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**GENDER IN THE LIBERAL WELFARE STATES:
AUSTRALIA, CANADA, THE UNITED KINGDOM AND THE UNITED STATES**

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INTRODUCTION: GENDERING THE COMPARATIVE ANALYSIS OF STATE

SOCIAL PROVISION AND WELFARE STATES¹

Feminist movements and more anonymous forces for legal equality have helped to usher in a host of legal and political reforms across most western states.² One set of important reforms occurred in the welfare states of these countries: systems of social provision moved from being expressly gender-differentiated, based on a logic of gender difference, to gender neutrality. Yet despite the gender-neutrality in the formal provisions of most contemporary welfare states, including those in Australia, Britain, Canada and the United States, these systems of social provision remain profoundly gendered. A wealth of empirical research demonstrates that state social provision affects women's and men's material situations, shapes gender relationships, structures political conflict and participation, and contributes to the formation and mobilization of identities and interests (see, e.g., Finch and Groves 1983; Gordon 1990; Hernes 1988; Land 1983; Lake 1992; Nelson 1984, 1990; Orloff 1991; Pedersen 1993; Piven 1985; Saraceno 1994; Vandepol 1982; Waerness 1984). Until recently, however, mainstream comparative research neglected gender, while most feminist research on the welfare state had not been systematically comparative (Orloff 1993a; Sainsbury

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² It may be that we are passing out of the era of systems of state social provision that might properly be termed (Keynesian) "welfare states" (in the sense of being committed to the welfare of the citizenry, rather than merely preventing riot and starvation) and into an era of what might be called "Schumpeterian workfare states" (Jessop 1993). However, academics continue to refer to these systems in the western capitalist democracies as "welfare states"; so, for the time being, will I.

1993).³ But in the last few years, a number of analysts have begun to tackle the tasks of gendering the comparative analytic frameworks used to understand welfare states and comparing the effects of state social provision on gender relations across a range of countries -- tasks I take up in this paper, a comparative analysis of the gendered effects of income maintenance programs in four countries, Australia, Canada, Great Britain, and the United States (for other such efforts, see Heitlinger 1993; Hobson 1990, 1994; Jenson 1986; Koven and Michel 1993; Leira 1992; Lewis 1992; Lister 1994a; O'Connor 1993a, 1993b; Orloff 1993a; Pedersen 1993; Ruggie 1984; Sainsbury 1993, 1994a, 1994b; Shaver 1990, 1993a; Skocpol and Ritter 1991; Skocpol 1992; Taylor-Gooby 1991).

THE LITERATURE ON GENDER AND WELFARE STATES

Over the past two decades, we have amassed a large body of research showing that state policies of all kinds are shaped by gender relations and in turn affect gender relations. Generally speaking, one of two broad understandings of the relationship between the state and gender predominated in analyses of social policy. The first saw states contributing to the *reproduction* of oppressive gender relations, the second saw states varying in terms of their *ameliorative* impact on social inequality. Analysts emphasizing reproduction have focused on the ways in which state social provision enforces or encourages conformity to the traditional gendered division of labor and its concomitant, women's economic dependency; little of this work has been comparative. Analysts emphasizing amelioration have focused on poverty and generally have been less attentive to gender relations than to women's economic situation; some have explored cross-national differences in

³ By "feminist," I mean simply that gender is considered essential to the analysis.

poverty rates and social spending. More recently, a third strand of thinking has emerged from theoretically-informed comparative analyses of gender and social policies, emphasizing the *variation* in the effects of social policies on gender: male dominance was not necessarily reproduced, indeed, it was often transformed; some amelioration was possible, although it was sometimes coupled with greater regulation by the state.

All of these approaches have helped to show the importance of gender relations in the welfare state and the significance of welfare states for the situations of men and women and their relationships. Yet these studies share some analytic weaknesses: an inadequate theorization of the political interests of gender and a failure to specify the dimensions of social provision and other state interventions relevant for gender (and other) relations (see also Borchorst 1994a). The two weaknesses are related -- if one wants to argue that welfare states help to promote patriarchy or that welfare state benefits help women -- one needs to specify the yardsticks for measuring these effects.⁴ What will constitute evidence that a given policy works for or against male dominance? Are women's interests limited to the economic (i.e., more money)? Comparative analyses have generally had a more nuanced view of gender and state policies, but the understandings of gender interests and their measures often remain implicit and, to some extent, idiosyncratic.

How to overcome these difficulties in analyzing the relationship between gender and welfare states? First, we need some explicit framework for assessing the gendered effects of social policy which is informed by an understanding of gender interests. Of course, one must be careful making assertions about "women's

⁴ One could agree that there are cross-national and/or historical variations in the form of welfare states that affect gender interests in equivalent ways -- but it seems likely both that gender interests are constituted differently under different systems *and* that different systems do better at satisfying demands for gender equity/equality *or* women's demands (not necessarily the same things) than others.

interests" (see, e.g., Molyneux 1985; Jonasdottir 1988). Women who have stable ties to breadwinners may well see their interests as dependent on their husbands' well-being and therefore, as well-served by market provision (provided, of course, that their husbands can command a decent market wage and that they do not anticipate being deserted). And clearly, which institutional sphere -- market or state -- is preferable to the family as a provider of welfare will depend on different women's earnings capacities (i.e., their human or cultural capital or their class position -- take your theoretical pick), the rules under which benefits can be claimed, and a range of other factors, which will almost certainly not have the same impact on all women. Given women's historic weaknesses in the labor market, combined with a preference only recently under challenge for (most) mothers to stay at home to care for their children, it is the state which has offered an alternative to the family -- or, more accurately, marriage -- as a source of income for women so that they may support their families, either through outright grants or as a provider of supplemental assistance to women in the paid workforce. This may be changing in the contemporary period for some women who can do well in the labor market, particularly where there have been strong legal efforts to overcome discrimination. Below, I argue for an understanding of women's gender interests as securing treatment for those doing caring work (either full-time or in combination with paid work) equal to that for those doing primarily paid work and as securing the capacity to form and maintain an autonomous household.

Second, we need to examine the ways in which different aspects of state provision and intervention are articulated, and how they fit within the larger power structures. One promising development has come with the elaboration of the concept of "social policy regimes," which offers a way to analyze the qualitative variation across national systems. As Shaver (1990) describes them, social policy regimes are institutionalized patterns in welfare state provision establishing systematic relations between the state and social structures of conflict,

domination, and accomodation. Such patterns refer to the terms and conditions under which claims may be made on the resources of the state, and reciprocally, the terms and conditions of economic, social, and political obligation to the state. The elements constituting social policy regimes may be economic, legal, political and/or discursive. These regimes are to be found in both individual institutions of the welfare state and in common patterns cutting across domains of social provision, such as health, education, income maintenance, or housing. Mainstream analysts of regime types have been concerned with the effects of welfare states on class relations and particularly with whether the state can "push back the frontiers of capitalism" (Esping-Andersen 1990). Feminist analysts using the regime type concept are interested in the gender effects of state social policy, and sometimes also in the relation between gender and class effects; they are struggling with the question of how to define and measure gender interests (e.g., "woman-friendliness," in the felicitous phrase coined by Helga Hernes [1988]).

GENDER AND REGIME TYPES

Much recent work on gender and welfare states builds on Gøsta Esping-Andersen's *Three Worlds of Welfare Capitalism* (1990). While Esping-Andersen's work only incidentally takes account of gender differences among different types of welfare states, the ideal-typical scheme he proposed has inspired a great deal of fruitful research on the variation among regimes as investigators have utilized or reworked his schema to incorporate gender. In brief, Esping-Andersen proposes three dimensions that characterize welfare states: the *relationship between the state and the market* in providing welfare (broadly understood), the effects of the welfare state on social *stratification*, and the character of *social rights*, particularly their generosity and how eligibility is structured (e.g., the bases for making

claims). Central to the understanding of how welfare states may affect class relations are the concepts of social rights and the "*de-commodification* of labor," defined as the "degree to which the individual's typical life situation is freed from dependence on the labor market" (Esping-Andersen and Korpi 1987: 40). These rights affect the class balance of power by insulating workers to some extent from market pressures and by contributing to working-class political capacities.

Esping-Andersen has constructed a typology of regimes representing "three worlds of welfare capitalism" -- liberal, conservative-corporatist and social-democratic -- based on where they fall out on the three dimensions. Liberal regimes promote market provision wherever possible, encourage social dualisms between the majority of citizens who rely mainly on the market and those who rely principally on public provision and do little to offer citizens alternatives to participating in the market for services and income. The welfare state is well-developed in both social-democratic and conservative-corporatist regimes, bringing almost all citizens under the umbrella of state provision, but in other ways the two types differ. The former are universalistic and egalitarian, while the latter preserve status and class differentials. Only social-democratic regimes promote significant decommodification of labor, for conservative-corporatist regimes condition their relatively generous benefits on strong ties to the labor market. There are implications for labor market policy as well, with liberal regimes reluctant to embrace active labor market measures and the others more consciously steering the economy, though in different directions. Despite the fact that "there is no single pure case," Esping-Andersen classified the United States, Canada, Australia, and (probably) Great Britain as liberal regimes; the Nordic countries are identified as social-democratic regimes; and Austria, France, Germany, Italy, and the Netherlands are conservative-corporatist regimes.

Many feminist analysts have critiqued Esping-Andersen for the gender-blindness of his scheme: his citizens are implicitly male workers, his dimensions

tap into states' impact on class relations and the relationship between states and markets without considering gender differences within classes or the relations between states and families, he leaves invisible women's work on behalf of societal welfare (i.e., unpaid caring/domestic labor), and his framework fails to consider states' effects on gender relations, inequalities and power (see, e.g., O'Connor 1993; Orloff 1993a; Lewis 1993; and the essays in Sainsbury 1994a). Still, his work has been provocative in the best sense of the term -- it has stimulated many analysts to try to make sense of gendered relations and patterns in welfare states. Analysts interested in gender have been concerned with determining if liberal, conservative and social-democratic regime types have distinctive effects on men and women, or if there are analytic dimensions relevant for gender relations -- such as "models of motherhood" (Leira 1992) or the male breadwinner-female housewife family (Lewis 1992) -- which may or may not co-vary with class-related dimensions.

Some analysts have compared the effects on men and women of states classified as having different welfare regimes on the basis of existing typologies based on state-market relations and class effects, as Esping-Andersen (1990: chs.7-9) himself does in his examination of labor markets in the United States, Germany, and Sweden (see also Ruggie 1984). Extending the analysis of regime types to consider the ways in which care work (broadly defined) is organized and supported has been a key area of concern for those interested in states and gender relations (Taylor-Gooby 1991; Gustafsson 1994). Sainsbury (1993) compares four different welfare states -- the U.S., the U.K., the Netherlands, and Sweden (which, although she is not explicit as to her selection criteria, do correspond to Esping-Andersen's three types [allowing for Britain's status as a mixed type]). She considers the effects on women of two aspects of social provision: first, the bases for making welfare claims (an element of social rights), and, second, programmatic characteristics (i.e., social assistance, social insurance or universal entitlements). She shows that indeed, whether claims are based on labor market status, need or

citizenship is significant for gendered outcomes; women do best in Sweden, a system with strong universal characteristics, and fare worst in the United States and Britain, the countries with claims based principally on labor market participation. Lewis and Astrom (1992), however, claim that Sweden's "woman-friendly" universalism is based on the fact that most Swedish women are in the paid labor force, thus successfully laying claim to the status of "worker citizens" as they also press demands based on "difference" (echoing Ruggie's [1984] argument). This would imply that the claims bases delineated by Esping-Andersen, Korpi and others as important for the character of social rights must also be considered in terms of their gender content, and that we need also to evaluate additional bases for making claims, particularly status as a spouse.

Some analysts are using data from the Luxembourg Income Study to assess regime-type concepts, in essence using regime-type as a dummy variable. For example, Sara McLanahan and her colleagues have used LIS data to examine women's poverty levels, the association of different women's roles with poverty rates, and differences in men's and women's poverty in countries said by Esping-Andersen and others to represent different regime types (McLanahan, Caspar and Sorenson forthcoming; Caspar, McLanahan and Garfinkel 1994; Wong, Garfinkel and McLanahan 1993). These studies find relatively high poverty rates for single mothers and relatively high gender gaps in poverty (i.e., the difference between men's and women's rates) in all four of the liberal countries and in Germany, but most notably in the United States, Canada and Australia. Moreover, the policy strategies of countries which have relatively low poverty rates for women and low gender gaps differ qualitatively and in ways which seem to be related to regime types as defined by Esping-Andersen -- Sweden reduces women's poverty by promoting their employment, Italy by reinforcing marriage (so that women's access to men's wages is [they assume] assured), the Netherlands by providing generous social transfers to all citizens. However, there are variations that cannot

be explained strictly with reference to regime type; for example, inequality among women occupying different combinations of roles (marital status, employment status and motherhood status) is least in Sweden, the Netherlands and the United Kingdom, each representing a different regime. It is worth noting further that gender roles appear to have a significant influence on outcomes apart from differences in regimes types: "marriage and work reduce the risk of poverty for women in all countries, whereas motherhood increases the chances of being poor. The only mothers who have a better than average chance of staying out of poverty are mothers who combine parenthood and work with marriage" (McLanahan, Caspar and Sorenson forthcoming: 18). In other words, being linked to a man through marriage or being like a man in working for pay are the ways women can (most often) stay out of poverty; engaging in the unpaid caring work that is women's responsibility in the sexual division of labor without access to a male wage makes women vulnerable to poverty. This, too, suggests that Esping-Andersen's regime-type framework is inadequate for understanding some key gendered effects of policy.

GENDERED DIMENSIONS FOR ASSESSING WELFARE REGIMES

Feminist analysts note that Esping-Andersen's framework was developed to address issues of class rather than gender power. Therefore, we argue, we cannot fully tap into states' effects on gender relations simply by looking at how women fare in different regime types using his (or others') gender-blind dimensions. Rather, we need specifically *gendered dimensions* to assess the impact of state policies on gender relations. Thus, these dimensions inherently incorporate assumptions about the character of gender interests. Scholars such as Jane Lewis (1992) and Diane Sainsbury (1994b) have developed such dimensions within

frameworks that do not also include the dimensions of mainstream schemes. Others, including the author, have tried to build frameworks that incorporate both gender and class dimensions (Orloff 1993a; see also O'Connor 1993; Shaver 1990).⁵

Jane Lewis argues for considering policy regimes in terms of their different levels of *commitment to a male breadwinner-female housewife household form*, which in ideal-typical form would "find married women excluded from the labour market, firmly subordinated to their husbands for the purposes of social security entitlements and tax, and expected to undertake the work of caring (for children and other dependants) at home without public support" (1992: 162). Women's interests, she thereby implies, are least well served by policies supporting this traditional set of arrangements (here echoing the reproduction analysts), but fare somewhat better when policy supports dual-earner households (thus opening up the question of variable effects). She contrasts France, Sweden, Britain and Ireland, finding Britain and Ireland strongly committed to the breadwinner form, France less strongly so, and Sweden only weakly so, tending to a dual-breadwinner form. Although these cases are also in different regime clusters in Esping-Andersen's scheme, there is considerable variation in the extent to which states approximate the ideal-type within his clusters (e.g., Germany vs. France within the corporatist type or Norway vs. Sweden within the social-democratic cluster). Sainsbury (1994b) proposes examining states in terms of their similarity to one of two gendered ideal-types: the breadwinner model (similar to Lewis's conception) and what she calls an individual model, where both men and women are earners and carers, benefits are targetted on individuals, and much caring

⁵ Thus, I disagree with Sainsbury's (1994c) argument that building a regime-type framework that can assess gendered effects will proceed best by "separating gender out" -- rather, I want to build dimensions that can assess the specific effects of the state on gender, but consider this alongside class effects. Sainsbury describes my earlier work as though I were interested only in refashioning mainstream concepts to encompass men and women. I think that she has misread my efforts -- I do argue for "refashioning" mainstream concepts by *gendering* them. But in addition, I propose new and specifically gendered dimensions (Orloff 1993a).

work is paid and provided publicly.⁶

While Lewis's approach does underline the fact that dimensions of variability based on gender relations do not correlate neatly with class-related dimensions (see also Shaver and Bradshaw 1993), this model seems to conflate a number of potentially separable dimensions, most notably women's exclusion from paid work and their subordination within a male-headed family (these are discussed more fully below). I would argue for examining these factors as separate dimensions of variability. Moreover, Lewis's formulation may give too much significance to women's paid work and not enough to other aspects of individual autonomy; for example, in discussing the French case, Lewis notes that women's paid work was not considered problematic partly because men retained authority over their wives through the patriarchal legal framework in force until 1970 (Lewis 1992: 165). Along with access to paid work and women's freedom from dependence on male breadwinners, one must consider issues of autonomy and bodily integrity (Shaver 1993a).

My own strategy has been to build a gendered conceptual apparatus for evaluating welfare states by drawing on feminist and mainstream work on regimes types (Orloff 1993a; see also O'Connor 1993). Thus, gendered analyses are built on the basis of the cumulated cross-national research findings about the relationship between states and markets and about the varying effects of states on class relations. While most of this research has been gender-blind, it is not irrelevant for gender analysis, as the work discussed earlier makes clear.

A good deal of research makes clear that the organization of *state-market*

⁶ However, we may need to consider whether some elements of the individual model can be provided by non-state sources; for example, in looking at services related to the organization of daily life, O'Connor (forthcoming) finds that market provision of services is important in allowing some American women to enter the paid labor force (although this certainly reflects and reinforces market-based stratification).

relations and of the power balance among labor, state and capital decisively affect the character of women's labor force participation, the success of gender equality efforts and the organization of public family support systems (see, e.g., Ruggie 1984; Jenson 1986; Pedersen 1993). In addition, the role of families with particular sorts of gendered divisions of labor and power in the provision of welfare services and income has been highlighted by feminist analyses (e.g., Hobson 1990; Finch and Groves 1983; Ungerson 1990). Thus far, this dimension has received a great deal of attention, largely because the majority of comparative analyses have focused on countries which contrast sharply in terms of the role of the state and the overall institutional organization of welfare services and incomes. For example, Ruggie (1984) compares the U.K. and Sweden, Pedersen (1993) and Jenson (1986) compare Britain and France, and Esping-Andersen (1990) contrasts the U.S., Sweden, and Germany. Thus, these comparisons have featured one of the liberal countries in contrast with a conservative and/or a social-democratic regime -- in either case, states with larger roles than has typically been the case in any of the liberal countries. In such comparisons, the state-market-family relations dimension tends to overshadow other characteristics as relevant for gendered outcomes. (Similarly, when all western welfare states are included in an analysis, this dimension stands out). I hope to extend our understanding of states' impact on gender by, in effect, holding constant the dimension of state-market relations so that the contribution of other dimensions to gendered variation can be highlighted and that differences (as well as likenesses) among countries with a similar institutional framework can be discerned.

I also would argue that we need to investigate *stratification*. To assess the effects of policy regimes on gender relations, we must assess how state social provision contributes to gender differentiation on the systemic level (e.g., through creating different programs for labor market and family "failures") and individually (e.g., through processes of making claims on the state, where men

have typically made claims as individuals and workers, women often as dependents and family members). Some states have reinforced social divisions through the establishment of separate programs for different groups, as in Germany's pension programs for salaried and waged workers or the separate welfare systems for indigenous peoples run by Australia and the United States (Shaver 1990). Similarly, differentiation in gendered identities and interests can be strengthened by offering different programs for women and men. Feminist analysts have argued that there is a pronounced and gendered dualism *within* systems of social provision (see, e.g., Fraser 1989; Shaver 1987, 1990, 1991, 1993b). This is marked, and partially determined, by the differing kinds of claims made by men and women. Men tend to make claims as worker-citizens -- they need programs to compensate for failures in the labor market. Women are more likely to make claims as members of families and need programs especially to compensate for family "failures".

Gender differentiation may -- at least theoretically -- be compatible with gender equality (defined in terms of equal access to socially-valued resources), and therefore I remain agnostic as to whether moves from the "logic of difference" to the "logic of sameness" (Shaver 1993b) alone can enhance women's interests. However, it seems that in most systems of social provision, claims based on motherhood or marriage to a covered wage-earner are associated with lower benefit levels or fewer services than work-based claims, and often with more stringent eligibility requirements. Helga Hernes argues that "there is a political struggle between men and women to count certain types of unpaid work as a legitimate basis for welfare rights" (1988: 194), although there are clearly cross-national and historical differences in the extent to which states help to reduce the costs to women for engaging in traditional patterns of participation in paid and unpaid work -- in terms of current living standards and pension or other social benefits.

I view equal access to benefits of similar quality as key elements of women's interests -- so I attend to how women are treated relative to men. Lewis's and Sainsbury's schemes seem to give inadequate attention to women's situation when they are not linked to men through marriage. As Barbara Hobson points out (1994: 175), Lewis's classificatory scheme does not capture a core feature in the variability of welfare states: that "they redistribute resources and services that affect women's economic well-being," particularly that of single mothers.⁷ She goes on, "to cluster Britain, the Netherlands and Germany into a strong breadwinner model is to ignore the differences in poverty among solo mothers, who are the residuum in the male breadwinner ideology" (Hobson 1994: 175).

Finally, I am interested in the effects of *social rights* on power relations of all kinds. *De-commodification* "protects individuals, irrespective of gender, from total dependence on the labor market for survival... [a] protection from forced participation, irrespective of age, health conditions, family status, availability of suitable employment, [that] is obviously of major importance to both men and women" (O'Connor 1993a: 513).⁸ For Esping-Andersen, de-commodification is at the core of the state's emancipatory potential. But this does not exhaust the ways in which states affect social relations. In particular, not all social groups have equal access to the jobs that allow personal independence and access to decommodifying benefits. I have argued that *access to paid work* and to the *services that facilitate employment* for caregivers are critical gender dimensions of welfare regime variability, and reflect core gendered interests of women (see also

⁷ Solo mothers are, Hobson (1994) argues, a strategically important group -- because all married mothers are potentially *solo* mothers, their treatment is consequential for women's marriage relationships through (partially) setting the terms upon which women can exit from marriage or cohabitation.

⁸ However, we must consider as well how decommodifying benefits may affect men and women differently (Orloff 1993a: 317).

O'Connor 1993a).⁹ I also have proposed to consider how benefits contribute to the *capacity to form and maintain an autonomous household*, a dimension which indicates the ability of those who do most of the domestic and caring work -- almost all women -- to form and maintain autonomous households, that is, to survive and support their children without having to marry to gain access to breadwinners' income. This enhances women's power vis-a-vis men within marriages and families?¹⁰ (This does not imply that gender relations are only constituted within heterosexual family relationships, simply that this is a very significant site for their constitution; it does imply that women have an interest in gaining an equal share of power within heterosexual relationships). This implies a greater range of choice for women, and I assume it is in their interests. The capacity to form and maintain a household embodies what some have called "the right to a family," and also reflects the character of laws regulating sexuality, marriage and household formation (e.g., laws on divorce, custody, homosexuality).¹¹ Men typically gain this capacity through their market work;

⁹ O'Connor (1993a: 511) conceptualizes these dimensions as aspects of the ways in which the state affects "personal autonomy and insulation from personal and/or public dependence," which centrally affects gender relations. Paid work is a principal avenue by which women have sought to enhance their independence from husbands and fathers in families -- thereby undermining the breadwinner-housewife family form -- and claim full status as "independent" citizens; it is also a prerequisite for gaining access to work-related benefits which decommodify labor. Indeed, some mainstream analysts (e.g., Hicks) have argued that it is assuring access to paid work -- i.e., *full employment* -- that is the most important social right of citizenship; decommodifying benefits are premised upon a guarantee of access to paid work and, e.g., in the Swedish case, on the taxes generated by high levels of employment.

¹⁰ This also pushes us to assess women's status when they are not linked to men in order to assess the *potential* vulnerability of all women and its contribution to the relative powers of marriage partners (England and Kilbourne 1990).

¹¹ The dimension of capacity to form an autonomous household seems to imply more than individual independence -- it also gets at whether women can support families (as well as themselves), thus including some of the legal issues around women's heading households. Furthermore, this dimension seems amenable to being used to get at some of the ways in which states structure 'racial' or ethnic inequalities. A number of women of color (e.g., Hooks 1982) have criticized some white feminists' focus on the family (and especially economic dependency within the family) as a source of oppression, pointing out that families can also be sites of resistance -- particularly when racist policies are aimed at reducing the capacities of minority populations to

many income maintenance programs allow men to continue to support their families when they lose their wage-earning capacities temporarily (unemployment, disability) or permanently (retirement, disability). However, access to paid work is not the only route for women to achieve freedom from dependence on male breadwinners; women have also pursued and sometimes achieved the equivalent of a citizen's wage for mothering, as in the Netherlands (Knijn 1994; see also Pedersen 1993 on the struggle for motherhood endowments in Britain). State policies have differed in how (if at all) they support the capacity to form and maintain an autonomous household for women. Hobson (1994) suggests that some countries exhibit patterns "in which social provisioning, services and protective legislation are aimed at a mother who works outside the home. Others are built around a mother carer in the home; and some have contradictory policies..." Thus, some regimes have promoted *women's employment* through varying combinations of child-care services, wage subsidies, or improved-access (e.g., affirmative action or employment equity) policies; this overlaps, then, with the dimension of access to paid work. Other regimes have offered *support for solo mothers* to stay at home to care for their children. This policy strategy (sometimes referred to as "maternalist") maintains core features of the traditional gender division of labor -- women remain responsible for caretaking -- but challenges other elements of male dominance, specifically economic dependence on husbands. (Of course, women do not forgo their principal responsibility for caregiving even when they work for pay, although typically they do somewhat less housework than women who stay at home full time). These differences in how women are treated -- as mothers or as workers -- reflect what Leira (1992) calls "models of motherhood". Leira (1992)

reproduce (see, e.g., Roberts 1993). Many of these policies in effect deny women and men of color the "right to a family." For example, the legal frameworks referred to above as determining who shall have the right to a family often incorporate 'race' or ethnicity-specific standards, as when Australian and American officials deemed the culturally-specific family and household practices of indigenous peoples as prima facie evidence of "unfitness" and grounds for the removal of children from their parents (see e.g., Burney 1994; Broome 1982).

finds that there is significant variation among social-democratic countries in the level of public child-care provision and the concomitant differences in women's labor force participation -- Denmark and Sweden offer greater support for combining motherhood with paid work (particularly for mothers of very young children) than does Norway (see also Borchorst 1994); she argues that this results from differing models of motherhood, a dimension which cross-cuts the regimes as classified by state-market and other mainstream dimensions. Thus, I will investigate whether or not the state in any way promotes women's autonomous households, then I will evaluate *how* they are supported: through supporting women's full-time care-giving or by encouraging women's employment.

RESEARCH STRATEGY

This new comparative and gendered research is beginning to suggest some of the ways in which states do differ in their effects on gender relations. However, conclusions based on analyses which contrast countries purporting to represent different regime types are very likely influenced by which country is chosen to "stand in" for any given regime cluster, when we have not carefully assessed their differences and similarities across dimensions relevant for gender.¹² We know that the U.S., Britain, Canada and Australia differ from Sweden, or, for that matter, from any other European country -- but I would argue we don't know well enough just how, and how -- along which dimensions -- they may or may not differ from each other.¹³ Both description and explanation of variation are needed. My own

¹² This echoes the problem of conclusions about gender and *the* welfare state which are based on the examination of only one system of social provision, a failing common to both British and American scholarship.

¹³ In research related to this present effort, Shaver (1993) has found that the liberal states differ in their approach to what she calls "body rights," as reflected in abortion policies. While in Australia

preference is for some sustained attention to the "dependent variable," since there has been altogether too little systematic attention to how states vary in the ways they affect gender relations.¹⁴ In this paper, I offer a description of how states affect gender relations through income maintenance programs in Australia, Canada, Great Britain and the United States, structured by the analytic framework described above. Income maintenance programs are central components of states' social policies and contribute mightily to expenditures and taxation; they form one important basis for social politics. I look at all the major income maintenance programs -- old-age, unemployment and sole-parent provision -- as well as at family allowances.¹⁵

and Britain abortion is part of citizens' entitlement to medical care, in the U.S. and Canada, women are understood to have access to abortion as part of their right to bodily integrity and control.

¹⁴ I would further argue that a focus on states' impact on gender relations, rather than on all major social relations at once, is justified by the importance and complexity of this relationship. Some analysts tired of mainstream scholarship's rather single-minded focus on class and the state-market relation and their concomitant lack of attention to other important sources of identity, interests, and political mobilization have called for a simultaneously racialized and gendered analysis (while presumably continuing to incorporate class issues) (e.g., Roberts 1993; Boris 1995 forthcoming). I assume heterogeneity of interests and issues among women and among men (based on 'race,' ethnicity, nationality and a number of other significant identities or social locations), but I also believe it makes sense to trace out the specific ways in which gender relations -- across a number of social groups -- are shaped by state policies. While experienced by women and men of distinct social groups in different ways, the sexual division of labor (women having responsibility for caring and domestic labor, men for paid labor) and women's economic dependency are critical to gender relations as constituted in the capitalist, democratic West. We need investigations of how systems of social provision have affected the sexual division of labor and economic dependency specifically as well as investigations of how states affect the construction of 'race,' ethnicity, and nationality (see, e.g., Williams 1995 forthcoming). However, I take the point made by a number of feminist scholars of color -- that caregiving in the face of racial (or, for that matter, class) oppression incorporates elements of resistance (e.g., Roberts 1993), and that families can be sites of solidarity and comfort as well as gender oppression; thus, I make no assumption that social arrangements under which women do the bulk of care work are entirely oppressive. Rather, I am concerned with investigating the costs and benefits within systems of social provision of performing caregiving work full- or part-time or for a significant period of one's life.

¹⁵ This contrasts with the focus of a number of recent feminist analyses which have looked at programs specifically targetted on single mothers. This reflects my concern for considering overall patterns of social policy effects on gender relations -- what I would call gender regimes (borrowing from Connell 1987) in state social provision. For this purpose, we need to know not only about women's situation if they are single mothers, but also how women fare as widows, as wives and as

Clearly, the most important justification for examining Australia, Canada, Great Britain and the United States is found in Esping-Andersen's typology and in the tremendous amount of scholarly activity it has stimulated. While there have been analyses of the Scandinavian countries and some attention to whether some specific cases (e.g., the Netherlands) fit into the social-democratic or conservative-corporatist groups, less attention has been given to the liberal countries.¹⁶ Evaluating a key component of the welfare states of these four countries will allow some assessment of the usefulness of the coherence of the liberal grouping once gender is taken into account.

There are good reasons to think that social policy liberalism is significant for gender outcomes. Liberalism in social policy implies a preference for private rather than state action and provision, with "private" encompassing families, markets and capitalist organizations, and voluntary organizations. True, there have been recurring debates among adherents of liberalism over the extent to which state intervention is necessary to undergird responsible individual initiatives, mitigate against market and family "failures" and ensure a "level playing field" by guaranteeing certain rules of the game and social minima. These debates pit social liberals against traditional or "laissez-faire" liberals (now often referred to as the new right [U.K., U.S., Canada], economic rationalists [Australia], or as conservatives -- the party label in Britain and Canada, and a common descriptor for U.S. Republicans).¹⁷ Even in the more expansive view of

workers and how men in various statuses are affected as well; we need to know about the *relative* treatment of wage earners and caregivers over the entire life course.

¹⁶ A recent collection edited by Castles (1993a) offers some remedy to this neglect, but the contributors have not offered a gendered analysis (but see, for suggestive pieces, Castles and Flood 1993; Schmidt 1993; Therborn 1993).

¹⁷ The laissez-faire strand of liberal thinking is expressed in a preference for *residualism* -- public benefits will be the province of only the poorest; all others will be encouraged to turn to the market, family or private charity for benefits and services. Recently, this view has been expressed by Margaret Thatcher and the British Tories, Ronald Reagan and the American Republicans, and, to a

liberalism, states should not intrude very much on market functioning, and most citizens should rely principally on private sources of income and services. This arrangement, according to Esping-Andersen (1990: 61-65), encourages social dualisms between the few who must rely on limited forms of social assistance and the many who rely principally on the market for welfare (e.g., private pensions, health plans and the like).

But women in these countries are not positioned in the same way relative to markets, families and states. Families -- or, to be more precise, husbands -- remain a key source of income for women, a point that is often lost in discussions of the state-market division of labor. Two-parent families or elderly couples are in the vast majority economically maintained predominantly by adult men. Married women are working in increasing numbers, but their contribution to households' cash income is still fairly small -- in most Western countries, it averaged about 20 per cent circa 1980 (Hobson 1990: 240). Therefore, non-elderly married women still depend to a large extent on their husbands for financial support.¹⁸ Husbands "specialize" in market work and wives in the provision of domestic work and child care (Wright *et al* 1992; Bryson 1994). Thus, when marriages break up or end in widowhood, mothers are often unprepared for assuming the full burden of providing income and care for their families while widows have less access to market-based retirement income. Not surprisingly, given their greater weaknesses

lesser extent, Brian Mulroney and the Canadian Progressive Conservatives and the Australian Liberals, and policy intellectuals like Charles Murray (who has argued for entirely across the English-speaking world abolishing public social provision for the working-aged as the only way to contain the "underclass" [e.g., Murray 1989]). "Social" liberals have argued for a larger role for the state, accepting the arguments of T.H. Marshall and others about the necessity of social rights in a democracy. In this view, the state should cushion the blows of market failure but otherwise leave room for individual initiative in the private sphere.

¹⁸ According to Hobson's (1990) comparative study of economic dependency (using LIS data), husbands' average contribution to family income in Sweden, the United States, Australia, Canada, Germany, and the U.K. ranged from 67 to 80 per cent. Even in Sweden, which had the lowest dependency rate -- about 40 -- men still contributed over two-thirds of the family income. This reflects the persistence of the traditional division of labor.

in the market and their lack of reliable access to a male wage, women-maintained families and households relied on state support to a greater extent than did two-parent families and aged couples. (Although husbands still do depend on their wives for servicing, when they are deprived of wifely labour by divorce or other circumstances, they are usually better positioned to purchase such services on the market). Investigations of men's and women's income sources show that women depend more heavily on the state for income than do men (Smeeding, Rainwater and Torrey 1993; Mitchell 1993). Given that households maintained by women in Australia, Canada, the U.K. and the U.S. depend heavily on public transfers relative to households maintained by men, we can say that *dualism is gendered*.

In terms of state-market relations, these countries feature a relatively restricted role for the state in the provision of income and services; indeed, the state typically promotes private provision -- for example, through vouchers -- rather than providing services or benefits directly (the U.K.'s National Health Service is a notable exception). All four dedicate lower proportions of GNP to social spending and feature lower levels of net redistribution of income than do European countries (Castles and Mitchell 1993). In Canada, Britain and the United States, private sources of income (work, investment, and private pensions) for the aged -- Esping-Andersen's key measure of state-market relations -- played a relatively larger role than in other countries (1990: 86-87); data on this factor for Australia is not included, but other studies (e.g., Smeeding, Torrey and Rainwater 1993) find this pattern there as well.

But while pension regimes formed an important basis for Esping-Andersen's categorization of the four as liberal regimes, one sees greater diversity in the organization of payments to non-elderly families. Recent studies of LIS data from the U.S., Canada, Australia, the U.K., Sweden, France, Germany and the Netherlands show that the U.K. and the U.S. are at opposite extremes in terms of the proportion of income all types of families with children get from public sources,

with Australia and Canada falling in the middle of the range (Rainwater 1993; Mitchell 1993); in all cases, however, families with a male parent present gained more income from the market than did solo mother families. Differences are especially notable among single-mother families. Mitchell (1993) found that the proportion of their income derived from earnings ranges from a low of 21.3 percent in the U.K. to a high of 54.7 percent in the U.S. Australia is closest to the U.K. in the proportion of these families' income coming from earnings -- 30 percent, while Canada, at 49.2 percent, is closer to the U.S. The clustering of the two North American countries on the one hand, and Australia and Britain on the other in terms of the earnings of female sole parents is replicated for reliance on public transfers: these mothers in Australia and the U.K. receive above 60 percent of their income from public transfers; in Canada and the U.S., they get about 35-40 percent of their income from public transfers. Among solo mothers with some earnings, Rainwater (1993: 9) shows that the U.K. provides publicly a substantial proportion of these families' incomes -- 48 per cent, while the U.S. provides 21 per cent, and Australia and Canada provide slightly more -- 33 per cent and 26 per cent. Fewer solo-mother families in Australia and the U.K. than in Canada and the U.S. have any earnings (Rainwater 1993), and higher proportions of them rely on public sole parent benefits (Evans 1992a, 1992b). In all four countries, a much higher proportion of solo-mother families than of two-parent families have no earnings -- and, clearly, those with no earnings will be particularly dependent on the state for support.¹⁹ But this is particularly noticeable in the U.K. and Australia, where 63 per cent and 56 per cent of these families, respectively, have no earnings as compared to 12 per cent and 4 per cent of two-parent families. In the U.S. and Canada, in contrast, under a third of solo mothers (30 per cent and 31

¹⁹ Private sources of income, which includes child support where not provided through the state in the form of advance maintenance payments, show some variation, but are not as significant for single-mother families than either wages or public support. Canadian data on private income sources is missing from the LIS data sets (Wong, Garfinkel and McLanahan 1993: 180).

per cent) have no earnings -- much less than in Australia and the U.K., but far more than the 2 per cent of couple-headed families in the two North American countries. Indeed, according to Mitchell (1993: 4), single mothers in Australia and the U.K. are quite a bit less likely to work for pay than those in Canada and the U.S. -- 35 and 44 percent versus 58 and 57 percent. Differences in labor force participation are somewhat less pronounced among married women with children: about 61 per cent in Canada, 59 per cent in the U.S., 54 per cent in the U.K., and 53 per cent in Australia, but women are more likely to work part-time in the U.K. and Australia.²⁰

These patterns may well reflect different models of motherhood -- women are expected to depend on the market (to be workers) in North America, while there is greater support for traditional stay-at-home motherhood in Britain and Australia. Indeed, the impact of liberal ideologies and institutional arrangements on gender relations is not unambiguous²¹, and analysts of liberal political arrangements are not of one mind when it comes to assessing their significance for gender relations (e.g., compare MacKinnon 1989, Eisenstein 1984, Pateman 1988). Liberal social policy promotes the commodification of *some* labor, but commodification has rarely been applied to women on the same terms as to men, running into competing imperatives of social reproduction and men's interests in encouraging women to marry and maintain responsibility for domestic work. There has been important historical, cross-national and inter-racial/ethnic variation in the ways regimes treat women's labor. Most recently (i.e., from the 1940s through the 1980s), the institutional arrangements of the four countries assumed and in varying ways supported employment opportunities and family

²⁰ The declining labor force participation rates of single mothers in Britain and Australia have been the focus of concern among policymakers, who see some evidence of policy-created "poverty traps" and work disincentives (see, e.g., Colledge 1991; Millar 1991: 8).

²¹ Like Esping-Andersen, Castles and Mitchell rely only on class-related measures of (in)egalitarianism and neglect gender (and other) aspects of inequality.

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wages for men, and housewifery -- noncommodification -- for women (of the dominant racial groups). But today, there is a lack of consensus across the political spectrum²² and in all social groups on the preferred role for women -- mother or worker. These concerns pervade social policy debates -- about employment opportunities and day care, about how (or even whether) to publicly support caregiving work, about the extent to which motherhood should be optional (the abortion debates). To fully explore these and other gendered effects, we will need to go beyond the institutional relations among states, markets, and families.

A COMPARISON OF INCOME MAINTENANCE IN THE UNITED STATES, THE UNITED KINGDOM, CANADA, AND AUSTRALIA: GENDER STRATIFICATION AND THE CAPACITY TO FORM AND MAINTAIN AN AUTONOMOUS HOUSEHOLD

This section offers profiles of the income maintenance systems in each of the four countries. These profiles provide the "raw material" for assessing the countries' policies for their effect on stratification and the quality of social rights as they affect citizens' independence from market and marriage/family. They also give us a basis for comparing systematically the structures and gender effects of policies in the four countries, with the aim of assessing the utility of the notion of a distinctively *liberal* policy regime. (Readers with limited time may want to skip this section and get straight to the punchlines in the conclusion).

The analytic dimensions sketched above do not correspond neatly to specific

²² This is not a liberal versus conservative issue alone. For example, divisions on the right follow gender lines: social conservatives are most concerned with maintaining the sexual division of labor, with women at home caring for children -- even if this implies a public subsidy, while those who prefer a "purer" laissez-faire approach are prepared to push everyone, mothers included, into the labor market for subsistence, even if this means children are left to orphanages (DeParle 1994; Murray 1994).

features of income maintenance programs. Thus, it will be necessary to look at a number of characteristics of systems of social provision, including: (1) the level of differentiation of programs based on caretaking and on paid work (that is, programs directed at ameliorating the consequences of market versus family "failures"); (2) the proportion of men and women (and subgroups of men and women) making claims based on participation in the paid workforce, financial contribution, citizenship, need, and family or marital status, service (using categories generated from both mainstream and feminist analysis); (3) the distribution of men and women (and subgroups of men and women) across different kinds of programs²³; (4) benefit levels, limits on the duration of benefit reciprocity, and eligibility requirements -- the conditions of *access* to different programs, in particular, who has individual rights to various benefits. An important aspect of social benefits as they affect gender relations is the extent to which they individualize or "familize" recipients -- is there individual access? or is access mediated by one citizen's relation to another through marriage or familial relationship? These characteristics of income maintenance programs will allow us to assess how states contribute to gender differentiation, how they treat men and women, workers and caregivers, and the extent to which individuals can use state support to offset dependency vis-a-vis the market (*decommodification*) or marriage and family (*capacity to form and maintain an autonomous household*).

I have organized these profiles by the different risks of income interruption that are addressed by social provision: old age, unemployment, single parenthood ("family failure"), and subsidies for the cost of raising children (i.e., family allowances). It should be noted that the risk of old age is in reality two separate

²³ The different distributions of men and women across different kinds of claims and programs will not alone tell us what is the specifically *political* contribution to these patterns -- it could be argued that these or other, parallel patterns of gender differentiation (e.g., occupational sex-segregation) are simply the result of social forces (whether or not these include an assessment that male dominance is involved). Thus, to understand fully the contribution of the state to gender differentiation, one needs to examine eligibility requirements.

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risks: of losing income due to retirement, or of losing income because of being economically dependent on someone who retires or dies (i.e., widowhood). Single parenthood is principally a risk to income security for women, who when they divorce or fail to marry the fathers of their children, usually lose access to a family-supporting male wage even as they typically retain custody of the children. However, all single parents must be both nurturers and breadwinners; they lack the labor and/or wages provided by a second parent. Thus, to some degree, even single fathers or women earning (atypically) high wages suffer from the loss of access to a second income and from having to make up for the services provided by a second parent. Thus, for each risk in each country, I give information on eligibility requirements and coverage, the gender of claims, and benefit levels (as well as duration of benefits, where applicable). But before turning to these profiles, let me present some historical background on the development of these programs.

Gender in the Historical Development of Social Provision

Over the past century, state social provision has tended to develop categorically; that is, separate programs were established to deal with separate categories of income interruption (thus moving away from the "indiscriminate" character of poor relief). Policy-makers focused on a range of different problems having to do with the failures of the market -- unemployment, work accidents, old age, sickness and disability, as well as problems following from "failures" of the family, particularly the break-up of marriages by death or other circumstances (or their failure to form) -- widowhood, desertion and single motherhood and the need of families with children for extra income. Therefore, gender differentiation was an essential feature of these systems. In no case were these programs intended to provide *alternatives* to the market for men or to marriage for women, although

that was to some extent their unintended consequence.

In the late nineteenth and early twentieth centuries, across most countries in the industrializing West, most of the early social programs advocated by alliances of overwhelmingly male working-class movements and male intellectual, political and reform elites aimed at bolstering the position of male breadwinners when they were unable to support their families financially due to loss of jobs or wage-earning capacities. These programs offered (male) workers protection against failures in the labor market. Most reform, women's and working-class organizations in Britain and her former colonies, the United States, Canada, and Australia accepted the goals of a "family wage" for men and stay-at-home, full-time motherhood for women (at least those of the dominant racial/ethnic groups).²⁴ Some women and a few male reformers also championed the creation of programs that would allow single mothers, usually widows, to support their children after the death or desertion of the family breadwinner. These programs offered (female) caretakers protection against family or marital failures.

The initial programs of social provision established across the west in the "formative period of the welfare state," approximately the 1880s through the 1920s -- old age pensions, workmen's compensation, sickness insurance, unemployment insurance, survivors' benefits (usually called "widows' or mothers' pensions") -- were designed to fit and reinforce the sexual division of labor as manifested in male breadwinner families. Thus, all countries first developed income security systems marked by a work/family dualism. Moreover, this structure of modern

²⁴ In a comparison of the development of infant welfare programs in Britain and France, Jane Jenson (1986) shows that within French policy discourse, it was accepted that many working-class mothers would work for pay outside the home. But almost without exception, the traditional gender division of labor, with women taking responsibility for domestic work and caring and men for (the majority of families') wage-earning, was taken for granted. Indeed, even in situations in which, for various reasons, mothers were expected to work, they were not expected to relinquish responsibility for their domestic and caring duties. Thus, for example, in the French case, mothers were expected to work in the paid labor force and also carry out domestic chores.

social provision was institutionalized at a time when the work and family patterns of men and women were far more distinctive than they are today, so that work-related programs tended to serve men while almost all of the clients of family-related programs were women.

A round of expansion and restructuring occurred in the 1930s in the United States and in the wake of World War II in Britain, Canada, and Australia; the male breadwinner-female housewife family form was, if anything, even more entrenched. Newly created or reformed programs continued to be premised on the assumption of women's responsibility for unpaid care and domestic work in the home and men's responsibility for supporting themselves and their families through wage work. Thus, for example, dependents' and survivors' benefits for housewives were part of the first set of reforms of the U.S. Social Security Act (1939), while Beveridge's proposals in Britain explicitly discussed women's roles as carers and led to the "married women's option," which allowed women workers to opt out of their own insurance coverage under National Insurance as they were expected to rely on dependents' benefits provided to their husbands in old age (see, e.g., on U.S., Burkhauser and Holden 1982:7-13; on U.K., Pascall 1986: ch.7; Lewis and Piachaud 1992: 32). In Australia, a widows' benefit for deserted and widowed women (not men) either caring for dependent children or over the age of fifty (and not remarried) was established in 1942 (Shaver 1992: 7). Canadians initiated a family allowance, payable to women, and continued to offer mothers', rather than parents', allowances for single parents (Guest 1980: 8).

In the 1960s and 1970s, Western welfare states were expanded and reformed in various ways. One of the key shifts which occurred in this period was what Sheila Shaver (1992) has termed a movement "from difference toward equality". That is, where provision in earlier periods was consciously premised on the ideal and material reality of gender differentiation in roles, during the 1960s and 1970s legislation and court decisions shifted social provision toward formal

gender neutrality (as was the case in a range of other spheres, such as employment). Thus, for example, the Australian sole parents' pension was made available to men for the first time in 1977 (Shaver 1992: 16), in Britain legislation to discontinue the "married woman's option" under National Insurance was passed in 1975 (Pascall 1986: 208), and some discriminatory provisions were eliminated from U.S. social security programs (Burkhauser and Holden 1982: 7-13).

The earliest social policy initiatives further institutionalized the sexual division of labor, underlined distinctive gender identities, and thereby helped to shape gender interests. Differentiation by gender and by social function (work and caregiving/domestic work) was the explicit aim of social policy. Inequality in the benefits available to men and women was its concomitant, whether the explicit aim of policy or not. Over the last three decades there have been significant efforts to remove gender discrimination from social policy -- almost all social programs are now formally gender neutral. Yet according to many analysts, social provision continues to contribute to gender differentiation and hierarchy. Thus, we need to question to what extent and *how* social provision implicitly or explicitly reinforces gender differentiation and inequality. This is partly a question of *where* gender differences are established -- through market and family processes or through political ones, such as social policies. Of course, even the ostensibly gender-neutral provisions reflect politics; for example, as Jill Quadagno (1988: 556) puts it, "penalizing women in old age for family responsibilities that create irregular work histories is a *political* decision" (emphasis in original).

United States

Social provision in the United States is notable for several reasons: The system is almost entirely categorical, and is sharply bifurcated between social

assistance and contributory social insurance,²⁵ partly reflecting the strong role (historically and currently) of federalism -- indeed, there are no universal citizenship programs. Moreover, a very high proportion of spending goes to the elderly; it is comparatively ineffective against poverty among non-elderly groups and does not aim to reduce income inequality substantially.

Old age: Old-age, disability and survivors' insurance -- what Americans call "Social Security" -- is a contributory, national program, established in 1935, that insures against the loss of income due to retirement *and* the loss of income suffered by those who depend economically upon a retired wage-earner, thereby combining protection against family and labor market failures. Fraser (1989: 150-51) calls social security a "hermaphroditic" program, "internally dualized and gendered," in that it offers benefits to almost all men as wage-earners and to most women as wives or widows. In addition to OASDI, there is an income-tested program for the elderly poor, Supplemental Security Income (SSI), initiated in 1974. There is no universal pension entitlement for citizens or long-term residents in the United States.

Eligibility and coverage: Entitlement to old-age coverage under social security can be established in two distinctly gendered ways.²⁶ First, retired workers claim benefits by working for a minimum number of years (10) in a covered occupation and making contributions through a payroll tax which is evenly split between employers and employees (in contrast to most countries, there is no government contribution).²⁷ To receive full benefits, one must have

²⁵ Actually, one might well describe the U.S. system as trifurcated, if we include state or locally-funded and administered general assistance as distinct from federally administered or mandated programs.

²⁶ Information on eligibility for OASDI is taken from the *Social Security Bulletin Annual Statistical Supplement, 1992* (U.S. Social Security Administration 1993: 7-50) unless otherwise noted).

²⁷ The payroll tax is not levied above a maximum cutoff, so that payroll taxes are not as

contributed for forty years and have stopped working (the so-called "retirement test") (Myles 1989: 61). Second, one can also claim benefits by being married to such a person or having once been married to such a person; pension rights are retained for divorcees who were married for at least ten years prior to their divorce and who have not remarried prior to reaching age sixty (60). Thus, work in the paid labor force establishes individual entitlement and marriage to a covered wage-earner establishes *auxiliary* entitlement for those who did not work outside the home. Dependents' benefit are set at 50 per cent of the contributor's benefit, while survivors receive 100 per cent.

Many women are *dually entitled*; they have established an individual entitlement through work in the paid labor force but also have an auxiliary entitlement through marriage. Since their individual benefits would be lower than the dependents' benefits they can claim on the basis of the husbands' record, they receive what the Social Security Administration calls a "partial wife's benefit" combined with their own retired worker benefit -- but this is no more than what they would have received based on their marriage even if they had not worked. (In Britain, some have referred to the comparable case as a situation of "wasted contributions" [Lister 1992]). Until 1977, dependents' and survivors' benefits were available without question to female spouses, but for male spouses to qualify, financial dependence had to be proven. In the wake of a successfully-argued gender discrimination lawsuit (brought by a man who was denied a dependent's benefit), this double standard has given way to gender-neutrality in spousal benefits (Burkhauser and Holden 1982: 7). Similarly, benefits for surviving children were made gender-neutral in the 1970s.

progressive as the income tax system (see, e.g., Cates 1983). Eligibility requires contributions for a minimum number of quarters; in 1993, it was 42 quarters, or ten and one-half years; this minimum is scheduled to rise by a quarter each succeeding year (Myles 1989: 61). The minimum threshold for payment of payroll taxes is quite low (\$200 yearly).

The largest, most politically popular U.S. social program was built on the assumption that men would be breadwinners and women housewives, or, at best, secondary workers and still economically dependent on men. It offers an important advantage to "housewife-maintaining families" at the expense of single people and dual-earner couples. Many women -- about one-quarter of all female beneficiaries - find they have paid taxes without gaining access to benefits any better than what they could claim on the basis of a dependent's claim. While the system is now officially gender-neutral, in that male dependent spouses can claim as can female dependent spouses, de facto the system continues to offer a bonus to "traditional" male breadwinner-female housewife marriages, since these are the overwhelming majority of marriages where there is a dependent spouse (in 1979, the husband was totally or highly dependent in about 4 per cent of marriages, as contrasted with about 63 per cent of marriages in which the wife was totally or highly dependent [Hobson 1990: 243]).²⁸

The proportion of elderly people receiving social security benefits (i.e., Old Age or Survivors' insurance) is quite high: 83 per cent of women and 87 per cent of men aged 65-69, 90 per cent and 98 per cent respectively for those aged 70-74, and 100 per cent for those over 74 (Bolderson and Mabbett 1991: 152). Coverage has been expanded to encompass virtually all wage-earners (and their spouses) (Burtless 1986: 27), but marginally fewer women than men claim these contributory benefits. While there were important gender- and race-related exclusions of domestic and agricultural work at the outset of the program (Orloff 1993b: ch.9), approximately 95 per cent of jobs are now covered (U.S. Social

²⁸ Of course, the women in these marriages are not being accorded explicit recognition for the care and domestic work they have provided, as the eligibility is entirely based on the paid worker's contribution record. There has been some debate about giving some sort of credit to those workers who have stints as an unpaid caretaker -- overwhelmingly women, but there has been no resolution; similarly, there has been no resolution of concerns about the present disadvantage for dual-earner couples, which are increasing as a proportion of all marriages (see, e.g., Burkhauser and Holden 1983; Bergmann 1986).

Security Administration 1993: 9). Reflecting their somewhat weaker attachment to the labor market, fewer women than men among paid workers are currently fully insured (90 per cent versus 76 per cent); however, among those aged 25-29, the gap is much smaller: 94 per cent vs. 90 per cent (U.S. Social Security Administration 1993: 164). And even among those not fully insured, many will be able to claim benefits on their spouses' records. Still, one must recognize that this contributory system that most benefits traditional breadwinner families leaves vulnerable some citizens, mainly women and the long-term unemployed among men: those who do not establish eligibility for worker benefits because of their marginal attachment to the labor force *and* who lack secure marital ties to workers. These people must depend on an income-tested program, Supplemental Security Income.

For those elderly persons without sufficient income from old-age insurance or private sources, there is Supplemental Security Income, a national income- and asset-tested benefit for people over 65, the blind and disabled, introduced in 1974 (Myles 1989: 60-61; only about one-third of SSI goes to the elderly). Only about 5 per cent of the elderly receive SSI, with most of these using SSI to supplement inadequate social insurance benefits (Bolderson and Mabbett 1991: 152). SSI replaced the partially federally-funded state-level old-age assistance programs under which benefit levels and eligibility requirements had varied widely. Under the Reagan administration, the minimum benefit under social security was eliminated, under the expectation that the elderly poor could get SSI (Williamson and Pampel 1993: 101).

Public old-age insurance is most accessible and generous to those conforming to the standard male employment pattern. This group also gains coverage from private occupational schemes. Access to *private* occupational pensions is skewed by gender. As Jill Quadagno (1988: 541-42) puts it, "to an increasing extent the major factor differentiating the aged poor from the more affluent is access to a second pension," and not surprisingly, women's access to

occupational pensions is significantly less than men's (Treas 1981: 580-81).

The Gender of Claims: If we look at the status of social security beneficiaries in 1991, we see that the vast majority -- over 99 per cent -- of men make claims as worker-contributors, based on their own earnings record, while a large proportion -- 39 per cent -- of women are claiming benefits on an auxiliary basis, that is, they make claims as dependent spouses (15 per cent) or as survivors (24 per cent). Almost three-fifths (59 per cent) of women are entitled to retired-worker benefits. However, 40 per cent of these (which equals 24 per cent of all women receiving social security) have a so-called dual entitlement -- their individual benefits are less than the benefit to which they are entitled simply by virtue of their marriage, so they receive partial wife's benefits but are counted as retired worker beneficiaries. The proportion of women with only an auxiliary entitlement has been declining -- and is expected to continue declining as more women enter the paid labor force for at least some periods of their lives.²⁹ Still, women's growing propensity to engage in paid labor is not being reflected in strictly individual entitlement to benefits; rather, the legacy of women's low pay and intermittent work histories is reflected in the large and growing proportion of women with dual entitlement -- women who are paying taxes yet receiving no additional benefits beyond what non-working women receive. In total, almost two thirds -- 63 per cent -- of all U.S. women are in actuality receiving benefits based on their status as wives or widows of male workers.

Looking at the gender breakdown within "worker," "spouse" and "survivor" categories in the old-age insurance system is also instructive. The majority of retired workers, 52 per cent, are men, but women make up almost half of all retired workers, about 48 per cent; note that about two-fifths of these are also

²⁹ Given the history in many countries of paying dependents' benefits directly to retired wage earners, it is worth noting that in the U.S., even when claims are based on spouses' work records, pensioners have always received their own benefit checks.

relying on spousal benefits. Among spouses and survivors, men make up a miniscule proportion of claimants -- about one percent in each category. Certainly, women are more likely to be widowed than are men, but this alone does not explain the disparity. Since Americans can claim only one social security benefit, they take survivors' benefits only if they are higher than one's own retired-worker benefits -- and only a tiny number of American men find themselves in that situation, reflecting their almost universal access to jobs paying better than their wives'. It is also noteworthy that three-quarters of the recipients of income-tested SSI benefits are women (U.S. Social Security Administration 1993: 273), reflecting both women's greater longevity and their greater vulnerability to poverty.

Benefit levels: Benefits are income-related, but a minimum benefit for those with low wages or intermittent work histories was recently abolished. They are reduced by earnings (the "retirement test") up to age 72 (Myles 1989: 61). The system does a better job of ensuring income security for the non-poor than of providing basic security for the poorest elderly (Myles 1989), yet replacement rates are low enough that there is still plenty of scope for private occupational pension coverage for higher-income workers. Because of women's economic disadvantages, their overall average and work-related benefits tend to be lower than men's. In 1991, for example, women's average benefit was \$518 per month, men's \$707. Benefits based on beneficiaries' own earnings were even more disparate -- women got \$542³⁰, men \$709. Among spouses, women averaged a \$327 benefit and men \$202 (recall that less than 1 per cent of men claimed this category of benefit). Women averaged a \$583 survivor's benefit, men \$423 (recall that the spouse's benefit is simply transferred to the survivor). (All figures from U.S. Social Security Administration 1993: 183). In 1991, the average monthly benefit for the aged under SSI was \$228 (U.S. Social Security Administration 1993: 272; some states

³⁰ It is not clear from Social Security's published data if this figure includes the additional benefits some of these women claim on the basis of their husbands' records.

opt to provide supplements to SSI).

In 1991, the U.S. poverty line -- which is equivalent to about 40 per cent of the median income -- for a single individual 65 or over was set at about \$544 per month; for an elderly couple, about \$687. Thus, men were far more likely than women to receive a benefit sufficient to keep them above poverty, especially if combined with a wife's benefit (and elderly men are more likely than older women to be married; U.S. Social Security Administration 1993: 137,140). Benefits targetted on the aged poor were not alone sufficient to keep them above the poverty line, but in combination with other sources would get them close to it. In 1980, *benefits as a proportion of the average production worker's wage* ranged from about 30 per cent (for the minimum single person's benefit -- what a person would receive without contributions, after a means test) to about 80 per cent (for a couple in which one spouse earned the wage of the average production worker and worked 35 years) (Palme 1990: 60).

Unemployment: Unemployment insurance, financed through employer contributions, was initially legislated on the national level in the 1935 Social Security Act, but was established as -- and continues to be -- a federally administered program. Thus, states set benefit levels and control some eligibility requirements. It was designed to protect full-time, regular workers -- usually thought to be male breadwinners -- against temporary unemployment.

Eligibility and coverage: To be eligible for unemployment insurance, workers must have worked a minimum period of time and earned a minimum amount of earnings; if they leave a job "voluntarily," benefits can be delayed or denied. To maintain eligibility, claimants must show evidence of availability and willingness to work (e.g., through approved job search procedures; limiting one's availability to certain hours can render one ineligible). The proportion of American workers with coverage under UI -- both male and female -- has been declining over the last decade or so. Through the 1950s and 1960s, the proportion of the

unemployed with access to UI was around one-half; the proportion peaked at 78 per cent in 1975, but has since declined to slightly over 40 per cent in the early 1980s (Blank and Blinder 1986: 192). The eligibility criterion of a recent and fairly stable work history precludes benefits for new entrants to the workforce, the erratically employed, and the chronically underemployed (Burtless 1986: 29). These groups must rely on other, income-tested sources of support.

Unemployment insurance is formally gender-neutral, and has been from its initiation. However, Diana Pearce (1986: 146) notes that outcomes are not neutral with respect to gender. Her remarks refer to unemployment insurance in the United States, but apply equally well to programs in the U.K. and Canada:

Because of the mismatch between a program explicitly designed to aid only regularly employed male heads of households and a female workforce whose labor market participation patterns differ fundamentally from that model, unemployment compensation is structurally biased against women. Consequently, women find themselves disqualified as claimants or allotted reduced benefits more often than men do.

Unemployed women and men who cannot qualify for coverage under UI, or who have exhausted their benefits, do not have much of a safety net -- unless they have children. Some, but not all, states and municipalities have general assistance programs -- the true descendants of poor relief, retaining all its administrative discretion and having none of the limited entitlement potential of programs such as AFDC (for example, a number of states -- Michigan and Pennsylvania among them -- have legislated arbitrary limits on eligibility, e.g., up to three months in any twelve [DeParle 1992]). Because many unemployed women -- or women who have never been in the labor force -- have children, they have access to Aid to Families with Dependent Children (discussed below) if they are poor enough. Long-term unemployed childless men and women (or parents who are not living

with their children) have nothing but Food Stamps; arguably, they receive the worst treatment under the U.S. social policy regime. Food stamps are the only federal program available to any poor person who meets the criteria -- a very low income (not more than 130 per cent of the poverty line) and limited assets (although they can have a house and car); this programs gives relatively limited assistance, which must be applied toward food purchases (although there is a black market which allows food coupons to function more or less as cash) (U.S. Social Security Administration 1993: 99-101; Finegold 1988).

Until 1961, the only two-parent families eligible for AFDC were those in which one parent was incapacitated. Congress passed legislation to allow states to expand AFDC coverage to two-parent families in which both parents were unemployed; this program is called AFDC-UP (for unemployed parents). However, in 1988, when the Family Support Act mandated the creation of this program in all states, only twenty-six states had established the program (U.S. Committee on Ways and Means 1988: 403), and even now, restrictive income limits (on average, \$803 per month for a family of three) and stringent eligibility requirements regarding recent employment have kept this program a very small portion of the caseload -- under 5 per cent (Ellwood and Summers 1986: 84).

The Gender of Claims: Men and whites are overrepresented among the insured unemployed; women were about 46 per cent of the unemployed in 1979 but only 36 per cent of unemployment insurance beneficiaries (Blank and Blinder 1986: 192-93).

Benefit levels: Unemployment insurance benefits are income-related and are taxable above essentially middle-class (annual) incomes. The average monthly benefit in 1988 was \$602 (this varies very widely by state, as well as by beneficiaries' contribution records and number of dependents [as well as whether or not the state had dependents' allowances]) (U.S. Committee on Ways and Means 1988: 337-38). The poverty line for a family of three is about \$755 per

month. Women's benefits on average are lower than men's, and less likely to be sufficient to lift women's families out of poverty (Pearce 1986: 158). The duration of benefits has been significantly reduced in the last few years; the maximum duration of UI was 65 weeks in 1976 (Blank and Blinder 1986: 192), but in 1988 was 26 weeks in almost all states (U.S. Committee on Ways and Means 1988: 337-38).

Single Parenthood: The risks for women and children associated with family break-up were among the first to be protected against by the American states, most of which offered non-contributory, means-tested mothers' pension programs for widowed, and in some cases divorced, deserted or never-married mothers with children at home. In theory, these programs would allow poor women to stay at home with their children if they were deprived of access to a breadwinner's wage, rather than having to try (often unsuccessfully) to combine paid work and mothering or to give them up to orphanages (as was the practice before their enactment)³¹ (Vandepol 1982; Orloff 1991; Skocpol 1992). In short, they were premised on the desirability of the traditional sexual division of labor and were an example of the "logic of difference" in action. (In practice, women often had to supplement grants with paid work [Goodwin 1992]). The mothers' pensions programs were given federal funding under the 1935 Social Security Act and renamed Aid to Dependent Children, and at that time, made explicitly gender-neutral -- *any* caretaker of children could claim them. After the passage of the Social Security Act, all poor mothers who had lost their access to a breadwinner's wage -- through widowhood, divorce, non-marital births -- were (at least formally) potentially entitled to ADC. Within only a few years after passage, in 1939, the actuarially strict contributory old-age insurance program was fundamentally

³¹ Still, analyses of implementation have shown that many recipients had to work to supplement inadequate grants, usually in jobs that could be done without interfering with domestic responsibilities (Goodwin 1992).

altered by the addition of dependents' and survivors' benefits. Survivors' benefits were made available for all widows of covered wage-earners, leaving women who lost their claims on the income of their children's fathers because of divorce or desertion or who never married them dependent on ADC, later Aid to Families with Dependent Children (AFDC). AFDC is still administered by the states rather than the federal government. Thus, after 1939, the different categories of single mothers were subject to quite different treatment under the U.S. policy regime.

Eligibility and coverage: Under the contributory social security system, survivors' insurance is available to widowed spouses of covered wage-earners caring for children under age 16. In 1982, 86 per cent of white widows, and 69 per cent of black widows were eligible (Garfinkel and McLanahan 1986: 18-21, 26).

AFDC is available to divorced, deserted, or never-married single parents (or other caretakers) of children under age 18 with very low incomes and few assets. Until the 1960s, a "suitable home" requirement functioned to disqualify women who did not meet administrators' standards of respectability (Bell 1965; Abromovitz 1988). There is substantial evidence that these standards were often used to disqualify black women. But through a series of political and legal challenges, in the 1960s administrative discretion was curbed to some extent and AFDC assumed more of the character of an income-tested entitlement.³² But as the entitlement character of the program increased, benefit levels and income limits decreased and work and child support requirements proliferated. And as the income limit has contracted, so has the proportion of single parents with coverage; in 1986, about 44 per cent of all single mothers received AFDC, down from almost two-thirds in 1973 (Evans 1992a: 387). Current Republican proposals would

³² The addition of Medicaid benefits in 1965 -- income-tested medical coverage, extended automatically to AFDC families -- was one unambiguous advantage welfare families have over other groups of the poor and near-poor (as is well known, the U.S. as yet has no generally-available health insurance).

eliminate the entitlement status of AFDC and other anti-poverty programs altogether.

Since the 1960s there have been increasingly serious requirements for work on the part of single-parent welfare recipients and more rigorous attempts to collect child support from non-custodial parents (mostly fathers, hence the concern with "deadbeat dads"). Work requirements have been in place for the unemployed parents (usually the fathers) in two-parent families in the AFDC-UP program since its initiation. With changes brought about by the 1988 Family Support Act, all AFDC parents with children three years of age and above are required to work or undergo training, and states have the option of imposing the work requirement on parents of children as young as one year. The requirement is being phased in, and states have not consistently found the funds for the mandatory transitional child care and health insurance and for training. Yet the requirement makes clear that mothers (as well as fathers) -- at least poor ones depending on AFDC -- are expected to combine parenting and paid work, a dramatically different model of motherhood from that embodied in the original Social Security Act.

The Gender of Claims: In contrast to provision for sole parents in Australia and Canada in the post-WWII period, AFDC has been, since its inception, formally gender-neutral. About 13 per cent of single-parent families in the United States are headed by fathers (about 22 per cent of all families with children are headed by a single parent) (Rainwater 1993: 26). However, few men receive AFDC or AFDC-UP -- in 1991, 89 per cent of all adult recipients of AFDC were women³³ (personal communication from Mr. Lou Carrera, Department of Health and Human Services). Thus, if we looked only at *single*-parent families, we would find an ever higher proportion of (adult) women recipients.

³³ According to Nelson's calculations, 81% of the heads of AFDC families were women in 1979 (Nelson 1984: 222); this seems to be a low estimate.

Benefit levels: The relative stinginess of America's provision for non-widowed single parents is well-known in academic circles if not in popular discourse. AFDC benefits -- though increased somewhat in the late 1960s and 1970s -- have fallen through the 1980s and 1990s, as they have not been indexed to inflation (see, e.g., Ellwood 1988: 58). Monthly benefits for a parent and two children in Pennsylvania (a state with slightly above-average benefits) in 1988 were \$402, and such a family would also qualify for food stamps worth \$138, for a total cash income of \$540 per month (recall that the poverty line was \$755) (U.S. Committee on Ways and Means 1988: 406). In a study of the relative situation of non-working single mothers in several Western countries (Sweden, Germany, France, Israel, Canada, Australia, and the U.K.), Kamerman (1986: 259) found that mothers in Pennsylvania ranked last in terms of yearly income as a percent of the average production worker's wage, at 44 per cent, although those in New York, one of the most generous states, ranked fourth.

Widows with children at home typically fare much better than divorcees and never-married mothers. Unlike AFDC, Survivors' Insurance benefits are not income- or asset-tested, and can therefore be combined with earnings; in 1990, widows (with a child under 16) received an average monthly benefit of \$557; surviving children received an average monthly benefit of \$404, while the AFDC average benefit *per family* in 1990 -- which could not be combined with earnings or child support (save a \$50 set-aside) without being reduced dollar for dollar (although it is supplemented by Food Stamps) -- was \$392 (U.S. Social Security Administration 1993: 210,319). The U.S. average survivor's benefit was equal to about 67 per cent of the average production worker's wage (OECD 1991: 28; as contrasted with less than half for typical AFDC benefits). As contributory social security benefits and coverage expanded, widows with children -- like the elderly who also depended on the old age, disability and survivors' portions of social security -- have received ever more favorable treatment. Studies of single mothers

show that widowed mothers are much less likely to be poor than other single mothers, largely because of the more generous public benefits available to them (Garfinkel and McLanahan 1986: 25-26).

Currently, there is no definite limit on the duration of Survivors' Insurance or AFDC benefits beyond the age of youngest child (16); in this way, these family-related programs are unlike unemployment insurance. However, an increasing number of states and the federal government are considering the imposition of a two-year limit on AFDC benefits; after this period, would-be welfare reformers are debating what options might be offered -- public service work (i.e., service in exchange for benefits, sometimes referred to as "workfare"), public employment, or nothing.

Family Allowances: The United States has no universal family allowances. However, parents who have earnings are eligible for a modest Earned Income Tax Credit, claimed through the tax system (this has been expanded considerably under Clinton's recently-passed budget package). This could be seen as an income-tested analogue of family allowances which bolsters the incomes of those parents in the paid labor force, thus working with the policy of pushing mothers into paid work.

United Kingdom

Britain's system is in some ways quite similar to that of the United States; most notably, the system is bifurcated between contributory social insurance for

sickness, unemployment, retirement and widowhood (National Insurance, or NI) and income-tested social assistance, Income Support, for sole parents, the elderly poor, the impoverished working poor and the long-term unemployed. NI old-age provision includes dependents' and survivors' benefits. But in contrast to the U.S. system, in Britain there is (still) a strong element of universalism -- in the flat-rate benefits of the basic old-age pension, in children's allowances and, most famously, though outside the sphere of income maintenance proper, the National Health Service. Like American social provision, British social insurance is structured around programs addressing certain categories of risks of income interruption: old age, retirement and disability; widowhood; unemployment; industrial accident. The income-tested social assistance, however, is not categorical, and is administered by the national government. (Given the unitary form of government, federalism was not a force here, although struggles between local and national government, taking on a partisan cast, were important in the 1980s as an aspect of the Thatcherite attack on the welfare state).

Old age: After industrial accidents, old age was the first risk of income loss for which Britain established modern social provision; in 1908, income-tested non-contributory pensions were established for all British citizens seventy years of age and over. This was supplemented by a contributory scheme for those aged 65-69 and the widowed and orphaned in 1925. In the wake of World War II, under the influence of the Beveridge Report, National Insurance was established, replacing other programs. National Insurance provides a flat-rate benefit to contributors over the age of 60 for women, and 65 for men (Walker 1992: 187),³⁴ along with a dependent's benefit for spouses of contributors. Feminist analyses of Beveridge's social policy approach find explicit references to the desirability of women staying at home to perform caring and domestic labor and the propriety of married women's economic dependence (see, e.g., Lewis and Piachaud 1992: 32). Thus, as is

³⁴ There was a retirement test, as in the U.S., between 1949-89 (Walker 1991: 187).

the case in the U.S., the old-age portion of NI is internally dualized along gender lines.

Eligibility and coverage: As in U.S. social security, benefits under NI depend upon participation in the paid labor market *or* on being married to someone who worked for pay and contributed. Women divorced after relatively long unions are also afforded access to dependents' benefits. Until 1978, NI gave married women in the labor force the option of paying reduced contributions on the assumption that they would make claims based on their husbands' records; those choosing the "married woman's option" lost individual entitlement to old-age benefits. However, to claim their own (employment-based) benefit, in addition to making contributions, married women had to pass the "half test," which required them to work at least one-half their married lives before they could count contributions made before and after marriage (Groves 1992: 198). If married women did make claims as dependent wives, their husbands' benefits would be augmented by an amount equal to 60 per cent of a single person's pension; women now can make their own claims.

In 1975, the "married women's option" -- that clear evidence of a "logic of difference" -- was phased out for succeeding generations. Although this change was implemented in 1978, under a "grandmothers' clause," married women already in the program could continue paying the reduced rates; in 1989, 20 per cent of married women were still paying the reduced rate of contributions, as compared with 68 per cent in 1978 (Callendar 1992: 134). More recent changes aim at encouraging all to establish individual claims, as the full tax rate for lower-paying jobs has been set below the older reduced rate for married women (Lister 1992: 31). Moreover, a formally gender-neutral rule initiated in 1978 gave some credit to those who worked at home. Full pensions became available to those with twenty years' worth of contributions or home responsibility credits, although to claim these credits, a person had to have been a full contributor before leaving the labor

market for unpaid caring work (Sainsbury 1993: 74). This augmented the initial eligibility rules under which one needs to pay sufficient contributions in nine out of every ten years of a "working life" to qualify for a full pension, which clearly disadvantages those with intermittent work histories (Walker 1992: 188). Those with non-standard work are also disadvantaged by the earnings threshold for paying NI contributions, which excludes many low-wage and part-time jobs from coverage. Approximately 18 percent of all working women, in contrast to three (3) percent of working men, had earnings below the minimum (Callendar 1992: 136).

The basic old-age pension, despite its universalistic tendencies, was not meant to undercut the market. Rather, by offering a basic minimum, it allowed all to live decently while allowing those who could to supplement their state pensions with provision earned in the market (Esping-Andersen 1990). In 1975, an earnings-related second tier of pensions -- SERPS -- was introduced for those reaching pensionable age in 1978, with the scheme scheduled to reach full maturity in 1998. From the beginning, employers were allowed to contract whole occupational groups out of SERPS and into private employers' provision (Groves 1992: 202). The Thatcher administration tried to do away with SERPS altogether in 1986 in favor of purely private provision, but in the face of intense opposition, was forced to be satisfied with merely scaling it back (Walker 1992: 188-89). Initially, the surviving spouse could inherit the full SERPS pension (providing both were over retirement age), but in the 1986 social security changes, this was scaled back to one half (Walker 1992: 188-89). Generally, the 1986 reforms encouraged privatization, allowing employees to opt out of SERPS in favor of "appropriate personal pensions" which depend upon investment performance (Groves 1992: 204).

In its (albeit limited) provision for those with caring responsibilities, Britain

differs from the U.S.³⁵ But the social insurance system still operates with structural constraints against women, both unpaid carers and paid workers. The dependents' benefit under the basic pension remains below the rate of contributors, and for many years was paid to the contributor as a supplement rather than to the dependent directly. The survivors' pension under SERPS is pegged at one-half the main beneficiary's rate. And to the extent that women occupy a disadvantaged position in the labor market, they are disadvantaged by rules which are premised on the standard, i.e., typically male, employment history.

The British system offers both employers and employees relatively easy exit from state provision, particularly in the years since Thatcher's reforms. And, given the relatively low replacement rates of the basic pension and even of SERPS pensions (Palme 1990: 64), occupational pension coverage is quite important. However, access to occupational coverage goes disproportionately to those in advantaged positions in the labor market. In the mid-1980s, only 26 per cent of women, but 62 per cent of men, had income from their own or a survivors' occupational pension. Among those with pensions, women had lower amounts (Groves 1992: 200). And among current employees, full-time workers have greater coverage than part-time workers, and men have greater occupational pension coverage than do women, among both full-time and part-time workers (among full-time private sector workers, about one half of men were covered as opposed to about one-third of women [Groves 1992: 199-200]).

As in the U.S., those elderly people who do not receive adequate income from state or private pensions (or earnings) must rely on income-tested provision --

³⁵ Britain is cross-nationally unusual in having a benefit specifically targetted on informal carers of disabled people, the Invalid Care Allowance (recently, Ireland introduced a similar benefit). The ICA was designed to partially replace lost earnings of working-aged care providers. It was also a prime example of the patriarchal assumptions embedded in social provision until changes forced by the EC in 1986 -- before that date, married women were simply ineligible for the ICA on the (explicit) grounds that "they might be at home in any event" (DHSS 1974, quoted in Glendinning 1991: 172; see also Joshi 1991).

there is no universal citizenship pension. But in contrast to the U.S., income-tested provision for the elderly is not separated out from a general social assistance program for those outside the labor force, Income Support (in 1988, this program replaced a similar income-tested program, Supplementary Benefits).

The Gender of Claims: In 1990, just under two thirds of women receiving a retirement pension qualified on the basis of their partner's insurance contribution (i.e., claimed as married women or as widows) (Walker 1992: 187). In contrast, all men made claims on the basis of their own contributions as workers (U.K. Department of Social Security 1992: 102-03). Housewives, women who opted for the married women's reduced rate and women who made contributions insufficient to entitle them to individual worker benefits are all counted as making claims on their husbands' records (this last category is folded in with retired workers in the U.S).. As in the United States, the proportion of women making claims on the basis of their own earnings is rising slowly (U.K. Department of Social Security 1992: 105). And because of women's continuing labor market disadvantages and the expansion of non-standard employment, the number of working women whose own work-based pension "would be less than the standard rate payable to a married woman on her husband's insurance" may also increase, as it has in the U.S. (however, British data do not permit the disaggregation of the dependent pensioner group to see the proportion of what are called in the U.S. "dually entitled").

The gender breakdown within "worker" and "spouse" and "survivor" within NI categories is similar to that observed in the U.S. The majority of retired workers, 59 per cent, are men, with women making up about two-fifths (41 per cent) of this category. No men are listed as claiming benefits as spouses and survivors. Again, women are more likely to be widowed than are men, but, like their U.S. counterparts, few British men would be advantaged by claiming benefits on their wives' records. Given the existence of the married women's option until

1978, very few wives even had entitlement that would have given their spouses such a choice.³⁶ The aged make up a substantial proportion, about one-third, of all Income Support cases (or about one-quarter of all recipients). However, it is aged women who predominate in this category -- 25 per cent of all cases are women 60 and older, only 10 per cent of all cases are older men (U.K. Department of Social Security 1992: 23-24).

Benefit levels: Basic flat-rate old-age benefits in 1992 stood at about 54 pounds sterling weekly, 33 for married women on their husband's insurance; in 1980, these rates were 27 and 16 (U.K. Department of Social Security 1992: 133). (According to Palme [1990: 65], as of 1980, pensions from SERPS were still insignificant). In 1980, the contributor's benefit represented about one-third of the average production worker's wage (Palme 1990: 64). Women's labor-market disadvantages are reflected in lower pensions in the U.S., where benefits are income-related. This will not be the case in the U.K., as the basic contributory pension is flat-rate. However, to the extent that earnings-related pensions (either public -- the SERPS -- or private) become more important, the extent of women's disadvantage in the labor market will be reflected in their benefits, as it already is in SERPS (U.K. Department of Social Security 1992: 118).

Unemployment: Britain was the first country to initiate contributory unemployment insurance, in 1911. This program was folded in to National Insurance in the 1940s. From the outset, this program has been targetted on the "standard" (that is, male) worker (Callendar 1992).

The National Insurance system offers unemployment benefits to covered individuals for a maximum of one year (Callendar 1992). The married women's

³⁶ As best I can tell from the publication *Statistics 1992* of the Department of Social Security, no men make claims based on their wives' contributions -- however, there is no reference to whether or not they *can* do so; see also Lister 1992, which lists widowers making claims on wives' contributions as nil.

option allowed women to pay reduced contributions and be excluded altogether from unemployment coverage. Until 1975, even if they paid full contributions, they were ineligible for full unemployment benefits (Callendar 1992: 134). In 1975 there was a shift to a formally gender-neutral set of rules. Now, the situation in regard to unemployment coverage is quite similar to that in the U.S. -- that is, it is because of women's structural disadvantages in the labor market (e.g., working in part-time or low-pay jobs) and because the system was designed to protect primary workers that they suffer from disadvantages under the unemployment insurance system. For example, being classed as a "voluntary" quitter is one of the most important reasons women are denied benefits (Callendar 1992: 137). In short, the system rewards those who have had recent, steady, full-time employment.

Recent shifts have tightened eligibility and made it more difficult for "nonstandard" workers to gain coverage under the contributory system. These changes will disproportionately affect women. Changes enacted in the 1989 Social Security Act provide that after a maximum of thirteen weeks, claimants must be available to accept full-time employment and "can neither impose restrictions on the nature, hours, rate of pay or location of work for which they are available, nor refuse a job handled by the Employment Service for those reasons". Moreover, claimants must demonstrate adequate child care arrangements (Callendar 1992: 136). Other changes in the mid-1980s also disadvantaged atypical workers; for example, the reduced rate of national insurance benefits, for those failing to meet full contribution conditions, was abolished in 1986 (Lister 1992: 31). This leaves unemployed people without eligibility for full benefits with access only to income-tested assistance or reliance on their partners (Callendar 1992: 135).

In contrast to the U.S., the long-term unemployed and new entrants to the workforce in Britain have access to nationally-administered social assistance, the Income Support program (see Callendar 1992: 137-38); indeed, more of the unemployed receive IS than UI. However, eligibility for Income Support is based

on a *household test of means* and on the employment status of the spouse (one is disqualified for IS if the spouse is working at least 16 hours per week). These rules of eligibility disproportionately affect married (or cohabiting) women's claims for IS in periods of unemployment.

The Gender of Claims: Men made up 70 per cent of those claiming Unemployment Benefit (U.K. Department of Social Security 1992: 139; see also Lister 1992). They also make up the vast majority -- 81 per cent -- of unemployed claimants of Income Support (U.K. Department of Social Security 1992: 24). And, because of the household means test, fewer married women are Income Support beneficiaries than either men or single women; married women tend to rely on their own NI benefits or go without any coverage at all (Callendar 1992: 138).

All unemployed and low-paid workers have access to a social assistance safety net in Britain. But this has become gender neutral only recently. While solo mothers could claim Supplementary Benefits (the precursor of Income Support) in their own right (and, of course, based on their household income), until 1983, married and cohabiting women could not. The family "head," assumed to be the unemployed male breadwinner, was to be the claimant. After the 1983 changes (spurred by an EC rather than an "indigenous" ruling), such women could claim SB/IS, under restrictive conditions. Now, either partner can claim IS when *both* are unemployed, but only 5 per cent of claimants in married couples were women in 1990 (Lister 1992: 42). The program has always been income-tested on the aggregate income of the household, but recently, no matter what the household income, if one partner is employed full-time ("generously" defined as sixteen hours per week or more), the other has no right to income support (Callendar 1992: 137).

Benefit levels: In 1990, the weekly rate for unemployment benefit was 37 pounds sterling; this was augmented by 23 pounds for an adult dependent (U.K. Department of Social Security 1992: 145). In the same year, the average weekly payment for unemployed claimants under Income Support was 45 pounds sterling

(U.K. Department of Social Security 1992: 20). Unlike unemployment insurance, which is limited in duration, Income Support may be received for an indefinite period, although with increasingly strong work requirements.

Single parenthood: Modern public provision (i.e., outside the Poor Law) for widowed mothers with children at home was initiated in 1925 as part of the Widows', Orphans', and Old Age Contributory Pensions Act. The preferability of mothers staying out of the labor force to look after their children was assumed. This assumption was still central to the Beveridge proposals and to the National Insurance program that emerged in their wake. As in the United States, young and elderly widows are provided for separately from unmarried or divorced women.

Eligibility and coverage: Contributory National Insurance, as discussed above, covers widows with children at home as well as elderly wives and widows. Non-widowed lone parents must rely on income-tested social assistance, Income Support, if they are not working outside the home, or on Family Credit and other programs if they are working for pay. Thus, as in the U.S., there is a split between widowed and other single mothers in policy treatment. But in contrast to the U.S., provision for non-widowed single parents is *non-categorical* -- all unemployed people (or those permanently out of the labor force) have access to Income Support, and all low-wage workers have access to Family Credit and other income-tested supports. There is a lone parent family premium for unemployed solo parents, and a small addition to the child benefit and some additional tax allowance for working solo parents (Millar 1989: 155; Millar 1992). Still, the treatment of single parent families on social assistance was (as of the mid-1980s) slightly more generous than that of two-parent families; as Millar (1989: 149) points out, they are eligible for the higher long-term rate of benefit after one year while two-parent families where the man is unemployed cannot ever get this rate, and they are not required to

work (U.K. Department of Social Security 1992: 15). In 1983, about one half (48 per cent) of single mothers received Supplementary Benefit, but the proportion receiving Income Support was up to almost two-thirds by 1987 as fewer single mothers attempted to work for pay (Evans 1992a: 387).

There is at present no requirement that single-parent beneficiaries of Income Support work for pay, although there have been some efforts to make paid work more attractive for single parents (U.K. Department of Social Security 1992: 15). Indeed, according to Evans (1992a), there has been relatively little interest in forcing solo mothers into the paid workforce. Political concerns about sole mothers have focused on "family breakdown" and the supposed social and familial ills caused by sole motherhood and have been linked to stronger enforcement of child support obligations (Lister 1994). Reforms such as requiring IS recipients to establish paternity and assign child support collections to the state have been instituted.

Gender and claims: Most single parents depend on Income Support, but they do not represent the only constituency served by the program. In 1991, lone parents -- about 95 per cent of them mothers -- represented a little under a third of the IS caseload, as did the unemployed (31 per cent); the remainder consists of the aged and disabled (23 per cent and 8 per cent respectively) (Department of Social Security 1992: 23). Among women depending on Income Support, a large proportion did so because of single parenthood (33 per cent), but the aged represent the largest group of women recipients (45 per cent), the unemployed only 10 per cent, the disabled 7 per cent. For men, the distribution across categories of need was quite different -- 55 per cent of male IS recipients were unemployed, 22 per cent were over age 60, 10 per cent were disabled, and only 2 per cent were sole parents (Department of Social Security 1992: 24-25). In 1991, women made up 56 per cent of Income Support beneficiaries (U.K. Department of Social Security 1992: 24-25). *Benefit levels:* The average Income Support payment to lone parents was

about 56 pounds sterling in 1990 (U.K. Department of Social Security 1992: 20). In Kamerman's study of the relative situation of non-working single mothers in several Western countries, referred to above, mothers in the U.K. ranked sixth in terms of yearly income as a percent of the average production workers wage, at 51.7 per cent. Currently, there is no limit on the duration of IS benefit receipt beyond age of youngest child.

Family Allowance: There is a fairly generous universal family allowance, paid to mothers, which provided low-income parents with a substantial part of their income. In 1979, a non-employed lone mother with two children in the UK would receive over one-quarter of her income from the family allowance, as compared to 8 per cent in Canada, 9 per cent in Australia, and, of course, nothing in the U.S. (Millar 1989: 155).

Canada

Canada's system of social provision is in some ways structurally similar to those of the U.S. and U.K., most notably in that the system is split between social insurance and social assistance programs. But in Canada, social insurance, particularly for the elderly -- in most countries the biggest of all contributory programs, was slow in coming; until the mid-1960s, Canada relied almost exclusively on a mix of means or income tested programs and universal "demogrants" (i.e, universal pensions). Moreover, the divide is blurred somewhat by the presence of universal programs -- family allowances, universal health insurance, and a basic pension. Since 1966 Canadian social assistance has been non-categorical, with the exception of a special income-tested program for the

elderly.

Old age: Modern social provision for the elderly in Canada was established in 1927, with the initiation of federal grants-in-aid for provincial, non-contributory, income- and asset-tested old-age pension programs for citizens or residents of long standing aged seventy or above; all provinces were participating by 1936. A contributory system of social insurance similar to the U.S. Social Security system was enacted by the Canadian parliament, but was invalidated by the Privy Council (Orloff 1993b: ch.8). Thus, old-age provision was deflected from a contributory trajectory for several decades. A universal "demogrant" for the elderly aged seventy and above -- Old Age Security -- was initiated in 1951. At the same time the government also established a means-tested pension for those aged 65 to 69 known as Old Age Assistance (Guest 1980: 145). Old Age Assistance was phased out when the age of eligibility for the universal pension was reduced to 65 in 1970 (Myles and Teichroew 1991: 87). In the mid-1960s, dissatisfaction with the capacity of these programs to provide income security helped to usher in an earnings-related pension plan, the Quebec/Canada Pension Plan. A new income-tested supplement to Old Age Security benefits, the Guaranteed Income Supplement, was initiated in 1967 (Bryden 1974: 130-33).

Eligibility and coverage: The eligibility requirements for the three programs of old-age protection represent three of the major bases for making claims on the state: citizenship, contributions and need. Almost entirely missing is provision for spouses (wives in most cases). Both the income-tested and the universal pension were (and are) gender neutral: men and women qualify on the same basis -- need and citizenship along with 40 years residence after age 18 respectively. Couples simply get two pensions. Eligibility for benefits under the Quebec/Canada Pension Plan is established through contributions based on paid work. The Quebec/Canada Pension Plan is formally gender-neutral, but favors workers with typically male work careers (i.e., steady full-time employment). As in the worker

entitlement portions of the American and British pension systems, women are disadvantaged to the extent that they are disadvantaged in the labor market. While 87 per cent of the male population age 18-64 make contributions, only 60 per cent of the female working-aged population does (Statistics Canada 1990: 123). There is no provision for credits for periods of unpaid caretaking as in Britain, although years with no or low earnings and spent caring for a child under 7 may be excluded from benefit calculations (Health and Welfare Canada 1991: 163). And the period of contributions required for a full benefit is relatively long -- 40 years, a plateau difficult for those who have had intermittent work careers to reach (Myles 1989: 61). Unlike the British and American systems of contributory old-age insurance, there is no dependent's benefit for non-working spouses (usually wives), but survivors inherit 60 per cent of their spouses' pensions (Bryden 1974: 155; Guest 1980: 151-54). Divorced spouses split pension credits (if they were married at least 3 years), and divorced survivors are still eligible for benefits.

There is one, rather limited, benefit that targets mainly older non-working wives. This is the Spouse's Allowance, introduced in 1975, which goes to the spouses of OAS/GIS recipients -- male or female -- aged 60 through 64 (and therefore ineligible for the OAS and GIS); it provided benefits equivalent to the OAS/GIS package (National Council of Welfare 1989: 12). This benefit is particularly advantageous for men, who are the majority of spouses of younger partners.

For the impoverished or income-poor elderly, there is the income-tested (but not asset-tested) Guaranteed Income Supplement (Bryden 1974: 130-33). This is available to OAS recipients who have insufficient incomes (Statistics Canada 1990: 109n5). The GIS replaced means-tested old-age assistance, and was initially seen as an interim measure until the Q/CPP matured (Myles and Teichroew 1991: 89). However, more recently, Progressive Conservative policymakers have preferred to expand the GIS rather than the universal demogrant (OAS) to

address the problem of old-age poverty, particularly among widows (Myles and Teichroew 1991).

While Canada's old-age provision provides better protection against poverty than its U.S. counterpart, it does less well at maintaining income differentials (Myles 1989: 61-63; Palme 1990: 89). As Myles and Teichroew (1991: 91) put it, "the public system was meant to provide a base that would be completed by occupational pensions... [and] private savings for retirement". But this dualistic design has important gender implications. It results in two spheres of public provision for the aged -- a public, but means-tested domain, which is "predominantly a welfare state for women," and a tax-subsidized and government-regulated "semiprivate welfare state of occupational pensions and RRSPs [Registered Retirement Savings Plans] [which] is mainly, if not exclusively, a welfare state for men--organized workers and the predominantly male occupations of employed professionals and managers" (1991: 99). In the absence of well developed earnings-related public provision, private provision is relatively more important to the well-being of the elderly in Canada. And, as has been noted with reference to the U.S. and the U.K., because women are in disadvantaged positions in the labor market, they have less access to occupational pensions or private investment. Thirty-seven percent of the female labor force has occupational pension coverage, while 52 per cent of the male workforce does (National Council of Welfare 1989: 42).

The Gender of Claims: Old Age Security, a citizenship benefit, is about evenly split between the sexes (given differential mortality) -- 47 per cent of pensioners are men, 53 per cent women. The Spouse's Allowance goes overwhelmingly to women -- 91 per cent of recipients. The income-tested GIS is utilized more heavily by women than men; of those receiving a maximum GIS supplement (i.e., the poorest elderly), 29 per cent are men, 71 per cent women, while of those receiving a partial supplement, 38 per cent are men, 62 per cent

women (Health and Welfare Canada 1991: 22). Currently, about 60 per cent of C/QPP recipients are male (Health and Welfare Canada 1991: 174; for the more detailed breakdown described below, I relied on unpublished data on the Q/CPP provided by Health and Welfare Canada). Men make up 58 per cent of retired worker beneficiaries, but women predominate among those receiving survivors' benefits, 91 per cent, and among those receiving both survivors' and workers' benefits, 85 per cent. Almost all men are claiming their benefits as workers -- 93 per cent, while 4 per cent receive survivors' benefits and 3 per cent get both. The majority of women -- 51 per cent -- claim as workers, and another 22 per cent get both worker and survivor benefits, but a significant proportion, 37 per cent, get only a survivor's benefit.

Benefit levels: The OAS pension in 1990 was about \$350 per month (Health and Welfare Canada 1991: 123). Maximum GIS supplements to the universal pension amounted to \$413 monthly for a single pensioner and \$270 to each person in a couple (in 1990) (Health and Welfare Canada 1991: 123). With the OAS and maximum GIS benefits, single elderly people are still left considerably below the poverty line (which varies depending on location); couples, however, are brought up to the poverty line -- or closer to it than singles -- in most locations (National Council of Welfare 1989: 17). The Q/CPP is still maturing, but benefits are beginning to provide a significant addition to OAS payments for those who have had a standard work history before retiring. In 1989, men's average benefit under CPP was \$363, women's average benefit was \$223; under QPP, \$348 and \$203 respectively (Statistics Canada 1990: 123).

In 1980, old-age pension benefits as a proportion of the average production worker's wage ranged from about 30 per cent (for the minimum single contributor's benefit) to about 50 per cent (for a couple in which one spouse earned the wage of the average production worker and worked 35 years) (Palme 1990: 61).

Unemployment: Contributory unemployment insurance, first established

only after years of provincial-federal wrangling in 1940, gave income-graded benefits to all who had worked thirty weeks in the two-year period preceding the application and also provided a small (15 per cent) supplement to cover the dependents (however many or few) of married claimants (Struthers 1983: 200-01; Guest 1980: 107-08).³⁷ In 1956, Canada initiated a provincially-administered, partially federally-funded and needs-tested Unemployment Assistance program for the able-bodied unemployed not covered under UI or by provincial allowances for single mothers (Guest 1980: 146). In 1966, the Canada Assistance Plan (CAP) was initiated, under which provinces were free to consolidate all need- and means-tested categorical programs, including unemployment assistance, as well as general public assistance (i.e., poor relief) with the federal government providing partial funding (Guest 1980: 155).

Eligibility and coverage: Contributory unemployment insurance offers short-term protection for the unemployed who have been regular full-year workers. Beneficiaries must have worked recently and be ready and able to take new jobs. Parental and maternity leave is offered within the unemployment insurance system, with similar qualifying conditions as related to past work and contributions.

Again, to the extent that women's disadvantages in the labor market prevent them from fitting the pattern of the typical male worker, they are disadvantaged in the Unemployment Insurance program, but there are no explicitly gendered provisions. Those not covered by UI have access to the Canada Assistance Plan, but then they are subject to a *household* means test. This means

³⁷ Seasonal, domestic and agricultural workers were excluded from coverage, and there was continued intra-governmental struggle over which level would offer these workers provision in the event of their unemployment. Historically, this focus on "regular" workers had as much to do with distinctions between urban industrial and rural agricultural workers as it did reluctance to offer protection to women workers. Federal Canadian policymakers did not want to take fiscal responsibility for unemployed casual, part-year workers, who predominated in agricultural regions and were often unemployed for part of the year (Struthers 1983).

that secondary workers in two-parent households, disproportionately women, are unlikely to get any unemployment benefits unless their spouses are unemployed, too. There are no published figures available giving a gender breakdown of unemployed CAP recipients.

Currently, the CAP offers two levels of benefits, the higher one to long-term recipients (unemployables), while short-term assistance goes to those who are considered employable, that is, the unemployed who have no coverage under UI and insufficient private income. In most provinces, both types of assistance are administered by the province; but in Nova Scotia, Ontario and Manitoba, the municipalities have some responsibility for those who are to receive short-term assistance -- the unemployed (National Council of Welfare of Canada 1987: 4-6).

The Gender of Claims: Men are the majority of beneficiaries under the regular unemployment insurance program, while women make up over 99 per cent of those taking parental leave.

Benefit levels: Unemployment insurance gives 50 weeks coverage for fully-insured workers, and can be extended with training. Maternity benefits are offered for 15 weeks, then parental leave -- which can be shared by both parents -- lasts an additional 10 weeks (Health and Welfare Canada 1991: 184-85). Benefits are income-related; in 1990, maximum benefits were \$384 per week, and are taxable at relatively high (annual) incomes (Health and Welfare Canada 1991: 186).

Single Parenthood: Like the U.S., and for similar reasons, Canada initiated mothers' pension programs in the early part of the twentieth century (1919 on) (Strong-Boag 1979). Again, these pensions reflected the "logic of difference". In the 1966 legislation that established the Canada Assistance Plan, referred to above, provinces were authorized to combine the income- and asset-tested mothers' allowances with other social assistance programs, including unemployment assistance. This allowed provinces to give support for working poor

households for the first time and, by ending the categorical nature of social assistance programs that restricted eligibility to solo *mothers*, also extended support for the first time to *male* sole parent families. And with the establishment of the Quebec/Canada Pension Plan, widowed parents of young children now have survivors' benefits.

Eligibility and coverage: The CAP offers benefits, subject to income and assets tests on a non-categorical basis to poor single parents, unemployed two-parent families, the working poor, impoverished single people, and the disabled. In most provinces, single parents with children under sixteen are still considered "unemployable," and thus eligible for long-term social assistance. Since the late 1970s, five provinces have explicitly defined single mothers as employable with concomitant work requirements (although not a work-for-welfare scheme such as U.S. "workfare," which is understood to be excluded from cost-sharing under the Canada Assistance Plan); others are considering such a change (Evans and McIntyre 1987; Evans 1992a, 1993; Ontario Social Assistance Review Committee 1988). However, despite the proliferation of pilot work programs and other efforts to encourage single mothers' work, commentators see less evidence of rigorous enforcement of work requirements than in the United States (Evans 1993). Moreover, despite the federal-level gender neutrality, the fact that provinces have retained a good deal of discretion meant that gender differentiation could continue (as it had under provincial administration of mothers' allowances). (Provinces set eligibility conditions and benefit levels without federal oversight [Evans 1992a]). Provinces have not always treated solo mothers and fathers the same. For example, until a 1986 court ruling, Nova Scotia denied eligibility for long-term assistance to solo fathers (National Council of Welfare of Canada 1987: 20), while in the 1980 version of its social assistance legislation, Ontario distinguished between single mothers, who were considered unemployable and therefore eligible for long-term assistance (Family Benefits) and others (presumably including single

fathers), who, as "employable," could get only short-term general welfare assistance (Bureau, Lippel, and Lamarche 1986: 102-03). National data is lacking on how many single parents rely on welfare (National Council of Welfare 1990: 78).

The Canadian system, like its U.S. and British counterparts, differentiates among single parents, but to a lesser extent.³⁸ Until the initiation of the Q/CPP in the 1960s, widows, like divorcees and never-married mothers, relied exclusively on mothers' allowances. Now widows (and widowers) do get limited social insurance provision (a survivors' benefit) through their spouses' contributions under the Q/CPP, while the other types of single parents must rely on the CAP.

The Gender of Claims: Provincial estimates are sketchy, but in 1987 Ontario reported that single mothers made up 30 per cent of the CAP caseload, Quebec that they made up 20 per cent (National Council of Welfare 1990: 78). There does not seem to be a published breakdown of sole parent recipients by sex, but a recent government inquiry into sole parents and welfare in Ontario (Ontario Social Assistance Review Committee 1988) assumes women were the parents in 95 per cent of sole-parent families on welfare. Women made up 90 per cent of those receiving surviving spouses' pensions (for those under age 45, most of whom would be caring for children) (Health and Welfare Canada 1991: 174).

Benefit levels: In Kamerman's study of the relative situation of non-working single mothers in several Western countries, referred to above, mothers in Canada ranked fifth in terms of yearly income as a percent of the average production workers wage, at 52.5 per cent. A recent OECD study (1991: App.2C) estimates that average benefits for single mother families are the equivalent of about 40 per

³⁸ Leman (1980: 177) points out that the CAP also offers protection to many of the disabled, a group served by contributory social insurance and SSI in the U.S. (although as the Q/CPP matures, some disabled will be transferred to its rolls); he suggests that this may contribute to the lower level of negative public opinion in regard to welfare than exists in the U.S.

cent of the average production worker's wage. The maximum rates per month for surviving spouses were \$493 in Quebec and \$324 in the rest of Canada; children receive flat-rate benefits of \$29 in Quebec and \$108 in the rest of Canada (Health and Welfare Canada 1991: 164). As in the programs for single parents in the other three countries, in Canada there is no definite limit on duration of benefit receipt beyond the age of the youngest child.

Family allowances: Family allowances, introduced in 1944, are of more importance to poor households than to the non-poor, but their universal character is an important feature of Canadian social provision differentiating it from U.S. policy and making it more similar to the British (although there have been proposals recently to make family allowances income-tested). As in Britain, the allowances are paid to mothers. However, because the family allowances have not been increased to keep up with inflation, they are of declining importance, and are currently overshadowed by the tax credit as an income source for poor households with children (National Council of Welfare of Canada 1992: 52-54). Together the two benefits were equivalent to only 8 per cent of the poverty level for a single parent and one child, as compared to social assistance benefits which averaged 70 per cent of the poverty line (Goldberg 1990: 75-76). All needy parents (with incomes up to near the median) are also eligible for a refundable child tax credit (Goldberg 1990: 74).

Australia

Australia is cross-nationally unusual in that contributory social insurance is virtually undeveloped (although Medicare requires a small contribution from beneficiaries), while other social programs -- family allowances, benefits for the elderly, sole parents, the unemployed, and others -- are income-tested (this is a

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recent development in the case of family allowances [Shaver 1991: 156-58], but was always a feature of the other programs). Like many countries, the earliest provisions were means-tested and non-contributory social assistance. But in the wake of World War II, there was a struggle over the financing form to be adopted in expanding social provision. The basic structure of the system was established when Labor won the battle for a tax-based form of financing of the welfare state against the conservatives' plan for contributory financing (Watts 1987; Shaver 1989: 158-60). Thus, according to Shaver (1989: 160) the Australian system is

more unitary than contributory systems, in which gaps and shortfalls in contributory coverage typically have to be filled by means-tested supplements.... The two-tier [i.e., social insurance and social assistance] basis creates social and political distinctions between entitlements paid for through contributions, and welfare conceded to the poor. Australia's tax-transfer framework defines access and equity within a single system of revenue and eligibility. While it makes comparatively few distinctions among claimants, the rights of all claims carry the welfarist connotations of means-testing.

Old age: Public provision for the elderly (and invalids) dates from the 1908 old age and invalid pension; from its inception, this provision -- and the other programs which followed it -- has been a means-tested and flat-rate system, offering men and women individual citizenship entitlement, conditional on need. Debates have tended to focus on the restrictiveness of the means and assets tests, with bipartisan changes to weaken the means and assets tests through the 1970s and similarly bipartisan efforts to increase selectivity in the 1980s (Shaver 1991).

Eligibility and coverage: Eligibility for the age pension is established by a household income and assets test and age. The only significant gender difference is that men and women become eligible for pensions at different ages; women gain eligibility at age 60, men at 65, reflecting prevailing notions about typical age differences in marriages (although here is an example of where catering to

"difference" offered women a bonus). However, this age difference for men and women is being phased out over twenty years. In contrast to the bulk of provision in Britain and the U.S. (and most European countries), entitlement is not derived from formal work-force participation and therefore, there is no privileging of male workers over unpaid female carers in the Australian old-age program. However, "housewife-maintaining" households received some advantage in this system in that there is a wives' pension for the spouses of male aged and invalid pensioners who do not qualify on their own, but none for the husbands of female age pensioners (Bryson 1983: 138). Before 1972, the wives' pensions were paid to the husband; after this date, women received the payment directly, although they depended on their husbands' entitlement for their own eligibility (Bryson 1983: 138). Shaver (1992: 9n3) points out that "the non-pensioner husband of a female age pensioner may receive a carer's pension if his wife requires full-time care".

Shifting levels of coverage reflect the shifting means test. In 1933, about one-third of the aged population of pensionable age received pensions; this rose to one-half in 1960, two-thirds in 1972. By 1981, the pension was virtually universal (99 per cent of those over 70, and 87 per cent of those 65 and above, received at least a partial pension), but the selectivist turn was evidenced by the end of the decade in falling coverage (Shaver 1991: 113-14). In 1990, 66 per cent of pension-age women (i.e., age 60 and above) received means-tested age pensions, as compared to 50 per cent of pension-age men (i.e., age 65 and above) (Australia, Office of the Status of Women 1991: 146-47).

Given the relatively low replacement rate of the age pension (Palme 1990: 60), private provision for retirement is quite important, and, as has become the familiar refrain here, women have less access to private provision, either occupational pensions or private investments. In 1990, about 44 per cent of female workers, as compared to 58 per cent of male workers, had superannuation coverage (Australian Office of the Status of Women 1991: 141). Recently, private

pension funds have been made compulsory under the Accord; this measure has extended coverage to women widely and rapidly, but many of the actual entitlements are quite small.

The Gender of Claims: The Australian system of old-age protection is not internally dualized between workers' and dependents' benefits; both men and women qualify because of age and need. Indeed, Shaver and others have argued that at the peak of means test relaxation, the Australian age pension approximated a universal citizenship entitlement and was therefore relatively gender-blind. As selectivity has increased and to the extent that women are more vulnerable to poverty than are men (and because they live longer), women make more use of the scheme -- in 1990, 30 per cent of all age pensioners were male, while 70 per cent were female (Australia, Department of Social Security 1990: 42). Yet gender differences reflecting the sexual division of labor are not institutionalized in the system. Of course, all receiving the wife's pension are women. Most of those receiving the carer's pension are men (about 65 per cent), because women can qualify for wives' pensions if they are caring for their husbands.

Benefit levels: In 1990, the standard, full age pension weekly rate was \$141A for single persons with no dependents, and \$118A for each partner in a married couple; additional allowances were available for children (Australia, Department of Social Security, 1990: 42). In 1980, old-age pension benefits as a proportion of the average production worker's wage ranged from about one-third (for the single person's benefit) to a bit over 50 per cent (for a couple) (Palme 1990: 61).

Unemployment: Unemployment benefits, initiated in 1944, date from Labor's wartime extension of social provision (Shaver 1989: 159).

Eligibility and coverage: Unemployment benefits are non-contributory

(financed from general revenues) and needs-tested, with a household test of means. As is the case in both Britain and Canada with means-tested (though non-categorical) social assistance for the unemployed (who are ineligible for whatever reason for unemployment *insurance* benefits), this rule disqualifies second earners -- usually women -- in couples where the primary earner is still employed. Unemployment benefits offer dependents' allowances for spouses and children (Bryson 1983: 138; Shaver 1991: 150), although until recently only wives could qualify as dependent spouses (Shaver 1992: 7). However, with changes introduced in association with the "Working Nation" White Paper on Unemployment, the spouse of an unemployed person is not eligible for support unless caring for a child under 16 or is aged 40 or more and lacking recent employment experience. This introduces a degree of individuation in benefit eligibility in place of the earlier household basis.

The Gender of Claims: Unemployment (and sickness) benefits were more likely to be claimed by men than by women -- 6 per cent of all men received benefits as compared to 3 per cent of women (Australia, Office of the Status of Women 1991: 146-47).

Benefit levels: Weekly unemployment pensions for single adults were \$130A weekly, \$235A for married claimants (Australia, Department of Social Security 1990: 57). There is no definite limit on the duration of unemployment benefits, but in the recent reforms, work requirements have been strengthened and training and job search assistance enhanced.

Single Parenthood: Like unemployment benefits, non-contributory widows' pensions were initiated during Labor's wartime extension of social provision, in 1942 (Shaver 1989: 159). Class A widows' pensions provided for widowed and deserted (de jure and de facto) wives, allowing them to stay at home to care for their children (until they reached age 16, or 24 if they were full-time students). In 1972, the supporting mother's allowance extended these benefits to

never-married mothers, and in 1977, the supporting mother's allowance was extended to male sole parents, becoming the supporting parent's allowance (Shaver 1989: 165-66). Class B widows' pensions go to childless widows aged 50 or more, or to women aged 45 who became ineligible for Class A pensions because their children had grown up (Bryson 1983: 139). Thus, provision catered to stay-at-home mothering for mothers without men to support them. With the 1987 social security changes, the supporting parents' benefit is to end once the youngest child turns 16, and the expectation is that sole parents will return to the paid labor force by this time (if not sooner) (Cass 1992: 10; Shaver 1992: 9). And Class B pensions are now being phased out as a part of a move toward gender neutrality and away from recognizing "difference"; as Shaver (1992: 9) puts it, "with this development, the provisions for a distinctive life cycle pattern shaped by motherhood has been effectively removed from the social security system".

Eligibility and coverage: Sole parent pensioners are encouraged, but not required to seek paid employment (Cass 1994; see also Evans 1992b). Child support enforcement has recently been significantly enhanced as well.

The Gender of Claims: Despite the formally gender-neutral eligibility, women, given their economic vulnerabilities, are disproportionately represented among sole-parent pensioners. Mothers are the heads of about 77 per cent of sole parent families, fathers of 23 per cent (Rainwater 1993: 26), yet (in 1990) single mothers made up 95 per cent of all sole parent pensioners (Australia, Department of Social Security 1990: 65). In 1981, 11 per cent of male sole parents received a pension as compared to 80 per cent of female sole parents receiving some form of public support (43 per cent of all single mothers receive the sole parents' pension, 37 per cent the Class A widows' pension; Bryson 1983: 136,145n1).

Benefit levels: Average weekly sole parent pensions were about \$192A (Australia, Department of Social Security 1990: 65). In Kamerman's study of the relative situation of non-working single mothers in several Western countries,

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referred to above, mothers in Australia ranked seventh in terms of yearly income as a percentage of the average production workers' wage, at 50 per cent. Again, sole parent benefits are indefinite until the youngest child reaches age 16.

Family allowances: Child endowments, initiated in 1941, were a weekly benefit for every child but the first, made payable to mothers (Cass 1983). In the 1970s, these were expanded (after a period in which the value of the endowments had eroded due to inflation) and renamed family allowances. In 1990, the allowance for two children represented about 4 per cent of disposable income for poorer families with earnings (Rainwater 1993: 9). In the current restructuring of the Australian welfare state, they have been made income-tested, although they still go to about 90 per cent of families with children (Mitchell: personal communication).

CONCLUSION

Let us now try to summarize the contribution of social provision in the four countries to gender stratification and to the capacities of different groups to form and maintain an autonomous household.

Gender Stratification

To what extent are there separate programs for labor market and family "failures"? In all four, there is some differentiation, although some of it occurs *within* programs -- particularly those for the aged -- where, arguably, it is less visible and therefore does less to underline gender difference politically. In fact,

this formal gender neutrality and lack of programmatic gender differentiation may well contribute to the illusion that gender equality of treatment has been achieved. Moreover, it is important to stress that with very few relatively minor exceptions, programs are formally gender neutral, which was not the case as recently as the 1970s. Gender differentiation is strongest for the U.S. and Australia. Australia's social assistance-based system is entirely categorical; however, the age pension covers both retired workers and the dependents of those workers within the same need-based framework. The U.S. system is strongly categorical, although there are a few exceptions, such as Food Stamps. The old-age insurance system has sub-programs that correspond to retired workers' and survivors' benefits, while dependents' benefits are differentiated through the notion of auxiliary entitlement. The U.K.'s non-categorical Income Support system combines with a social insurance system structured similarly to the American scheme. However, claims related to family versus labor market do turn up within the Income Support system. Canada's social insurance system caters principally to workers, not containing the dependent spouses' benefits of the U.S. and U.K. although featuring survivors' protection for men and women. The social assistance program is non-categorical for the non-aged; however, as in Britain, family versus labor market related claims are evident within the CAP. Certainly, it is evident in Canada and the U.K. as it is in the U.S. and Australia that single mothers are making use of social assistance. Nonetheless, it is difficult to evaluate the comparative level of political panic about single motherhood with any certainty or to link the level of such concerns with the categorical or non-categorical nature of provision for sole motherhood.

To what extent do these states' systems of social provision generate and sustain gender differences through processes of claiming state benefits and participation in different programs? In all of these systems of social provision, men make almost all of their claims on the basis of their *paid work*, while far fewer

women do. A partial exception comes in men's use of need-based claims for Australian age pensions and income-tested old-age coverage in the other three; nevertheless, men's reasons for needing such programs stem from their retirement from paid work. Thus, men get benefits almost exclusively from programs designed to compensate for failures in the labor market for - example, unemployment insurance or assistance, workers' compensation, old-age retirement pensions. As women have entered the paid workforce in increasing numbers, they too have made these sorts of claims, although not always under the same terms of eligibility and benefits as do male claimants. In contrast, most women in these states -- though the proportion has been slowly declining in the last few decades -- have made their claims based on *familial or marital roles*. Women, most often making claims as members of families, have claimed benefits from programs targetted at compensating for family "failures," the break-up of marriages due to divorce or the death of their husbands or the need to raise children alone. Men -- even single fathers -- very rarely make use of these programs.

Men make up the majority of unemployed claimants in all four countries, women the vast majority of sole parent beneficiaries. In the three countries with work-based old-age programs, men are the majority of those making claims on their own work record, but increasing numbers of women are in this category as well. (However, it may be of some symbolic significance that American women with dual entitlement are counted as "retired workers" while their British counterparts are counted as "dependent spouses"). Men make almost no claims as dependents or survivors under old-age insurance in the U.S. and Britain, thus, women make up almost this entire category of claimants. Women predominate among those getting survivors' benefits or both retired-worker and survivors' benefits in Canada. And women predominate among those claiming income-tested old-age pensions in Australia or supplements based on need in the other three countries. Only in Canada's universal old-age pension is there a lack of gender

differentiation. Thus, it seems fair to summarize that these systems of social provision do help to generate and sustain distinctive gendered identities and interests.

What is the link between gender differentiation and gender inequality?
American scholars have tended to see a direct link between differentiation and inequality, identifying a "two-tier" welfare state with inadequate social assistance programs serving a predominantly female clientele and relatively more generous contributory social insurance targeting a male clientele (see, e.g., Pearce 1986; Nelson 1984, 1990). Fraser describes the U.S. system:

Consider that the "masculine" social-welfare programs are [contributory] social insurance schemes. They include unemployment insurance, Social Security (retirement insurance), Medicare (age-tested health insurance)... These programs ...are administered on a national basis, and benefit levels are uniform across the country. Though bureaucratically organized and administered, they require less, and less demeaning, effort on the part of beneficiaries in qualifying and maintaining eligibility than do "feminine" programs.... [I]n most cases [they] lack the dimension of surveillance.... In sum, "masculine" social insurance programs position recipients primarily as *rights-bearers*.... Neither administrative practice nor popular discourse constitutes them as "on the dole". ...[T]he "feminine" sector.... consists in relief programs, such as AFDC [Aid to Families with Dependent Children], food stamps, Medicaid, and public-housing assistance... [which] are not contributory but are financed out of general tax revenues... [and] not administered federally but by the states. As a result, benefit levels vary dramatically, ... though... everywhere [are] inadequate.... They require considerable work in qualifying and maintaining eligibility, and they have a heavy component of surveillance. These programs do not in any meaningful sense position their subjects as rights-bearers.... These recipients are... essentially *clients* (Fraser 1989: 152, author's emphasis)

There are several things to be kept in mind when considering the possible relationship between differentiation and inequality. First, as we have seen, not all countries have systems bifurcated between social insurance and social assistance - Australia has only social assistance (Shaver 1987), while Nordic welfare states have large universal components (Sainsbury 1993). Second, while social assistance

does generally offer benefits inferior to social insurance, it is not limited to women or to family "failures" in all countries. For example, men claiming non-contributory, means-tested unemployment benefits outnumber men claiming unemployment insurance in Britain. Indeed, both family and market "failures" are dealt with through the U.K.'s Income Support as well as the Canada Assistance Plan, so that both men and women are social assistance clients in these two countries. Furthermore, while the description of a two-tier, gender-hierarchical system fits the American case best, even here one must make some caveats.

The "two-tier" formulation focuses on the *direct* claims made by American men and women. However, many women -- a larger number than social assistance clients -- are incorporated into the welfare state indirectly, on the basis of their marriage to men who have made contributions to social insurance programs. Women claiming old-age insurance benefits based on their marital tie to covered wage-earners receive relatively worse benefits than do men -- who claim as wage-earners -- within the same program. This is quite true as regards the *basis* of claims -- but it is not true with respect to the *treatment* of claims. Women receiving Social Security, as wives or widows with or without children, unlike women receiving social assistance, are still treated as rights-bearers rather than clients -- their marital tie to a covered breadwinner entitles them to the same standardized treatment and to nationally-set, inflation-indexed benefits accorded to men under social security. They are therefore considerably better off than those depending upon AFDC.³⁹ Much the same could be said about widows or wives in the U.K. In short, different groups of women and men are positioned differently vis-a-vis welfare states.

³⁹ It should be noted that access to maritally-based claims to social insurance is not the same for women in different class and racial or ethnic groups -- to state the obvious, one must be married to a man in covered employment to gain access to dependents' benefits; among men, racial or ethnic minorities and all blue-collar workers bear a disproportionate share of the burden of unemployment, both temporary and long-term, with clear implications for those who depend on them for financial support.

Some women are bound to the U.S. and U.K. welfare state *as (needy) mothers*, others *as the wives of covered wage-earners*. However, divorce -- or the threat of it -- may undercut the wifely bond for some women. This distinction is significant politically. Wives and needy mothers are not united merely because both make claims on the basis of "marital or family status," rather than as workers. (And recall that a significant minority of women are making claims as workers). Indeed, in the U.S. and U.K., the system of social provision divides women in a number of ways; for example, it reinforces differences among single mothers -- widows rely on social insurance, single or divorced mothers on social assistance. In both countries, although especially so in the United States, these differences are linked to racial divisions; widows are disproportionately white, unmarried mothers disproportionately women of color. The difference between the two tiers of social insurance and social assistance in the United States -- often understood as reproducing different treatments for men and women -- would be better conceptualized as producing different treatment for members of families which are headed by a male breadwinner with an economically dependent wife (and children) on the one hand and families maintained by women who are outside the paid labor force, or on its fringes, on the other (Weir, Orloff and Skocpol 1988). In the U.K., the differences between the two tiers take on less the character of two-parent versus single-parent families, although that is present. Rather, class differences or differences rooted in dual labor markets are reflected in the two tiers -- the middle class and "respectable" working class are set against the long-term unemployed and single mothers relying on the dole. (Indeed, some U.S. men -- those without attachment to the paid labor force, disproportionately of minority racial or ethnic backgrounds -- also rely on the lower, social assistance tier, but this is in important ways dissimilar to the U.K. case: the assistance to which the long-term unemployed have access in the U.S. is not nationally administered or even mandated, it is really analogous to locally-run poor relief). The Canadian system is also bifurcated, yet the late development of social insurance has meant

that wifely protection does not assume the same significance as it does in the U.S. and U.K. The social assistance tier includes needy mothers and wives in working poor families (and thus looks similar to Britain's), while the old-age system with its universal and need-based programs does much less to underline differences between paid workers and caregivers. All of these factors undermine the argument that two-tier systems of social provision generate distinctive interests for all women or all men -- rather, interests are gendered but are also further differentiated.

Things look somewhat different from an Antipodean perspective. There is differentiation in the types of claims men and women make, but the system of social provision does not offer different benefit levels to clients of work-related versus family-related programs -- pension levels are set at the same level for the elderly, sole parents, the unemployed, with the same access to dependents' allowances, and the like, although there are some minor differences in income and assets tests. Pensions for the elderly, the welfare-state program affecting the largest number of citizens, are noteworthy in that they do not reward wage-earners any more than those who have been principally caregivers. Widowed or single women (even those who have not worked for pay) qualify for support as needy individuals (Cass 1994: 107), although married women must qualify based on a household test of means and assets, so may be disqualified by their partners' resources. This contrasts with the contributory systems in the U.S. and the U.K., where most married women and widows gain access to benefits through their husbands' contributions. Canada's heterogenous system of old-age protection has elements of individual entitlement for men and women, and a contributory system which protects primarily retired paid workers while giving some assistance to survivors, mainly women.

Australian provision was shaped by assumptions about the traditional sexual division of labor, but this was reflected in different institutional

arrangements than was the case in the "two-tier" systems. This unitary system of provision does not entrench differences among women as deeply as a "two-tier" system would. For example, once the supporting parents' allowance was initiated with the same benefits as the older widows' pensions, the position of widowed mothers was not materially better than that of divorced, deserted or never-married mothers (Shaver 1987: 109). Perhaps there was some political significance to the different programs, particularly in regard to underlining the distinctive identity of different groups of single mothers. With the amalgamation of the former Class A widow's pension and supporting parent's benefit into a single program, sole parent pension, in 1989 (Australia, Department of Social Security 1990: 64), even this distinction has been erased (at least officially). Therefore, different gender identities are certainly underlined by the Australian system. But I would agree with Shaver (1987: 109) when she contends that the Australian system is "not as deeply gendered as the [U.S.] system Fraser points to".

The bifurcated systems of the U.S. and the U.K. do the most to reinforce and actually contribute to creating gender differentiation and inequality. But within formally gender-neutral need-based and labor-market based programs, we see the reflection of the disadvantages accruing to women given their caregiving responsibilities at home and vulnerabilities in the market. Because men are generally better positioned in the market, they are more assured of access to public social insurance and private occupational pensions benefits, and reap the rewards of higher benefits in income-graded systems. In this case, public provision "merely" ratifies men's "privately" generated economic advantages. Yet as economic restructuring and welfare reforms aimed at increasing selectivity and market incentives proceed, and as marital bonds remain fragile, gender-neutral social insurance provision for "typical" workers and social assistance for the casualties of non-standard employment may further undermine the position of anyone outside the primary labor market, a category disproportionately made up by women but

not exclusive to them.

Social Rights

An important aspect of social benefits as they affect gender relations is the extent to which they individualize or "familize" recipients -- *is there individual access to benefits? or is access mediated by one citizen's relation to another through marriage or familial relationship?* For example, in the U.S. and U.K. social insurance programs, married women are made eligible for dependent spouses' pensions on the basis of their husbands' contributions and employment history and may face barriers to establishing their own individual claims if they engage in non-standard employment. Universal citizenship pensions in Canada give individual entitlement to men and women. In income-tested social assistance programs, the use of household means tests undermines women's abilities to claim benefits as individuals -- in the unemployment assistance programs of Australia, the U.K. and Canada, the Australian age pension and in the U.S. AFDC-UP program, eligibility is conditioned jointly on the incomes of both spouses in the case of married couples, which effectively disqualifies the second earner, usually the woman, from benefits when her income alone is interrupted. (The generosity of the means test for the Australian age pension and the fact that many spouses are not working offers individual entitlement to a larger number of women than is the case for programs for those of working age). Women's claims to benefits are also undercut by the "cohabitation rule," present in many countries' social assistance programs for sole parents, including those of all four of these countries. This presumes that living or sleeping with a man indicates that he is financially supporting his partner.

How much leverage do these systems give to workers vis-a-vis the market?

Esping-Andersen (1990: 51) has argued that decommodification is not very well-developed in these four countries, and the surveys of income maintenance here would confirm this judgement. Unemployment insurance is linked to recent, steady, full-time labor market experience and is of relatively short duration, particularly in the U.S. This undercuts its potential to act as an alternative to the market. The level of social assistance benefits for unemployment is relatively low in Australia, the U.K. and Canada, thus encouraging paid work. However, social assistance is of more or less unlimited duration, subject to increasingly stringent efforts to move workers back into the labor force. Given very high unemployment levels in the three countries, such efforts may not amount to much more than harassment. The "dole" can function as a subsistence-level social wage. (Of course, it is not aimed at the traditional goal of social citizenship -- participation -- but functions more as a bribe against unrest). American has no national unemployment assistance, but locally-administered general relief functions in a way similar to the dole for residents of some areas, particularly high-unemployment inner cities or reservations populated by African-Americans, Native Americans and other racial or ethnic minorities. Yet given America's lower unemployment rate, there is less tolerance for non-work and more effort at forcing people into low-wage work.

What of women's capacities to form and maintain autonomous households? Among the aged, women are essentially guaranteed a subsistence-level benefit. Many women have individual access to benefits, either through their own work or because divorcees' access to benefits has been protected, but the related problems of derived benefits and of aged women's poverty continue to vex policy-makers. Still, most political concern of late focuses on women of working age. In this last section, I concentrate on the rights of this group, where the problem of the ambiguity surrounding women's preferred role -- worker versus mother -- is very pronounced.

All four countries seem to allow more independence for mothers vis-a-vis marriage and the family than for workers vis-a-vis the market.⁴⁰ At present, a single mother can maintain a household without access to a male wage and without herself working for pay. The right to benefits providing the capacity to form and maintain autonomous households has expanded from widowed women of the dominant racial group to almost all women over the course of this century, as de jure exclusions (e.g., of native women) and de facto discrimination have been challenged. Despite the shortcomings of the programs for sole parents, feminists and others have been more likely to defend them as an important social right in the wake of cutbacks (Cass 1994; see, e.g., Piven 1985). However, women's risk of maintaining an autonomous household in impoverished circumstances is very high in the United States, Canada and Australia (of single mothers with no earnings, all three countries have rates of 90 per cent or above); Britain's single mothers' risk of poverty was considerably lower (22 per cent), but has recently been climbing and may yet reach levels found in the other three (Mitchell 1993). Even when these women have some earnings, their poverty rate in these nations is noticeably higher than elsewhere (with the possible exception of Germany). While the capacity to form and maintain an autonomous household is assured by the state in these four countries (albeit with sometimes onerous requirements), as it is across the West,⁴¹ it is in fact the impoverishment of single mothers which distinguishes the U.S., Canada and Australia -- and, increasingly, the U.K., from the countries of Europe.

⁴⁰ Single fathers have also had access to sole parent benefits in all four countries since the 1960s, and their use of these benefits may be of interest relative to their taking on non-traditional family work. Yet it is of less theoretical interest in terms of the capacity of such programs to enhance *women's* leverage within marriage or their capacity to live alone.

⁴¹ Indeed, these countries (and probably most Western countries) seem to have some time ago passed a threshold of support above which women could support their own households, and increasing rates of single parenthood would seem to confirm this (not that there is any relationship between the generosity of benefits and the rate of single parenthood -- the U.S. unambiguously leads in the latter but has the least generous of benefits).

Sole parent benefits were established with the aim of allowing (white) single mothers to pursue the distinctive, non-commodified life pattern deemed appropriate for all mothers (or at least for white ones). In short, public provision construed single mothers as unemployable, as mothers rather than as potential workers. This is eroding to some extent in all four countries. The Australian and British systems have recently undergone restructuring (the Social Security Review and the Fowler Review), Canada's system has been investigated at various levels, and the United States, despite the passage of major changes in social assistance programs in the Family Support Act of 1988, is (as I write this) in the midst of considering yet further changes. Changing gender relations have helped to propel the changes, and shifting assumptions about gender as embodied in the reformed systems will have far-reaching implications for men and women. Sole parent provision is limited to women with children under 16 or 18, and "bridges" to old-age provision for non-working women have been cut back or eliminated. And all four countries have developed or are attempting to develop incentives for solo mothers to take paid work, such as wage supplements, subsidized services and the like, as well as disincentives for staying on public support. Yet there are some significant differences between the U.S. and the other three countries in regard to enforcement of work for single mothers on public benefit.

Australia is now pursuing a policy of *encouraging* sole parent pensioners to enter the labor force while their children are young, and requiring work after children reach age sixteen (when entitlement for the pension ends, forcing parents to work or move to unemployment programs) (Australia, Department of Social Security 1990: 64-67; Cass 1994). With the end of the Class B widow's pension (for those whose children had left home but who were too young for the age pensions), the system no longer provides for the traditional woman's pattern of full-time caregiving and housewifery over the entire life cycle. Rather, full-time caregiving will only be supported through the sole parent's pension for a limited period (Cass

1994: 109).

As it applies to the provision of basic income support, a gender-neutral model of citizen worker has largely overtaken earlier provisions framed in terms of [gender] difference and a distinctive role for women as dependent on a male breadwinner in Australian social security. (Shaver 1993b: 10)

The changes underway in Canada seem fairly similar to those in Australia; that is, there are moves to encourage work through the development of pilot jobs programs and the like. While some provinces have introduced work requirements that potentially apply to single mothers, enforcement efforts have so far been rather weaker than analogous attempts in the U.S. The U.K. is doing some encouraging to move single mothers into paid work, but given the huge pool of unemployed male workers on the dole, this is not the highest priority of the Conservative government, which also professes concern for "the family," meaning the traditional gender division of labor. Rather, strengthening child support enforcement has taken on more importance. This allows for cuts in social assistance spending for single-mother families while not upsetting traditional gender roles, particularly men's responsibilities for supporting their families financially and women's responsibilities for care.

In the 1990s, the United States is moving to *require* that single mothers receiving AFDC (or "welfare") enter the paid labor force, whatever the age of their children.⁴² Under current ("unreformed") regulations -- that is, on the basis of the Family Support Act of 1988 (passed with bipartisan support during Ronald

⁴² As noted above, U.S. single mothers with access to survivors' insurance through Social Security -- widows of covered wage-earners -- fare much better than other single mothers; their benefits are higher and they may combine them with paid work with no penalty but are not required to work (Garfinkel and McLanahan 1986). However, they make up a relatively small proportion of single mothers.

Reagan's administration) -- single parents are required to be at work or in training after their youngest child reaches three years of age, and states have the option of requiring work or training for parents of children as young as one year (U.S. Social Security Administration 1993: 83-97); however, states are far from having fully implementing these provisions -- they are more expensive than simply sending a check in the mail. Reforms considered at both the state and national level prior to the 1994 election, which returned Republican majorities to both houses of Congress, proposed that AFDC recipients be required to work after two years of benefits and debated whether public employment should be guaranteed to those whose benefits have run out, whether part-time work should "count" as fulfilling the work requirement for sole parents, and so on.⁴³ The Republicans' current welfare bill would end the status of AFDC as an entitlement and sharply reduce funding for the non-elderly poor. Some states (e.g., New Jersey) have already enacted legislation that will deny additional benefits for children born while a beneficiary is on welfare, and others are considering this change. All of these changes will further limit full-time caregiving as an option for poor mothers, already severely circumscribed by the only partially implemented reforms of 1988. The United States, then, is moving in the direction of making AFDC more like unemployment insurance -- a short-term benefit to help claimants "get on their feet" after the crisis of job loss, divorce or birth of a child outside of marriage, but resolutely pushing them to commodification and the labor market through the stick of short benefit duration or benefit cut-off and, in some states, the carrot of job training, day care subsidies and health insurance guarantees. While (like their Australian counterparts) Clinton administration officials evidence some concern about children's poverty, they have not focused on lessening poverty through raising benefits; rather, they have sought to "make work pay" through tax credits

⁴³ Information about these proposals comes from articles published in *The New York Times* during 1993, 1994, and 1995; details available from the author.

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and increasing the minimum wage (thus, their policy preferences look a bit like a less generous version of Sweden's supports for single mothers). Their Republican opponents simply aim to make welfare unbearable or unobtainable as a way of enforcing paid work on poor mothers and ultimately hope to prevent motherhood outside of marriage altogether.

Australia, Canada and the U.K., despite recent changes, still offer single mothers the capacity to maintain an autonomous household without participation in the labor market for a certain period of their children's lives. The United States is moving to require that all who want to maintain a household obtain the means of supporting that household through the market. For some women, the market -- particularly since it has been subjected to equal opportunity regulation -- does offer wages capable of sustaining independent households; indeed, the proportion of single-mother families is higher in the U.S. than in the other three countries despite its stingier public support. But for women with little training, the market offers little and now the state is moving in the direction of offering even less (see, e.g., Jencks and Edin 1995). This is a fairly significant difference in the character of social rights as it applies to gender relations. While analysts are, I think, correct to identify a shift from gender "difference" to "sameness" in these social security systems, the shift toward entitlement being based solely on worker status has been far more dramatic -- and coercive -- in the United States. I would argue that -- at the least -- there are different models of motherhood in operation. Women with children are still to be treated as mothers in Australia and the U.K., a bit less so in some Canadian provinces, but they are increasingly treated as workers in the United States -- workers who must rely on the same inadequate protection from unemployment and low wages as male workers.

What accounts for these differences? I am in the midst of carrying out research on this issue, but will here sketch some possible answers.

The differences in the four states' support for the capacity to form and

maintain an autonomous household accompany a pattern of stronger traditional arrangements relative to the sexual division of labor in Australia and the U.K. than in North America, with somewhat higher rates of housewifery and higher rates of part-time versus full-time paid work for all women -- in short, a "model of motherhood" based on full-time caretaking (or its nearest equivalent, part-time, non-career-oriented work) and different from that in North America, where combining full-time work and parenting for mothers is gaining acceptance. Overall labor force participation rates for women (in 1990) are a bit higher in North America: about 68 per cent in Canada and the U.S., 65 per cent in the U.K., and 62 per cent in Australia. Differences in labor force participation are somewhat more pronounced among married women with children: about 61 per cent in Canada, 59 per cent in the U.S., 54 per cent in the U.K., and 53 per cent in Australia. But perhaps most significant for the issue of how paid work affects the traditional sexual division of labor is differential rates of part-time work, as such work challenges traditional patterns less than does full-time work. Australian and British women are more likely to work part-time than their North American counterparts: 40 and 44 percent versus about 25 percent (O'Connor 1993b).

Furthermore, the policy difference correlates with variation in the racial characteristics of the clientele of sole parent programs in the four countries as this has been historically created by the structures of social provision and immigration and settlement patterns. Australian⁴⁴, Canadian and British sole parent pensioners are overwhelmingly white. In the United States, single mothers on benefits are disproportionately minority and indeed, a majority of claimants are African-American or Latino; white women are a significant proportion of AFDC recipients, but, not being concentrated in the ghettos of major metropolises, have

⁴⁴ Until fairly recently, Australian Aboriginal women were often not allowed the "right to a family" or the capacity to form an autonomous household -- their children were forcibly removed, while the "white Australia" policy prevented non-Europeans from entering the country.

less public visibility, and are indeed less likely than minority mothers to be on the program for long periods (U.S. Department of Health and Human Services Office of Family Assistance 1991: 6; Bane 1988). And differences in the emerging "models of motherhood" which we see expressed in U.S. policies versus those of the other three countries may relate to the fact that U.S. women of color have been held to requirements about combining motherhood and paid work that have differed historically from those applying to whites. As the clientele of AFDC is perceived as less white, the standards applicable to women of color are being made requirements of the entire program, a trend reinforced by the increasing proportions of all women entering the labor force.

Another key difference is the strength of organized labor (which is related to racial and ethnic heterogeneity), which has affected the development of social rights more generally. Where social assistance is available to all, there seems to be less obsession with getting solo mothers depending on public support into the paid labor force. This is reinforced by differences in the character of the low-skill labor market and unemployment levels -- the U.S. has more low-skill jobs and a lower unemployment rate than the other three (although Canada is moving toward the U.S. pattern). Lack of the "dole" "encourages" participation in that low-wage, low-skill labor market.

Finally, historic differences in state capacities to intervene in civil society and in geopolitical pressures that contributed to the perceived need to increase fertility are reflected in the levels of public support given to women to bear and care for children. Policymakers who have wanted to increase national fertility have often (though not always) turned to supporting women's traditional roles.

A Single Liberal Regime?

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Esping-Andersen has argued that in liberal regimes "concerns of gender matter less than the sanctity of the market" (1990: 28). Historically, this has not been true. All four of the countries here examined deliberately created gender differentiation and at the least tolerated gender inequality within their systems of social provision. Women's access to benefits that might support an autonomous household was and is hedged in with racial, gendered and class-based restrictions - but to the extent that it has existed and has been generalized to all single mothers, it is premised on women's -- or at least mothers' -- exclusion from the compulsion of proletarianization. The sanctity of motherhood has shielded women from the sanctity of the market. This continues to be the case in Australia, Canada and the United Kingdom, even if motherhood is no longer defined as a life-long occupation. Only in America, then, does the market really matter more than "concerns of gender," at least as those have been invoked to protect mothers of young children from the compulsion to sell their labor power in order to survive. This certainly suggests that concerns of gender -- and the ways these intersect with race and class -- fragment the cluster of liberal policy regimes.

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