and out-of-school care facilities are a main precondition for mothers to return to their workplaces after maternity leave, or for parents of either sex after their parental leave. Regardless of why parents choose to return to their workplace, be it for economic or any other reason, they depend on reliable and affordable formal childcare to perform well at their paid work. Where childcare capacity is constrained and/or prohibitively expensive, parents cannot engage in paid work as they wish, or depend on access to cheaper and/or informal care.

According to the "Barcelona Targets" which the EU agreed on in 2002, Member States should make available facilities for 33 per cent of children under the age of three and for 90 per cent of children from three years to school age.³³ The goals were to be accomplished by 2010, but have not been reached by a number of EU Member States, particularly with respect to the provision of services for the 0-3 years old.

In particular for children under three years of age, childcare services are often an important reason for concern for parents, and source of major differences be-

³³ In March 2002, the Barcelona European Council acknowledged the importance of childcare in terms of growth and equal opportunities calling on Member States to "remove disincentives to female labour force participation and strive, taking into account the demand for childcare facilities and in line with national patterns of provision, to provide childcare by 2010 to at least 90% of children between 3 years old and the mandatory school age and at least 33% of children under 3 years of age" (European Council 2002: 12).

tween countries. The use of childcare services for this age group is strongly correlated with the entitlement to parental leave and the level of benefits, if any, during parental leave, as well as other work-family reconciliation support.

Cultural differences and institutional legacies have a strong influence on the demand for childcare services as well: Childcare services, even for small children, have a long tradition in **Iceland**, and Icelandic parents show a high level of trust in childcare institutions (Eydal, Gíslason 2008). Similarly, the demand for enrolment in *école maternelles* in **France** for two-year-olds often exceeds supply, reflecting the high opinion that French families have of their childcare programmes, as well as parental preferences about the return to the workplace (Fultz et al. 2003).

In contrast, in the **Czech Republic**, child care centers that provide care for children age 0 to 3 (nationally referred to as *crèches*) were drastically reduced in the 1990s.³⁴ This was a consequence of the introduction of extended parental leave and benefits, shifts in public spending priorities and the abolishment of enterprise-provided care facilities. But it also reflects the fact that Czech families prefer maternal care to *crèches*, and even consider maternal care preferable to childcare services up to the age of 3-4 years (Kuchařová et al. 2003).³⁵

Enrolment rates for children ages 0-2 differ significantly between the three countries (see Table 4). While more than half of all children of that age group attend a child care facility in **Iceland** (56 per cent) and almost half of all children in **France** (43 per cent), only 3 per cent of all children of that age group are enrolled in the **Czech Republic**.

Table 4. Enrolment rates in child care facilities

	Iceland	France	Czech Republic
0-2 years of age	56	43	3
3-5 years of age	95	100	82

Source: OECD Family Database, years 2005 (0-2 years) and 2006 (3-5 years)³⁶

³⁴ In 1989, the coverage rate for 0-3 years of was 20 per cent (OECD 2006).

³⁵ In fact, *crèches* are administered by the Ministry of Health (kindergarten are under the Ministry of Education) and have not benefited from the curriculum review process that redefined pre-primary education for the 3-6 years olds since 2000 (OECD 2006).

³⁶ <http://oecd.org/els/social/family/database> (accessed 28.3.2011).

In contrast, differences in enrolment rates in child care facilities between the three countries are far less marked for children 3 to 5 years old. **France** boasts an enrolment rate of 100 per cent in its extensive system of *école maternelles*.³⁷ Enrolment of that age group is not much lower in **Iceland** with 95 per cent. In comparison with these two, enrolment is lower in the **Czech Republic** with 82 per cent, but much higher than for younger children (OECD Family Database). Moreover, enrolment reaches higher levels in the Czech Republic as well for children closer to primary school age (Kuchařová et al. 2003).

³⁷ The École Maternelle is an international exemplar of ECEC programmes, a publicly funded pre-school programme, administered under the Ministry of Education and delivered under education auspices. Preschool facilities may be situated next to or even in a primary school, but often are free-standing. The programmes are free for the standard school day, which usually covers 8 hours (8:30 am – 4:30 pm), and have supplementary (“wrap-around”) services available before and after school hours, at lunchtime, and during school holidays for parents who have a longer workday and young children in need of care and supervision. Parents pay for the supplementary services at income-related fees. The programmes are universal, and available to all children regardless of parents’ income or employment status (The Clearinghouse on International Developments in Child, Youth and Family Policy, <http://www.childpolicyintl.org/countries/france.html#maternity>).

Implementing maternity protection and family-friendliness

The analysis of legal entitlements, of course, only gives a partial picture of access to maternity benefits and family-friendly policies. It leaves aside concerns about the implementation of laws and policies. It also does not include benefits that may arise from collective bargaining as well as benefits offered by individual employers to members of their workforce. At the same time, information about these aspects is difficult to collect and to compare between the three countries. Policy implementation is influenced by a variety of different factors, including the design and strength of implementing institutions, nation-specific aspects regarding the compliance with labour legislation, as well as trust in the legal system and the availability and accessibility of legal recourse, as well as monitoring procedures and responsibilities. Individual and family behaviour are also strongly influenced by (gendered) cultural practices and divisions of roles, for example about childcare responsibilities.

The available evidence discussing the implementation of maternity protection and family-friendly policies globally highlights a number of particular issues (International Labour Office 2010) which will be addressed in this part of the study: The coverage of benefits, monitoring mechanisms, the take-up of benefits – particularly of fathers, the availability and accessibility of high quality childcare facilities and family friendly workplaces.

Broadening the coverage of maternity protection legislation

Maternity protection legislation and family-friendly measures are faced with the challenge of defining who falls under the scope of legislation and who does not, or who is entitled to all, or only to some of the benefits. At least three groups of women and families are often mentioned as having problems to benefit from protective and supportive legislation (International Labour Office 2010, Steinhilber 2003): Those with an insecure and precarious labour market position or working in informal employment; the self-employed and domestic workers.

The access of workers with insecure and precarious positions on the labour market to maternity protection depends on the eligibility criteria for statutory maternity benefits: In **Iceland**, the law requires that a woman was employed for at least six months with social security coverage in order to benefit from maternity benefits; in the **Czech Republic**, the law prescribes 270 days of social security coverage in the 2 years before childbirth. In **France**, a woman has to have been employed for at least 10 months of coverage and 200 hours of employment in the 3 months before certification of pregnancy. As a consequence, those women on employment contracts that do not ensure statutory insurance, as well as those women on short-term/part-time contracts below the threshold of social security coverage, or those who fail to accumulate the minimum contribution periods, face difficulties in accessing maternity protection (Steinhilber 2003).

It is difficult to assess to what extent women's access to maternity protection has declined with the increase in precarious and insecure employment relations in the past years. Similarly, data is hard to come by to assess the extent of how different types of employment contracts affect women's enjoyment of health and safety provisions in relation to maternity such as transfer to a safe workplace during pregnancy or breastfeeding support. It may be that the women with a more insecure or vulnerable employment status are more likely to leave the labour market, at least temporarily, as a consequence of pregnancy and maternity. Including access to maternity protection and benefits, in cash and kind, for all women regardless of their employment status is therefore an important measure of efforts to expand social protection.

In all three countries covered here, self-employed women have full access to maternity protection legislation through their inclusion in the statutory social security schemes. In this sense, all three countries are good practice examples by international standards. In addition, while not a major group on the labour market in both countries, it is still noteworthy that domestic workers in the Czech Republic and France are explicitly included in maternity protection coverage (International Labour Office 2010).

Monitoring implementation

While it seems fair to claim that a large majority of women in the three countries have access to high levels of maternity protection by international standards, it should also be noted that monitoring the implementation of maternity protection provisions is always a challenge (International Labour Office

2010). Assessing if mothers indeed enjoy the leave and benefits they are entitled is only possible on the basis of a close look at workplace practices, supplemented by court records, as well as information coming from trade unions and legal councillors.

There is some evidence, for example, that women find the breastfeeding support provided for by maternity protection laws inadequate or impractical. In 2009, the French Academy of Medicine found current regulations supporting breastfeeding in the workplace to be unrealistic and not implemented (French National Academy of Medicine 2009). The Academy therefore recommended that postnatal maternity leave should be prolonged up to six months for mothers to breastfeed. However, breastfeeding rates have been low in France for a long time, and it is far from clear that women's preferences regarding breastfeeding depend on leave policies or workplace support: Iceland, for example has high breastfeeding rates without special legislation on the topic.

Increasing the take-up of benefits by fathers remains a challenge

Globally, awareness for the need to ensure greater involvement of men in reproductive and care work has increased tremendously in recent years (Hobson 2002). Low involvement of men in care and reproductive work is considered a key obstacle to gender equality: The fact that the responsibility for the direct care involved in the upbringing of children is overwhelmingly shouldered by women continues to be a central factor limiting women's career progress and income equality (Fatherhood Institute 2010).

In this context it is central that governments develop policies that, on the one hand, allow fathers to take time off from their workplaces to spend time with their children and, on the other hand, stimulate greater interest of fathers to make use of available leave and benefit entitlements. While the take-up of paternity and parental leave by men has been increasing over the last years, it is still low across Europe, with some positive exceptions in the Nordic countries. When entitlements to (paid) parental leave are family based (i.e. it is left to the family to decide who takes leave), it is more often the mother who uses the larger portion of the leave, if not the whole (International Labour Office 2010: 118).

A critical factor in the take-up rates of parental leave and other family-friendly benefits of both women and men is whether or not leave is paid (Hein 2005). The effect is even stronger in the case of take-up by men. In practice, most leave is taken by women, but the duration of leave often depends on the availability

and level of a cash benefit. In a Eurobarometer Survey in 2004 in the EU-15 Member States, 42 per cent of fathers gave as a main reason for their refusal to take parental leave the inadequate remuneration during the leave. 31 per cent of the fathers feared that taking parental leave would negatively affect their careers (Eurostat 2009).³⁸ Consequently, the low take up of leave perpetuates social expectations that it is mostly women who are in charge of childcare and that women will reduce their labour force involvement once they have children.

The three countries covered here differ significantly in the take-up of parental leave by men (see Table 5). While the data are scarce and not strictly comparable, it is fair to conclude that fathers' participation in leave entitlements is among the highest in all European states in **Iceland**. This is mainly a result of the Icelandic parental leave system which reserves a third of the overall leave as individual entitlement to a child's father (Eydal, Gíslason 2008, Gíslason 2007). In **France**, in turn, fathers' overall take-up is mainly a result of the short statutory paternity leave. In turn, fathers' take-up of parental leave is very limited (Fagnani, Letablier 2005). In the **Czech Republic**, where there is no individualised leave entitlement and no statutory paternity leave either, nor any incentives for fathers to participate in parental leave, the participation of fathers in parental leave is minimal (Wóycicka 2003, Kocourková 2010).

Table 5. Take-up of parental leave by fathers

	Iceland	France	Czech Republic
Percentage of fathers who take paternity/father-only leave	88.5 % of fathers for every 100 mothers taking some leave (2007) ⁴⁰	60 % – 67 %; that is ca. 2/3 of all eligible fathers (2003) ⁴¹	No statutory leave for fathers
Percentage of fathers who take parental leave		1-2 % of all parents taking leave ⁴²	1.4 % men among recipients of the parental allowance (2006) ⁴³ 1.6 % (2009) ⁴⁴

³⁸ Of the three countries covered here, unfortunately only France participated in the 2004 survey.

Percentage of leave taken by fathers	Roughly one third of leave days (101 days on average taken by men/181 days taken by women) (2007) ⁴⁵ 94 days on average taken by men/177 days taken by women (2009) ⁴⁶	No data available.	No data available
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Growing political attention has been dedicated to the development of appropriate measures to increase the take-up of leave by fathers. Yet gender role divisions and stereotypes, in particular those which imply “good” mothers, prove to be very persistent. Of the three countries, only **Iceland** has managed to substantially increase the parental leave period taken by fathers over time by introducing the non-transferable period of three months leave. In 2001, fathers took on average 17 per cent of total leave days used, while in 2007, fathers used an average of 35 per cent of all leave days used. In 2007, 88.5 per cent of fathers took a period of leave (paternity and/or parents’ joint rights) for every 100 mothers taking some leave (Einarsdóttir, Pétursdóttir 2010). Nevertheless, the distribution of take-up of the days that are not assigned to either parent beforehand continues to reflect a strong gender pattern: 21.2 per cent of fathers took some of the parents’ joint rights, while 93.1 per cent of mothers took some period of parents’ joint rights. And 16.4 per cent took less than their three months of designated parental leave (Einarsdóttir, Pétursdóttir 2010).

³⁹ It is impossible to calculate the number of parents on Parental leave because employers are not required to provide information about take-up. Statistics are limited to CLCA, and it is not possible to find out how many recipients of CLCA are also on Parental leave (Fagnani, Boyer 2010).

⁴⁰ Einarsdóttir, Pétursdóttir 2010

⁴¹ 60 % is the figure given by Fagnani, Boyer 2010 (for 2003), whereas Bauer, Penet 2005 (Study “Congés autour de la naissance” based on interviews with 2000 mothers and 2000 fathers) estimate 67 %.

⁴² Women make up 98-99 per cent of parents taking leave, as Fagnani, Boyer 2010 show.

⁴³ Kocourková 2010

⁴⁴ Statistical Yearbook of the Ministry of Labour and Social Affairs 2009, data provided in a personal communication by Vera Kuchařova, Research Institute for Labour and Social Affairs, March 2011

⁴⁵ Einarsdóttir, Pétursdóttir 2010

⁴⁶ Statistics Iceland – Statistics: Health, social affairs and justice: Social Insurance (www.statice.is)

Even in **Iceland**, social norms influence decisions over leave, as Gíslason explains: “The environment puts pressure on mothers to use as much of the parental leave as possible and those who don’t comply feel the disbelief and disapproval from those near them” (Gíslason 2008: 97). Similarly, a study on **France** emphasizes the gendered dynamics of intra-family discourses and decision-making as a key factor for men’s reluctance to use leave entitlements (Gíslason 2008). In the **Czech Republic** the Ministry of Labour and Social Affairs in 2006 supported a public campaign about fathers on parental leave (see Box 9). While generating important public debates, it did not yield a measurable effect.

Box 9. Documentary TV about fathers on parental leave in the Czech Republic

Since May 2006, a series of short documentary films on parental leave were shown, initiated by the Czech Ministry of Labour and Social Policy and screened by Czech Television. It included some that documented the life of a few fathers on parental leave. The show reached a broad audience in the Czech Republic. It raised much-needed public attention to the fact that some men indeed take advantage of their equal right to parental leave. Moreover, the show provided evidence against widespread prejudices that men could not take over more caring responsibilities because of some inherent difficulties to accomplish all care- and household-related tasks. In their own words, men could talk about their situation, and thereby contribute to the public debate about gender relations. It also became clear that often economic considerations of families have a strong influence over decisions about the division of parental leave between mother and father.

High-quality affordable childcare facilities and family-friendly workplaces are key

Parental employment, in particular the employment of both parents, depends to a significant extent on the accessibility and affordability of high quality childcare and after-school care institutions, as well as other support that parents receive at the workplace. If childcare facilities are not accessible or affordable, parents cannot choose freely how long to stay home with their child or when to resume employment – regardless of entitlements to parental leave. Because of the prevalent gender division of labour, it is overwhelmingly women

who stay out of the workforce, if childcare services are limited, not affordable, or do not meet parent's expectations in terms of the quality of services offered. In addition, the level of parental fees for childcare also has an impact on the demand for childcare services (Mareš 2004).⁴⁷

Surveys in the **Czech Republic** have indicated that parents perceive the access to affordable and quality childcare services as a main issue of concern in their decision-making about a return to the workplace (Mareš 2004, Sirovátka 2004). In general, however, data about parental preferences regarding care options, childcare services, length of leave etc. are difficult to compare between countries. In the Czech Republic, for example, one can only conclude that parents would be interested in childcare services for children younger than three years of age, because places for two-years olds in childcare facilities are scarce. In addition, a study on "Employment and care for small children in the view of parents and employers" in 2006 showed that "inadequate nursery, kindergarten, and similar services" and "lack of transportation options" were perceived as key problems in the reconciliation of employment and family life. In addition, especially mothers criticised the lack of part-time/flexible work opportunities pointing to the lack of support from employers toward mothers of young children (Sirovátka 2004).

⁴⁷ A comprehensive analysis of developments in the field of childcare in the three countries is beyond the scope of this study. Instead, see, for example European Foundation for the Improvement of Living and Working Conditions 2009.

Policy implications of the three-country comparison

Work-family reconciliation policies, as is widely agreed, are key instruments for the promotion of gender equality at home and in the labour market. Measures to facilitate work-family reconciliation serve to “improve the quality of life for both women and men and increase labour force participation” (Eurostat 2009). Fortunately, today, the reconciliation of work and family life is found among the main topics on the social policy agendas throughout Europe. It follows logically from the need for well-furnished maternity protection and benefits.⁴⁸

Family-friendly measures and reconciliation support in the interest of gender equality require an encompassing package of measures, including maternity protection, job-protected parental leave, early childhood education and care services and out-of-school care services, flexible work schedules and other family-friendly support at the workplace (OECD 2008). If various benefits and services are available, families can plan their work and family commitments more easily. But a variety of benefits and services also has advantages for employers, as they can make reasonable plans about whether and when employees will return to their workplaces.

Along these lines, the comparison of maternity protection and family-friendly policies in France, Iceland and the Czech Republic reveals a number of important points for consideration for ongoing and future policy debates:

- Maternity protection legislation is a key instrument to ensure women’s participation on the labour market without fear of discrimination because of family plans. Public policy should, however, strike a careful balance between protecting women’s reproductive function and address the needs of breastfeeding mothers, while not supporting discrimina-

⁴⁸ Work-family reconciliation, or work-life balance, however, not only concerns the needs of parents. Employees who are not parents (or no longer have small children) may also have family/care responsibilities and a range of other needs regarding their quality of life.

tory and overprotective attitudes against women. Over the years, a strong consensus has developed that with the exception of standards and benefits related to maternity protection, all other special protective measures are contrary to the objectives of equal opportunities and equal treatment of men and women.⁴⁹

- Access to maternity protection and benefits in cash and in kind should be available for all women, particularly for groups of women with marginal or precarious labour market positions. Not enough is known about the impact of an increase in precarious employment for some groups of women on their maternity protection. But the three countries covered here are positive examples with respect to the availability of maternity protection for self-employed women.
- Maternity benefits in all three countries are covered from social security. This is in line with the international consensus that maternity benefits as well as family-friendly measures at the workplace should be funded in ways that do not place the burden exclusively on the employers' shoulders. Otherwise, employers are more likely to discriminate against women in the hiring process, or are hesitant to become more family-friendly. Funding maternity benefits from statutory social security and finding incentives for family-friendly measures, such as tax incentives, are therefore important to promote the effective implementation of maternity legislation and to expand family-friendly measures at the workplace.
- Mechanisms to ensure compliance with existing maternity protection legislation are needed, and legal recourse has to be available for women and men who see their rights violated. Support for pregnant and breastfeeding mothers should be tailored to their needs, which may depend on specific workplace conditions. At the moment, the available information about implementation gaps in maternity protection and family-friendly policies in the three countries is limited.

⁴⁹ In 1989, the ILO Meeting of Experts on Special Protective Measures for Women and Equality of Opportunity and Treatment considered that "special protective measures for women alone in the case of dangerous, arduous and unhealthy work are incompatible with the principle of equality of opportunity and treatment unless they arise from women's biological condition" and recommended that, in so far as future ILO action is concerned, "there should be a periodic review of protective instruments in order to determine whether their provisions are still adequate in the light of experience acquired since their adoption and to keep them up to date in the light of scientific and technical knowledge and social progress" (ILO 1989).

- In Europe, governments have become increasingly concerned about the ageing of the population on the one hand, and about the need to increase or sustain employment rates, on the other. In the past, it was argued that an inverse relationship existed between fertility and women's employment participation. However, more recent evidence shows that if social norms about working mothers change, and if there are policies that support a combination between childrearing and female employment (e.g. parental leave, availability of childcare, and opportunities for flexible hours and part-time employment), there can be a positive relationship between women's participation and fertility (Boeri et al. 2005, OECD 2008). Iceland and France are examples to confirm this positive link between women's employment and fertility. But also in the Czech Republic, observers have argued that, albeit slowly, growing attention to family support measures has contributed to increasing fertility (in addition to the shift of women's fertility to a later age) (Kocourková 2009).
- Countries face the challenge of balancing parental preferences (with respect to childcare and employment) and the long-term consequences of extended absences from the labour market: Long leaves (in a majority taken by women) contribute to women's lower overall employment rates and lower earnings, and have an impact on women's career prospects. Parents are not having real freedom to choose to return to work unless childcare institutions were accessible, affordable and of a quality that meets parental preferences. The OECD has therefore concluded that "Good parental leave schemes give parents *choice* in their return-to-work decision, and allow *flexibility* in taking leave entitlements" (OECD 2008:21, my emphasis). Flexible leave schemes allow parents, for example, to return to work after a shorter period, possibly on a part-time basis, without loss of overall leave entitlements.
- In the interest of women's economic security, it is important that leave systems do not lead women to leave the labour market for extended periods of time, and that leave systems promote a greater take-up of leave by men. Where extended childcare leave and a traditional gender role division in the care for young children are preferred by a significant part of the population (as seems to be the case in the Czech Republic⁵⁰), the longer-term consequences of extended leave need to be publicly debated, and conditions need to be in place for all those parents/mothers who do not choose the "traditional" model if the government is truly

committed to promote gender equality. To the contrary, the current leave/benefit set-up in the Czech Republic may be an example of a system that offers some incentives for an earlier return to the labour market (higher benefits are paid during shorter absences from employment; and employment is possible while collecting parental allowance). However, little improvement is visible with respect to the development of childcare institutions for children under three years of age.

- Regardless of parental preferences and gendered norms that influence family decision-making, the OECD claims that benefit and tax systems should strengthen incentives for parents to return to work rather than keeping the incentives that lead to long – or irreversible – absences from the labour market (OECD 2008). Tax/benefit systems should be designed so as to give both parents equally strong financial incentives to work and to enhance women’s economic security (Dingeldey 2001).
- Combining work and family responsibilities is a particular challenge for most single parents, a majority of them women. They are especially in need of comprehensive support systems, in particular childcare support, in order to be able to participate in the labour market. Benefit packages in the three countries under study here so far appear to not have addressed the poverty risk of single-parent households, as the high poverty rates illustrate.
- In the interest of gender equality, it is essential that policy encourages fathers to take up more responsibility for the care of children. Provision of paternity leave, as well as the individualisation of leave entitlements through the introduction of non-transferable parental leave for fathers has proven to be important instruments to that end. However, paternity leave systems differ between countries, and conclusive lessons from a comparison of the various systems are difficult to draw, not the least because in all systems, even in the most advanced Nordic countries, change has been slow to come on the side of fathers. Of the three countries covered here, significant progress in that direction is visible in Iceland and to some extent in France (though mostly with respect to paternity leave). In the Czech Republic, in turn, policy has not yet adapted to the European trends toward greater paternal engagement (Gíslason 2007, Fagnani, Letablier 2005, Wóycicka 2003). Nevertheless, a greater involvement of fathers is a *sine qua non* to break the vicious circle of a more limited labour market presence of women leading to employers’ perception of women as less committed to their career.

- Trade unions as well as national bodies for gender equality and women's organisations (and men's organisations, where they existed), as well as the media have played key roles in preparing the ground for father-specific policies, or increasing their public acceptance. In the Czech Republic, for example, discussions about fathers' use of parental benefits have been controversial, provoking even ridicule. In such a context, there is a risk that better entitlements of men do not result in de-facto change because of a lack of public acceptance. Public campaigns on family policy in the Nordic countries have therefore included significant attention to the promotion of a greater role of men in family matters. The above-mentioned TV documentary in the Czech Republic which was supported by the Ministry of Labour and Social Policy also falls into this rubric.
- Social protection through collective agreements, as well as individual employers – possibly with governmental encouragement – have a crucial role in the creation of family-friendly work environments and ensuring a safe and healthy workplace for all. Provisions for pregnant and breastfeeding women are key, but so are the provisions available for all employees, including providing for part-time and flexible working hours, home- and tele- working, or childcare support (Hein 2005). At the same time, the role of public support for employers in their efforts to introduce family-friendly measures should not be underestimated.
- The financial and administrative arrangements in place to pay for childcare and out-of-school care, as well as quality standards (regarding health and safety, student-teacher ratios, levels of qualification of staff, learning standards, the supervision of facilities etc.) are of major importance for the ability of parents to reconcile their family responsibilities with their labour market roles. In particular, child care services for small children have to move to the centre of political attention: Child-care services need to be accessible, affordable and reliable, so that parents have in fact a real choice when it comes to deciding who should care for their small child, and how such care should be organised. Efforts to increase the quality, accessibility and affordability of childcare institutions need to go hand in hand with measures addressing the needs and rights of children as well as parents (OECD 2008).

Concluding remarks

The comparison of maternity protection and family-friendly policies in France, Iceland, and the Czech Republic has revealed the similarities and differences in the three countries' approaches. All three countries offer high levels of maternity protection, with respect to the scope of the legislation, the level of benefits, health and safety provisions and the protection of employment rights.

Larger differences between the three countries are visible with respect to family-friendly measures and work-family reconciliation policies in the interest of gender equality. The international trend toward policy support for both parents' employment and incentives toward a more equal sharing of care responsibilities is most closely reflected in Iceland. In turn, France offers significant support to women's employment and economic independence, particularly through a wide system of childcare and after-school care institutions. However, policy changes in recent years seem to have moved the country a bit away from that commitment to public care institutions, in favour of home-care for small children (through parents or family-based childcare professionals) and support for longer leave. The promotion of greater gender equality in the division of care responsibilities through policy measures directly addressing men has not been a strong policy priority in France in recent years. Of the three countries, the Czech Republic, in policy and popular practice, adheres to the most "old-fashioned" model of work-family reconciliation: Extended leaves are available, which are overwhelmingly taken by women. The use of childcare services is very high for the pre-primary years, but very low for younger children. No special policy measures promote the greater involvement of men in early childcare. However, the country has in recent years introduced reforms that now allow a certain measure of flexibility in the leave/benefit system and grants a generous entitlement to paid work to a parent (de facto, most often a mother) on parental leave.

All three countries reflect a shift in policy focus and rationale in Europe, with a strong movement from policies focused at mothers and their caring roles toward policies focused at parents and at work-family reconciliation policies more broadly conceived (Kamerman, Moss 2009). Thereby, gender equality has progressively moved more toward the centre of attention in family policy.

Nevertheless, maternity protection continues to be a key precondition for women's participation in employment on a basis of equal opportunities and non-discrimination. It is a condition for the realisation of women's fundamental human right to live free of discrimination and harassment. To effectively address women's employment discrimination, links between non-discrimination legislation/policy and maternity protection need to be strengthened, conceptually as well as with respect to monitoring the implementation of existing legislation and policy.

With respect to men, policy attention has in recent years focused on measures to "permit, encourage, or even compel" (Kamerman, Moss 2009: 263) men to take leave and to take up a greater share of family responsibilities and unpaid care work. Admittedly, the success of these measures has varied, depending on the design of the policy measures as well as a host of other social and cultural factors. The examples of father-specific family policy measures illustrate the persistence of traditional gender norms and relations as well as the significance of cultural and institutional contexts in the development and reform of family-friendly policies. It also highlights that good practice examples with respect to the promotion of gender equality through family-friendly policies certainly influence national policy debates, but may not always be instantly transferable to another country.

The international policy trend toward equal treatment of women and men in work-family reconciliation policies is clear, however. Because of the persistently unequal distribution of unpaid care work responsibilities between women and men, the majority of beneficiaries of family-friendly policies remains to be women – yet this is so as a matter of fact, and not of principle. Protective measures for women at the workplace cannot be linked to their gender *per se*, but to specific situations of need for specific support, such as pregnancy and breastfeeding – while general health and safety standards should be high for all workers, women and men.

Moving toward gender equality in work-family reconciliation policy implies that special attention is required for the development and implementation of policy measures that can exert a positive impact on men with respect to enhancing their family roles. Reviewing the available experiences with male-targeted family-friendly policy measures and formulating applicable policy recommendations promise to be a rich enterprise for some time to come.

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Annex 1. Maternity protection and family-friendly policies in Iceland, Czech Republic, France

	Iceland	Czech Republic	France
Maternity leave and benefits	Faedingarorlof¹	Materska dovolena	Congé de maternité
Duration	13 weeks ²	28 weeks ³	16 weeks/26 weeks ⁴
Multiple births	26 weeks ⁵	37 weeks ⁶	34 weeks (twin births) / 46 weeks (other multiple births) ⁷
Adoption leave	13 weeks ⁸	22 weeks ⁹	10 weeks ¹⁰
Mandatory maternity leave period	No mandatory leave	If taken, may not be terminated or interrupted before six weeks after childbirth ¹¹	8 weeks, of which at least 6 weeks must be taken after childbirth ¹²
Recommended maternity leave period	At least the first 2 weeks after the birth ¹³	Shall never be shorter than 14 weeks ¹⁴	
Leave prior to birth	4 weeks ¹⁵	6 weeks ¹⁶	6 weeks ¹⁷
Leave after birth	9 weeks	22 weeks	10 weeks
Scope	All employed or self-employed women workers ¹⁸	Employed persons. Self-employed persons insured under "Old-Age, Disability, and Survivors". ¹⁹ The mother of the child or the child's substitute caregiver (substitute caregivers may include men). ²⁰	All persons employed on the basis of a contract of employment in the private and public sectors, in the liberal professions, trade unions and associations of all kinds and domestic workers. ²¹

	Iceland	Czech Republic	France
Benefit	80 per cent of the average wage or income during the last 2 years before the year of the child's birth with a ceiling ²³	Daily benefit is 60 per cent of the daily assessment base with a ceiling. ²⁴	Self-employed persons who are compulsorily insured with the sickness and maternity insurance scheme for the self-employed. ²²
Employment guarantee	It is not permitted to dismiss an employee due to the fact that she/he has given notice of intended maternity/paternity leave or during the leave, without reasonable cause (in such case the dismissal shall be accompanied by written arguments). The same rule applies to pregnant women, and women who have recently	Employer may not dismiss a female employee while she is pregnant or on maternity leave or while a female or male employee is on parental leave. ²⁸ If a female employee returns to her job upon termination of the maternity leave, or a male employee upon termination of the parental leave, the employer is required as-	Dismissal is prohibited during pregnancy, where this has been medically certified, during maternity leave and during the period of paid adoption leave, as well as during four weeks after the end of maternity and adoption leave. ³¹ At the end of maternity leave, paternity leave, adoption leave (including the period of unpaid adoption leave) and parental leave or period of part time work, the employee

	Iceland	Czech Republic	France
Financing of benefits	<p>given birth.²⁶ The employee shall be entitled to return to his or her job upon the completion of maternity/paternity leave or parental leave. Should this not be possible, he or she shall be entitled to a comparable position with the employer according to the employment contract.²⁷</p> <p>Social Security: Maternity/Paternity Leave Fund³³</p>	<p>sign their original work and workplace to them again. If that is impossible because the work has ceased or workplace has been cancelled the employer shall assign another work to them, corresponding to their employment contract.²⁹ A maternity compensation benefit may be paid.³⁰</p> <p>Social Security: Sickness Insurance</p>	<p>has the right to return to the his/her previous work, or to a similar job remunerated at least at the same rate. In addition the employee is entitled to wage adjustments rates granted during her/his leave period.³²</p> <p>Social Security: Health Insurance Funds</p>
Right to nursing breaks	–	<p>Two half-an-hour breaks (per each child) per shift until the end of one year of child's age and one half-an-hour break per shift in the following three months.³⁴</p>	<p>Breaks of one hour per day during working hours (one year)³⁵</p>

	Iceland	Czech Republic	France
Paternity leave	"Fedraorlof"³⁶	-	Congé de paternité
Duration	13 weeks as paternity or parental leave reserved for the father ³⁷	No paternity leave. Paid time off for husband or cohabitee at childbirth to transfer the woman to hospital and back. Unpaid time off for the father to attend the birth. ³⁸ The father may use a portion of the maternity leave. ³⁹	11 consecutive days ⁴⁰ + 3 days paid leave for family reasons ⁴¹
Scope	Every employed or self-employed worker ⁴²	-	All persons employed on the basis of a contract of employment in the private and public sectors, in the liberal professions, trade unions and associations of all kinds. ⁴³ Self-employed persons who are compulsorily insured with the sickness and maternity insurance scheme for the self-employed. The beneficiary must be the child's natural father. ⁴⁴

	Iceland	Czech Republic	France
Benefit	80 per cent of the average wage or income during the last 2 years before the year of the child's birth with a ceiling ⁴⁵	–	100 per cent of the daily wages up to a ceiling fixed by social security, calculated on the basis of the three preceding monthly wages (after deduction of social contributions) ⁴⁶
Financing of benefits	Social security: Maternity/Paternity Leave Fund ⁴⁷	–	Social Security: Health Insurance Funds
	Iceland	Czech Republic	France
Parental leave	Foreldraorlof ⁴⁸	Rodicovska dovolena	Congé parental
Duration	13 weeks: leave granted until the child is 3 ⁴⁹ + 13 weeks unpaid leave granted until the child is 8	Paid leave available up to the child's third birthday. ⁵⁰ Leave is an individual entitlement – can be taken by both parents simultaneously, but only one is entitled to cash benefit. ⁵¹	Leave granted until the child is 3. ⁵² Parents can decide every year if they renew the leave.
Scope	All employed or self-employed workers. ⁵³ May either be taken by one of the parents or divided between them. ⁵⁴	The mother of the child upon termination of the maternity leave and the father as of the child's birth date. ⁵⁵ A parent who personally and duly cares	Mother and father. All persons employed on the basis of a contract of employment in the private and public sectors, in the liberal professions, trade unions and associations of all kinds

	Iceland	Czech Republic	France
Benefit	80 percent of the average wage ⁵⁹ / Grant for working less than 25% time ⁶⁰	for a child who is the youngest in the family. ⁵⁶ Parental allowance: The value of the allowance varies according to the length of the leave. ⁶¹ Higher benefit for 2 years; medium benefit for three years; lower overall benefit for four years.	and domestic workers ⁵⁷ At least one year on seniority in the enterprise at the date of birth of the child or at the date of the arrival in the household in case of adoption. ⁵⁸ Infant Accommodation Benefit (Prestation d'accueil du jeune enfant – PAJE) contains several benefits: Childcare benefit CLCLA ("Supplement for Free Choice of Working Time"): flat-rate benefit paid to all families who meet the eligibility criteria whether or not they take parental leave. For parents with one child: until six months after the end of maternity leave; in others until child is 3 years old. Payment varies depending on how much a parent works during this time: Parents receive €553/month if they take full leave. Reduced benefit if parent works part-time. ⁶²

	Iceland	Czech Republic	France
			<p>COLCA ("Optional Supplement for Free Choice of Working Time")⁶³: flat-rate benefit (790 Euro) for families with at least 3 children if one parent stops working completely. Paid for one year. Large families can choose between CLCA and COLCA.</p> <p>Allowance supporting the freedom of choice of childcare (Complement de libre choix de mode de garde) Paid for children younger than age 6 if the parents are working and pay for child care by an accredited caregiver or home worker. Amount of benefit depends on the parent/couple income and on the age of the child.⁶⁴ The parents' contribution to the child caregiver's salary must not be less than 15%.</p>
Financing of benefits	Social Security ⁶⁵	State social support system ⁶⁶	The National Fund for Family Allowances (CNAF) ⁶⁷

	Iceland	Czech Republic	France
Birth grant			
Scope		Low-income families ⁶⁸ , residing permanently in the Czech Republic ⁶⁹	Single parents or couples with an income up to a certain ceiling.
Which children		For the first child, and other child(ren) born together with it: ⁷⁰	For each child, incl. adopted. ⁷¹ In case of multiple births/adoptions, benefit is paid for each child.
Birth grant	–	13,000 koruna for the first live-born child. In case of multiple birth: 19,500 koruna. ⁷²	€ 903.07 are paid at the start of the 7th month of pregnancy (€1,806.14 for an adopted child) ⁷³
Financing of benefits		State social support ⁷⁴	Caisse nationale des allocations familiales
Other family benefits			
General family allowances	Child benefit (income-tested) ⁷⁵ ,	Child allowance (income-tested+)	Young Child benefits with several components. ⁸¹ – basic allowance (see below)

	Iceland	Czech Republic	France
	<p>Child education grant⁷⁶ and social allowances (means-tested)⁷⁷</p> <p>Flat-rate benefits as tax reduction for families with income below a certain level</p> <p>All benefits paid for children below age 18⁷⁸</p>	<p>A flat-rate amount is paid according to the child's age⁸⁰</p>	<ul style="list-style-type: none"> - supplement for reduced work (see "Parental leave"), - supplement for child care - parental allowance for a sick child - special allowance for a disabled child - single-parent allowance (see below), - orphan / abandoned child allowance - a new school year allowance (means- tested), - family supplement (means-tested) - housing allowance (means-tested) - home moving allowance. <p>Basic family allowance: monthly benefit (€177.95) during the first three years⁸². The benefit can only be paid simultaneously for more than one child if they were multiple births. Eligibility on a means-tested basis that includes approximately 90 percent of families⁸³: The total family income must not exceed a</p>

	Iceland	Czech Republic	France
Single-parent allowance	Higher supplement to annual (income-tested) child benefit for single parents	Preferential treatment of a single parent: longer benefit duration ⁸⁶	maximum that varies according to the number of children and family situation (a single person, a couple with a sole breadwinner, or a couple with two incomes). ⁸⁴ Benefit for families with more than one child (up to age 20) ⁸⁵
Birth grant	–	Means-tested lump sum of 13,000 koruna is paid for the first child, 19,500 CZK in the case of multiple births ⁸⁷	Means-tested Allocation de parent isolé (Single parent allowance) was available until 2009, has been replaced by the Revenu de solidarité active (RSA) which intends to ensure a minimum income. Means-tested lump sum of € 889.72 is paid for each child at the 7th month of pregnancy ⁸⁸ (€1,779.43 for an adopted child) ⁸⁹
Sick child benefit	Caring for a sick child ⁹⁰	Caring for a sick child ⁹¹	Caring for a sick child: “allocation journalière de présence parentale” (daily parental presence allowance) ⁹²

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Last access: Websites: 09/12/2010

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- ¹ The term *faedingarorlof* (literally 'birth leave') is used in law to refer to paid Maternity, Paternity and Parental leave. But in common parlance, the term is mostly used to refer to women's leave due to birth and childcare. When the father takes his leave, it is usually referred to as *fedraorlof* (Paternity leave). So even if the law makes no distinction between different types of leave taken by mothers and fathers, a distinction is made in everyday usage. (International Network on Leave Policies & Research, 2010: Iceland)
- ² Act on Maternity/Paternity Leave and Parental Leave, Act No. 95/2000, as last amended by Act. No. 173/2008, § 8
- ³ Labour Code No. 262/2006, *Sbirska zakonu*, 2006-06-07, *Castka* 84, pp. 3146-3241, Trade Links (English Translation), Coll. «*Zákoník práce*» Ministry of Labour and Social Affairs, Czech Republic, 236 p., § 195(1).
- ⁴ Labour Code (Code du Travail) No. 73-4 dated 2 January 1973, *Journal officiel*, 1973-01-03, § L1225-17. For the third and each subsequent child the duration is extended to 26 weeks (eight weeks before and 18 weeks after the expected birth) (Labour Code § L1225-19).
- ⁵ Parents shall be entitled to a joint maternity/paternity grant for an additional three months for each child born live after the first in a multiple birth (Act on Maternity/Paternity Leave and Parental Leave, Act No. 95/2000, as last amended by Act. No. 134/2009, § 21: http://eng.felagsmalaraduneyti.is/media/acrobat-enskar_sidur/Act-on-maternity-paternity-leave-with-subsequent-amendments.pdf)
- ⁶ Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration
- ⁷ Labour Code § L1125-18
- ⁸ Act on Maternity/Paternity Leave and Parental Leave § 8
- ⁹ 22 weeks when the female employee has taken a child into foster care, 31 weeks for two or more children (Labour Code, Section 197, § 2)
- ¹⁰ Labour Code § L1225-37. If the adoption brings the total number of children in the family to three or more, the duration of the leave is 18 weeks. In case of multiple adoption the leave is extended to 22 weeks (same §). If a child is adopted by a couple where both parents are employed, adoption leave is extended with 11 days (18 days in case of multiple adoption) on the condition that the leave is shared between the two parents (Labour Code §§ L1225-40, L1225-42).
- ¹¹ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>
- ¹² Labour Code § L1225-29
- ¹³ Act on Maternity/Paternity Leave and Parental Leave § 8
- ¹⁴ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>
- ¹⁵ Act on Maternity/Paternity Leave and Parental Leave § 8
- ¹⁶ Woman has no possibility to extend postnatal leave period by taking a shorter prenatal leave, but postnatal period is extended if child is born earlier than estimated (up to a total of 28 weeks) (Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>)
- ¹⁷ At her request and if her state of health as certified by a medical practitioner allows it, the woman may reduce the prenatal leave up to 3 weeks with a corresponding increase of postnatal leave. (Labour Code § L1225-17). For mothers who have given birth to their third child (or have already two children at home) the eight weeks' period of prenatal leave may be extended by two weeks with a corresponding reduction of postnatal leave.
- ¹⁸ Act on Maternity/Paternity Leave and Parental Leave § 1. Both parents must have been working in Iceland for at least 6 consecutive months before the first day of parental leave (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration). This grant, sometimes called "birth grant", is not to be mistaken for the "birth grant" specified below under the topic "Other family benefits".
- ¹⁹ Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration
- ²⁰ The insured must have at least 270 days of coverage in the 2 years before childbirth and have reported a loss of earnings. Self-employed persons must have at least 180 days of coverage in the year before childbirth. The mother must have undergone medical examination to confirm the pregnancy. (Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration)

- ²¹ Labour Code § L1211-1 and Collective Agreement Regarding Domestic Workers of 24 November 1999, extended by decree of 2 March 2000 (JO of 11 March 2000), § 23. The insured must have at least 10 months of coverage and 200 hours of employment in the 3 months before certification of pregnancy (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration).
- ²² Social Security Code (Code de la sécurité sociale), consolidated text, consulted November 2009, §§ L311-2, L311-3. Female job seekers receiving, or who have received, an unemployment benefit during the last 12 months or who have ceased work within the last 12 months are eligible for the cash maternity or adoption benefit based on their last wage (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration).
- ²³ Act on Maternity/Paternity Leave and Parental Leave § 13. Eighty per cent of earnings for earnings lower than ISK200,000 (€1,260) per month. Seventy-five per cent of earnings over ISK200,000 up to a ceiling of ISK300,000 (€1,890) per month. The payment to a mother working shorter part-time hours, i.e. between 25 and 49 per cent of full-time hours, is at least ISK65,227 (€410) per month; and for a mother working longer hours, at least ISK91,200 (€575). (International Network on Leave Policies & Research, 2010: Iceland) 49,702 kronur (€313) a month is paid to parents working less than 25% time. The grant for a parent attending a full-time education program is 113,902 kronur (€716) a month. (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration).
- ²⁴ The daily assessment base is calculated as a percentage of the insured's gross earnings: 90% of gross earnings up to 790 koruna (€33) plus 60% from 791 koruna (€33) to 1,185 (€49) koruna plus 30% from 1,186 (€49) to 2,371 koruna (€98). The maximum gross earnings used to calculate the daily assessment base are 2,371 koruna (€98). The maximum daily benefit is 783 koruna (€33). (Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration)
- ²⁵ Social Security Code §§ L331-3, L331-4, L331-5, L331-6, R323-4. The maximum monthly earnings used to calculate benefits are €2,885. The minimum daily benefit is €8.63. The maximum daily benefit is €77.24. Maternity, paternity, and adoption benefits are adjusted annually. (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration).
- ²⁶ Act on Maternity/Paternity Leave and Parental Leave § 30
- ²⁷ Act on Maternity/Paternity Leave and Parental Leave § 29
- ²⁸ Labour Code No. 262/2006 Coll. «Zákonik práce» (Section 53/1/d)
- ²⁹ Ministry of Labour and Social Affairs of the Czech Republic : <http://www.mpsv.cz/en/1607>
- ³⁰ Paid for a loss of income resulting from a change of employment because of the pregnancy or childbirth. The benefit is the difference between the earnings before and after job transfer. The benefit is paid from the transfer day until maternity leave begins; after childbirth, the benefit is paid from the day of returning to the usual job until the end of the 9th month after the date of childbirth (Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration).
- ³¹ Labour Code § L1225-4
- ³² Labour Code §§ L1225-25, L1225-26, L1225-36, L1225-43, L1225-44, L1225-46, L1225-55
- ³³ Act on Maternity/Paternity Leave and Parental Leave §§ 4, 13.
- ³⁴ If a woman works reduced working hours, for at least one half of the statutory weekly working hours, she is entitled to only one half-an-hour break per each child until the end of one year of child's age. Rest intervals for nursing shall be calculated as part of the working hours and wage compensation is paid at the average earnings amount. (Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>)
- ³⁵ Labour Code § L1225-30
- ³⁶ See annotation 1
- ³⁷ Act on Maternity/Paternity Leave and Parental Leave § 8. (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration). Fathers can take their leave wholly or partially at the same time as the mother, or wholly or partially after the mother's leave, i.e. as a parental leave. If both parents take leave simultaneously, they also receive their parental benefits simultaneously. (Haataja 2009, p. 7).
- ³⁸ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>

- ³⁹ From the start of the seventh week after childbirth, either parent may use the leave. This change was introduced by an amendment to the Sickness Insurance Act, implemented in January 2009. (International Network on Leave Policies & Research, 2010: Czech Republic)
- ⁴⁰ 18 consecutive days in case of multiple births (Labour Code § L1225-35). Paternity leave should be used during the 4 months that follow the birth (Labour Code § D1225-8).
- ⁴¹ Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration
- ⁴² Act on Maternity/Paternity Leave and Parental Leave § 1. The right of paternity leave shall be conditional on the fact that the father himself has custody of the child, or has joint custody with the other parent at the beginning of the paternity leave (same act, §§ 8, 9).
- ⁴³ Labour Code § L1211-1. The insured must have at least 10 months of coverage and 200 hours of salaried employment in the 3 months before the paternity leave period. Male job seekers receiving, or who have received, an unemployment benefit during the last 12 months or who have ceased work within the last 12 months are eligible for the cash paternity benefit based on their last wage. (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration)
- ⁴⁴ Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration
- ⁴⁵ Act on Maternity/Paternity Leave and Parental Leave § 13.) Eighty per cent of earnings for earnings lower than ISK200,000 (€1,260) per month. Seventy-five per cent of earnings over ISK200,000 up to a ceiling of ISK300,000 (€1,890) per month. The payment to a mother working shorter part-time hours, i.e. between 25 and 49 per cent of full-time hours, is at least ISK65,227 (€410) per month; and for a mother working longer hours, at least ISK91,200 (€ 575). (International Network on Leave Policies & Research, 2010: Iceland) 49,702 kronur (€313) a month is paid to parents working less than 25% time. The grant for a parent attending a full-time education program is 113,902 kronur (€716) a month. (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration).
- ⁴⁶ Self-employed fathers receive a daily flat rate for the duration of paternity leave, on condition that they stop all economic activity. Collaborating spouses of self-employed women are entitled to a replacement benefit if they stop working for at least 11 days and hire a person to replace them to carry out their usual professional and household activities (Social Security Code §§ L331-3, L331-8, L613-19-2, R323-4, D613-4-2, D613-6).
- ⁴⁷ Act on Maternity/Paternity Leave and Parental Leave §§ 4, 13
- ⁴⁸ "Foreldraorlof" refers to the unpaid leave; the 13 weeks leave granted until the child is 1,5 is translated into English by the Icelandic Ministry of Social Affairs and Social Security as "parents' joint rights". (International Network on Leave Policies & Research, 2010: Iceland)
- ⁴⁹ Act on Maternity/Paternity Leave and Parental Leave §§ 8, 24-25. In 2009, Parental leave was amended twice. The ceiling on payments was lowered and parents could also take leave until the child is 36 months old, when previously the leave had to be utilised before the child turned 18 months. This amendment was put in to compensate for the lower ceiling on payments. (International Network on Leave Policies & Research, 2010: Iceland)
- ⁵⁰ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>
- ⁵¹ Note that the parental allowance can be paid until the child is 48 months old, i.e. for about a year longer than the parental leave.
- ⁵² Labour Code §§ L1225-47, -48
- ⁵³ Act on Maternity/Paternity Leave and Parental Leave §§ 1, 8, 24
- ⁵⁴ Act on Maternity/Paternity Leave and Parental Leave §§ 8, 24-25. Lesbian and homosexual couples can apply for leave (International Network on Leave Policies & Research, 2010: Iceland)
- ⁵⁵ A female and male employee may both take parental leave at the same time (Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>). They can alternate in receiving benefits as often they want ((International Network on Leave Policies & Research, 2010: Czech Republic).
- ⁵⁶ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1603>
- ⁵⁷ Labour Code § L1211-1
- ⁵⁸ Labour Code § L1225-47. Eligibility for CLCA becomes more restrictive the fewer children a parent has: for example with three children the eligibility condition is to have worked for two out of the

- five years preceding birth (two out of the four years for parents with two children) but with only one child it is necessary to have worked without break for two years preceding birth (International Network on Leave Policies & Research, 2010: France)
- ⁵⁹ Act on Maternity/Paternity Leave and Parental Leave §§ 13, 18 and 19. See benefits for maternity and paternity leave. Persons who are not active in the labour market and parents attending full-time educational programmes are also eligible for a maternity grant. (Social Security Act, Act No. 117 on social security, dated 16 December 1993 (Stjórnatidindi, 1993), as amended up to Act No. 53 of 2005 (Stjórnatidindi, 2005), §§ 15-16).
- ⁶⁰ Maternity or paternity grants of 49,702 kronur a month is paid to parents working less than 25% time (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration)
- ⁶¹ A parent may draw the parental allowance for a period of up to two, three or four years of the child. By selecting the period of support, the parent also selects the amount of the allowance: increased benefit rate (11,400 CZK) until the child is 24 months old; standard benefit (7,600 CZK) until the child is 36 months old; or basic benefit (7,600 CZK) until the child is 21 months old and reduced benefit afterwards (3,800 CZK) until the child is 48 months old. Once this decision has been made, the selected option cannot be changed and may not be paid retrospectively, even where the parents alternate their claim to parental allowance. The parent's income is not tested; the parent may carry out an occupational activity without losing their entitlement to parental allowance. However, during the period of this occupational activity, the parent must ensure that the child is in the care of another adult. (Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1603>)
- ⁶² €241.88 a month is paid if the insured person works less than half the normal working period (nonsalaried persons must work less than 77 hours a month) or €139.53 a month is paid if working between 50% and 80% of the normal working period (less than 122 hours a month for a nonsalaried person). The full rate is €374.17 a month; if the beneficiary is not entitled to the base allowance, the full rate is raised to €552.11; €419.83; or €317.48, according to the number of worked hours. The parent must have contributed to social insurance for at least 4 quarters in the 2 years before the child's birth for the first child, in the last 4 years for families with two children, or in the last 5 years for families with three or more children. (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration)
- ⁶³ Whether or not the parents choose to take parental leave, a basic family allowance is paid. See below. Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration)
- ⁶⁴ For instance, for a single parent, the minimum income required is approx. €400/month.
- ⁶⁵ Act on Maternity/Paternity Leave and Parental Leave §§ 4, 13
- ⁶⁶ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>
- ⁶⁷ http://www.cleiss.fr/docs/regimes/regime_france/an_index.html
- ⁶⁸ Families are entitled to the birth grant provided the family income in the calendar quarter prior to the birth of the child does not exceed 2.4 times the family's living minimum. (Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1603>)
- ⁶⁹ Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration
- ⁷⁰ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1603>
- ⁷¹ La Caisse nationale des allocations familiales (Cnaf): <http://www.caf.fr>
- ⁷² Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1603>
- ⁷³ La Caisse nationale des allocations familiales (Cnaf): <http://www.caf.fr>
- ⁷⁴ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1603>
- ⁷⁵ Flat-rate benefits are awarded as a tax reduction to families with children and income below a certain level. The benefit is assessed based on the previous year's income. The annual child benefit in 2009 is 61,191 kronur for children younger than age 7 at the end of the 2008 income year. In addition, married or cohabiting parents receive a supplement of 152,331 kronur for the first child and 181,323 kronur for the second and each additional child. Single parents receive a supplement of 253,716 kronur for the first child and 260,262 kronur for the second and each additional child. Income test: Benefits are reduced according to certain rules when income exceeds 3,600,000 kronur

- for married or cohabiting parents; 1,800,000 kronur for single parents. (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration)
- ⁷⁶ 21,657 kronur a month is paid to children aged 18 to 20 who are in full-time education or vocational training if one or both parents are deceased or an old-age or disability pensioner. (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration)
- ⁷⁷ Means-tested allowances help pay for certain living expenses such as housing. (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration)
- ⁷⁸ Child must be supported by person with unlimited tax liability in Iceland (Social Sec. Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration)
- ⁷⁹ Family income must not exceed 2.4 times the monthly living minimum. The monthly living minimum is defined as 3,216 koruna for an unmarried person; 2,880 koruna for the first adult in a family; 2,600 koruna for another adult in the family; 1,600 koruna for children younger than age 6; 1,960 koruna for children aged 6 to 15; and 2,250 koruna for children aged 16 to 26. Benefit paid for dependent children in education (up to age 26) or with disabilities (Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration)
- ⁸⁰ 500 koruna for a child younger than age 6; 610 koruna for a child aged 6 to 15; 700 koruna for a child aged 16 to 26. Child allowances are paid monthly (Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration)
- ⁸¹ Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration
- ⁸² This benefit is paid for a child born, adopted, or fostered after December 31, 2003.
- ⁸³ Ray 2008, p. 13
- ⁸⁴ Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration
- ⁸⁵ A family must have at least two children younger than age 20. A working child must not earn more than 55% of the legal minimum wage. €123.92 a month is paid for two children; €282.70 for three children; €441.48 for four children, plus €158.78 for each subsequent child. A supplement of €34.86 is paid for children older than age 11 and €61.96 for children older than age 16 (except for the first child in a two-child family). A flat-rate allowance of €78.36 a month is paid for up to a year to families with three or more children entitled to family allowances including one child who is age 20. The earnings of a working child must not exceed €819.82. (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration)
- ⁸⁶ Longer periods of benefit payment from the Sickness Insurance System for so-called lone employees (a man or a woman) (Section 10 (2) of Act No. 88/1968 Coll.): maternity benefit (benefit in cash) paid for a period longer by 9 calendar weeks to an unmarried, widowed, divorced or for other serious reasons lone woman who does not live with a (male) cohabitee, i.e. for a period of 37 weeks and 31 weeks, respectively. Under Section 12a benefit in cash is provided to a man (a male employee) who is single, widowed, divorced or for other serious reasons lone, who does not live with a (female) cohabitee, if he takes care of a child or a child whose mother has died. In this case, the benefit is awarded for 31 weeks. (National Centre of Social Studies 2005, p. 224) For a lone parent caring for a sick child the period for which this benefit is awarded is extended for up to 16 calendar days (National Centre of Social Studies 2005, p. 225).
- ⁸⁷ Families are entitled to the birth grant provided the family income in the calendar quarter prior to the birth of the child does not exceed 2.4 times the family's living minimum.
- ⁸⁸ To qualify, the expectant mother must prove that she has submitted to the first routine prenatal examination performed during the first 14 weeks of pregnancy.
- ⁸⁹ Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration
- ⁹⁰ Should a child need to stay in hospital for more than seven days directly following the birth, it is permitted to extend the parents' joint right to maternity/paternity leave by the number of days the child has to stay in hospital, prior to its first homecoming, by up to four months. It is also permitted to extend the parent's joint right to maternity/paternity leave by up to three months in the case of a serious illness of the child which requires more intensive parental attention and care. (Act on Maternity/Paternity Leave and Parental Leave § 17)
- ⁹¹ An employer shall excuse absence from work of a male/ female employee during provision of care to a sick family member and during provision of care to a child aged under ten that, for serious rea-

sons, cannot be placed in care of a child educational facility or school. A male/ female employee shall be not entitled to any wage compensation for that period, however will be entitled to the sickness insurance benefit as stipulated by special legal provisions. (Ministry of Labour and Social Affairs, Czech Republik: <http://www.mpsv.cz/en/1607>) Financial support for care of family members is awarded for a maximum of 9 calendar days, it amounts to 69 % of the daily assessment base (up to CZK 480 of the gross daily wage 90 %, between CZK 480 and CZK 690 of the gross daily wage 60 %, over CZK 690, it is not included into the calculation), the maximum base is CZK 558, i.e. CZK 386 per calendar day. (National Centre of Social Studies 2005, p. 225)

- ⁹² A parental allowance is paid for up to 310 days during a 3-year period to a parent who has fully or partially ceased employment to care for a seriously sick, injured, or disabled child. A recipient of the parental allowance for a sick child is not eligible for a supplement for reduced work or the special parental allowance for a child with a disability. (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration) The allowance is served without condition of prior professional activity, provided that the adult stops working. Its amount depends on the size of the family.

Annex 2. Main differences between Convention 183 and 103

Issue	Convention 103 / Recommendation 95	Convention 183 / Recommendation 191
Scope		Covers all employed women, including those in the informal sector who have an employer Categories of employed women can be excluded if employers, workers, governments agree. But periodic reports to show what is done to extend coverage to excluded groups
Length of leave	Convention: 12 weeks minimum leave Recommendation: 14 weeks recommended leave	New provision on health protection of pregnant and breastfeeding women added Convention: 14 weeks minimum leave Recommendation: 18 weeks recommended leave
Protection from dismissal	Length of post-natal leave not specified Women are protected from dismissal for any reason while on maternity leave.	Six weeks compulsory post-natal leave. Provision may be changed if workers, employers, and governments agree to shorten compulsory leave or have none at all Dismissal during and for a period after maternity leave is allowed for reasons unrelated to maternity.

Breastfeeding breaks	<p>No duration of entitlement to nursing breaks specified.*</p> <p>Recommendation 95 :</p> <p>Nursing breaks of 1.5 hs daily recommended;</p> <p>Combining breastfeeding days to shorten workday should be allowed</p> <p>Costs of workplace facilities for breastfeeding should be born by community or social insurance</p>	<p>If a breastfeeding woman is fired and files a complaint, her employer has the burden of proving that breastfeeding was not the cause of her termination</p> <p>Breastfeeding recognized as a woman's right: on paid time, counted as work time</p> <p>One or more daily breaks for breastfeeding, or daily reduction of hours worked, but specific entitlement left up to national law and practice</p> <p>Combining breastfeeding breaks to shorten workday allowed</p> <p>Longer or more frequent nursing breaks upon medical certificate</p> <p>Recommendation 191:</p> <p>alternative to medical certificate for more frequent nursing can be "other appropriate certification as determined by national law and practice</p>
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* Convention 3 had specified two half-hour breaks daily.

Annex 3. Level of benefits and financing

	Iceland	Czech Republic	France
Maternity leave and benefits	Faedingarorlof¹	Materska dovolena	Congé de maternité
Administrative procedure for receiving benefits	Must be applied for at the Childbirth Leave Fund at the Directorate of Labour ²	<ul style="list-style-type: none"> – Leave: no special application needed, it is sufficient to notify the employer, using a statutory form signed by the relevant physician³ – Benefit: applications for state social support (child allowance, birth grant) with employment service⁴ 	Application with Sickness Insurance Fund
Deadline for application	<ul style="list-style-type: none"> – For maternity/paternity leave: no later than six weeks before the anticipated birth of the child. – For maternity/paternity allowance: no later than three weeks before the anticipated birth of the child.⁵ 		No legal deadline, but it is recommended to inform the employer in writing before the beginning of the maternity leave, and to include a medical certificate. ⁶

	Iceland	Czech Republic	France
Notification of the employer	No later than eight weeks before the anticipated birth of the child. ⁷		
Financing of benefits	Social Security: Maternity/Paternity Leave Fund ⁸	Social Security: Sickness Insurance ⁹	Social Security: Health Insurance Funds ¹⁰
Contribution rates	Employee: 0% Self-employed: 8.65% Employer: 8.65% Government: any deficit ¹¹	Contribution to sickness/maternity fund: Employee: 0% ¹² Self-employed: 1.4% Employer: 2.3% Government: any deficit ¹³	Employee: 0.75% Self-employed: not applicable Employer: 12.8% Government: certain proceeds ¹⁴
	Iceland	Czech Republic	France
Paternity leave	Fedraorlof ¹⁵	–	Congé de paternité
Financing of benefits	Social security: Maternity/Paternity Leave Fund ¹⁶	–	Social Security: Health Insurance Funds ¹⁷

	Iceland	Czech Republic	France
Parental leave	Foreldraorlof ¹⁸	Rodicovska dovolena	Congé parental
Financing of benefits	Social Security ¹⁹	State social support system; (also for child allowance and birth grant) ²⁰	The Fund for Family Allowances (CAF)
Contribution rates	Government: total cost ²¹	Government: total cost ²²	Employee: 0% Self-employed: 5.4% Employer: 5.4 % Government: see maternity benefits Blank fields: no data available

Blank fields: no data available

- ¹ The term *faedingarorlof* (literally 'birth leave') is used in law to refer to paid Maternity, Paternity and Parental leave. But in common parlance, the term is mostly used to refer to women's leave due to birth and childcare. When the father takes his leave, it is usually referred to as *fedraorlof* (Paternity leave). So even if the law makes no distinction between different types of leave taken by mothers and fathers, a distinction is made in everyday usage. (International Network on Leave Policies & Research, 2010: Iceland)
- ² http://en.island.is/family/having_a_baby/maternity_paternity_leave_and_parental_leave
- ³ Ministry of Labour and Social Affairs of the Czech Republic : <http://www.mpsv.cz/en/1607>
- ⁴ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1603>
- ⁵ http://en.island.is/family/having_a_baby/maternity_paternity_leave_and_parental_leave
- ⁶ If a pregnant woman would like to apply for the *Prestation d'Accueil du Jeune Enfant* (PAJE) paid out through the *Caisse d'Allocations Familiales*, she needs to announce her pregnancy to the CAF during the first fourteen weeks.
- ⁷ http://en.island.is/family/having_a_baby/maternity
- ⁷ http://en.island.is/family/having_a_baby/maternity_paternity_leave_and_parental_leave
- ⁸ Act on Maternity/Paternity Leave and Parental Leave §§ 4, 13.
- ⁹ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>. Since 1 January 2009, sickness insurance has been regulated through the Act No. 187/2006 Coll. on Sickness Insurance, as amended (Ministry of Labour and Social Affairs of the Czech Republic : <http://www.mpsv.cz/en/1610>)
- ¹⁰ <http://www.ilo.org/dyn/travail>
- ¹¹ Universal pension (contributions also finance maternity and paternity benefits): Insured person: 0% / Self-employed person: 8.65% of presumptive income / Employer: 8.65% of gross payroll / Government: finances any deficit (Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration).
- ¹² There is a significant difference between contributions to cash sickness and maternity benefits (lower contributions) and other medical benefits (higher contributions).
- ¹³ Sickness insurance: Employee: 0% / Self-employed person (voluntary participation): 1.4% (from the assessment base which cannot be lower than double the amount for the participation of employees and will be determined every year) / Employer: 2.3% (Insurance rates from the assessment base for social insurance in the Czech Republic valid from 1. 1. 2010) (Czech Social Security Administration: <http://www.cssz.cz/en/social-security-premiums/insurance-rates/>) / Government: Any deficit (Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration)
- ¹⁴ Government: Proceeds from a 12% surcharge on automobile insurance premiums plus proceeds from an earmarked tax on the costs of pharmaceutical advertising, alcohol, and tobacco. Proceeds from a contribution levied on all individual income finance sickness insurance and family benefits. (Social Security Programs Throughout the World: Europe, 2010: France, US Social Security Administration)
- ¹⁵ See annotation 1
- ¹⁶ Act on Maternity/Paternity Leave and Parental Leave §§ 4, 13
- ¹⁷ <http://www.ilo.org/dyn/travail>
- ¹⁸ "*Foreldraorlof*" refers to the unpaid leave; the 13 weeks leave granted until the child is 1,5 is translated into English by the Icelandic Ministry of Social Affairs and Social Security as "parents' joint rights". (International Network on Leave Policies & Research, 2010: Iceland)
- ¹⁹ Act on Maternity/Paternity Leave and Parental Leave §§ 4, 13
- ²⁰ Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1607>. The state social support is regulated by Act no. 117/1995 Coll., on State Social Support, as amended (Ministry of Labour and Social Affairs of the Czech Republic: <http://www.mpsv.cz/en/1603>)
- ²¹ Social Security Programs Throughout the World: Europe, 2010: Iceland, US Social Security Administration
- ²² Social Security Programs Throughout the World: Europe, 2010: Czech Republic, US Social Security Administration



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