Inclusiveness and Flexibility of Income Support Policies

rEUsilience Working Paper Series: 2

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September 2023

Innovate UK

This project has received funding from the European Union's Horizon Europe research and innovation programme under Grant Agreement No Project 101060410 and Innovate UK, the UK's Innovation Agency.

rEUsilience

Risks, Resources and Inequalities:
Increasing Resilience in European Families

Title: Inclusiveness and Flexibility of Income Support Policies

Date: September 2023

Responsible organisations: University of Oxford

Author(s): Mary Daly

Version: 1.0

Citation: Daly, M. (2023) Inclusiveness and Flexibility of Income Support Policies. *rEUsilience Working Paper Series,* 2023:2. DOI: 10.31235/osf.io/pm7na

Acknowledgements:

This project has received funding from the European Union's Horizon Europe research and innovation programme under Grant Agreement No Project 101060410 and Innovate UK, the UK's Innovation Agency.

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Introduction: Work Package 5[1]

This Work Package (WP) starts from the premise that the structure and content of social policy is extremely important for familial functioning and resilience. Both services and cash supports are conceived to play a role. The WP's objective is critically to compare three fields of policy - income protection, care, and work-life balance – to assess how they individually and in association might enable or negatively affect resilience among families. Relevant policy during the pandemic will also be examined. For the analysis, the focus is placed on the rules and regulations that govern access in the six national settings. The overarching research question asks: How do these policies in their design conceive of and might affect decisions, behaviours and resilience in and by families and their members?

The unique contribution of rEUsilience is to locate resilience in the intersection between private life, especially family life, the economic system, especially the labour market, and the state, especially the welfare state.

It directs the attention to in the first instance family. This means that the project starts from the perspective of family and the dynamics involved in key aspects of family functioning, especially the management of family and working lives, and associated resources and risks. Family is conceived as an economic and social entity, engaged in both production and (social) reproduction activities. Classically configured as the institution responsible for the care and maintenance of children and, to a lesser extent, adults, the core activities of family from a resilience perspective centre on care-giving, labour input and resource accrual and distribution. A layer of complexity is added in that familial operation is mediated by personal and interpersonal relationships and also societal norms about family roles and responsibilities (important in every known society, although varying). Family is, then, a very broad concept involving: a structure; a set of labour and work activities; practices regarding accumulation, dispersal (sharing) and consumption of resources; personal and collective commitments and engagement; relationships between individuals; a set of responsibilities and roles.

Family resilience, a second key concept, is conceived as agentic - referring to the capacity of families to overcome adversity and maintain well-being despite challenges stemming from such factors as illness, income inadequacy, demands of and conflicts between paid work and family exigencies and commitments. The project approaches resilience indirectly. It looks at risks and challenges (both in general population terms and in terms of families'

[1] The helpful background research undertaken by Sunwoo Ryu is acknowledged with thanks. The report is also indebted to rEUsilience partners for information on the systems in their countries.

real-life experiences) and identifies needs (that might give rise to resilience) and behavioural pathways towards relevant outcomes. So, the project's indirect notion of resilience examines the context in which resilient behaviours might be called for and/or obtain in the sense of: (1) needs and risks that arise from the intersection of socio-economic and familial factors and (2) outcomes that are conditioned by the presence of resources.

Social policy, the focus of this WP, is one such potential resource or gateway to resources. However, as developed below, social policy can also exclude some families from adaptive agency or the protective factors they need. Social policy is embedded in a further conceptual category and societal institution: the welfare state. Through their welfare states, countries transfer different types of resources to families. Three such types of resources are potentially transferred: time (as in paid or unpaid leave for parents or carers from employment and flexible working time), money (as in cash benefits and tax reliefs), in-kind support (as in access to childcare and other relevant services). Depending on their amount and quality, these types of resources might help to prevent difficult situations from arising or enable families to navigate them once they do. There is, of course, variation in the extent to which European countries commit to these different types of resource transfer or support but the long-term welfare settlement in Europe, theoretically at least, sees the welfare state as a player in regard to each.

How might welfare states engage with families?

This occurs both directly and indirectly. Among other things, this means that not all the six dimensions of family identified above are affected by welfare state policy and practice. Existing literature confirms that the three elements of family that the welfare state engages most actively with are: family structure, family resource levels and family-related behaviour in the rearing of children and the managing of this with labour market participation of family members (especially parents) (Ferrarini 2006; Daly and Ferragina 2018). In broad strokes, the development pattern over time is one of social policy more purposefully seeking to affect the latter behavioural set, in comparison to heretofore where it was concerned more with family as a structure or unit of organisation that needed support with some of the costs of child-rearing (either out of general solidarity or anti-poverty motivations) (Mätzke and Ostner 2010). Scholars describe a turn to activation in the last decades. While individual labour market engagement has been to the fore in this regard, so too has family-related behaviour – how people parent their young children, how they organise to 'balance' their work and family lives. Three important insights about social policy follow here. The first is that the welfare's states engagement with family has been broadening. The second is that 'family policy' does not fully encapsulate the welfare state's engagement with family. Now labour market policy and care policy may also be involved. Such broadening is reflected in the three policy fields chosen for study in this WP: income support, care-related service provision and work-life balance. Third, we must investigate how the welfare state affects family life and resilience not just in structural and status terms but also in behavioural terms.

Thinking in terms of how to configure the welfare state's engagement with family, we can identify a number of possible mechanisms. A first mechanism is of inclusion/exclusion. Policies may explicitly or implicitly exclude some individuals and families from support by virtue of the rules applied (e.g., the age or number of children for the purposes of support, the sexual orientation of the parents, residency and citizenship background). Such an effect may be either a matter of non-recognition or prioritisation of, say, a particular need, category of people or situation as meriting support or resources. One broad indicator continuum here is the degree of universalism versus targeting. A second and related mechanism whereby an effect relevant to families can be created is the extent to which changes in family structure and behaviours are supported or encouraged. This gets close to risks in the sense that a change could mean greater exposure to risks, as when an extra child is born or when there is a change in paid labour participation (e.g., a mother and/or father entering or leaving the labour market (which simultaneously means a change in their position and role in the family)). Income or other supports that allow flexibility (in the sense of protecting against the negative effects of a change) are hugely important in a context of a sudden deterioration or potential improvement in individuals and family circumstances. A third way in which family structure and behaviour may be affected is by contradictions within or between policies. Some classic situations here might be if tax allowances or benefits encourage the mother to be homebound whereas child care is only available to or more strongly promoted when both parents are employed. Such 'contradictions' or lack of complementarity create difficulties for decision making and may force more severe trade-offs than are desirable.

The three criteria applied for policy review in WP5 are: inclusiveness, flexibility, and complementarity.

Inclusiveness is understood as the degree to which rights are available to all irrespective of (forms or previous length of) their employment, citizenship status, or other criteria based on family, gender, and intersectional characteristics (Dobrotić and Blum 2020).

Flexibility is defined as the extent to which policy either encourages or enables people to make a change (such as to take up training or education or to increase or lower hours of work or to have another child).

Complementarity is the degree to which incentives/disincentives and supports are consistent across policy domains, e.g., between leaves and flexible working arrangements.

By definition then, a social policy promoting family resilience is one that is inclusive, allows for flexibility and where the conditions of entitlement are complementary across policies. The significance of these for familial resilience is examined and compared across countries to answer the following three questions:

- How inclusive are policies?
- How much flexibility do policies allow families?
- Is there complementarity across policies?

The latter can be assessed only in terms of the policy configuration as a whole and so will not feature in deliverables 1, 2 and 3 of this WP since each focuses on a single policy set. Complementarity will be considered therefore in deliverable 5 which is the synthesis report.

Inclusiveness and Flexibility of Income Support Systems

This deliverable focuses on income support.

Income support policies are broad in scope and reach, usually covering six types of need or exigency - old age, unemployment, illness, child-related costs, low income, maternity and paternity. Only some of these are relevant to the current endeavour in the sense that they have a family relevant component or orientation. This is adjudged to be the case for the last three.

When one starts with policies oriented to the support of families, all roads lead to cash supports to families with children - these may be termed differently in different places but some form of such support is well-known as a welfare state staple across countries. Research confirms that child benefits are not only the most common but also the most important form of additional income support for families with children (Aerts et al, 2022: 11). Child-related benefits (organised either as cash allowances or tax allowances) have a long history in a range of welfare states in Europe although they have different roots (especially in regard to concerns around fertility, child- or family-related poverty or income adequacy more broadly) (Gauthier 1996; Bahle 2008). The literature points to policy design as one of the most significant factors determining their effects (Bradshaw and Finch, 2002; Ghysels and Van Lancker 2011: Aerts et al 2022). Minimum income benefits, the second benefit to be examined, are relevant for two reasons. First, they are a point of last resort and general support in the case of (individual and familial) low income (Nelson 2010). Second, they provide an important window on how welfare, rarely based on the individual's circumstances, takes account of the broader household or family context in the individual lives. It should be noted in this regard that household is often – although not always – a proxy for family here. Maternity-related income and leave policies are relevant especially for how they shape the circumstances of individuals and families in the early period of child-rearing. These have now been joined by other types of leave relevant to parenting (especially paternity and parental leave) as part of the policy shifts described above. The result is a broadened portfolio of leaves in most countries. Since maternity and paternity policies are covered in deliverable 3 of this WP, this report concentrates on the child-related- and minimum income-related benefits.

Among the most common criteria used by welfare states for funnelling public resources to individuals or families and achieving intended function are: employment circumstances and history, residence or legal (citizenship) status, type of family structure, and family stage and organisation (especially regarding child-rearing behaviour). Employment participation is viewed as important in every welfare system and always has been, but now the welfare state's role is more and more focused on (encouraging) participation in employment (so called 'active' rather than 'passive' support) (Adema et al 2020). Apart from reasons of costs and funding, labour market participation is valued as self-sufficiency and 'independence'. Residence and legal status are important criteria also. Historically, where a strong understanding of the welfare state as a national state level entity prevailed, benefits were configured in citizenship terms (Sainsbury 2012). The implied demarcation between citizen and non-citizen is harder to maintain when high levels of migration mean that many residents but non citizens have very similar rights to citizens. So, specific conditions around residence and legal status are becoming more prominent for welfare receipt purposes (Bruzelius 2018). When it comes to family structure, there is a long history also of countries favouring particular types of families in their support systems. Historically, the most favoured or highly supported family type was the male breadwinner model – this was an economic arrangement but it both fed on and bled into social norms and everyday practices (Lewis 1992). We now know that this was deeply gendered (in resting on and reinforcing a set of assumptions and practices that differentially-treated male and female life situations) and conservative (in terms of maintaining a particular status quo). Now policy is oriented also to a two-income family model, and indeed – variations notwithstanding – the European social model could be argued to support this as the most desired family structure for households with children (Daly 2020). This has received policy expression in the thrust towards supporting 'work/life balance' which essentially aims for participation in both spheres of life (especially by women). Supporting more diversified household structures does not always mean a gender equality perspective of course but the favouring of the two-earner household is a profound movement in policy. The final relevant policy consideration is stage of family life. The amount of public support a family receives is not just heightened at particular stages but is also calibrated, especially at the early stages of family life when, first, home-based caring of young children is supported and later extra-familial care and a series of adjustments of employment time are institutionalised by leaves for parenting. In a move that extends to influencing behaviour at key stages of family life and thereby affecting the organisation of family life rather than, say, family structure, both leave policies and services for childcare are becoming ever more differentiated and tailored to particular behavioural outcomes regarding parenting patterns and children's childhoods. This is the period of family life (apart from, arguably, old age) that garners the most in terms of state 'support' (with all 'systems' in operation – parental leave, income support and childcare) and where the state is at its most active regarding family.

These kinds of developments are realised through rules and regulations and it is these that we examine in this WP. The spotlight is placed on two dimensions of design and functioning: entitlement principles and eligibility criteria. We also look in places at some data on the benefits paid to or services received by families. The purpose of this is not to study outcomes but, rather, to confirm how aspects of policies and their design affect family income. It should be noted that the unit of analysis is family as a collective entity; the questions and interrogation therefore are directed to ask about the support of the family with children as an institution and we do not consider the implications for individuals in this WP.

To interrogate the degree of inclusiveness of family benefits and minimum income programmes we examine:

- Whether the policies are universal in terms of family type or situation?
- What conditions regarding citizenship or residence govern access?
- Which family types/exigencies are covered?
- How is targeting (exclusiveness)) reflected in different benefit levels?

Flexibility is more complex to conceive of and measure than inclusiveness. The core idea has some roots in a capabilities approach. Javornik and Yerkes (2020), for example, use flexibility as a category to analyse childcare service provision placing the focus on availability and freedom of choice. When thought of in a family policy context, the notion of flexibility highlights the degree of choice enabled by policy especially to women in their motherhood role. Incorporating but also moving beyond such a focus, we conceive of flexibility as closely relating to family transitions in the labour market engagement of two-parent and one-parent families and a change in the number of children. We cannot observe these as active transitions (not least because we are limited to secondary data sources) but we can access them by comparing families with particular structural characteristics. Looking at the benefit system as a whole (rather than just the child-related and minimum income benefits) on the one hand and the benefit and taxation system on the other within and across countries, this part of the research is led by the following questions:

- What degree of support does the benefit system provide to a two-parent family with two earners as compared to one with either one earner or no earner?
- What degree of support does the benefit system provide to a home-based lone parent as compared to a half-time labour market and half-time family engagement?
- What degree of support does the benefit system provide when the number of children increases from one child to two children and from two to three children?

This is a review of policy and the methodology used reflects the review's objectives. The main method used is analysis of the existing rules governing benefits and a review of some secondary data to identify some outcomes. The empirical evidence is drawn from a range of sources. For the first part – examining inclusiveness – the evidence is drawn from the EU Mutual Information System on Social Protection (MISSOC) database. This, established in 1990, presents information on the main eligibility and entitlement conditions prevailing for each of the main components of the social protection system and their organisation in the 27 EU member states (as well as the three countries of the European Economic Area – Iceland, Liechtenstein and Norway). It is updated twice a year. The date chosen for the analysis was July 2022 (the last fully updated version available when this research began). As the UK is not included in MISSOC, national governmental sources were used for the evidence for that country. For the flexibility/transition analysis, the OECD Tax Benefit Calculator is used to compute change in key parameters. The analysis also includes some outcome data from other data bases (especially those of the European Union (ESSPROS) and OECD (Family Database, Social Expenditure Database).

In the following pages, we first undertake two policy case studies, investigating the inclusiveness of, first, family policy and, then, minimum income schemes. We then undertake an investigation of flexibility allowed by the benefit system as a whole, using the indicators and data sources set out above.

Inclusiveness

Inclusiveness of Family Benefits

Child-related transfers are complex in terms of what they aim to do and how they are organised. The existing literature (especially Letablier at al 2009: 9) highlights different possible objectives that can be aimed for, including:

- compensating for and helping with the costs of children;
- reducing poverty faced by families and children;
- promoting children's well-being, development and rights;
- affecting fertility;
- changing female and male employment rates;
- changing the nature and extent of gendered practices, relations and inequality.

This, somewhat ideal palette in that not all countries can be expected to aim for all objectives given differences in the history and prioritisation of family policy, sets the background scene as we proceed.

Some points of clarification should be noted at the outset. First, the term 'child benefits' is used to demarcate the field we are examining, that is payments that are directed to families in recognition of the costs involved in rearing children. Second, we have to mention a particularity in relation to Belgium where family benefits are under the jurisdiction of the federal entities rather than part of the national social security system. Given regional variation, this analysis takes the policy system as it exists in Flanders (home to 57% of the population) as the focus of analysis. In justification of this decision, there is a good deal of similarity between the benefits in place here and the other regions of Belgium and focusing on one region makes the analysis easier to manage and more precise.

When it comes to how payments are organised and what is supported, three main types of payment characterise the universe of child-specific income support in Europe as a whole. These are: regular payments for children (most widely up to 18 years or so), once-off payments, and tax allowances. Regular payments, most widely known as child benefits, are meant to compensate families with the cost of child-rearing. They are usually 'untied' in the sense that there are no behavioural conditions attached to their receipt (unlike conditional cash transfers which require certain behaviours on the part of the parent and even sometimes child as a condition of receipt). A second form of provision is one-off grants or payments. These are most common as birth or adoption grants but countries may also seek to support families with school or other costs associated with children. Thirdly, tax systems typically have allowances whereby families can offset the costs of childrearing. The following analysis concentrates on the regular child-specific payments made through the benefit system, as these are the most significant forms of child-related support.

Table 1 summarises the national systems in terms of the key indicators of flexibility outlined in the last section and Table A.1 in the Appendix presents the overall 'universe' of family benefits in the six countries. The data in the first row of Table 1 show that all countries have some system of child-specific payments in place but that they vary in terms of their inclusiveness and the extent to which targeting is used to govern access.

TABLE 1 COUNTRY SITUATION ON KEY INDICATORS OF INCLUSIVENESS

	Belgium (Flanders)	Croatia	Poland	Spain	Sweden	UK
Universal child benefit	Yes	No	Yes	No	Yes	Quasi
Second tier of child benefits (for needy families with children)	Yes	Yes	Yes	Yes	No	No
Inclusiveness in terms of citizenship or residence conditions of the main child benefit	Residents with Belgian citizenship, legal residence or a right of residence for at least 3 months or victims of human trafficking or human smuggling	A Croatian citizen or a foreign citizen with at least 3 years residence or a refugee/foreign national with asylum status or under subsidiary protection	A Polish citizen or foreigners who fall under the scope of the law on social security co-ordination or refugee status or a residency permit (with no minimum duration)	Both the parents and their disabled child(ren) should reside legally in the country	Legal custodian of child with a residency permit (no minimum duration)	Those with a right to residency and living in the UK for at least 3 months to be eligible
Families receiving additional support:						

Larger families (2+ children)	Yes	No	Yes	Yes	No	No
Child illness/disability	Yes	Yes	Yes	Yes	Yes	Yes
Lone parenthood recognised as needing extra resources	Yes	Yes	Yes	No	No	No
Upper age limit including if child is in school/higher education	25	19	18	18 (but no age limit applies if disability level higher than 65%)	Up to 16, or as long as the child still is in compulsory school (typically until the age of 16)	20

Flanders and Poland are the most inclusive, having, first, a universal system and, second, a further tier of support for needy families. The Flanders region has an overarching Growth Package (*Groeipakket*), formerly Child Benefit (*Kinderbijslag*), which includes a set of financial allowances tailored to each family with children.[2] The package is quite diversified and layered, comprising a base benefit which is universal (that is, regardless of household income), an additional (social) allowance for families with low income, specific coverage of the situation of lone parents and a care allowance for children with specific support needs due to ill health or disability.[3] Poland rivals Flanders in terms of inclusivity but the targeting of larger families and the tasks of rearing young children are much more specific there in comparison. It, too, has a multi-layered system of child-related financial support with a general family allowance - Family 500 Plus (*Świadczenie wychowawcze*) which is available for all children regardless of household income and is paid at the same amount per child – and an income-tested Family Allowance (*Zasiłek rodzinny*) that has many supplements that recognise the extra needs of lone parents and large families especially.[4] There is also Family Care Capital (*Rodzinny kapitał opiekuńczy*) which aims to

[2] http://web.archive.org/web/20220712213038/https://www.groeipakket.be/tegemoetkomingen (archived on 30 July 2022)
[3] In addition, the Growth Package also includes a starting benefit for childbirth or adoption, childcare service-related allowances, an orphan allowance and school-related benefits such as the annual School Bonus (*Schoolbonus)* at the start of the new school year and the annual School Allowance (*Schooltoeslag*).
[4] The Family Allowance provides multiple supplements, such as: One-off childbirth allowance (dodatek z tytułu urodzenia się dziecka); Single parent allowance (dodatek z tytułu samotnego wychowywania dziecka); Allowance for raising a child in a large family (dodatek z tytułu wychowywania dziecka w rodzinie wielodzietnej); Allowance for education and rehabilitation of a disabled child (dodatek z tytułu kształcenia

strengthen the capability of the family to organise care between the end of the paid parental leave and the age of preschool entry. This is only given in respect of children aged between 12 and 35 months and for the second child on.

Sweden also has a universal child cash payment in place (*Barnbidrag*) but not a second tier. This configuration of just one tier, the OECD points out, is the norm among its member states; it also points out that about half of its member countries means test the main child-specific income benefit.[5]

The UK is mid-way between these three countries and Croatia and Spain. Table 1 records the UK as having a quasi universal, child-specific cash benefit but no second tier specific to children. The UK had a fully universal child cash benefit in place until 2013 when the Child Benefit was made subject to a newly-introduced High-income Child Benefit Charge. The latter provides for the Child Benefit to be clawed back through the tax system from families where the higher earning partner has an adjusted net income in excess of £50,000.[6] At the time of its introduction it was estimated that some 800,000 families would be affected by this (Seely 2023) but as of the tax year 2019-20 some 373,000 individuals had declared a liability for the charge (HM Revenue and Customs 2022). It should be noted that in the UK's general system of support for low-income individuals and families – Universal Credit - there is a benefit cap in place whereby families receive allowances for only two children (known as 'the two-child benefit cap'). This prevents parents from claiming Tax Credit or Universal Credit for any third or subsequent child born after 2017, regardless of income or other need. It is estimated to affect some 1.5 million children and leave the families affected up to £3,000 a year worse off.[7]

Neither of the two remaining countries has universal child-specific benefits, but they both have targeted child income supports (that is, a second tier). Croatia has child allowance (*Doplatak za djecu*) which is closely tied to income of the household and individual members. The benefit is provided only if the household income per member does not exceed HRK 2,328.20 (€310) a month. Spain has a different policy constellation again. This country provides a family allowance (*Prestaciones Familiares*) but this is highly selective and is mainly for children with a disability (*prestaciones por hijoo minor acogido a cargo*). There is recognition of children within the minimum income scheme (*Ingreso Mínimo Vital*) which contains a supplement for child support aid (*Complemento a la infancia*)[8] but this is the case in most countries. While the UK has no general second tier of child-specific cash benefits, Scotland is an exception in granting a means-tested allowance in recognition of the costs of low-income families. This is named the Scottish Child Payment (which was introduced during the high-

i rehabilitacji dziecka niepełnosprawnego); Allowance for the child's schooling outside the place of residence (dodatek z tytułu podjęcia przez dziecko nauki w szkole poza miejscem zamieszkania); Start of school allowance (dodatek z tytułu rozpoczęcia roku szkolnego); and Allowance for childcare during the period of parental leave (dodatek z tytułu opieki nd dzieckiem w okresie korzystania z urlopu wychowawczego).

[5] https://www.oecd.org/els/soc/PF1_3_Family_Cash_Benefits.pdf

[6] The charge levied depends on how much in excess of the threshold the income is – for example where the income is between £50,000 and £60,000 the charge is 1% of the Child Benefit received for every £100 of taxable income and once the £60,000 threshold is reached the Child Benefit is totally withdrawn. Note that this policy has been criticised for its bias against a single-earner families in that while a single earner couple earning £60,000 would have the whole of their Child Benefit clawed back, a dual earner couple each earning just under £50,000 – with a much larger combined household income – retain their Child Benefit in full (Seely 2023).

[7] https://www.theguardian.com/politics/2023/jul/11/labour-urged-again-to-vow-to-scrap-tories-two-child-benefit-limit

[8] Since the 1st of June 2020, the means-tested Family Allowance component is subsumed in the new Minimum Income Support. The other provisions have remained standalone (OECD, 2022b).

intensity phase of COVID-19 in February 2021) and is available until the child reaches the age of 6 (but is targeted by income and existing benefit receipt).

The second row in Table 1 considers inclusiveness in terms of the citizenship or residency conditions attached, noting that most EU citizens have reciprocal rights to benefits so they are not considered here.[9] While countries share a condition of legality (as in legal residence), they vary in terms of the period of residence required and the strictness of the exclusions. Neither Sweden nor Poland has a minimum period of residency but the other countries do, with Croatia as the most exclusionary requiring at least three years of residence for a non-EU foreign citizen to qualify for child-specific benefits. Both Belgium and the UK have a three-month minimum period. However, the UK goes beyond a blanket sense of legal residence as a condition of entitlement, and restricts some legal residents from access to this and other benefits. In particular, those subject to different types of immigration control are barred from claiming public funds (defined to include benefits and housing assistance). This ban includes categories of people whose leave to remain in the country is as a status of spouse, a student or granted under 'family or private rules'. Moreover, a person who has an indefinite leave to remain as the adult dependent relative of a person with settled status is subject to a five-year prohibition on claiming public funds. Asylum seekers, 'visa overstayers' and those with a pending immigration appeal are also excluded. It is estimated that there are some 1.3 million people living in the UK with the condition of 'no recourse to public funds' attached to their visa.[10] It has also been reported that a fifth of the estimated one million destitute households (which contain at least half a million children) in the UK are migrant households (Joseph Rowntree Foundation 2020). Overall, the exclusion of (non-EU) migrant families and children from child and other benefits and services is the most likely form of familial exclusion in the other countries as well (bar Sweden). In the UK case, and perhaps also in other countries, there are likely to be strong gender differences here as 'dependants' are most widely women.

The next criterion (third row of Table 1) concerns the type of child-related or family-circumstance recognised as meriting specific or explicit support. Looking across the countries serves to define the universe here showing it to consist of three such situations: larger families (most usually 2+ children), child illness or disability, and lone parenthood. Table 1 shows that Belgium (Flanders) and Poland are the only two countries of the six to cover all three exigencies.

To take large families first, in Flanders the amount of the base child benefit paid per child becomes more generous as the number of children in a family increases (with payment rates basically in two bands: 1-2 children and 2+ children). There are also age supplements to recognise that costs increase as the child grows. Sweden pays a supplement to the child benefit as the number of children rises. None of the other countries gives greater benefits to large families specifically. In Poland, while the Family 500 Plus is paid at the same rate for all children, the means-tested Family Allowance rises in value not on the basis of the number of children but on the basis of

[9] However, there are also exclusions of EU citizens, especially those that are on a low income – see Bruzelius et al (2017) and Seeleib-Kaiser (2022).

[10] https://www.compas.ox.ac.uk/2022/destitution-in-the-uk-how-the-no-recourse-to-public-funds-immigration-condition-affects-poverty/#:~:text=It%20is%20estimated%20that%20there,condition%20attached%20to%20their%20visa.

the child's age. Note the exceptional nature of the UK here again: the value of the Child Benefit is decreased after the first child (as of July 2022, £21.80 for the first child and £14.45 for second and subsequent children per week).

Some calculations from the OECD – on the basis of 2018 data – help to give a sense of what the benefit conditions and organisation mean in income terms for families. It should be noted that 'family benefits' is defined by the OECD more broadly than in the current analysis: as family-related transfers to families, often taking the form of child benefits, family allowances or family-related refundable/non-wastable tax credits.[11] The calculations are based on a simulation of the generosity of family benefits for a two-parent, two-earner household, with one parent working full-time and one part-time (both on median wages), by the number of children in the household, assuming the youngest child is aged 6.

TABLE 2 TOTAL VALUE OF FAMILY BENEFITS OF A TWO-CHILD FAMILY WITH 1.5 EARNERS BY NUMBER OF CHILDREN AS % OF MEDIAN GROSS FULL-TIME EARNINGS, 2018

	Belgium	**Croatia**	**Poland**	**Spain**	**Sweden**	**UK**
1 child	2.9	0.0	0.0	0.0	2.8	2.7
2 children	8.1	0.0	11.0	0.0	7.8	4.6
3 children	15.9	14.0	22.1	0.0	11.7	6.4
4 children	23.8	23.0	49.1	0.0	12.6	8.2

Source: OECD Family Database, Graph PF1.3.C.

This table confirms Spain and Poland as outliers, the former being the least and the latter the most generous. Spain does not register any support for families with median gross full-time earnings in the simulation in question whereas in Poland the benefit income rises progressively by number of children to the stage where a family with four children receives family benefits equivalent in value to half median gross full-time earnings. This is by far the extreme case. In other countries the amount of support is at its maximum 24% (in Belgium and Croatia) or around 10% of median gross income in Sweden (12.6%) and the UK (8,2%). The OECD reports that on average the value of family benefits for this family type more than doubles when the number of children increases from one child (2% of average full-time earnings) to two children (5% of average full-time earnings), and then doubles again for three children (10% of average full-time earnings).[12] A four-child version of this family receives, on average, family benefits worth about 15% of average full-time earnings. Poland is identified by the OECD (along with Estonia) as the country with the largest increases in family benefits by family size.

[11] https://www.oecd.org/els/soc/PF1_3_Family_Cash_Benefits.pdf
[12] https://www.oecd.org/els/soc/PF1_3_Family_Cash_Benefits.pdf

The second type of family situation recognised for support is child disability or illness. All six countries recognise this and have some provisions in place for it. Flanders offers a Care Allowance for Children with Specific Support Needs which is available for all children who meet the illness condition provided they are not in receipt of any other social benefit. Poland has three child-related care benefits (a Special Attendance Allowance, a Medical Care Allowance and a Nursing Benefit) which offer financial allowances in the case of demanding or intense needs on the part of children who are ill or have a disability. The intention is to compensate for extra disability-related expenses or familial carers' inability to participate in the labour market due to care responsibilities. The Special Attendance Allowance is means-tested but the others are not. However, the Nursing Attendance Allowance which is the most generous is specifically for a child who becomes disabled under the age of 18 or, if at school, under the age of 25. There are no specificities in the other two care benefits regarding when the child acquires the disability. Sweden, too, has a number of income support provisions in place for children with a disability. These are not income-tested but eligibility and amount of support varies according to the degree of disability. The provisions include an assistance allowance (*Assistansersättning för barn*) (when the child needs personal assistance for more than 20 hours per week on average), an additional cost allowance for children (*Merkostnadsersättning för barn*) when the child has a disability that is expected to last for at least six months and the disability costs at least SEK 13,125 per year, and a care allowance for a child with disabilities when the care and supervision needed for a child exceeds what is typical for a child of the same age without a disability (*Omvårdnadsbidrag*).[13] The UK system does recognise child disability for income support purposes (the only one of the three family situations recognised specifically there). The Disability Living Allowance for children, which is provided in England, Wales and Northern Ireland, and Scotland's Child Disability Payment, are available for children aged up to 16 years.[14] In Croatia families with a child with a severe disability receive a larger Child Allowance. Eligibility hinges on the average monthly household income per member and is provided only if the household income per member does not exceed HRK 2,328.20 (€310) a month but if the child has a severe health impairment, the allowance is provided irrespective of family income. As mentioned, Spain's child benefit is mainly conceived as a benefit for disabled children. This is not means-tested but the amount paid differs according to the degree of disability.

In regard to lone parents, two countries – Croatia and Poland – have additional supports built into their child-specific support systems for such families. The Polish Family Allowance pays a benefit per child that is more than double that paid for other children and family size is recognised by payments that rise in value with the age of the child and a special allowance of 95 PLN per month for third and subsequent children. Croatia's means-tested child allowance (*Doplatak za djecu*) is offered at a different rate according to the type of family with the children of lone parents receiving a higher benefit. Flanders in its Social Allowance pays additional benefits for single parents with children born before the start of 2019 but not for children born after that. The UK grants no additional specific income support for children from lone parent families or larger families – when they are on a

[13] https://www.forsakringskassan.se/privatperson/foralder/om-ditt-barn-har-en-funktionsnedsattning/vardbidrag

[14] When the child turns 16 years, he or she can receive Personal Independence Payment in England, Wales and Northern Ireland or Adult Disability Payment in Scotland.

low income (either from employment or benefits) they are supported through the Universal Credit programme which is the catch-all minimum income scheme with supplements for children but as mentioned above a two-child limit is applied. The same is true for Spain and also Sweden.

The final indicator of inclusiveness focuses on the generosity of the benefit. Table 3, based on data from the OECD Family Database, gives a sense of how the different systems and their rules play out in terms of the level of income received. A number of points about this calculation and analysis should be noted in advance. First, this indicator provides estimates of the value of total family benefits (i.e., the sum of all types of family benefits) by family status and income level with the value of family benefits expressed as a % of national average full-time earnings (average wage). This calculation is done on the basis of simulating the values of the total amount of family benefits available to a two-child family, where the oldest is age 12 and the youngest is nine years old, for different types of family with different earnings levels. Second, the data refer to 2018 and in the case of Belgium the evidence is for the country as a whole rather than Flanders.

TABLE 3 TOTAL VALUE OF FAMILY BENEFITS FOR A TWO-CHILD FAMILY BY FAMILY TYPE AS % OF MEDIAN GROSS FULL-TIME EARNINGS, 2018

	Belgium	Croatia	Poland	Spain	Sweden	UK
Lone parent of two children, working half-time	10.5	7.3	36.5	2.2	14.4	18.4
Couple with two children parent, one earner	8.6	0.0	11.0	0.0	6.0	0.0
Couple with two children, 1.5 earners	8.6	0.0	11.0	0.0	6.0	4.6

Source: OECD Family Database, Graph PF1.3.A.

This WP and deliverable are especially interested in the combination of conditions applied, especially in regard to the connections to the labour market. While the data are general and have to be treated with care, they show several things (Table 3). First, in most countries most family benefits seem not to vary by the employment status of the second earner. As the second and third data rows show, all the countries are ‘indifferent’ to this, with only the UK rewarding the second earner through family benefits. The OECD reports that on average across OECD countries, a two-earner, two-parent family with one parent working full-time and the other part-time (both on median wages) receives family benefits worth 5% of average full-time earnings.[15] All of the six countries are more generous to lone parent families than those with two parents, with Poland the most generous, followed by UK (which is in any case strongly supportive of working so at least part of the relative 'generosity' here is due to in-work benefits). On average across OECD countries, this type of single-parent family receives family benefits worth just under 14% of average full-time earnings.[16]

Above all, this table shows that relative priorities differ but that, looked at horizontally, lone parent families emerge as a group that garners the highest benefits across all countries. Relativities vary with Poland by far the most generous to this type of family followed by the UK and Sweden. This data also confirms that, of the six countries considered, Spain and Croatia (in that order) are the least inclusive and supportive of families.

By way of overview, we may note some key points. First, the degree of variation is striking; second, it is clear that child income supports are under-developed in some countries compared to others; third, three particular family situations garner the most support and are most likely to be recognised as a source of need: larger numbers of children, child illness or disability and lone parenthood. There are a number of underlying models in the six systems. One is the strongly pro-large family model exemplified by Poland where the value of benefits for families can reach almost half the average wage when a family has four children. Spain offers an opposing model with a system where families hardly receive any extra income through child or family benefits. Hence, we might deem it as relatively neutral on families. Croatia might also be deemed to be more neutral to, rather than supportive of, families. The other three countries offer exemplars of a further two models. Belgium and Sweden both have relatively inclusive and generous systems of child support across the board in that they recognise different family situations for extra support purposes and their targeting of support to large families is less extreme than that of Poland. The UK is counter to both of these in specifically withholding support from larger families (as in the two-child benefit cap for example and reserving the most generous child benefit for the first child) and excluding the families of many migrants from receiving support. One other thing that is suggested by Table 3 and the other information is that the UK is the country that most uses child and family payments to reward employment of the second partner.

This is only part of the package though – we now look at minimum income schemes (MIS) to see how personal and family characteristics are interwoven in how access to these benefits are governed and rationed.

[15] https://www.oecd.org/els/soc/PF1_3_Family_Cash_Benefits.pdf
[16] https://www.oecd.org/els/soc/PF1_3_Family_Cash_Benefits.pdf

Inclusiveness of Minimum Income Schemes

The history of minimum income schemes (MIS) in most welfare states is in anti-poverty and public intervention to offer basic subsistence (Natili 2020). Poor relief and public assistance are concepts that have informed their development. In some countries MIS are marked by the term 'assistance' in their name to distinguish them from so-called 'benefits' which are usually based on social insurance contributions and are almost always rights-based benefits, in most systems the pinnacle of 'deservingness'. Historically entitlement for MIS hinged on demonstrating need to officials who were usually vested with discretion to confer resources (reflecting the patriarchal underpinnings of these systems). Over time, the discretionary nature of the schemes has been downplayed or replaced with clear conditionality categories (Nelson 2010; Natili 2020) which are available as of right provided one meets the conditions.

As background, it should be noted that the overall social protection systems across the six countries differ substantially in coverage or reach, structure and design. In particular, some countries use both social insurance and social assistance, which tend to differ from each other in terms of the degree to which the latter are means-tested. In addition, and relatedly, some social protection systems strongly differentiate between different sub-sectors of the population – especially in the present comparison Belgium and Spain – whereas others operate more generic systems, based on general situation or conditions rather than target group. In general, Sweden has the fewest categorisations of the six countries here and in this and other regards it operates a near universalistic system which makes its MIS quite residual. The UK provides the contrasting case here in having the most widespread MIS provision. There are two relevant things to note. First, social insurance is much more peripheral in the UK than in the other countries and, second, the huge reforms that have been undertaken in the UK for the last decade have, among other things, rolled all the different categorical means-tested benefits into one system. Hence, the MIS system in the UK extends far more widely than that in other countries.

For the purposes of this analysis, the focus is on anti-poverty benefits or MIS schemes for those of working age. In line with the definition adopted in the 2015 EU study carried out by the EU Network of Independent Experts on Social Inclusion, "minimum income schemes are understood as being essentially income support schemes for people of working age (whether in or out of work) which provide a means-tested safety net for those not eligible for social insurance payments or those whose entitlement to these payments has expired. They are in effect last resort schemes, which are intended to prevent destitution and to ensure a decent minimum standard of living for individuals and their dependants when they have no other or insufficient means of financial support." (Frazer and Marlier 2016: 5-6). Adopting this definition means that we delimit the analytic scope to comprehensive or non-categorical schemes that are open to all with insufficient means until they can support themselves. Hence, MIS schemes that are provided for narrower categories of people in need—such as disabled people and the elderly—and those that are provided with discretion in the form of a one-off payment are not included in this analysis.

Frazer and Marlier[17] divide the schemes into five types; our countries span three of these five types.[18]

a) simple and comprehensive schemes open to all with insufficient means to support themselves (Belgium, Sweden);

b) simple and non-categorical schemes but with rather restricted eligibility and coverage (Spain, Croatia);

c) general schemes of last resort with additional categorical benefits that cover most people in need of support (Poland, UK).

It should be noted in advance that two of the six countries are in the process of reforming their MIS. Spain introduced a new national MIS in 2021 and this scheme sits alongside and is sometimes supported by regional provision. The complexity of interrogating and drawing clear conclusions about the Spanish system should therefore be noted at this stage. The UK is also to some extent a special case as it has over the last decade undertaken a major reform of its income support system which has been rolled out gradually.

Inclusiveness is again the main criterion employed here, configured as the degree to which social rights are available to all irrespective of their situation. Given that full inclusiveness is close to universalism, what we want to discover is the degree of targeting and conditionality that operates to diminish or limit the degree of inclusivity (in terms of the number of people and situations included). As with the analysis of child benefits, the analysis of inclusiveness here proceeds on the basis of itemising and assessing the unit of entitlement and the application of conditions for eligibility or receipt of the benefit in focus. We therefore look at the individual/household dynamic regarding entitlement and also other personal conditions. But there is some specificity that needs to be in play here especially regarding requirements on labour market activity and engagement. Therefore, the indicators also include the strictness of the activation requirements and whether benefit receipt allows simultaneous employment. The latter is important not just because the more strenuous the conditions the less inclusive is the system but also because they have implications for work/family balance. The following five dimensions are examined.

- Unit of entitlement
- Unit of assessment
- Any attaching conditions re residency (citizenship) and age,
- Strictness of activation conditions
- Cumulation procedures regarding employment.

[17] See also Coady et al (2021).
[18] The other two types are ‘complex networks of different, often categorical and sometimes overlapping schemes which cover most people in need of support’ and ‘very limited or piecemeal schemes which are restricted to narrow categories of people and fail to cover many of those in need of support’.

Given that MIS tend to use the household rather than family as the unit of entitlement, we cannot draw conclusions about the governance of family structure or behaviour in the same way that the previous analysis of child benefits allowed. The MIS conditions, however, can be taken to indicate dependence on the income situation of others and the living unit as a whole.

It should be noted that the conditions relating to EU citizens are not covered as they have reciprocal rights of benefit entitlement within the state of residence although there are qualifications on this that should be noted (Bruzelius et al 2017).

Most of the details are again drawn from MISSOC referring to the benefits classified under 'Guaranteed Minimum Resources'.

Table A.2 in the Appendix presents an outline of the universe of different MIS programmes, including those available for specific categories as well as the general MIS. It shows, that as of July 2022, all of the six countries had non-contributory, means-tested and centrally-organised MIS programmes. The schemes vary widely across these six countries in terms of the degree of differentiation. For example, Belgium, Poland and Spain have separate schemes for working-age people in need, disabled people in need, and people of pensionable age, respectively. By contrast, Croatia and Sweden have an integrated scheme. The UK could also be said to have an integrated system with Universal Credit rolling a number of benefits and tax allowances into one.[19] The types of provision vary across the countries: whilst a periodic cash transfer is common, Croatia and Poland also provide additional one-off, discretionary cash transfers or in-kind benefits.

Concentrating now on the main MIS, the following are some key details from the lens of inclusiveness.

[19] These are Housing Benefit, Child Tax Credit, Working Tax Credit, Income Support, Income-based Job Seeker's Allowance, Income-related Employment and Support Allowance.

TABLE 4 RELEVANT FEATURES OF THE MINIMUM INCOME SCHEME(S)

	Belgium (Social Integration Income)	**Croatia (Guaranteed Minimum Income Benefit)**	**Poland (Periodic allowance)**	**Spain (National minimum vital income)**	**Sweden (Social assistance)**	**UK (Universal Credit)**
Description	Simple and comprehensive scheme	Simple and non-categorical with somewhat restricted eligibility and coverage	General scheme of last resort with additional categorical benefits	Simple and comprehensive scheme	Simple and comprehensive scheme	General scheme of last resort with additional categorical benefits
Unit of entitlement	Individual	Household	Household	Individual	Individual	Individual
Unit of assessment	Household	Household	Household	Household	Household	Household
Residency	Belgian nationals, persons with residency, persons under subsidiarity protection Broad and inclusive	Croatian nationals with residency, a foreigner with long-term or permanent residence, a foreigner under subsidiary protection Broad and inclusive	Polish citizens and those with a right to stay in the country Broad and inclusive	Legal residence in the country for at least one year Narrow and mildly exclusive	All persons with a legal right to stay in the country Broad and inclusive	Legally and habitually resident or in the country for an 'appreciable amount of time' Narrow and exclusive
Lower age for receipt	18	None	18	23	18	18
Allow a transition to employment	Yes	Yes (for 3 months)	Yes (for 2 months)	Yes	Yes	Yes

Source: Coady et al (2021), Figure A3.1.

* Note that the details refer to the general conditions and do not take account of special cases which exist in all countries.

Starting with the unit of entitlement, most of the countries operate an individual entitlement (Belgium, Spain, Sweden and the UK) whereas in Croatia and Poland the unit of entitlement is the collective unit (with household in Croatia clearly spelled out as a family or other community of persons living together and covering costs of living regardless of kinship; in Poland a household is not explicitly defined). When the fine details are examined, Sweden is the clearest in terms of the individual focus. Belgium specifies three categories of beneficiary: single persons, cohabiting persons and persons living together with dependent family. In Spain access to the minimum benefit is an individual right. In the UK, while the unit of entitlement is determined on an individual basis, if the claimant lives with a partner, she or he cannot claim Universal Credit by her/himself even if the partner is not eligible. They are both required to register and create accounts and to link them together if they wish to make a joint claim.

All the countries, though, take account of living situation for the purposes of calculating the benefit. Most widely, the household is defined as a domestic unit, composed of the beneficiary and other persons living with them who are linked to them by marriage, partnership or blood relationship up to the second degree.

Turning to specified conditions of access, there are four types that are relevant (in that they apply to at least one of the countries). These relate to age, residency, the application of a means or income test and the application of an employment test. Here, there is less variation among the countries in that they all apply at least three of these conditions. The details matter, though. As can be seen from the fourth data row of Table 4, we make an attempt to broadly categorise the inclusiveness in terms of conditions regarding residency. Four countries are classified as broad and inclusive attaching few if any residency conditions other than legal residency to receipt of MIS, whereas Spain and the UK are the most exclusive, both requiring a period of residence. This is one year in the case of Spain and 'an appreciable amount of time' in the case of the UK which is loosely defined but generally between one and three months (Parkes and Morris 2020: 5). However, the UK is arguably more exclusive still in that the no recourse to public funds provision as described for child benefits above also prevails for Universal Credit.

Turning to look especially at the age limit to qualify (given that all of the countries have a minimum system which people qualify for once they reach the national pension age), 18 years is the minimum age most widely applied (although people below that age can qualify if they have special circumstances). However, note that Croatia does not apply any minimal age and in Spain it is 23 years.

Countries vary in terms of whether the benefit can be received whilst in employment. As the next row of Table 4 indicates, all of the countries allow a transition to employment by enabling people to keep the benefit for a period upon taking up employment. Belgium, Spain, Sweden and the UK allow this indefinitely but both Poland and Croatia attach time limits (2 and 3 months respectively).

The interaction between the benefit and employment systems is crucial for both inclusiveness and work-family balance. The next set of data present some schematised data for the interaction (see Table 5). It should be noted that some unemployment programmes are included by the OECD and Coady (2021) (the two data sources) in their calculations.

The first row of the table shows that tapering of benefit withdrawal – which typically involves the gradual reduction of benefits as income rises or disregarding a fixed amount or proportion of earned income from the standard means test – is widespread in the national systems, with only Spain as the exception. As Coady et al (2021: 13) point out, tapering helps avoid so-called ‘cliff-edge’ effects where earning a marginal amount of income could lead to the complete loss of a benefit and therefore places very high disincentives for entering employment and increasing earnings.

The next indicator on the provision of in-work support (second row of Table 5) is more discriminating in separating the countries with only Poland and Belgium doing so. This mechanism, too, serves to reduce disincentives to take up employment or earn more income but, unlike tapering which smooths disincentives by allowing recipients to retain some amount from their existing benefits, in-work support tends to reward recipients with additional support (‘wage subsidies’) for moving into work or increasing their labour supply (ibid).

TABLE 5 KEY FEATURES OF MIS AND EMPLOYMENT

	Belgium	**Croatia**	**Poland**	**Spain**	**Sweden**	**UK**
Tapering of benefits or income disregards	Yes	Yes	Yes	No	Yes	Yes
In-work support	Yes	No	Yes	No	No	No
Active labour market participation programmes	Yes	Yes	Yes	Yes	Yes	No
Strictness of activation programmes*	Weak	Weak	Weak	Moderate	Strong	Strong

Sources: OECD and Coady et al (2021).

* As classified by Coady et al (2021), Figure A3.1.

The final two indicators relate to activation programmes – whether participation in such programmes is required for benefit receipt and the strictness of activation programmes in the country. The latter is drawn from Coady et al (2021) and is based on a series of indicators.[20] The ‘strictness’ is judged more in terms of the degree of implementation rather than the scheme on paper. In fact, all of the six countries have some form of conditionality associated with them, and adhere one way or another to the EU norm which includes the requirement to register with employment offices, demonstrate engagement in active job search, accept suitable job offers, and engage in activities that increase the chance of employment (such as training). Stricter conditionality involves a more rigid implementation of these common conditionalities. The comparison suggests that Sweden and the UK have the most stringent activation measures associated with MIS receipt in contrast to Belgium, Croatia and Poland where they are relatively weak. Spain is on the moderate side and could be categorised as having ‘soft conditionality’ in that formally people have to be registered at a public job centre and should be ‘actively’ looking for work. ‘Inclusion itineraries’ (*Itinerarios de Inclusión Social*) as individual pathways to work plans have been introduced but the evidence suggests that these and other conditions and procedures are only weakly followed up. As an example of a strict activation regime, in Sweden the claimant of social assistance should actively look for work, be registered with public employment services, participate in national labour market programmes and activation measures and accept job offers (European Commission 2022). Failure to comply with the work-related conditionality rules may result in benefit withdrawal, either in full or in part. The UK has a similar system.

For the purposes of calculating the MIS benefit level, there is little variation across the countries in that in all cases it is determined by the applicants’ household composition. This is only the outline situation though. Most of the countries operate a system that calculates a set amount for individuals to which additional amounts are added depending on household or family size and whether the members are adults or children. Croatia’s system is among the most specific, using criteria such as age, marital status or living status, single parenthood, pregnancy, capacity for work. Poland determines the benefit on the basis of a minimum amount for a single person and a household overall. Spain, too, sets a minimum amount but specifies this only for a single beneficiary or a single beneficiary with a disability. Sweden, also, attributes notional amounts to each household member, defining a household on the basis of a nuclear family concept and therefore taking into account only parents and children under 18 years (or 20 if they are in education). In some cases, an additional amount can be added for common costs. Housing costs are the most widespread ground for a supplement but these are in a separate scheme in Poland and Sweden. The extent of the housing costs covered vary – sometimes it is only rent or mortgage but in other countries (e.g., Croatia) heating and costs incurred to improve efficiency are also covered. There is also an absolute condition on the generosity of the payment in Croatia (a maximum of 150% of the minimum wage) and the amounts are reduced in Croatia if the person is of working age. MIS systems also tend to add supplements for certain situations.

Overall, variation is again striking but there is also a good deal of cross-national similarity in MIS schemes and how they relate to individuals or families. The unit of entitlement is formally the individual in most countries and

[20] Coady et al (021) base their designations on those of Immervoll and Knotz (2018) who assess the relative strictness of conditionality measures for jobseekers receiving unemployment and social assistance benefits and produce an overall strictness indicator that incorporates sub-indices on: the severity of availability requirements and suitable work criteria, job search requirement and monitoring, and sanctions.

for this purpose labour market and financial circumstances are important. But the household circumstances predominate in terms of whether one qualifies and the amount granted. The age limit at which one becomes eligible for MIS is 18 in most countries (except Spain where a 23-year threshold suggests that the family is deemed to be the unit of support prior to that). A source of cross-national variation pertains to the way MIS programmes are connected to employment in the six countries. Here, there is no systematic patterning in terms of the different elements considered (the tapering of benefits, in-work support, the presence of active labour market programmes and the strictness of activation).

Flexibility

As mentioned, flexibility is measured by looking at the extent to which the benefit system supports transitions which spell a major change in the family's circumstances. Since we are reliant on existing data sources, we are forced to limit the analysis to the transitions that are covered in the existing data. The two sources are from the OECD - the OECD Tax Benefit Calculator and the general statistical database on benefits, taxation and wages, OECD.Stat. It is the permissibility or relative incentivising or disincentivising of transitions that we look at here, in terms of how the existing system treats different changes of circumstances. We pursue this in two ways. The first concentrates on labour market behaviours using participant tax rates (PTRs) and Marginal Effective Tax Rates (METRs) to examine financial outcomes associated with in the case of the former a move into employment and in the latter an increase in earnings. This is data drawn from OECD.Stat. In a second step, we look more closely at the detail of the benefit system to see how it supports some similar transitions but including also an increase in the number of children in the family. This analysis proceeds by changing some key parameters on the benefit calculator to assess the resulting amount of support from all benefits as a % of net income.

Some qualifications are in order. First, it should be borne in mind that these are hypothetical situations and that we are reliant on the standardised calculations conducted by the OECD. Second, these are relatively static analysis in that a) they consist of just changing one parameter and b) they take no account of other factors that might change in the family's circumstances.

To investigate the incentivisation of employment, the participation tax rate (PTR) and the Marginal Effect Tax Rates (METR) are used. The former is calculated as the share of additional household income upon moving into employment or increasing or reducing employment that is lost due to reductions in benefits and income taxation. The METR is calculated as the share of additional household income from an increase in earnings that is lost due to reductions in benefits and income taxation. As Coady et al (2021: 10) point out, PTRs and METRs are strongly based on household composition, the level of earnings, the generosity of MIS payments, the rate at which support is tapered, and the interaction with the tax system. They also point out that estimates can be especially sensitive to the assumptions underpinning the estimation methodology, including the time horizon used and the size of the earnings increase considered. The estimates presented below come from the OECD's Social and Welfare Statistics database on the basis of the simulated PTRs and METRs for selected European countries in 2022. The table shows the proportion of earnings in the new job that are lost to either higher taxes or lower benefit entitlements when a jobless person takes up employment and their family claims social assistance and/or MIS benefits (including housing benefits).

TABLE 6 PARTICIPATION TAX RATES FOR FAMILIES CLAIMING MIS IN 2022

	Belgium	Croatia	Poland	Spain	Sweden	UK
Single with 2 children taking up a job at:						
average wage	74	53	48	49	54	36
minimum wage	88	79	45	80	-	50
Couple with 2 children, one partner is out of work and the second takes up a job at:						
average wage	66	47	56	54	68	61
minimum wage	84	73	68	90	-	49
Couple with 2 children, the partner works for 67% of average wage and the second partner takes up a job at:						
average wage	46	25	40	20	-	58
minimum wage	17	22	43	7	-	62

Source: https://stats.oecd.org/Index.aspx?DataSetCode=HOURSPOV

The variation is notable, both across countries and, within them, in terms of incentives and disincentives for various types of households. Of all the countries, Belgium is the one that most disincentivises a move into employment with Croatia and the UK forming the opposing case and most incentivising it. The incentivisation varies by type of family and remuneration level, however. The disincentives are greatest in all countries for the take-up of minimum-income jobs and they tend to be greater for a one-earner than a two-earner couple. The details matter, though.

A Belgian lone parent of two children taking up a job at average earnings would lose 74% of her earnings in higher taxes or loss of benefits and 88% if she takes a job at minimum wage. Croatia and Spain, too, strongly disincentivise a person in this situation from taking up low-paid employment but their benefit system is more supportive of a movement into work paid at the average wage. The UK system, and to a lesser extent that of Poland, offers the strongest incentives for lone parents to take up employment, with a preference for that paid at average wage.

Turning to couples, again the take-up of minimum wage work is more strongly discouraged than take-up of an average-waged job except when the other partner has a job that pays average wages – only the UK strongly disincentivises employment of the second partner in this circumstance. The significance of the wage level continues – albeit at somewhat different intensity – when the second partner is out of work (the circumstance being considered here is movement from a workless household to a one-earner household). But in no system is the loss less than 47% and in Belgium and Spain it is 90% if the new job pays minimum wage. There is considerably more encouragement of two-earner households and, in this instance, minimum wage is more encouraged than average-waged work in most countries – the UK is the outlier here where a person taking up a job at the minimum wage with a partner at two-thirds average wage would lose 62% of the additional income from the employment. Of the six different PTR scenarios considered, the most favoured arrangement for families with two children is a set up where one partner works at two-thirds of average wage and the other at minimum wages.

Table 7 presents some companion data showing the METR for families in similar situations as considered for the PTR analysis, although on this occasion the movement being investigated is that from half-time to full-time work for the principal earner.

The situation does not change hugely although generally the METRs are less than the PTRs, with the exception of the UK which moves into strongly negative territory with all changes (except in the case of the couple where the 'moving' partner is in an average-wage job and the other earns two-thirds of the average wage). This seems to be the situation which the UK most prefers. Belgium is close to the UK in quite heavily penalising the move from part-time to full-time work in all situations (again apart from the minimum-wage employment). Croatia is clearly the opposing case, its tax and benefit system favouring employment the most of any country and with very little variation by wage level of job or family circumstance. Spain and Sweden (for which some information is missing) follow Croatia in their level of support for switching from part-time to full-time work. Poland occupies a middling position. It should be noted that all of the six benefit and tax systems are more penalising of the move into full-time work by a lone-parent as against a two-parent household.

TABLE 7 MARGINAL EFFECTIVE TAX RATES FOR FAMILIES CLAIMING MIS IN 2022

	Belgium	Croatia	Poland	Spain	Sweden	UK
Single with 2 children moving from half-time to full-time work at:						
average wage	69	14	51	23	44	70
minimum wage	78	25	48	59	-	68
Couple with 2 children, one partner is out of work and the second moves from half-time to full-time work at:						
average wage	61	22	43	37	39	70
minimum wage	72	24	52	79	-	66

Couple with 2 children, the partner works for 67% of average wage and the second partner moves from half-time to full-time work:						
average wage	61	31	32	32	31	36
minimum wage	37	20	49	7	-	69

In order to focus more closely on the benefit system, we turn to the OECD Tax Benefit Calculator to examine what proportion of benefits people receive or retain in certain situations. It should be noted that the calculation is based on net income and does not include taxes.

The first set of scenarios tests how the benefit system treats earnings loss. To be precise, Figure 1 compares the contribution of benefits to the net income of a two-earner family with two children on combined earnings equivalent to 1.67 cumulatively of the average wage, a one-earner family with two children of the same age on 100% average wage, and the same family when the main earner exits the labour market but the second partner continues full-time working on two-thirds of the average wage.

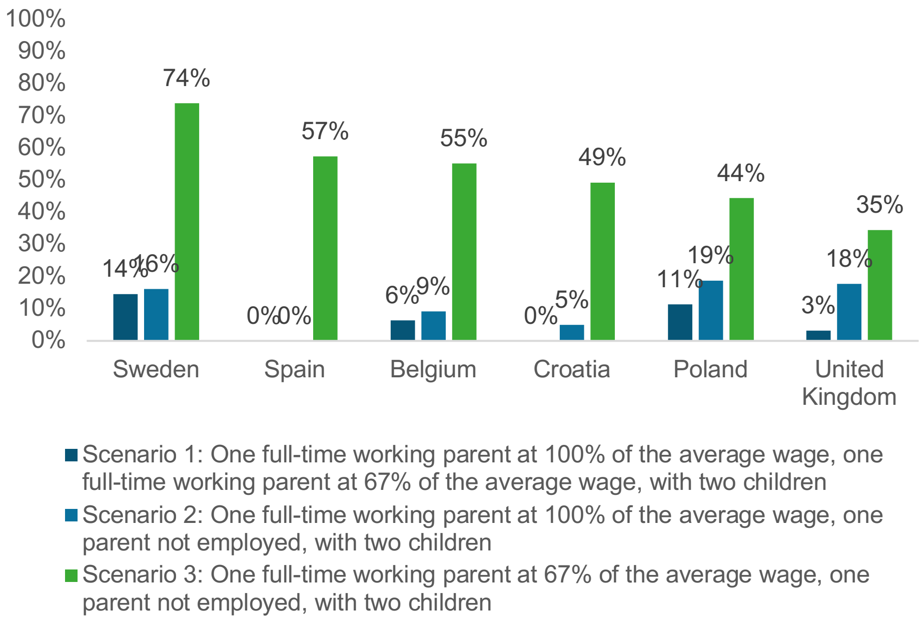

Figure 1 Benefits as % of Net Household Income of Two-parent, Two-child Family Experiencing Earnings' Loss

What Figure 1 first shows is that the two-earner family on 1.67 wages receives quite significant support from the benefit system in two countries: Poland (11% of net income) and Sweden (14%). The situation does not change a lot when the parent earning two-thirds of the average wage withdraws from the labour market as extra help from the benefit system kicks in in each country (except Spain). Poland again shows relative generosity here as does the UK which subsidises the family by 18% of net household income and Sweden (16%). The Belgian system is less generous (9%) as is the Croatian one (5%). When the family's circumstances change again and the second earner (on two-thirds of the minimum wage) now becomes the main earner, the cross-national comparison changes again. Now Sweden is the most generous, making up nearly three-quarters of the family income. This is followed by Spain (57%), Belgium (55%), Croatia (49%) and Poland (44%). The UK brings up the rear here, providing just 35% of the net household income. The UK is very clearly a benefit system supporting paid work and the two-earner household.

Figure 2 continues the comparison but this time looking at labour market entry. System proclivities are generally confirmed by the data which show the contribution of the benefit system when the partner in a one-child family enters the labour market on a part-time basis while the other is working at 100% of the average wage. Support through the benefit systems in Croatia and Spain falls away here offering nothing in either scenario. The UK is the country where this change makes the most difference to the benefit received – the proportion of the family income falling from 8% to 2%. The other three countries react much less severely than the UK and in Sweden actually the change yields a slightly larger share of benefit income. In Belgium the benefit income contribution falls from 9% to 7% and in Poland from 5% to 3%.

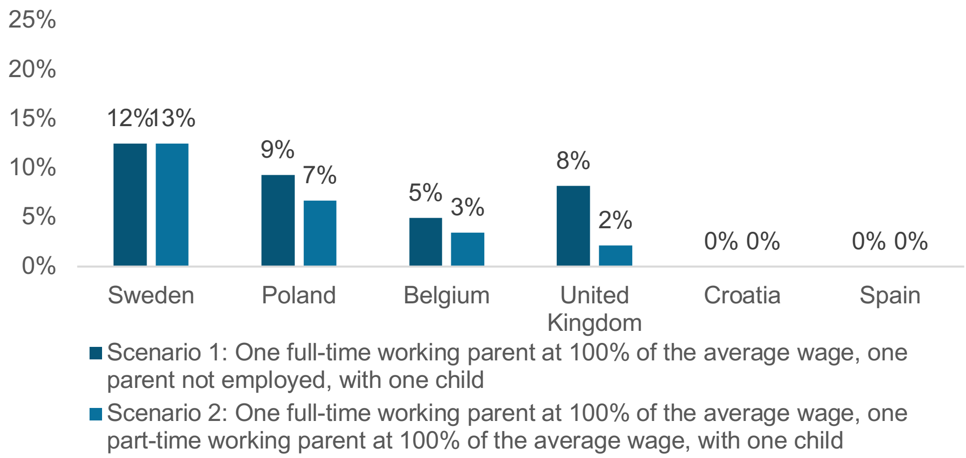

Figure 2 Benefits as % of Net Household Income of Two-parent, One-child Family Undergoing Labour Market Entry

Next, we turn to lone-parent families with two children and examine a change from unemployment or full-time home-making on the part of the parent to part-time employment at average wages. Essentially, this shows the extent to which the system encourages earning and employment for solo parents heading households. Figure 3 reveals Sweden as an outlier on the positive side – with benefits contributing some 65% of the net household income[21] – and parents in Croatia suffering the greatest fallaway of benefits upon taking up employment. The

[21] In the case of the lone parent based full-time in the home, the average benefit reaches 131% of net household income because a number of different allowances can be accumulated depending on the details of the family's circumstances.

patterning and comparison of the other countries is somewhat different to the results for the two-parent households in that Spain, Poland and the UK contribute about the same proportion (42%) to the family's net income and Belgium making a smaller contribution at some 19%.

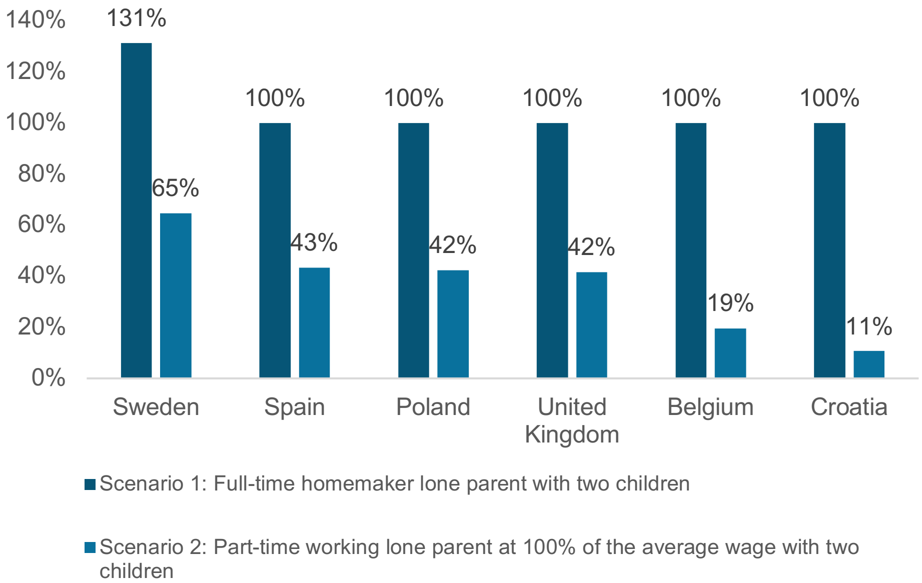

Figure 3 Benefits as % of Net Household Income of Lone Parent with Two Children Entering the Labour Market

Figure 4, presenting the final set of scenarios, shows the extent to which benefit support varies with the number of children, comparing the average benefit contribution to a two-parent, two-earner family with one, two and three children. We have had some sense of this already in Table 2 above but now the focus is on the benefit system as a whole rather family benefit. The pattern shown earlier is confirmed though indicating clearly that the benefit system varies depending on the number of children. The benefit systems in Croatia and Spain make no contribution and that of the UK only a very small contribution. But the other three systems show their support for families with larger numbers of children. A rising number of children makes the greatest difference in Poland with the proportion of the net household income contributed by benefits progressively rising from 6% for one child to 16% for three children. The direction is similar in Belgium although overall less significant. Sweden is generous for each scenario but it seems to be the fact of children rather than the number that makes the difference there.

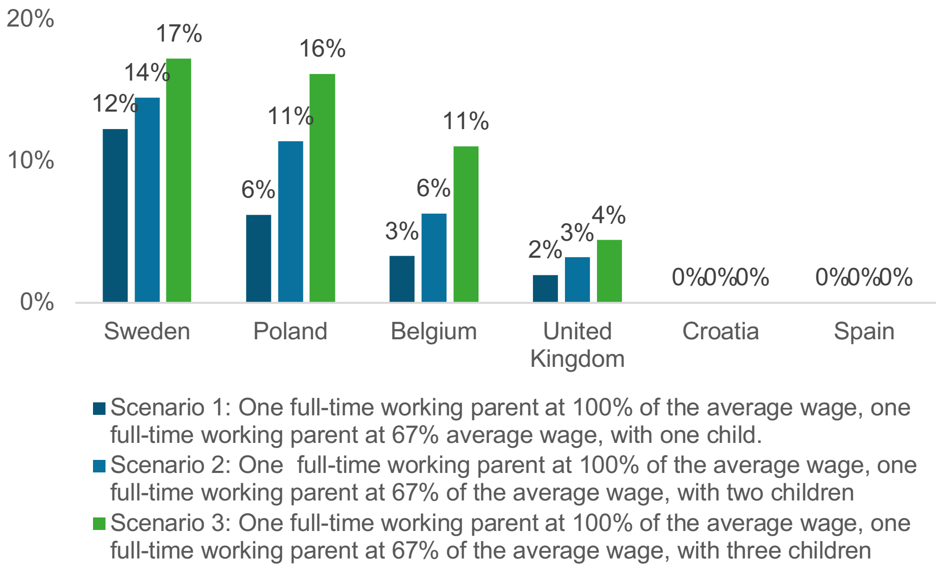

Figure 4 Benefits as % of Net Household of Families with Different Numbers of Children

Looked at as a whole, the degree of flexibility allowed families varies by their situation. But the evidence suggests that this is very finely calibrated, such that it is difficult to discern an underlying logic in each case. Countries vary in how supportive they are of labour market entry and in terms of wage levels of partner's jobs. However, it is possible say that of the countries considered Croatia and Spain tend not to calibrate their benefit systems for a two-earner family model or to incentivise higher numbers of children – these outcomes tend to happen by 'default' through a relatively neutral system, although of course they are not by accident.

Overview and Conclusion

This report has sought to identify key features of the income support systems in the six countries as they relate to families with children. The underlying aim was to set out the institutional context – especially of the benefit system – for how it constructs and supports particular structural arrangements and also some behavioural pathways for parents and families. For this purpose, two benefits were carefully examined and compared - child benefits and MIS – on the basis of two criteria - inclusiveness and flexibility. The first examined the range of personal and families and situations covered (included/excluded) in eligibility and entitlement conditions and the second looked at how the benefit systems in the six countries incentivised and disincentivised particular employment and family structural arrangements.

What the analysis shows is that the presence of children motivates support in all countries but to a differential degree and with different priorities. Four of the strongest points of variation are: whether a universal provision that supports all children regardless of their parents' income or other situation exists; whether this is accompanied by a second tier of child-specific supports (usually means-tested); the criteria used to determine the amount of the benefit; which family situations or circumstances or needs are recognised for the purposes of child benefits. In the latter regard, the research established that the universe of coverage envisages three circumstances: children being reared by one parent; children with a disability; families with larger numbers of children. The countries that are most supportive of children in terms of the degree of inclusiveness of their child benefit system are Belgium and Poland, followed by Sweden.

When it comes to the MIS, it is more difficult to identify the family-related components. These tend to be individual oriented in a way that child benefits are not, although in all six countries the benefit amount is calculated on the basis of the household, suggesting assumptions and practices relating to dependence among people who share a household or family. What matters also for MIS is engagement with the labour market on the part of the claimant.

In its third part the report looked at flexibility, interpreting this as the extent to which different family structures and work-family arrangements garner support across the different countries. Here, the focus was on the benefit system as a whole. The results again show variation across the countries but they also confirm some of the general findings on the two income support case studies in that Croatia and Spain make the least use of their income support systems to tailor the work-life balance or income situation of parents (except in the case of lone parents). They are the countries also least likely to vary benefit support according to the number of children in a family. The UK is similar in the latter regard but its benefit system is very finely tuned to encouraging employment on the part of benefit recipients. It is notably unsupportive of one-earner families, even when the earner is on a relatively low wage. Sweden and Belgium stand out as countries that offer generous support to families when wages are low. These, along with Poland, make strong use of their income support systems to incentivise particular family-based behaviours and structures.

Taken as a whole, the evidence and analysis impart a number of markers for future analysis. First, the presence of different priorities within and across countries has implications for family well-being and resilience that need to be investigated. Second, the very different approaches taken by child benefits and MIS – with one very focused on family form and organisation and the other prioritising labour market participation - raise questions about possible contradictions and lacking complementary in public systems of support regarding families. Third, we have used the criteria of inclusiveness and flexibility here in a relatively simple manner. But these are not simple concepts. There are different aspects involved as well as a complexity in that, for example, inclusiveness in regard to a collective unit (which is what we examined here) may have different consequences for the individuals that make up that unit. To take just one example, a policy that is judged as inclusive of families – in that it pays high premiums to large families – may incentivise full-time motherhood and so, viewed from the perspective of the individual, might exclude that person from paid work as a valued sphere of life. So, the potential significance of gender and generational factors and how the different criteria work intersectionally have to be borne in mind. These and other matters will be taken up in further deliverables of this WP, and the work of rEUsilience as a whole.

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APPENDIX TABLE 1 OVERVIEW OF FAMILY BENEFITS IN THE SIX COUNTRIES (AS OF JULY 2022)

	Belgium (Flanders)	Croatia	Poland	Spain	Sweden	UK
General family benefit system	▪ Growth Package (Groeipakket); especially the Base Benefit (Basisbedrag) and the Social Allowance (Sociale Toeslag)	▪ Child Allowance (Doplatak za djecu)	▪ Family Allowance (Zasiłek rodzinny) ▪ Family 500 Plus (Świadczenie wychowawcze)	▪ Family Allowance (prestaciones familiars) ▪ Child Support Aid (complemento a la infancia) as part of the Minimum Income Support (Ingreso Mínimo Vital)	▪ Child Allowance (Barnbidrag)	▪ Child Benefit ▪ Scottish Child Payment (in Scotland only)
For childbirth or adoption	▪ Existing as part of the Growth Package: Starting Benefit (Startbedrag)	▪ Cash Lump-sum Assistance for a New-born Child (Jednokratna novčana potpora za novorođeno dijete)	▪ Supplement existing as part of the Family Allowance above: One-off Childbirth Allowance (dodatek z tytułu urodzenia się dziecka)	▪ Existing as part of the Family Allowance above (for multiple births/adoptions or births/adoptions in large families)	▪ Allowance for the Adoption of a Foreign Child (Adoptionsbidrag)	▪ Sure Start Maternity Grant (in England, Wales and Northern Ireland) ▪ Best Start Grant and Best Start Foods (in Scotland)
For families with two or more children	▪ Different rates of the Base Benefit according to the family size for children born in 2018 and before only	▪ Supplement existing as part of the Child Allowance above (for the third and fourth child)	▪ Supplement existing as part of the Family Allowance above (for the third child onwards): Allowance for raising a child in a large family (dodatek z tytułu wychowywania dziecka w rodzinie wielodzietnej) ▪ Family Care Capital (Ustawa o rodzinnym kapitale opiekuńczym)	▪ Existing as part of the Family Allowance above (for the third child onwards) – single payment only for a child's birth or adoption	▪ Supplement existing as part of the child allowance above (for the second child onwards)	*None*

			(for the second child onwards)			
For single parent families	▪ Different rates of the Social Allowance for single parents for children born in 2018 and before only	▪ Supplement existing as part of the Child Allowance above	▪ Supplement existing as part of the Family Allowance above: Single Parent Allowance (dodatek z tytułu samotnego wychowywania dziecka)	▪ Existing as part of the Family Allowance above (for the third child onwards) – single payment only for a child's birth or adoption within single parent families	*None*	*None*
For disabled children	▪ Existing as part of the Growth Package above: Care Allowance for Children with Specific Support Needs (Zorgtoeslag voor kinderen met een specifieke ondersteuningsbehoefte)	▪ Supplement existing as part of the Child Allowance above	▪ Supplement existing as part of the Family Allowance above (Dodatek z tytułu kształcenia i rehabilitacji dziecka niepełnosprawnego) ▪ Care benefit (Świadczenia opiekuńcze)	▪ Existing as part of the family allowance above: Benefits for Disabled Children (prestaciones por hijo o menor acogido a cargo)	▪ Additional care cost compensation for children (Merkostnadsersättning för barn)	▪ Disability living allowance for children (in England, Wales and Northern Ireland) ▪ Child disability payment (in Scotland)
Other benefits/ supplements	▪ Existing as part of the Growth Package above: School Bonus (Schoolbonus); School Allowance (Schooltoeslag); Orphan Allowance (Wezentoeslag); Foster Care Allowance (Pleegzorgtoeslag)	*None*	▪ Supplement existing as part of the Family Allowance above: Commencement of a School Year Supplement (Dodatek z tytułu rozpoczęcia roku szkolnego) ▪ Supplement existing as part of the Family Allowance above: Child Education out of the	*None*	▪ Housing allowance (Bostadsbidrag) ▪ Alimony advance payments (Underhållsstöd)	*None*

			Place of Residence Supplement (Dodatek z tytułu podjecia przez dziecko nauki w szkole poza miejscem zamieszkania) ▪ Good Start Benefit (Świadczenie “Dobry start”)			
Tax benefits (excluding those for childcare costs)	▪ Tax rebates for families with children	▪ Tax relief and deductions for dependent children	*None*	▪ Tax allowances for families with children	*None*	▪ Child Tax Credit

*Policies highlighted in blue are included in the analysis below.

APPENDIX TABLE 2 TYPES OF MINIMUM INCOME SCHEMES IN THE SIX COUNTRIES ACCORDING TO MISSOC AND OECD TAX BENEFIT COUNTRY REPORTS (AS OF JULY 2022)

	MIS types	Main target groups	Degree of discretion	Form of provision	Periodic or one-off
Belgium	Social Integration Income (Revenu d'Intégration Sociale)	People in need (aged 18+ or younger if vulnerable)	Rights-based	Cash	Periodic
	Equivalent Integration Income (aide sociale équivalente au revenu d'intégration)	People who are not entitled to the Integration Income but are in similar need	Discretionary	Cash	Periodic
Croatia	Guaranteed Minimum Benefit (Zajamčena Minimalna Naknada)	People in need regardless of age	Rights-based	Cash	Periodic
	One-off Allowance (Jednokratna Naknada)	People in need due to the emergence of exceptional situations	Discretionary	Cash or in-kind benefit	One-off
Poland					

	Periodic Allowance	People in need (aged 18+)	The payment is right-based but the amount and duration is discretionary	Cash	Periodic
	Purpose Allowance	People in need due to the emergence of exceptional situations (including those who fail to meet the Periodic Allowance's income criterion)	Discretionary	Cash or in-kind benefit	One-off
Spain	Minimum Living Income (Ingreso Mínimo Vital)	People in need (aged 23+ or 18+ if vulnerable)	Rights-based	Cash	Periodic
	Regional-level Minimum Income Schemes: Catalonia's Garuanteed Citizenship Income (Renta Garantizada de Ciudadania)	People in need (aged 23+ or 18+ if vulnerable)	?	?	Periodic
Sweden	Social Assistance (Ekonomiskt Bistånd)	People in need regardless of age	The payment is rights-based but the amount and	Cash	Periodic

			duration is discretionary		
UK	Universal Credit	People in need aged 18+ but up to pensionable age	Rights-based	Cash	Periodic

*Policies highlighted in blue are included in the analysis below.

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This project has received funding from the European Union's Horizon Europe research and innovation programme under Grant Agreement No Project 101060410 and Innovate UK, the UK's Innovation Agency.

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