



# Towards a comprehensive terminology on paid parenting leave

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## Editors

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## Executive summary

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The COST Action ‘Parental Leave Policies & Social Sustainability’ (CA21150) focuses on enhancing and sharing knowledge about the role of paid parental leave (PPL) policies in fostering sustainable societies. The decision on terminology design for the PPL policies reflects values and expectations that pursue different goals in societies. As societies change, the terminology of parental leave policies also evolves.

Thus, WG4 of CA21150 provides a detailed exploration of recent developments in terminology, with a particular focus on the language used in leave policies. While the primary emphasis is on leave policies for parents of young children, it is important to note that other types of leave are becoming increasingly relevant. The report is divided into three main sections. The first examines the nomenclature used by international organisations with a focus on leave policies. The second looks at the terminology adopted by individual European countries, while the third reviews the language used in various comparative studies of leave policies. The concluding section reflects on whether a uniform or harmonised terminology for parenting leave policies for young children is desirable or feasible, and if so, what this terminology might entail.

Chapter 2 reviews official documents, databases, and policy frameworks to examine international leave terminology. Key sources include ILO conventions, EU directives, the OECD database and UN guidelines, alongside Leave Network research. The analysis identifies how organisations distinguish leave types—maternity, paternity, parental, and carer’s leave—while addressing health, caregiving, and gender equality. Legal instruments such as the 1992 EU Maternity Directive and the 2019 Work-Life Balance Directive set standards, complemented by softer recommendations such as the EU Care Strategy (2022). Despite progress, gaps remain, particularly in recognising the needs of parents of children with longer-term illnesses. The terminology not only informs regulations but also enables cross-national learning and monitoring, driving policy innovation and equitable leave access. This report identifies trends in international organizations towards the development of leave terminology naming new types of leave and design features, also creating umbrella terms referring to the whole leave package to facilitate international monitoring. It is also pointed out that children’s perspective is still held in a subordinate position at EU level, as leave policies are basically aimed at eligible mothers and eligible fathers.

Chapter 3 provides a comparative analysis of how PPL terminology is handled by the academic community in their research findings. A total of 38 PPL comparative research articles were reviewed. Different choices of terminology are made in different studies in varying contexts, and to some extent these choices affect what is measured and therefore the results of the study. Authors focusing on aggregate measures, such as the length of leave or its effects, tend to use an umbrella term, usually ‘parental leave’, but sometimes self-defined terms. However, in studies that focus on the distribution of leave - usually between partners - such as those that focus on the transferability of leave, gender-specific terms are common, either in generic forms such as paternal or maternal leave, or in self-defined terms. It can therefore be seen that the choice of terminology plays a central role in influencing the research design and therefore the reported findings. However, explicit discussion of terminology choices is yet far from universal. Many papers in our sample do not discuss their terminology choices and their impact on the research design and results, and it can be





assumed that at least some of them are not fully aware of these choices and their impact. A key conclusion, therefore, is that comparative leave studies should reflect in an open and explicit way on their terminological choices and their effect on the findings.

Chapter 4 gathers and analyses as much as possible of the terminology used in 30 European countries, representing a variety of family policy systems. The analysis classifies PPL terminology as ‘role-focused’ if it refers to distinct roles (e.g., maternity, paternity or parental care), as ‘action-focused’ where it refers to actions such as care giving, upbringing, or education, and as ‘event-focused’ where the native term pertains to birth or pregnancy. Terminology of leave policies, including maternity, paternity and parental leave, is essential for policy comparison but often oversimplifies complex and diverse arrangements. Maternity leave, historically aimed at maternal health, now frequently encompasses broader caregiving roles and may include fathers and grandparents. Paternity leave definitions vary widely, sometimes allowing use long after childbirth. Parental leave, though broadly defined, masks significant differences in transferability and gender equality. The traditional tripartite classification is increasingly outdated, omitting types of leave such as ‘carer’s leave’ or ‘childcare leave’. Gender-specific terms are also being replaced by gender-neutral ones, such as ‘partner’s leave’ or ‘birth leave’. Revisiting national terminologies could lead to more precise and inclusive international standards.

In sum, this report identifies new trends in international organizations towards a terminology that is more child-focused but often refers only to eligible parents. It also identifies a trend in the terms of PPL policies in some countries replacing gender specific terms by more gender-neutral ones, such as ‘partner’s leave’ or ‘birth leave’. Finally, it points out the lack of discussion on the terminology choices made by researchers on PPL when comparing PPL policies and their impact internationally.

The report concludes that while harmonizing terminology for leave policies within individual countries is neither necessary nor feasible, such harmonisation is crucial for presenting comparative information and conducting cross-country analyses. Standardized terms enable valid comparisons but must acknowledge the diverse values and assumptions underlying national policies. It is proposed that discussions should always include the original terms used in each country, both in English translations and in the local language, to preserve context and nuance. Finally, it is proposed that tables comparing countries drop attempts to show and compare ‘maternity leave’, ‘paternity leave’, ‘parental leave’ and ‘childcare leave’ or ‘homecare leave’. Instead, comparative tables should show aggregated results for ‘parenting leave’, divided into ‘mother only leave’, ‘father only leave’, ‘family leave’ and ‘total leave’.





# 1. Introduction

*Peter Moss*

Leave policies for parents with young children, entitling these workers to absence from work with a right to re-instatement, and usually providing some compensatory payment, have become an important building block of contemporary welfare states. Over time, several different types of leave have emerged, and become more generous and widespread, especially in higher-income countries. But despite some common trends in these leave policies, there is also much diversity between countries, especially in how policies are designed and, most recently, in the terminologies used to name different types of leave. These differences reflect different views about the purposes of leave and also, increasingly, about gender roles in relation to the care and upbringing of children. This report examines these terminologies, both as used by individual countries and by international organisations, which have shown increasing interest in documenting and comparing leaves cross-nationally.

A brief historical account of the evolution of leave policies for parents with young children provides a useful background for an understanding of the current situation. Statutory leave policy first appears in Europe in the 1870s and 1880s. The German Trade Code of 1878 included a maternity leave of 3 weeks, while the 1884 compulsory health insurance scheme, the first of its kind in the world, established by Otto von Bismarck, Chancellor of the German Empire, added a cash benefit. A year later the Austro-Hungarian Empire, covering a large swathe of Central Europe, introduced 4 weeks maternity leave, part of a wide-ranging 'Workers Code'. Thirty years later, on the eve of the First World War, 21 countries, in Europe and elsewhere, had maternity leave policies.

The next major step in the evolution of leave policies came nearly 50 years later. Hungary, then under a Communist regime, extended maternity leave first to 2½ years (1967) and then to 3 years (1969), far longer than in other countries. With this extension, leave was no longer confined to acting as a health- and pregnancy-related measure but assumed a wider role of enabling parental care of young children albeit initially only for one parent, the mother. This limitation was shortly rectified. Sweden, in 1974, introduced a parental leave, a leave that could be used by fathers as well as mothers, initially 6 months, then soon extended to 7 months (1975) and 9 months (1979). The same country at the same time also introduced a ten-day paternity leave, to be taken soon after the birth of a child, the first paid leave for fathers only; Norway had brought in two weeks paternity leave in 1977 – but unpaid.

With these landmark events, leave policy passed from the era of mothers to the era of parents. The next stage in that era was in 1993. Then Norway became the first country to introduce a 'father's quota' into parental leave, a period of well-paid parental leave that only fathers could take; previous parental leaves were family entitlements, meaning that parents could decide how to divide the leave period between themselves, usually ending up (as remains the case today) with mothers taking all. Sweden followed suit in 1995. These Nordic pioneers were designing a parental leave that recognised not only the right, but the responsibility too, of men to participate in the care of young children and adopting the basic principle of 'use it or lose it' (though parental leave schemes in both





countries have maintained a period of family entitlement alongside a father's and a mother's quota).

While individual countries have taken the lead in introducing new types of leave, two international bodies have also played a significant role in the evolution of leave policies, proposing minimum standards to which their members should adhere. In 1919, the International Labour Office (ILO), founded under the League of Nations and today a United Nations agency whose mandate is to advance social and economic justice by setting international labour standards, adopted its first Maternity Protection Convention, which included the principle of paid maternity leave (at least 12 weeks) as well as daily breastfeeding breaks and protection against dismissal during leave. The ILO has subsequently adopted two other Conventions (in 1953 and 2000), which have 'progressively expanded the scope and entitlements related to maternity protection at work in line with the evolving status and recognition of women's rights in the world of work (Addati et al., 2014). Most countries have yet to ratify these Conventions, which are not in any case legally enforceable.

That is not the case for Directives from the European Union (EU); once agreed by member states, these become binding and enforceable. The EU (or the European Economic Community as it was then) first entered the field of leave policy in 1983, when a Directive was proposed to set minimum standards for parental leave, a proposal that failed in the face of a veto from the United Kingdom. A second attempt, this time involving standards for maternity leave, was successful in 1992, despite continued UK opposition (nullified this time because the Directive was introduced as a health and safety measure, and so could pass on a majority vote). Finally, in 1996, a Directive on parental leave was agreed, this time with the UK having an opt-out from such social measures, though it adopted the Directive in 1998 under a new government. Most recently, in 2019, a further Directive (2019/1158), on Work-Life Balance, included, for the first time, minimum standards for paternity leave.

The evolution of leave policies for parents with young children has not been confined to maternity, paternity and parental leaves. Although not universal across the EU, many member states (and countries beyond) have some form of leave for breastfeeding, which usually takes the form of breaks during the working day or some other reduction in working hours. Similarly, many have some form of leave for parents to take when children are ill.

Other forms of leave have also emerged that support workers who do not have young children, for example leave to care for older children or adults who are ill or disabled. This last form of leave recently found recognition in the 2019 EU Directive, which introduces the concept of 'carer's leave', intended for 'workers providing personal care or support to a relative', and sets minimum standards for all member states. The standard set may be modest (five days a year -or per case-, with no mention of pay), but for the first time the EU has recognised leave that goes beyond leave for parents of young children, to cover the care of young people and adults – in short, opening the way to a life-course conception of leave.

Lastly, a few countries have initiated an additional form of leave, what might be called self-care leave (as opposed to caring-for leave), to support workers experiencing problems or crises in their personal lives. Examples include 'bereavement leave' (*sorgarorlof*) in Iceland following miscarriage, still birth or the death of a born child; and 'domestic violence leave' in Ireland. This newest form of







leave has been discussed by Marian Baird and colleagues (2022) in the context of ‘broadening our conception of leave’, covering ‘leave to care for self or others over the life course’.

Evolution in leave policy has also taken another form: changes in terminology. Terminologies for leaves in their original native languages have never been uniform, a fact that can get lost in translation in publications in the dominant English language. But the main recent development has been a move to terminologies that ‘de-gender’ how leaves are described, in particular moving away from references in some form to ‘maternity’ and ‘paternity’ to gender-neutral terms; in some cases, different types of leave are maintained, albeit with different labels, whilst in some others maternity, paternity and parental leave have been subsumed into a single overarching leave. Changes in design have also complicated matters. Some countries have enabled part of ‘maternity’ leave to be transferred, with the mother’s permission, to the father, so fathers can end up taking ‘maternity’ leave (the situation made even more confusing in the UK, by this transferred maternity leave being officially termed ‘shared parental leave’, when it is not parental leave, a form of leave which is, by definition, shared and directly accessible by mothers and fathers). Two countries also now have two separate leave measures, running side-by-side, but similarly named: both related to ‘parental leave’ in Spain (both unpaid but a new one designed with more potential in relation to the former to become paid), while In Ireland one is called ‘parental leave’ and the other ‘parent’s leave’.

Terminology is, of course, not neutral: it reflects values, assumptions and purposes. To take just two examples. Leave policies and their design reflect different values and assumptions about gender roles in respect of care for children, ranging from the maternalist, a belief in mothers’ different capacity and primary responsibility for the care of young children, to more gender equality-oriented approaches in child-rearing. While leave policies and their design are driven by different rationales, including protecting maternal and infant welfare (health rationale); incentivizing women and men to have more children (fertility rationale); promoting gender equality (equal opportunities rationale); increasing overall employment and making best use of the workforce (economic rationale); reducing numbers involuntarily out of work (unemployment rationale); and enabling better work-life balance (family policy rationale). Terminology, therefore, is not just a matter of tradition and a potential cause of confusion; it is also political.

This report discusses these developments in terminology in more detail and goes more deeply into the language used for leave policies. The focus is on leave policies for parents with young children, though as indicated above, it is important to bear in mind that there are increasingly other types of leave. In its three main parts, the report considers terminologies deployed by: some international organisations that have taken a particular interest in leave (Part 2); individual European countries (Part 3); and in a range of comparative studies of leave policies (Part 4). In its concluding discussion, the report considers whether a uniform or harmonised terminology for leave policies for parents of young children can or should be applied; and if so, what this might consist of.



## 2. Leave Terminology provided by International Organizations

*Sonja Dörfler-Bolt, Anna Escobedo & Thordis Reimer*

### 2.1. Introduction

International Organisations play an important role on the supranational level in leave policymaking globally. The International Labour Organisation (ILO) had a pioneering role in setting standards on supranational level through its first Convention on Maternity Protection in 1919. Other international Organisations followed, in particular the European Union. The ILO Convention focused on female workers, excluding mothers outside employment and male workers. Its aim was on one hand to protect employed women from occupational, health and safety hazards from before and after childbirth (including pregnancy and breastfeeding periods), on the other hand to protect maternal employment preventing discrimination during the whole pre- and post-natal established periods. The Convention fundamentally shaped subsequent leave policymaking. Although the ILO Maternity Convention developed further in 1953 and 2000, expanding entitlements related to maternity protection at work (Addati et al., 2014) it does not yet cover parental or paternity leave. However, the ILO Maternity Protection Recommendation, 2000 (No. 191) recommends the introduction of parental leave ‘during a period following the expiry of maternity leave’. One reason behind this is the variety of nations that are addressed by the ILO Conventions, which makes it challenging to set common policy norms about parental leave due to the tension between balancing sex-based maternity rights and measures to enhance gender balance in parenting leaves (O’Brien & Uzunalioglu, 2022).

In general, the international terminology on child-related leave policies has two main purposes that are linked to the role of international organisations in the leave policy development:

1. On the one hand, to enable international governmental organisations to regulate and promote the development at national level of different types of leave and measures for different purposes (e.g. maternity leave for the health of the mother and child, parental leave for childcare, leave to care for sick children). The terminology must be clear and at the same time keep up with international complexities.
2. On the other hand, international organisations also carry out statistical work and need to produce comparative, harmonised indicators in order to gain a comparative understanding and follow up oriented towards the eligibility, use, coverage, effects and impacts of either the different types of leave or the total amount of parental leave. It may be necessary to simplify categories in order to provide synthetic overviews (see, for example, the comparative efforts in the OECD Family Database indicators, which attempt to summarise leave entitlements under categories such as ‘total amount of paid leave available or taken by mothers or fathers’ or ‘expenditure on leave per new-born’).

In this chapter, both perspectives are considered, and a distinction is made between the use of terminology for regulatory on the one hand and for statistical purposes on the other.

The research questions for this report section are:





- Which is the international terminology that ILO and EU use to stimulate and control the accomplishments of national law to the corresponding conventions and directives?
- How do different EU and UN organisations (ILO, but also others) refer to leave terminology according to their different purposes (labour, children, women, fathers, or family diversity perspectives)?
- How do statistical offices of international governmental organisations deal with terminology diversity to produce comparative indicators (OECD Family Database, ILO Databases, MISSOC)?
- Which conclusions can we draw from the different ways of using leave terminology?

## **2.2. Methodology**

To answer our research questions, we have analysed a selection of international official documents, like the ILO Conventions and Recommendation on maternity leave, EU directives on maternity protection at work, on Parental Leave, on Work-Life-Balance, EU recommendations related to 2021 Children's rights or to the 2022 EU Care strategy. The Children's Rights Convention and related follow-up portals have been also included in this revision (UNICEF, 2024; UN, 1989).

Additionally, we analyzed the use of terminology in databases which refer to leave policies for statistical work and qualitative information, including MISSOC, OECD Family Database, ILO Global Care Policy Portal, ILO Working Conditions Law Database.

This section uses the terminology of the International Network on Leave Policies & Research (LP&R) as a basis for analysis. According to the comparative research work developed within the LPR Network (Dobrotić et al., 2022) the term 'parenting leaves' summarizes all types of leaves for parenting purposes like maternity leave, paternity leave, parental leave, childcare or home care leave and leave to take care of children who are ill. The term 'child-related leaves' is similarly used.

## **2.3. Terminology provided by international organisations for regulation of minimum standards and monitoring of policy development**

Besides national governments and actors, international organizations have a relevant role and impact on leave policymaking. They have also become a space for comparative learning and evaluation, producing harmonised data and comparative indicators, creating additional stimulus for national innovation and development, particularly in the field of social and leave policies.

*'Global and supranational level policy systems are complex, multi-level and fluid, interacting with new norms and local national systems. (...) International organizations play a significant role in signalling minimum standards and expectations for parenting leave. As norms evolve over time the ILO and the UN provide vital collective knowledge exchange, collaboration and lobbying on a global scale. (...) It is the EU, however, which has been at the forefront in attempting to move from recommendation to legislative implementation and reaching out to fathers and other caregivers as well as mothers. Despite a minimalist mandate it has led the creation of statutory inclusive standards, building on the foundational work of the ILO'. (O'Brien & Uzunalioglu, 2022: 78-79)*

International Governmental Organisations refer to different types of leave serving diverse purposes and rationales (e.g. maternity leave serving mother-infant health, paternity leave facilitating





father's presence and family support at birth time, parental leave oriented to the care of the child, leave to care for children who are ill). In this perspective clear terminology is also relevant when referring to design elements (e.g. flat rate or earnings-related allowances, family or individual benefits). Terminology needs to be clear and keep pace with complexity (related to the substantive topic and to diverse national regulatory legal traditions).

In the following we conduct a terminological analysis of three main international parenting leave regulatory documents in force (ILO Maternity Protection 2000 Convention<sup>1</sup>, European Union Council Directive 92/85/CEE and Directive (EU) 2019/1158 on Work Life Balance).

The three documents define and regulate minimum standards for four types of parenting leaves related to specific differentiated purposes, following the four-fold comparative typology used by the LP&R Network which corresponds to the typological structure regulated at EU-level:

1. Maternity leave (EU 1992 Directive, Article 8; ILO 2000 Convention and Recommendation)
2. Paternity leave (EU 2019 Directive, Article 4)
3. Parental leave (ILO 2000 Recommendation, EU 2019 Directive, Article 5 for leave regulation and Article 8 for payment regulation)
4. Leave to care for children who are ill (EU 2019 Directive, Article 6 which defines a broader carer's leave; Article 7 which defines a very flexible leave as time off for urgent family reasons; both can be used to care for children who are ill at short term).

In addition to legally binding documents, more soft regulation was also reviewed: the EU Care Strategy 2022 (which refers to generic family leave arrangements) and the EU Children's Rights Strategy 2021.

Although the EU 2022 Care Strategy focuses on the care formal sector, it has a specific section devoted to improve the work-life balance of European citizens based on the implementation of the 2019 WLB EU Directive. It refers to 'Increased access to special and family leave and flexible working time arrangements' and explicitly includes the aim of monitoring the implementation of the 2019 WLB EU Directive, particularly the '*uptake of family leave and flexible working time arrangements by women and men with care responsibilities*' (p.17).

It is worthy to mention that from the child's perspective, the 1989 Convention on the Rights of the Child does not explicitly mention leave arrangements for parents, although it refers to facilitating parental care for both mothers and fathers. We add therefore a section on international organisations reporting on leave from a child's perspective.

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<sup>1</sup> The ILO Maternity Protection Recommendation, 2000 (No. 191) is also included in the analysis. Even though it contents only recommendations, it opens a parental leave international agenda.





**Fig. 1:** A synthesis box of minimum standards defining parenting leave types for EU countries, set out by the ILO and the EU, in force at the beginning of 2025

1. **Maternity leave** (EU 1992 Directive, Article 8; ILO 2000 Convention<sup>2</sup>): 14 paid weeks, 6 compulsory weeks after birth; it includes breastfeeding paid daily breaks or a daily reduction of hours of work to breastfeed and extended leave if needed for health reasons before or after maternity leave; EU 1992 Directive foresees only 2 compulsory before and/or after birth, also includes paid leave for occupational risks during pregnancy and breastfeeding, and time off for medical visits.
2. **Paternity leave** (EU 2019 Directive, Article 4): 10 days; fathers or equivalent second parents shall have a right to paid paternity leave for at least 10 working days that will not be subject to a prior work or service requirement, marital or family status.
3. **Parental leave** (EU 2019 Directive Article 5 for leave duration regulation and Article 8 for payment level regulation): employees' individual entitlement to at least 4 months, of which at least 2 months are non-transferable months for each parent in couples, which should be paid in sufficient amount to be used, following the expiry of maternity or paternity leave periods<sup>3</sup>.
4. **Leave to care for children who are ill:** EU 2019 Directive Article 6 defines broader '**Carer's leave**' as a minimum standard of 5 days either per year, per person in need of care, or per case (according to national regulation) and Article 7 defines '**Time off on grounds of force majeure for urgent family reasons**' (per year or per case, according to national regulation). No international minimum standards or specific international regulations to protect parents of children with severe long-term illnesses or disabilities has been found in this search.

Sources: ILO Maternity Protection Convention (2000, No. 183) and Maternity Protection Recommendation (2000, No. 191); EU Council Directive 92/85/CEE on maternal protection at work; EU Directive 2019/1158 on Work Life Balance.

### The LP&R Annual Reviews 'Defining policies section'

Drawing on the experience of more than 20 years of monitoring parenting leave policies and changes across over 50 countries, maintaining a fruitful reporting tension between international categories and national schemes named in national languages, with terminological continuities and changes, the LP&R Network Annual Reviews are based on a four- categorised classification of parenting leave policies, according to four main purposes (*The text in italics is taken from the LP&R website and 2023 Annual Review*).

1. **Maternity leave:** *'Leave generally available to mothers only (except in a few cases where part of the leave can be transferred to other carers under certain circumstances). It is usually understood to be a health and welfare measure, intended to protect the health of the mother and new-born child, and to be taken just before, during and immediately after childbirth.'*
2. **Paternity leave:** *'Leave generally available to fathers only, usually to be taken soon after the birth of a child and intended to enable the father to spend time with his partner, new child and older children.'*

<sup>2</sup> The ILO 2000 Recommendation proposes the extension to at least 18 weeks and in case of multiple births.

<sup>3</sup> The ILO 2000 Recommendation proposes the introduction of parental leave during a period following the expiry of maternity leave.





3. **Parental leave:** *'Leave available equally to mothers and fathers, either as: (i) a non-transferable individual right (i.e. both parents have an entitlement to an equal amount of leave); or (ii) an individual right that can be transferred to the other parent (if eligible); or (iii) a family right that parents can divide between themselves as they choose. In some countries, Parental leave consists only of non-transferable individual entitlements; in other countries, it is an entirely family right; while in other countries, part of Parental leave is an individual right, the remainder a family right. It is generally understood to be a care measure, intended to give both parents an equal opportunity to spend time caring for a young child; it usually can only be taken after the end of Maternity leave. In some cases, parents can choose to take all or part of their Parental leave on a part-time basis. (...) In some countries, Parental leave is supplemented by a further period of leave intended also as a care measure, and given various names, such as 'childcare leave' or 'home care leave' This leave is for parents following the end of Parental leave and may not in practice be very different to Parental leave (although the conditions attached to the two types of leave may vary).'*

Childcare or home care leave may differ from parental Leave in terms of job protection (being considered as employed while on Parental Leave, but inactive entitled to return to job positions while on home care leave). Historically childcare or homecare leave and allowances were regulated as a recognition that maternity leave was too short to ensure care for a young child at home, before external care was both generally available at sufficient quality standards and recommended. Originally offered only to mothers from 1967 in Hungary, it spread rapidly in Eastern Europe and was gender-defined until Sweden formulated it as gender-neutral parental leave in 1974. In the 1980s and 1990s, both systems were developed. Since the 1996 EU Parental Leave Directive, the dominant trend has been to develop better paid and more limited parental leave, while home care leave schemes and benefits are often maintained as an alternative or complementary option (often low paid or unpaid) where childcare services are also available. In fact, the respective LP&R Country Notes, on which the Annual Reviews are based, contain a separate differentiated section on **'Childcare leave or career breaks'** where additional schemes are included usually with lower paid conditions (either with flat rate allowances or unpaid), sometimes not related to employment or implying a career break, but maintaining the protection of reintegration into employment as a basic condition.

4. **Leave to care for children who are ill:** *'This entitlement varies considerably between countries in terms of length, age of children included and payment. In some cases, it may be extended to include certain adult relatives'. In fact, this section in the LP&R Country Notes is referred to as 'Other types of leave and flexible working', which also includes more general leave types (for broader purposes or beneficiaries).*

The 2023 Annual Review and the LP&R website section on 'Defining Policies' reports that *'the distinction between these types of leave is beginning to blur in some countries, leading to the emergence of a single, generic Parental leave entitlement. [...] In a few other countries, although different types of leave with distinct conditions remain, these leaves have been renamed, e.g. 'Primary Carer's leave', 'Partner's leave' and 'Extended Leave' (New Zealand); 'Initial Parental leave', 'Father's only Parental Leave' and 'Additional Parental Leave' (Portugal).'*







### 2.3.1. ILO Maternity Protection Convention (2000, No. 183) and Maternity Protection Recommendation (2000, No. 191)

The ILO 1919 Maternity Protection Convention (No.3) was the first international attempt to regulate minimum standards for any parenting leave. This major achievement was the result of strong advocacy, including during the Women's Labour Congress in 1919 (ILO, 2019). *'The women who helped bring the 1919 Convention to life understood very well that maternity protection is not just about granting paid leave at the time of and following the birth of a child. It is also about safeguarding employment and providing income security during and after the birth so that women have the chance of an equal footing with men in the world of work. It is about access to quality maternal healthcare that guarantees the well-being of mothers and their new-borns'* (Opening Speech of ILO Director-General, Guy Ryder, ILO Geneva Conference celebrating centenary of Maternity Protection Convention, 8 November 2019, cited in O'Brien & Uzunalioglu, 2022, p.68).

The latest version of the ILO Maternity Protection Convention, 2000 (No. 183), still focuses on female workers (including those in atypical forms of employment) and excludes mothers not in employment and fathers. It sets minimum standards for maternity leave for women who provide the employer with a certificate stating the expected date of childbirth, from which a woman (to whom the Convention applies) is entitled to a period of maternity leave of not less than 14 weeks (Article 4). In order to protect *'the health of the mother and that of the child, maternity leave shall include a period of six weeks' compulsory leave after childbirth, unless otherwise agreed at the national level by the government and the representative organizations of employers and workers'*. Also *'the prenatal portion of maternity leave shall be extended by any period elapsing between the presumed date of childbirth and the actual date of childbirth, without reduction in any compulsory portion of postnatal leave'*.

The Convention has a clear focus on maternal and child health, so health protection extends, where necessary, to leave before and after maternity leave (Article 3 and 5). The length of maternity leave may depend on the actual circumstances of the birth and other health circumstances. Beyond these 14 weeks, the Convention also extends the periods of protection for pregnant and breastfeeding female workers to prevent occupational, health and safety hazards before and after childbirth (Article 3). This paves the way for the extension of additional leave linked to maternity leave for the prevention of occupational risks:

- *'Each Member shall, after consulting the representative organizations of employers and workers, adopt appropriate measures to ensure that pregnant or breastfeeding women are not obliged to perform work which has been determined by the competent authority to be prejudicial to the health of the mother or the child, or where an assessment has established a significant risk to the mother's health or that of her child. (Article 3). On production of a medical certificate, leave shall be provided before or after the maternity leave period in the case of illness, complications or risk of complications arising out of pregnancy or childbirth. The nature and the maximum duration of such leave may be specified in accordance with national law and practice.'* (Article 5)

ILO 2000 Maternity Protection Convention (Article 6) establishes minimum standards of economic protection in connection with maternity leave and extended leave in case of illness or health complications related to pregnancy and childbirth:





- Cash benefits shall be provided, in accordance with national laws and regulations, or in any other manner consistent with national practice, to women who are absent from work on leave referred to in Articles 4 or 5. (Article 6.1)
- Cash benefits shall be at a level which ensures that the woman can maintain herself and her child in proper conditions of health and with a suitable standard of living. (Article 6.2)
- Where, under national law or practice, cash benefits paid with respect to leave referred to in Article 4 are based on previous earnings, the amount of such benefits shall not be less than two-thirds of the woman's previous earnings or of such of those earnings as are taken into account for the purpose of computing benefits. (Article 6.3)
- Each Member shall ensure that the conditions to qualify for cash benefits can be satisfied by a large majority of the women to whom this Convention applies. (Article 6.5)
- Where a woman does not meet the conditions to qualify for cash benefits under national laws and regulations or in any other manner consistent with national practice, she shall be entitled to adequate benefits out of social assistance funds, subject to the means test required for such assistance. (Article 6.6)

This paves the way for the development of non-contributory maternity leave benefits. It also establishes orientation for health services and for the public or social security funding of maternity leave, or its extensions related to health complications:

- Medical benefits shall be provided for the woman and her child in accordance with national laws and regulations or in any other manner consistent with national practice. Medical benefits shall include prenatal, childbirth and postnatal care, as well as hospitalization care when necessary. (Article 6.6)
- In order to protect the situation of women in the labour market, benefits in respect of the leave referred to in Articles 4 and 5 shall be provided through compulsory social insurance or public funds, or in a manner determined by national law and practice. An employer shall not be individually liable for the direct cost of any such monetary benefit to a woman employed by him or her without that employer's specific agreement except where:
  - (a) such is provided for in national law or practice in a member State prior to the date of adoption of this Convention by the International Labour Conference; or
  - (b) it is subsequently agreed at the national level by the government and the representative organizations of employers and workers. (Article 6.8)

Article 10 establishes daily nursing breaks or working time reductions to support breastfeeding mothers:

- A woman shall be provided with the right to one or more daily breaks or a daily reduction of hours of work to breastfeed her child. (Article 10.1)
- The period during which nursing breaks or the reduction of daily hours of work are allowed, their number, the duration of nursing breaks and the procedures for the reduction of daily hours of work shall be determined by national law and practice. These breaks or the reduction of daily hours of work shall be counted as working time and remunerated accordingly. (Article 10.2)

Finally, the ILO Maternity Protection Convention, 2000 (No.183) aims at protecting maternal employment preventing discrimination during the whole pre- and post-natal established periods.







The ILO Maternity Protection Convention is complemented by the Maternity Protection Recommendation, 2000 (No. 191), which proposes that the duration of maternity leave be extended to at least 18 weeks and in the case of multiple births, the woman's previous earnings be maintained in full.

- Members should endeavour to extend the period of maternity leave referred to in Article 4 of the Convention to at least 18 weeks.
- Provision should be made for an extension of the maternity leave in the event of multiple births

The supplementary ILO 2000 Recommendation (No. 191) also refers to the father. It proposes the introduction of parental leave, and to equate adoption with the birth of a child, as follows:

- In the case of the death of the mother before the expiry of postnatal leave, the employed father of the child should be entitled to take leave of a duration equal to the unexpired portion of the postnatal maternity leave. (10.1)
- In the case of sickness or hospitalization of the mother after childbirth and before the expiry of postnatal leave, and where the mother cannot look after the child, the employed father of the child should be entitled to leave of a duration equal to the unexpired portion of the postnatal maternity leave, in accordance with national law and practice, to look after the child. (10.2)
- The employed mother or the employed father of the child should be entitled to parental leave during a period following the expiry of maternity leave. (10.3)
- The period during which parental leave might be granted, the length of the leave and other modalities, including the payment of parental benefits and the use and distribution of parental leave between the employed parents, should be determined by national laws or regulations or in any manner consistent with national practice. (10.4)
- Where national law and practice provide for adoption, adoptive parents should have access to the system of protection offered by the Convention, especially regarding leave, benefits and employment protection. (10.5)

### **2.3.2. Leave terminology in European Union Regulation**

The European Union has set minimum standards for members states for five types of parenting leave: Maternity leave (Council Directive 92/85/CEE), Paternity leave, Parental leave, Care leave and Time off for urgent family reasons (EU Directive 2019/1158), as well as for adoption in Directive 2006/54<sup>4</sup>(Article 16 and recital 27).

#### **2.3.2.1 The 1992 EU Directive to protect pregnant and nursing mothers at work**

The minimum standards for maternity leave in the EU are set by the Council Directive 92/85/EEC of 19 October 1992 on the introduction of measures to encourage improvements in the safety and health at work of pregnant workers and workers who have recently given birth or are breastfeeding (tenth individual Directive within the meaning of Article 16 (1) of Directive 89/391/EEC). *'This first Directive had in fact arisen from a 1989 gender-neutral Council Directive 89/391/EEC 'on the introduction of measures to encourage improvements in safety and health of workers at work' in*

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<sup>4</sup> Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast) <https://eur-lex.europa.eu/eli/dir/2006/54/oj>





*which pregnant and breastfeeding workers are not mentioned. Through social dialogue over the next three years specific attention was directed at safety measures in relation to health and safety of pregnant workers at work’ (O’Brien and Uzunalioglu, 2022:75).*

In Article 5.2 **maternity leave during pregnancy in case of additional occupational risks** is defined: *‘If moving her to another job is not technically and/or objectively feasible or cannot reasonably be required on duly substantiated grounds, the worker concerned shall be granted leave in accordance with national legislation and / or national practice for the whole of the period necessary to protect her safety or health’.*

Article 8 defines minimum standards for **maternity leave** duration and benefit level:

- Member States shall take the necessary measures to ensure that workers within the meaning of Article 2 are entitled to a continuous period of **maternity leave** of at least 14 weeks allocated before and/or after confinement in accordance with national legislation and/or practice. (Article 8.1)
- The **maternity leave** stipulated in paragraph 1 must include compulsory maternity leave of at least two weeks allocated before and/or after confinement in accordance with national legislation and/or practice (Article 8.2).

The allowance connected to maternity leave or extended maternity leave for (occupational) health reasons ‘shall be deemed adequate if it guarantees income at least equivalent to that which the worker concerned would receive in the event of a break in her activities on grounds connected with her state of health, subject to any ceiling laid down under national legislation’ (Article 11.3).

Article 9 establishes **Time off for ante-natal examinations**: ‘Member States shall take the necessary measures to ensure that pregnant workers within the meaning of Article 2(a) are entitled to, in accordance with national legislation and/or practice, time off, without loss of pay, in order to attend ante-natal examinations, if such examinations have to take place during working hours.’

### 2.3.2.2. The EU 2019 Directive on Work-life Balance

The ‘Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers and repealing Council Directive 2010/18/EU’ came into force on August 2, 2019, to be transposed by EU Member States by 2 August 2022 and for the payment or allowance corresponding to the last two weeks of non-transferable parental leave by 2 August 2024 (e.g. Article 20, paragraphs 1 and 2). The preamble presents 52 considerations and highlights the main objective of promoting gender equality by encouraging the participation of women in the labour market and employment protection for mothers, the equal sharing of caring responsibilities between men and women, and the closing of gender gaps in income and pay.

This directive lays down new minimum requirements at EU-level related to four types of leave: Paternity leave (Article 4), parental leave (Article 5), carers’ leave (article 6) and time off from work on grounds of force majeure (Article 7). Article 8 refers to payment and benefits related to these leaves. Article 9 raises the right to request flexible working arrangements for workers who are parents or carers. The directive applies to all workers (see section 3.4).

The minimum requirements for leave policies in EU member states established by this directive are as follows:



**Paternity leave:** Fathers or equivalent second parents shall have a right to paternity leave of at least 10 working days that will not be subject to a prior work or service requirement, marital or family status (Article 4). The benefits shall guarantee an income at least equivalent to the level of national sick pay. However, the right to a payment or an allowance may be subject to periods of previous employment, to be defined by the EU member states (Article 8).

**Parental leave:** Each worker has an individual right to parental leave of four months that is to be taken before the child reaches a specified age, up to the age of eight, ensuring that two months are non-transferable and adequately paid (Article 5). The level of payment and the age limit of the child are to be set by the EU member states and can be adapted to the needs of adoptive parents, parents with a disability and parents with children with a disability or long-term illness (Article 5, Article 8).

**Carers' leave:** Each worker shall have the right to carers' leave of five working days per year. Member states may allocate carers' leave on the basis of a reference period other than a year, per person in need of care or support, or per case (Article 6).

**Time off from work on grounds of force majeure:** Member States shall take the necessary measures to ensure that each worker has the right to time off from work on grounds of force majeure for urgent family reasons in the case of illness or accident making the immediate attendance of the worker indispensable. Member States may limit the right of each worker to time off from work on grounds of *force majeure* to a certain amount of time each year or by case, or both (Article 7).

**Flexible working arrangements:** Workers with children up to at least eight years, and carers, have a right to request flexible working arrangements for caring purposes (Article 9).

Member States shall provide monitoring reports and data by gender by 2027. Article 18 on 'Reporting and Review' requires EU member states to submit all relevant information on the implementation of the Directive 2019/1158 to the Commission by 2 August 2027. This includes aggregated data on the use of different types of leave and flexible working arrangements by men and women. Based on this, the Commission will prepare a report for the European Parliament and the Council, which may be accompanied by a legislative proposal. Additionally, the report will include studies on the interaction between different types of leave and the rights to family-related leave for self-employed persons.

Moreover, Recital 13 of Directive 2019/1158 also encourages that, in order to assess its impact, the Commission and Member States should 'continue to cooperate with one another in order to develop comparable statistics that are disaggregated by sex' (EU, 2019).

### 2.3.6. The use of the terminology on parenting leave policy from the perspective of children's rights

Overall, the binding standards at EU level on leave define it as a right of parents rather than of children. In general, the care of children is seen as the responsibility of the parents, as formulated in the 1989 UN Convention on the Rights of the Child (CRC). Although the ILO Convention refers to the importance of protecting the health of the unborn or new-born child, which is essentially linked to the health of the mother and child, it does not explicitly address the need for neonatal care. Instead, it focuses on health risks, such as hazardous substances or the importance of breastfeeding.





We therefore additionally searched for documents that define children's rights, to see if there was additional terminology in documents related to children's rights or research that adopts a child's perspective. These include the 1989 UN Convention on the Rights of the Child (CRC), the Treaty of Lisbon (EU, 2007), the Charter of Fundamental Rights of the European Union (2012) and a 2019 UNICEF report on 'Paid Parental Leave and Family-Friendly Policies' (UNICEF, 2019) to examine the extent to which they refer to specific leave terminology as described above.

The 1989 UN Convention on the Rights of the Child (CRC<sup>5</sup>) is currently the most widely ratified international human rights instrument (Tobin, 2019) and sets basic standards for children's rights around the world. The core message of this treaty is the assertion that children, alongside adults, are holders of human rights (UN Committee on the Rights of the Child 2003, Article 21). An important contribution of this treaty is the conceptualisation of the principle of the 'best interests of the child' as a primary consideration in all actions concerning the child (Article 3.1). There is no explicit right of children to legislation on leave for parents to care for their children, but there are several articles in the CRC that indirectly refer to this. These include:

- States should protect the best interests of the child through appropriate legislation (including for parents as caregivers) (Article 3.1)
- Children have the right to be cared for by their parents (Article 7.1)
- Both parents have joint responsibility for the upbringing and development of the child (Article 18.1).

The European Union has also formulated rights for children in the Charter of Fundamental Rights of the European Union (2012), which is based, among other things, on the Treaty of Lisbon (EU, 2007). The Treaty of Lisbon set out the 'eradication of poverty and the protection of human rights, particularly the rights of the child' (EU, 2012), as one of its objectives. In the 2012 EU Charter of Fundamental Rights there are two Articles setting out basic rights for children and families. Related to leave for parents as a children's right to care we find the following statements:

- Children shall have the right to such protection and care as is necessary for their well-being. (Article 24.1)
- Every child shall have the right to maintain on a regular basis a personal relationship and direct contact with both his or her parents [...]. (e.g. Article 24.3)

In addition, the rights of parents to economic security within the framework of care for children are also defined here:

- The family shall enjoy legal, economic and social protection. (Article 33.1)
- To reconcile family and professional life, everyone shall have the right to protection from dismissal for a reason connected with maternity and the **right to paid maternity leave** and to **parental leave** following the birth or adoption of a child. (Article 33.2)

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<sup>5</sup> The Convention on the Rights of the Child was adopted and opened for signature, ratification and accession in 1989 and came into force in 1990. It has been ratified by all eligible states except the United States.



UNICEF's 2019 evidence brief (Earle & Heymann, 2019) on 'Paid Parental Leave and Family-Friendly Policies' highlights how parental leave rights contribute to children's well-being, health and development, and thus directly serve the fulfilment of children's rights:

*'More generous parental leave policies are associated with a lower risk of poverty among two-parent and single-mother families. These findings suggest another pathway through which paid parental leave can support children's health and development. By reducing the risk of poverty, paid parental leave can help to reduce a child's risk of exposure to conditions that if experienced for a long period of time can be harmful to physical, cognitive and emotional development.'* (ibid., p.3)

In this UNICEF report the term 'paid parental leave' is used as an equivalent to all kinds of paid leave for childcare. The terms 'paid maternal leave' and 'paid paternal leave' are used to show the maximum entitlements related to leave for mothers and fathers separately. The term 'any paid leave for children's health needs' is also used in a figure to summarise all claims relating to leave available for serious illnesses, hospitalization, or urgent health needs.

Overall, it can be said that there is a clear trend in research to adopt a child's perspective when considering leave policies for childcare, and that this is also leading to new terminology for leave entitlements. At the level of international legislation, however, the terminology remains exclusively based on rights and benefits for working parents or 'families'.

To answer the first question on leave terminology in official documents provided by the EU and the ILO we summarise the results of the analysis as follows:

- Leave rights to care for children are represented by four types of leaves, broadly similar to the types of current leave research.
- Leave policy terminology and the minimum standards set out in EU directives or ILO conventions and recommendations reflect the purpose and scope of the eligibility criteria of leave policy: leave entitlements are intended for working (mainly employed) parents and thus currently exclude other groups of the population to different extents (with wide cross-national variation e.g. atypical or more informal employees or self-employed, students, unemployed or inactive mothers or fathers).
- Leave policy terminology reflects an awareness of the need for special protection for mothers during pregnancy and the weeks following childbirth, but also an awareness of the rights of the second parent.
- The rights of parents to leave work to care for children beyond infancy are articulated (e.g. to care in terms of short ordinary child sickness), but minimum standards are set at a low level. Parents of children with long-term illnesses or disabilities are not protected by specific provisions.

#### **2.4. Terminology provided by international organisations for comparative databases and statistical monitoring**

International and supranational organisations such as the European Union, the ILO and the OECD provide databases that allow for an international comparison of the status quo, the consideration of the development of parental leave regulations in different countries over time, the examination of the take-up of parenting leaves or a sociological analysis of the effects.





In this section, we address our second research question and examine the terminology used in four different databases: the ILO Global Care Policy Portal, the ILO Working Condition Laws Database, the Mutual Information System on Social Protection (MISSOC) and the OECD Family Database. These databases provide various information on leave duration, leave benefits and the uptake of leaves.

### **2.4.1 ILO Global Care Policy Portal**

The ILO provides two comparative databases on leaves: the ILO Global Care Policy Portal and the ILO Database of Conditions of Work and Employment Laws.

The ILO Global Care Policy Portal is the most comprehensive source of policy indicators on parenting leaves, care services (childcare and long-term care services) and non-discrimination policies for over 180 countries. It is updated regularly, with the most recent data for 2021. It uses ILO labour standards as benchmarks and focuses on, for example, various components of the ILO Maternity Protection Convention such as the prohibition of dismissal against pregnant workers, the scope of maternity benefits provided and breastfeeding regulations.

The ILO Global Care Policy portal uses the term ‘care leave policies’ for all parenting leave policies. This term encompasses the classic distinctions between ‘maternity leave’, ‘paternity leave’ and ‘parental leave’. ‘Long-term care leave’ is also included, which is a special leave entitlement available to employed persons to take care of family members (both children and adults) who have a long-term functional dependency. Emergency leave is considered a special leave of short duration that a worker can take in case of force majeure for urgent family reasons. Both these types of leave can be either paid or unpaid. There are also two further variables provided called ‘paid childcare leave reserved to mothers’ and ‘paid childcare leave reserved to fathers’, which sums up the paid maternity/paternity leave plus parental leave reserved to mothers/fathers (ILO, 2022).

In the ILO Methodology Report paternity leave is defined as a leave period reserved for fathers or partners of the birthing parents in relation to childbirth or leave that can be used exclusively by fathers or partners of the birthing parents as paternity leave (ILO 2022, p. 331). It does not include parental leave provisions that can be used by the father or mother or parts of maternity leave entitlements that the mother can transfer to the father. It also does not include ‘special’ leave provisions in addition to annual leave that may be used by fathers at the time of birth but are not strictly ‘paternity leave’. In the methodology chapter about maternity leave on the other hand, the term ‘birthing parent’ is not used, and the transferability to the father is mentioned without including also the partner of the birthing parent.

Parental leave is defined in the ILO Methodology Report as a leave through which ‘workers are protected from dismissal during parental leave’ (ILO 2022, p. 350). However, there is no mention of unemployed, self-employed or student parents, and the designations of groups of persons are gender-neutral (e.g. parents, workers). The only exception is the paragraph describing the rights of same-sex couples to parental leave, where gender neutrality is not always given.

The definitions related to maternity leave are consistent with the LP&R definition, but the ILO definition of paternity leave suggests a non-sex-specific scope of eligibility, which is not as clearly expressed in the LP&R definition.







#### 2.4.2 ILO Working Conditions Laws Database

The ILO Database of Conditions of Work and Employment Laws<sup>6</sup>, also known as the ILO TRAVAIL, offers an extensive overview of statutory regulations regarding working time, minimum wages, and ‘maternity protection’<sup>7</sup> in over 100 countries (164 countries for maternity protection). It provides detailed data for five distinct periods: 1994, 1998, 2004, 2009 and 2011/12.

The data covers key aspects of work, including working time, minimum wages and maternity protection. The maternity protection database includes information on maternity, paternity, parental and adoption leave. The term ‘maternity protection’ is used for leave for mothers because of the historical background of the ILO Maternity Protection Convention, which is still in place under this term. However, the database also presents policies for parents beyond maternity protection (e.g. paternity/parental leave).

The database also contains comprehensive information on the key legislative measures adopted in member states to protect the health and welfare of working women during pregnancy, childbirth and breastfeeding. Information on policies for fathers and adoptive parents are included as well.

For each country, the statutory entitlements are divided into four dimensions of maternity protection, covering the main provisions of the Maternity Protection Convention, 2000 (No. 183):

1. Provisions on maternity leave, paternity leave, adoption and parental leave; indicating which workers are covered, the conditions for eligibility, the duration of such leave periods as well as the possibility to take this leave as part-time leave
2. Cash benefits available during the various types of leave
3. Source of funding, health protection measures such as arrangements of working time, avoidance of dangerous or unhealthy work and provisions for breastfeeding
4. Provisions aimed at protecting women against discrimination on grounds of pregnancy/maternity and providing employment security

The terminology used in the ILO Working Conditions Laws Database for parenting leaves are built on the trilogy ‘maternity leave’, ‘paternity leave’, ‘adoption and parental leave’.

Information on both ‘long-term care leave’ and ‘emergency leave in case of force majeure for urgent family reasons’ - both included in the ILO Care Portal - have not yet been included in the database<sup>8</sup>.

#### 2.4.3 Mutual Information System on Social Protection, MISSOC & MISSCEO

The Mutual Information System on Social Protection of the Council of Europe (MISSOC), established in 1990, provides up-to-date descriptive information on social protection legislation in all EU-27 countries plus the non-EU countries Iceland, Liechtenstein, Norway, Switzerland, and the UK (up to 1st July 2019). The descriptive data have been provided since 2004 and are updated on a biannual basis (in January and July each year). MISSCEO is a complement to the MISSOC comparative tables,

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<sup>6</sup> ILO working Condition Database; available at: <https://ilostat.ilo.org/>

<sup>7</sup> Please note that here we will use the terminology that is applied by ILO; however, the dataset covers more than solely maternity leave provisions; that is, it covers other types of leaves (i.e., also parental and paternity leave).

<sup>8</sup> Currently, the ILO working Condition Database is being revised and cannot be accessed, since the website appears to be under construction (our last access was in July 2024).



established in 1999, which aims at promoting a regular exchange of information on social protection with countries not yet included in the MISSOC network<sup>9</sup>.

The data are organised through comparative tables containing detailed information on many aspects of social security: financing, healthcare, sickness, maternity/paternity, invalidity, old age, survivors, accidents at work and occupational diseases, family, unemployment, guaranteed minimum resources and long-term care. Data for the self-employed is provided in a separate dataset. The definitions and terminologies behind the policies, displayed in the MISSOC comparative tables, can be found in the MISSOC Glossary (MISSOC, 2024a) and in the MISSOC Correspondent's Guide (MISSOC, 2024b).

Definitions on parenting leave types are available for maternal benefits and paternity benefits. The 'family benefits' chapter includes parental and childcare allowances, as shown in the Correspondent's Guide Tables<sup>10</sup>. MISSOC focuses on allowances and benefits related to leaves, not the leaves themselves. This is because the core of this database is comparing and displaying social protection legislation.

According to the definitions there are two separate types of benefits for mothers:

1. **Maternal allowances** cover the period directly associated with giving birth or adoption, the related benefits can be provided in kind (e.g. pre-natal medical checks or spells in hospital during pregnancy or confinement) or in cash to replace income during absence from work.
2. **Maternity allowances** are benefits paid to mothers not eligible for maternity benefits. These kinds of benefits are not necessarily linked to a maternity leave.

Definition of paternity benefits is as follows: **Paternity benefits** are intended to cover a period of leave of absence from work of fathers directly after the birth or adoption of the child.

Female partners of women giving birth are not included in this definition, although there are policies in many countries, that do include female partners as recipients for paternity benefit (e.g. Austria's *Familienzeitbonus*). The terminology and the definition are therefore not gender neutral.

The terms parental leave and parental benefits are included in chapter IX 'Family benefits' in MISSOC (2024) and in the glossary (MISSOC, 2024a).

Parental benefits are described here as to be primarily intended to provide a replacement of income for parents taking time off from work to care for their children. However, in some cases, they are payable to all parents, irrespective of whether they were previously in employment, and can be combined with a paid activity. Thus, in this definition parental leave benefits are not strictly linked to full-time care leave. They usually start after maternity/paternity benefits come to an end or can be part of a single scheme including periods of leave and benefit for maternity and paternity. There is no further definition of the parent's gender or any other characteristics.

Information on unpaid parenting leave is not provided in detail, since unpaid leave does not entail social protection. MISSOC only sees it as necessary to mention that such unpaid leaves exist and to specify their length, as well as providing further information on the implications of taking unpaid

<sup>9</sup> Albania, Armenia, Azerbaijan, Bosnia and Herzegovina, Georgia, Moldova, Montenegro, North Macedonia, Serbia, Türkiye, Ukraine

<sup>10</sup> Available at: <https://www.missoc.org/missoc-database/comparative-tables/>





leave for benefits, e.g. whether periods of unpaid leave are treated as contributory for the purpose of determining entitlement to an old-age pension or the amount receivable.

There are three different kinds of childcare allowance, although they have the same purpose according to the definitions in the MISSOC database, which is to cover all or a part of the costs for childcare. They include:

1. Benefits paid to parents whose children are cared for while they go to work. The care may be in a crèche or childcare centre or provided by a professional child minder or someone else, such as a relative, friend or neighbour.
2. Benefits that sometimes follow parental leave and that typically allow at least one parent to remain at home to provide care for their children. In some cases, it is conditional not to use a public childcare facility.
3. Additionally, there is a mixture of the two first kinds of benefits included in the MISSOC definition: benefits that are payable to all parents irrespective of whether they are in employment or not and they can be part of a single scheme where parents are free to decide how to use the benefit (cash-for-care).

The first kind of childcare allowance is not related to any leave, while for the second one to be on leave is preconditional. The third kind of benefit cannot have a direct link to a leave but could be used as a financial support while being on leave (e.g. *Kinderbetreuungsgeld* in Austria).

In the MISSOC database, we can find detailed data on leave entitlements and leave benefits associated with the terms used by the LP&R. However, it is difficult to assess data on maternity or paternity leave for same-sex couples, as these benefits are associated with gender.

#### 2.4.4 OECD Family Database

The OECD Family Database was developed in view of the strong demand for cross-national indicators on the situation of families and children. It provides crucial cross-national indicators on family outcomes and family policies across the OECD countries. The database brings together information from various national and international databases. It currently includes 70 indicators under four main dimensions: (i) structure of families, (ii) labour market position of families, (iii) public policies for families and children and (iv) child outcomes. Each indicator typically presents the data on a particular issue as well as relevant definitions and methodology, comparability and data issues, information on sources and, where relevant, includes the raw data or descriptive information across countries. The database is updated on a regularly basis and is usually a few years behind the publication of national data. While all indicators cover at least 38 OECD member countries, some indicators include also non-member countries (e.g. OECD, 2024).

Data on parenting leave policies are included in the 3rd dimension of the OECD database 'Public policies for families and children' (PF)<sup>11</sup>. Under the heading 'Child-related leave' you will find detailed information by country and tables/figures on the following topics:

1. Key characteristics of parental leave systems
2. Use of childbirth-related leave benefits

<sup>11</sup> OECD Family database: <https://www.oecd.org/en/data/datasets/oecd-family-database.html>





3. Additional leave entitlements of working parents
4. Parental leave replacement rates
5. Trends in leave entitlements around childbirth
6. Same-sex and adoptive parental leave entitlements

Five general types of child-related leave are distinguished in the OECD Family Database:

**Maternity (or pregnancy) leave:** This is according to OECD typology description or operational definition an employment-protected leave of absence for employed women around the time of childbirth (or, in some countries, adoption). That means this leave can be either pre- (pregnancy) or post birth (or both) and both mandatory or voluntarily. The OECD doesn't define a payment linked to maternity leave as obligatory in their definition. Data for the uptake of maternity leave include also men as recipients in three countries (Chile, Spain and Denmark), which would require to be considered somehow. In Spain, eligible mothers were able to transfer some weeks of their maternity leave to eligible fathers until 2020. This option was subsequently abolished (except in the event of the mother's death). In Denmark for example the payment during maternity and paternity leave is the same benefit, which might explain, why there are male recipients included in the statistics for the uptake of maternity leave (Rostgaard & Ejrnæs, 2023).

**Paternity leave:** According to the OECD operational definition paternity is an employment-protected leave of absence for employed fathers at or in the first few months after childbirth. There is no time limit or further definition for the so-called 'first few months' and there is no definition concerning benefits or the length of the leave. The OECD points out, that in some countries a clear distinction between parental leave for fathers and paternity leave is not possible (e.g. Iceland), because father specific leave entitlements are part of the parental leave scheme, rather than a separate right (OECD 2024). The restriction of the definition and of the terminology to fathers excludes female partners of mothers (or mother's partners other than the father), which is also the case in most of the other databases. In the OECD Family Database, women are included as beneficiaries of paternity leave in some countries, like Austria, where female partners of the mother can receive paternity benefit. But it could also be related to transferability to the mother in cases where the father is absent, e.g. in cases of lone parenthood. This should be reflected somehow in the operational definition and terminology of paternity leave in the OECD (2023). Furthermore, the data for the uptake can refer either to the benefit or to the leave, which is not identical in all countries. For example, for Austria, only data for the benefit uptake (*Familienzeitbonus*) are displayed in the database.

**Parental leave:** This type of leave is considered an employment-protected leave of absence for employed parents, which can be supplementary to specific maternity and paternity leave periods and/or follows the period of maternity leave. Certain periods of parental leave can be reserved for use only by the mother or father and cannot be transferred and there can be weeks on top ('bonus') offered if both parents use a certain portion of the family entitlement, so that a certain number of weeks are ultimately 'reserved' for fathers or the 'second parent'. Parental leave in this definition is associated with a payment. There is no clear distinction between leave from work and payment in the OECD definition (as in some countries, e.g. Austria, these are different rights and regulations). Data on the take-up of parental leave by fathers do not distinguish between parental leave and





leave pay, although in some countries no data are available for parental leave without benefits, e.g. in Austria.

**Home care leave:** This type of leave is also named ‘childcare’ or ‘child raising leave’ in the OECD database and is an employment-protected leave of absence that can follow parental leave and allows at least one parent to remain at home to provide care until the child is two or three years of age. There is no mandatory payment linked to this type of leave, but there can be payments, mostly at a low flat-rate. The difference between parental leave and home care leave is not exactly clear in this definition, since both can be linked to a payment and allows parents to return to their job afterwards. In Austria, for example, parents can choose between a flat rate payment for a longer period or an income replacement for a shorter period. It is not clear from the data how the OECD has labelled these different options.

**Additional leave entitlements of working parents:** These leave entitlements refer to leave to care for sick children. They sometimes encompass allowances and are meant to be used by employees with a child, a partner, a parent or another family member that needs care due to illness. In many cases these provisions are included within wider entitlements to leave for ‘personal’ or ‘family’ reasons, with only those provisions that are to be used to care for a sick or ill family member included here. Entitlements regarding leave to care for children concern provisions over and above parental and childcare leaves. Long term care leaves to care for a disabled child are not included.

The database provides also a table with information on ‘leave entitlements of same-sex parents’. In this table one can find information split into male and female same-sex-parents leave entitlements. The variables cover maternity leave, paternity leave, home care leave and adoption leave. In this table there is also information about access to maternity, paternity, parental and home care leave in case of adoption which is called ‘adoption leave entitlements’.

The OECD Family Database further provides the two variables ‘father-specific parental and home care leave’ and parental and ‘home care leave available to mothers’. These variables include the minimum time of leave that is reserved for fathers and the maximum time that mothers can take. This includes all the days/weeks of parental leave that are an individual non-transferable entitlement for the father (or other parent)/mother, plus any weeks of sharable leave that are effectively ‘reserved’ because they must be used by the partner of the main leave-taker in order for the family to qualify for bonus weeks. The days/weeks are included here only if they are fully non-transferable. Any entitlements that are initially given to the father but that can be transferred to the mother are not included.

Additionally, there is a variable for ‘family leave entitlements’, which sums up all the parenting leave types mentioned above. It refers to paid birth-related leave, entitlements to care for young children, such as maternity, paternity, home care and parental leave. The database clearly differentiates between periods labelled ‘mother only’ and ‘father only’. These refer to individual, non-transferable entitlements for paid, employment-protected leave of absence for employed parents, so-called ‘quotas’, or periods of an overall leave entitlement that can be used only by one of the parents and cannot be transferred to the other. They also refer to any weeks of shareable leave that must be taken by one or both parents for the family to qualify for ‘bonus’ weeks of parental leave. Weeks of shareable leave refer to parental leave and home care leave entitlements that can be freely shared between mothers and fathers. The term ‘family leave entitlements’ is clear





and appropriate for this variable, as it expresses the sum of all family members' leave entitlements after the birth of a child.

To answer our second question 'How do international organisations deal with the diversity of leave terminology to produce comparable indicators to compare leave policies and their uptake across countries?' we summarise the results of the analysis as follows:

- In the databases examined, leave policies are usually described and analysed according to the four types of leave defined by LP&R. However, additional categories such as 'adoption leave' or 'home care leave' can be found.
- New categories are also created, not from a policy perspective but from a user perspective, such as 'leave entitlements of same-sex parents' or 'family leave entitlements' that are suitable to identify gaps in leave policies and allow for comparisons across countries from a children's perspective.
- The data provided by the OECD provides also an overview of specific entitlements by gender across countries, which is useful for monitoring the goal of gender equality.
- Information on both 'long-term care leave' and 'emergency leave in case of force majeure for urgent family reasons' is not yet available, which indicates a data gap in relation to these data.

## 2.5 Discussion, concluding remarks and recommendations

We will now summarise our findings on the analysis of leave terminology used in international legal documents and databases from international organisations. Special focus is given to use of distinct terminology across different fields of society, the wide range of terminology for the regulation and description of parenting leaves and a discussion of recent trends in the development of leave terminology.

The terminology used in the examined internationally binding documents and the databases of international organisations largely corresponds to the division of child-related leave into four types, which is also used in social research. We have seen that the terminology defined in the ILO conventions and EU directives is formulated in the context of parenthood (maternity, paternity, parental) and employment status.

In the databases, we find additional labels that summarise data on parent's leave rights for particular social or family groups. This description of leave policies, which focuses on the recipients of leave, is important for identifying inequalities between or within countries.

### | Leave terminology use in different social fields

We identify three fields where leave terminology is used and developed through interactive social processes:

1. **The Regulatory Field** (international conventions, directives) creating umbrella international terms and typologies, inspiring and addressing diverse terminology in national regulation. International regulation terminology needs to summarise and overcome national complexities in a relatively simple way (with clear purpose), as well as facilitating





compliance and comparative compliance monitoring. While national regulation terminology more often deals with complex historical social and policy compromises.

2. **The International Monitoring Organisations Field** (OECD, MISSOC, ILO databases): In this field organisations are particularly concerned with the creation of comparative databases, statistics and reports, which is why the diversity of terms often requires simplification, harmonisation or summarisation under new generic terms.
3. **The Social Field:** refers to the practical use of terminology in society, leaves are also re-named in a more popular or media-friendly way, with an impact of terminology on social structuring and conforming social debate at macro level (media, advocacy and political organisations, social partners), meso level (labour organisations, services) or micro level (conforming family patterns and individual expectations).

Legal terminology has an instrumental role defining eligibility, purpose and mechanisms (who is entitled to what). It also has a symbolical function which affects social processes and social structuring (interactions between public and private organizations, with families and citizens....) conforming power relations and identities, and contributing to develop sense of entitlement (Escobedo & Moss, 2025). Legal terminologies can promote or avoid social debates in particular directions (e.g. Austrian illustration of media and politician's use of the 'compulsory' component of paternity leave for the leave reserved for fathers)

### | Terminology for child-related leave policies: between harmonisation and diversification

International regulation terminology is both inspired by frontrunners and nurtures global trends of social change.

International terminology deals with different regulatory traditions in civil, labour and social law across countries. For example, there is often a separate terminology for leave arrangements (including job protection mechanisms) and another for related benefits. Depending on the country and how payments of leave benefits are built into legislation, these benefits are paid out of contributory social insurance funds and/or as state benefits. This is not always clear in the databases, especially if only data on benefits on individual level is available. The combination of both systems is sometimes referred to as a 'leave arrangement'. Ultimately, these differences mean that particular attention is required when comparing leave policy and leave benefits internationally.

The three databases of the different international organisations examined contain the tripartite typology of paternity, maternity and parental leave. They also include additional data on leave, such as pregnancy leave, which is considered part of maternity leave in legislation. In addition, the terms "care leave", "childcare leave" or "homecare allowance" or "allowance for childrearing" are used to refer to a (paid) leave or benefit, distinct from parental leave, which allows a parent to take paid leave to care for children. However, in some countries the term is also used to refer to a benefit paid to working parents to help cover the cost of childcare, rather than as paid leave from work. The benefits covered by this variable may also be a mixture of the first two types of support, i.e. a payment to parents who look after their children at home rather than using childcare facilities, often without job protection during this period, which is not always clearly defined.



The databases examined use many different ways of referring to types of leave other than the types of child-related leave defined by the LP&R. The terminology for leave to care for sick children varies from one database to another (e.g. “carer”’s leave” or “emergency leave”). Under these terms, it is difficult to extract information on this specific type of parenting leave, as the data may also refer to care for adults. If “leave to care for children” is subsumed under a generic term of familial care work for other persons, there is a risk that the analysis of the use of such policies across Europe may not be successful. It would be desirable to have more precise terminology here, at least for the data sets. Overall, it is difficult to monitor the care of sick children across Europe because there are different models (unpaid, paid for by the employer or financed by social security or other funds).

### **| Trends in the development of parenting leave terminology**

In the international databases we see a trend towards the development of leave policy for new work-life contingencies over the life course: parenting leave types are sometimes included in broader categories such as ‘child-related leave’, “family leave”, “carer”’s leave”, “force majeure leave for urgent family reasons”, career break programmes or other flexible working arrangements such as reduced working hours, time credit accounts or other types of leave. These broader categories are partly gender-neutral, but in some cases leave entitlements are also explicitly listed separately by gender.

In international legal documents, “maternity leave” is formulated as a right for women only. In contrast, with regard to “paternity leave”, we find the extension of this benefit to the “second parent”, thus referring to entitlements beyond gender. Gender-neutral terminology is more evident in two types of leave: “parental leave” and “leave to care for sick children”. In general, there are indications of individualisation of leave entitlements from the perspective of parents, which only refer to the family context in terms of transferability or duration of leave when the focus is placed on the child. An exception is paternity leave in Austria, which is referred to as “*Familienzeit*” (family time), which is intended to describe the fact that the whole family usually stays at home together during paternity leave after the birth of a child.

In the meantime, some countries have also adopted gender-neutral terms for maternity leave, such as birth leave. However, maternity leave covers much more than birth leave, both in practical and symbolic terms, as it includes protection against risks during pregnancy and childbirth, in addition to a recovery period after childbirth for both mother and child.

Overall, the definitions related to maternity leave do not appear to be gender neutral, while gender neutral terms are used more frequently for the definition of paternity leave. In one case, the definition of paternity leave stated that it was a leave “for fathers or partners of the parent giving birth” (ILO 2022, p. 331). In this context, an indicator on access to parenting leave for same-sex parents has recently been added to the OECD Family Database, covering the year 2022. In the definitions of leave entitlements for same-sex parents, the terms mother or father are usually avoided and replaced by more gender-neutral terms (e.g. by terms such as “birthing parents” to include trans parents).

There is also a tendency towards a child-focused terminology, which looks at parenting leave entitlements from a family perspective (i.e. all leave available to parents for their child). However, parenting leave and related benefits are still seen as a measure for working parents and not





explicitly aimed at protecting children's well-being. There are now some databases that already include a variable for the entitlement to leave for the whole family that reflects this kind of child perspective. An example of the terminology used for the sum of maternity/paternity and parental leave is father (or mother)-specific leave or child-related family leave entitlements.

Beyond research and monitoring of leave policies, we found that child related leave is rarely conceptualised or discussed from a child rights perspective in human rights treaties. There is also a lack of terminology in international regulations and monitoring of leave policies that refers to or addresses children's needs or rights. At present, children are referred to in EU level directives/conventions as new-borns or, when referring to infant health, usually only in the context of mother and child health. In reports and monitoring, the child's perspective appears in terms such as "child-related leave" or "childcare leave". However, these are not specified as child-related entitlements in the legal documents we reviewed, as they tend to focus only on entitlements for eligible parents. The lack of a child perspective in current international parental leave policy is problematic, for example in relation to multiple births, adopted children or children of same-sex couples or in lone-parent families. To address the lack of specific provisions for multiple births in international regulations or the fact that adoption is often treated differently from childbirth, ILO Recommendation No. 191 of 2000 proposes to extend maternity leave in the case of multiple births and to treat adoption as equivalent to childbirth in terms of "access to the system of protection offered by the Convention, in particular as regards leave, benefits and employment protection" for adoptive parents.







### 3. Literature Review on Comparative Studies on Leave Policies and their Terminology Use

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#### 3.1 Introduction

Leave policies began in Germany and Austria in the 1880s, when employment and health protection for pregnant women workers was introduced, and a maternity (and breastfeeding) leave was established as a social security provision to compensate lost salary during leave, within the frame of the foundation of the modern welfare state (Flora & Heidenheimer, 1981; Neyer, 1997). The main objective of leave policy was to improve the health of both mother and child. This provision was adopted by a growing number of countries from the beginning of the 20th century. In 1919, the International Labour Organisation (ILO) succeeded in adopting its 3rd Convention, which established a minimum standard of leave, requiring countries to provide 12 weeks of paid maternity leave (Addati et al., 2022). For decades, the only improvements in leave policy have been the increase of leave duration and its generosity.

In the 1970s, when the number of women in the labour force was increasing rapidly and companies were interested in retaining them after childbirth, as was, for example, the case of Sweden, leave policy was redesigned to include as an objective the promotion of reconciliation of work and family life, i.e. keeping mothers in paid employment while caring for children. This additional objective was institutionalised as a new leave right in addition to maternity leave, called parental leave and granted to mothers. In many countries leave policy design was based on the idea of the dual/earner family model, even though there is evidence that a substantial part of European countries has shown higher shares in women's part-time employment due to the persistence of a male breadwinner norm (Riederer & Berghammer, 2019; Cunha and Marinho, 2018). In the Nordic countries, typically considered as frontrunners in leave policies, this objective was however also framed within gender equality policy, particularly in Sweden and Norway, conceiving parental leave as a family right, that parents could share according to their preferences and needs, i.e., fathers had also right to parental leave (Lammi-Taskula, 2009; Haas & Rostgaard, 2011). According to the universalistic model of the welfare state in these countries, leave rights were conceived as a citizenship right, providing paid leave also to those parents not employed (though at a lower level than employed parents), aiming to protect all kind of families.

Aiming at changing gender inequalities in the uptake of parental leave and of family benefits, an individual leave right acknowledged to fathers on the bases of the principle "take-it or lose it", i.e. non-transferable to the other parent, was introduced during the 1990s, first in Norway then in Sweden (Lammi-Taskula, 2009; Brandt & Kvande, 2020). Later, this individual right to leave for fathers, established as a "father's quota" in the parental leave model of the Nordic countries, was introduced also in other countries as paternity leave, being designed in a similar way as maternity leave, though with different requirements and provisions, particularly in terms of length (Addati et al., 2022). The objective of introducing an individual non-transferable right to leave for fathers aims to promote gender equality in caring, but also aims to neutralize the motherhood penalty in employment, extending so the scope of objectives of leave policy (Hays, 1996).







This pluralization of objectives, common now in most developed countries, has been institutionalized in very different ways. Even though the EU has approved directives establishing minimum leave rights for every EU residing citizen, no clear convergence neither in its design, nor in their concrete application in everyday life has been identified (Finch 2021; De la Porte et al., 2023; European Commission et al., 2024). Leave policy design varies, among others, in terminology, type of entitlements (individual and/or family), eligibility, length, generosity and flexibility in use. This high complexity makes the analysis of patterns and dynamics of change over time and particularly comparison among countries very difficult and challenging (Moss & Deven, 2020; Dobrotić, 2023).

The objective of this section is to analyse how comparative studies have addressed international differences in leave design to carry out empirical analyses. We will focus on terminology use when analysing policy design, policy development over time, patterns of use or evaluating outcomes of different designs on labour and/or family dynamics and, furthermore, the consequences of using different strategies to deal with this complexity. More in particular, we want to address the questions: How do comparative studies deal with different leave terminologies? And how does the use of different types of terminology affect the results of analyses?

### **3.2 Data base and methodology**

Based on the literature review made by WG2 and WG3 of the CA21150, we have selected those publications appeared during the last five years, published in English and which compare more than two countries. The reason for selecting only publications in the last five years is only practical, as the number of publications in the field has grown impressively in recent years (Pizarro & Gartzia, 2024; André et al., 2025). However, we have also included other comparative studies published earlier in English where relevant to the discussion. The total number of articles reviewed is 38 and listed in the reference and annex section. For the analysis we have developed a template with keywords to be considered. These keywords include gender, quotas, bonus, length, income replacement, discrepancies with different terminologies, regulations and the leaves being compared, and how terminology choices may affect the results.

The publications we have reviewed include books, book chapters and articles, which can be characterised by the type of study, the aspects of leave policy that the authors focus on and their methodological approach.

We find studies that focus on the characteristics of leave policy, either in a specific narrow period of time or changes over a fairly long period of time. These studies focus on trying to establish a typology (Escobedo & Wall, 2015; Dobrotić & Blum, 2020), or address specific shortcomings related to gender and/or other social inequalities (Saxonberg & Szelewa, 2021; Addati et al., 2022; Dobrotić, 2023). Another set of comparative studies focusses more on the political, economic, social and/or cultural circumstances that shape the reform or evolution of leave policies over time (Meil et al., 2022; Son, 2023, De la Porte et al., 2023, Saxonberg & Szelewa, 2021). Others focus mainly on the use of leave, in particular on factors that facilitate and hinder its use (Bueno & Oh, 2022; O'Brien & Wall, 2019) and/or sharing among parents, where leave is partly a family right (Kaufman & Grönlund, 2021). Finally, we find comparative studies that focus on leave use only as an independent variable, in addition to other relevant variables, when analysing specific aspects of social life, for



example, when analysing the impact of parenthood on earnings (Musick et al., 2020) or on leave use (Olsson et al., 2023).

From a methodological point of view, we find mostly quantitative, but also qualitative approaches. In the quantitative approach we can identify two strategies: some authors produce a database with the characteristics of the leave policies they are interested in (Dovroćić & Blum, 2020; Blum et al., 2023; Earle et al., 2023; Son, 2023; Dobroćić, 2023), while other authors conduct a survey with a common questionnaire applied in all participating countries (Olsson et al., 2023). Authors relying on a qualitative approach, use either semi-structured interviews (Bueno & Oh, 2022; Kaufman & Grönlund, 2021; O’Brien & Wall, 2019), or documental analysis (Meil et al., 2022; Pizarro & Gartzia, 2024; Duvander et al., 2019), or combine both to some degree (De la Porte et al., 2023).

### 3.3 Leave terminology used in comparative studies

In order to make the description of leave policies more dynamic and to facilitate the understanding of the analysis of different leave entitlements, authors often use an umbrella term to refer to the different types of leave. The use of terms depends on whether the comparative analysis is based on types of leave (maternity, parental and/or paternity leave) or whether it focuses on the leave entitlement of each parent according to gender.

The most commonly used generic term is leave or leaves or, when discussing policy, leave policy. One problem with this term is that labour law recognises leave rights not only in case of parenthood, but also in other cases, such as illness, marriage, bereavement, holidays (annual leave), study or jury duty and other forms of leave. Some authors have therefore made this generic term more specific and have introduced a precise, albeit generic, adjective that distinguishes these leave types from others. This is the case, for example, of Dobroćić (2023), who uses the term parenting-related leave as a generic term for the three classical types of leave, although she recognises that in some countries there is also a right to “childcare leave” after parental leave that can be included as parenting leave. Earle et al. (2023) occasionally uses the term “paid leave for infant caregiving”. The emphasis in this case on infant caregiving suggests that there may also be a ‘paid leave for adult caregiving’, which is indeed the case, as Article 6 of the EU Work-Life Balance Directive introduces a new ‘carer’s leave’ into EU and national legislation.

A much more common term used to describe the ‘traditional trilogy of leave types’ (maternity, parental and paternity leave) is ‘parental leave’, mostly used as a term to cover all types of leave. We could find this use, for example, in the Bueno and Oh’s qualitative analysis (2022) of the narratives of 80 in depth-interviews with young men living in Korea, Spain and the United States to understand how the institutional and cultural context influences men’s views on the use of parental leave. It is used mainly in the literature review and analytic framework sections and is not problematic when describing leave policies in the three countries and discussing the findings, as they focus on parental leave rather than paternity leave.

Another case that also uses the traditional trilogy (maternity/maternity/parental) is Dearing (2015) and Dearing (2016). She conducts a literature review that focuses on the trilogy but when comparing the length of leave provisions, she uses the term parental leave as an umbrella that includes all types of leave. In her comparison of leave policies in 27 countries, Dobroćić and Blum (2020) develop an eligibility index that aims to identify an ideal leave policy model that supports gender equality





in the division of labour and points to well-paid leave as the main motivation for parents to share equally. Parental leave is considered as a leave that can be taken by parents, although it also includes periods of non-transferable time among parents. While ‘quotas’ and ‘bonuses’ are considered as ‘parental leave’, paternity and maternity leave are not, even though they function as equivalent. The reduction of complexity in the comparison of leave systems by creating a ‘parental leave’ variable that primarily considers the duration of leave is also found in the qualitative analysis conducted by Kaufman and Grönlund (2021). These authors compare the time used by the father and his partner in months when they need to standardise the comparison. However, as this is a qualitative study comparing only two countries (UK and Germany), they provide a country-specific context and nuances in their analysis.

A further example of this use can be seen in Olsson et al. (2023) quantitative analysis of the factors influencing the intention ‘to take parental leave’ in a sample of students from 37 countries who do not yet have children. The aim of the study is to analyse whether leave policies and gender equality predict cross-national variation in gender gap of young adults’ intentions to take leave, as expressed in a survey conducted at universities in these countries. The term ‘parental leave’, as an umbrella term for leave, appears in the title and the discussion of the results, but not in the design of the study, neither in the wording of the questionnaire, where a generic wording is used, nor in the definition of the variables entering in the statistical model. To analyse the impact of the design of leave policies, the authors distinguish between ‘father/mother exclusive leave (paid or unpaid)’ and ‘available leave length’ for the leave entitlement granted to each parent (i.e., as a family right or sharing leave).

A different approach to comparative leave analysis is taken by Duvander et al. (2019), who develop a quantitative study comparing the use of parental leave and its impact on fertility decisions in Iceland, Norway and Sweden. These authors do not consider the actual duration of leave but the definition of transferability. That is, they adopt the terminological strategy of classifying the use of parental leave as 1) use of the fathers’ quota and 2) use beyond the fathers’ quota. This strategy is not only very detailed, but it is also justified by the aim of the study, and they explain the limitations of, for example, excluding the length of leave. The results indicate that fathers use of leave increases the probability of having a second child, but not when they use only the fathers’ quota or beyond the fathers’ quota.

Where parental leave is often used as a synonym for leave is in quantitative comparative studies analysing the impact of leave policies on specific behaviours. This is most often the case when the leave policy is an independent variable along with other relevant variables, but not when the aim is to analyse the impact of the use of leave on, for example, paid work or family behaviour. An example of this use can be seen in Musick et al. (2020), a quantitative study that compares the share of couple income in the US, Germany and the UK after the first birth, using 10-year panel data. They do not use ‘parental leave’ as an independent variable, but as part of another variable called ‘public transfer’ which includes ‘parental leave’ among other dimensions. The problem here is that they do not adequately explain how parental leave was measured and included in the public transfer variable. Thus, this study is an example of a case where ‘parental leave’ is not a central variable and what it really measures is poorly explained. Other examples include Fuwa and Cohen (2007) when they analyse the impact of social policies on women’s employment and work-family conflict on the division of household labour in 33 countries, Hook (2010) when she analyses the impact of welfare



state policies in 19 countries on the gender segregation in housework over time, and Geist and Cohen (2011) when they analyse the impact of work-life balance policies, among other factors, on changes over time in the division of housework among partners living in 13 countries. This is also the case in the paper by De Rose et al. (2019), when they analyse whether social policies reduce barriers to the gender revolution by counteracting the traditionalising effect of entering parenthood. All these studies use the term parental leave, but measure it differently, even if they distinguish specific leave rights for fathers.

In studies that focus on each parent's leave rights or use, and not in comparison of leave types, a variety of encompassing terms have been used. We have found following terms in studies that pay special attention to father's leave right, though they could be applied also to mother's rights:

- 'Father-specific leave' (De la Porte et al., 2023), which includes paternity leave and paid earmarked parental leave. Similar to this is Olsson et al. (2023) term 'Father exclusive leave'.
- 'Fathers' leave' (Engeman & Burman, 2022), which covers five different provisions identified by authors as leave provisions for fathers: paternity leave and non-transferable parental leave, mothers' transferable leave, transferable parental leave (part of the leave considered as a family right) and bonus leave.
- 'Paid leave reserved for fathers' (Earle et al., 2023).

The calculation of these exclusive periods, specifically reserved for each parent, will be the subject of our discussion in the next section. In particular, we will look at the treatment of aspects such as quotas, bonuses, the transferability of leave rights, and shareable leave.

Finally, there are studies where different terms are used to describe different circumstances. For example, Earle et al. (2023), who focus on time for childcare, use the term 'paid leave for infant care' to refer to the 'traditional trilogy of leave types' (maternity, parental and paternity leave), but when discussing differences in leave entitlement in relation to biological or adopted children, they distinguish 'paid leave for biological parents' and 'caregiving leave for adoption' as two separate categories. This strategy is somewhat confusing, but not misleading. It should not go unmentioned at this point that De la Corte-Rodriguez also addresses adoption leave in his discussion of the implementation of the EU Work-Life Balance Directive (European Commission et al., 2024), as the directive does not yet provide equal rights for both types of parenthood (adoptive parents are not entitled to paternity leave, but only to parental and carers' leave).

### 3.4 Strategies to harmonize measures of generosity

Investigating the effects of leave duration and the generosity of benefits are key aspects of the comparative analysis of different leave policies, also because they are the main drivers for increasing the take-up of leave entitlements. As research has shown, a high level of earnings replacement is key determinant of the uptake and length of leave taken by mothers and, even more so, by fathers (O'Brien, 2009; Karu & Tremblay, 2018; Brandt & Kvande, 2020). However, unpaid leave is not irrelevant as a care resource for working parents. Although it is not widely used, for some families or in some circumstances, it is a valuable resource for balancing work and care responsibilities such as bridging the period between the end of paid leave and start of ECEC services or schooling (Meil et al., 2017).





Lammi-Taskula (2022) also prioritizes the length in a comparative analysis. The author has compared the parental leave system in five Nordic countries. Although she uses the traditional trilogy and describes extensively and deeply the parental leave system and the use of parental leave in each country, when decides to compare all countries, the use of leave is reduced to the total number of days of leave (of any type) used.

Comparative authors have used several strategies to address the manifold differences in entitlements across countries. One type of approach that can be observed is to evaluate leave policies, in particular the length and replacement rate, according to a specific objective. Several recently published comparative studies evaluate the implementation of the EU Directive on Work-Life Balance (EU 2019/1158), which was adopted in 2019, in a selection or in all EU countries. De la Porta et al. (2023) have evaluated if recent reforms or reform intentions in Denmark, France, Germany and Poland accomplish the EU Directive on Work-Life Balance and whether there is a convergence of leave policies in these countries. De la Corte-Rodriguez (European Commission et al., 2024) does so for all EU countries and concludes that one year after the deadline to transpose the directive, there is still considerable work to be done at national level to achieve an effective implementation of the directive in all but one country, with an adequate income replacement level being one of the key issues (together with inclusiveness and non-transferability). In their analysis of leave policy developments in ILO signatory countries, Addatti et al. (2014) evaluate, among other aspects, the alignment of national leave provisions with the relevant ILO conventions.

Another approach considers the length of leave regardless of whether if it is paid or unpaid, although it is more common is to compare the length of paid leave at any level of replacement, i.e. either well or poorly paid, as a lump sum or as a specific percentage of previous salary. This approach is quite common in quantitative studies when leave policy is analysed as a single independent variable in a statistical model analysing specific work or family behaviours (Fuwa & Cohen, 2007; Hook, 2010; Geist & Cohen, 2011; Meil, 2013; De Rose et al., 2019). When leave policies are the dependent variable, strategies can be more nuanced. Earle et al. (2023) use different strategies to evaluate, on the one hand, the evolution of leave policies over time and, on the other hand, gender gaps in current leave models, on the other. In the first case, they identify the evolution over time of the proportion of countries that provide paid paternity leave of at least two weeks, paid maternity leave of at least 14 weeks and paid parental leave reserved for each parent and for both parents. In the second case, they classify countries according to the prevailing gender gap in leave entitlements, ranging from no leave entitlements for fathers or not meeting ILO standards for mothers to countries with a difference of 12 weeks or less between paid leave reserved for mothers and paid leave reserved for fathers.

A more differentiated approach is the distinction between well-paid, paid and total (paid and unpaid) leave used in the comparative tables of the Annual Review of the International Network on Leave Policy and Research (Blum et al., 2023). In this case the threshold for being considered well paid is 66 per cent or more of previous earnings. A slightly different approach is used in Dobrotić (2023), where this strategy is used for parental leave, but for maternity and paternity leave the average replacement level is calculated. An additional synthetic indicator is included measuring the total length of leave rights by age of the child at the end of well-paid and total leave entitlement. This approach implies that parental leave is taken immediately after the end of maternity and paternity leave, being so very illustrative of how long parents can stay on leave to care for an infant



but overlooks the right to take this leave in EU countries until the child's 8th birthday (e.g. EU Directive 2019/1158).

An alternative strategy to account accurately for the replacement level is to use OECD's Full Time Equivalent Indicator (OECD, 2024), which measures the duration of paid leave if it were paid at 100 per cent of previous earnings (see also Dearing 2015). It is calculated by multiplying the length of leave by the replacement rate received by the claimant during the leave period. In addition to describing the generosity of leave policies across countries in a synthetic way for direct comparison, as is done in OECD statistics, it can easily be used in quantitative analysis as either a dependent or independent variable. Son (2023), for example, uses this indicator to assess the influence of women's political power, among other factors, in improving maternity leave provisions. Olsson et al. (2023) use the same indicator, together with length of leave and other variables, to analyse how policies shape student's intentions to take leave in different countries.

### 3.5 How to resolve comparison between individual and family leave rights

When comparing the legislation on leave policy and the rights enshrined therein, it is important to distinguish whether the leave entitlement is defined as an individual entitlement or as a family entitlement that can be divided according to the agreements made by both parents. In countries where leave rights are recognised according to the traditional trilogy, paternity and maternity leave are individual rights, while parental leave can be either an individual entitlement, a family entitlement or a mixture of both. The EU Directive on Work-Life Balance requires EU member countries to make at least part of the parental leave an individual and non-transferable right. In fact, the general tendency has been to consider all leave rights as individual entitlements, especially if they are not very generous, and eventually to introduce the right to transfer part of the leave to the other parent. In countries where there is only a parental leave right, quotas for each parent were introduced by the end of last century, making part of the leave individual and non-transferable (Brandth & Kvande, 2020; Haas & Rostgaard, 2011).

When comparing the generosity of leave between countries, and in particular when calculating indicators to capture the length and level of income replacement for each parent, an important question is how to treat quotas and how to combine family rights with individual rights. Different strategies have been used to deal with these issues. With regard to quotas, they are either treated as part of parental leave and calculated as such, or they are treated as functionally equivalent to maternity and paternity leave. The relevance of using either strategy depends on the objective of the analysis and the methodology used. For example, when analysing quantitatively the factors conditioning the use of leave or its impact on different labour market or family arrangement behaviours, the results may be biased depending on the strategy used.

Studies that consider quotas as equivalent to maternity and paternity leave include Olsson et al. (2023), who introduce the amount of 'exclusive leave available to fathers' as an independent variable to explain the gender gap in intended leave use by students in 37 countries. Earle et al. (2023) and Addati et al. (2022) also follow this strategy when analysing the evolution of fathers' leave rights across the world. The Annual Review of the International Network on Leave Policy & Research (Blum et al., 2023), in providing the comparative tables that attempt to synthesise leave policies while preserving as much specificity as possible, follows the opposite strategy by





considering quotas as part of parental leave. A slightly different approach is taken by Dobrotić (2022), who considers the quota for mothers within the parental leave scheme as equivalent to maternity leave, but not so the quota for fathers.

In terms of how to calculate family rights, this is not a problem when analysing each type of right individually but may be problematic when calculating a global indicator. While calculating the total length of parental leave as a family right is unproblematic, the question arises as to how to proceed when it is an individual right. In the latter case, the question arises as to whether the duration of the leave should then be calculated either as the sum of both individual entitlements, assuming that the parents could take leave consecutively to look after the infant for longer, or whether only the duration for a single parent should be calculated. Most of the studies reviewed do not explicitly discuss this question but decide for one of these options. When calculating the indicator of a financially generous leave, Olsson et al. (2023) do not clarify this question in their article, so there is no information on how they calculate their indicator. Engeman & Burman (2022), when discussing the evolution of fathers' leave rights, calculate the maximum period that a father can be on leave, implying that the whole period of parental leave as a family right can be used by the father, whereas if it is an individual, non-transferable right, only the period that a father can use it is calculated.

### 3.6 Conclusions

In conclusion, we have shown above how different choices of terminology are used in different studies in varying context and, to some extent, how these choices affect what is measured and therefore the results of the study. As shown above, authors focusing on aggregate measures, such as the length of leave or its impact, tend to focus on an umbrella term, usually 'parental leave', but at other times self-defined terms or indices. However, in studies that focus on the distribution of leave - usually between partners - such as those that focus on the transferability of leave, gender-specific terms are common, either in generic forms such as paternal or maternal leave, or in self-defined terms.

The choice of terminology can thus be seen to play a central role in affecting the research design and the results. However, explicit discussion of terminology choices is yet far from universal. Many papers in our sample do not discuss their terminology choices and the effects on their findings, and one may assume that at least some of them are not fully aware of these choices and their effects. A key conclusion, therefore, is that comparative leave studies should always reflect openly and explicitly on their terminological choices and their effects.





## 4. Native terminology in comparative perspective

*Dimitrina Ivanova and Peter Moss*

### 4.1 Introduction

Terminology plays a crucial role in scientific research. A coherent terminological apparatus and a shared understanding of meaning buttress knowledge accumulation across disciplines by allowing for a robust comparison and evaluation of findings. Yet, leave terminology has been largely overlooked in comparative perspective until now. At the same time, studies emphasising native terminology are sparse. However, as Baird and O'Brien (2015) have stressed: '[l]eave terms are cultural, and increasingly political, markers of policy intent.' (Baird and O'Brien, 2015, pp.201). The present effort begins to narrow these gaps by discussing and evaluating the most prominent terminological strategy and looking into the alternatives found in native language terms.

The leaves associated with care for children at and around their birth granted to parents and guardians are commonly separated into distinct parts in both academic and regulatory settings. The distinction most often makes references to separate maternity, paternity, and parental leaves. Maternity leave is the oldest of them, notably legislated in 1919 during the first International Labour Organization (ILO) conference (Addati, 2015). Two more Maternity Protection Conventions followed in 1952 and 2000 suggesting 14 and 18 weeks respectively (ibid.). Not all countries legislated the right simultaneously: CEE states quickly adopted maternity leaves in 1920s (Dobrotić & Stropnik, 2020), Germany had maternity protection even before 1919, while the UK waited until the 1970s (Moss & O'Brien, 2019). Parental leave came next, with the Nordic countries adopting paid parental measures in the 1970s (Eydal et al., 2015), while the CEE started introducing childcare leaves around the same time (Dobrotić & Stropnik, 2020). In 1983 the first attempt at a European Union regulation was foiled by an UK veto and an EU directive on parental leave would have to wait until 1996 (Moss & O'Brien, 2019). When it finally arrived, the Parental Leave Directive of 1996 contained little in the way of compulsory minimum standards providing instead a host of non-binding recommendations and derogation options (Leon & Millns, 2007). The 1996 directive was revised in 2010 providing for at least a month of ear-marked leave for each parent, albeit without a payment obligation (De la Porte et al., 2020). Finally, a payment obligation was introduced in the European Union Directive 2019/1158 on work-life balance that also created a right to paternity leave at the European level (European Commission et al., 2024).

To discuss maternity, paternity and parental leaves effectively, we need to establish some definitions. The reviews of leave policies and related research compiled annually by experts of the International Network on Leave Policies and Research (LR&R) contain some of the most comprehensive and nuanced data on child-related leaves. Extending to 50 country cases in their latest 2023 report, the reviews have long been noting the commonly used tripartite classification is largely artificially drawn and becoming outdated (Blum et al., 2018). Nonetheless, for ease of comparison, the reviews still distinguish between the three categories of leave. It is worth examining the definitions attached to these three types as LR&R offers a carefully crafted and detailed explanation of difference that can still be problematised.







Maternity leave is defined as '[l]eave generally available to mothers only (except in a few cases where part of the leave can be transferred to other carers under certain circumstances). It is usually understood to be a health and welfare measure, intended to protect the health of the mother and new-born child, and to be taken just before, during and immediately after childbirth' (Blum et al, 2023, pp. 3).

Paternity leave is '[l]eave generally available to fathers only, usually to be taken soon after the birth of a child and intended to enable the father to spend time with his partner, new child and older children' (Blum et al, 2023, pp. 3).

Parental leave is '[l]eave available equally to mothers and fathers [...] Parental leave consists only of non-transferable individual entitlements; in other countries, it is an entirely family right; while in other countries, part of Parental leave is an individual right, the remainder a family right. It is generally understood to be a care measure, intended to give both parents an equal opportunity to spend time caring for a young child' (Blum et al, 2023, pp. 3).

The reviews also make space for a fourth type of leave that supplements parental leave and is also a care measure. This period could be called a childcare leave or a home care leave in the native terminology and can be very similar to parental leave in design (Blum et al., 2023).

Firstly, we need to acknowledge this classification is an artificial separation. This is not self-evidently an issue. However, the extent to which native terminology and leave design manage to fit into these separate definitions varies widely between country cases. It is worth keeping in mind that the established classification disciplines discussion, denotes standard entitlements, and as shown in later sections, can serve to obfuscate diverse leave arrangements. We can briefly point out here that the three-or four-type leave separation omits other types of entitlements such as (breast)feeding leaves, home leaves, and carer's leaves. While the separation has proven useful in standardising otherwise diverse leave rights and intertwined entitlements, the argument we are putting forward cautioning against the (over)reliance on this type of classification is twofold: the tripartite classification is imprecise, and it is becoming outdated.

## **4.2 Evaluation of established terminology**

The definitions provided in LR&R reviews need to encompass leave rights that have evolved and grown in complexity since the corresponding terms were first established. As such, they need to allow for exceptions to a general rule and present a broad description. If generally clear, these definitions can be imprecise. Entitlements recognised as maternity leaves are, contrary to the definition provided above, sometimes not short. These leaves do not conform neatly to the initial goal of early maternity legislation: protecting the health of pregnant workers and allowing (a short) time to physically heal from childbirth (Sagmeister, 2019). Maternity leaves have been reformed and expanded throughout the years. But they have always had a secondary implicit purpose in allowing mothers to provide care (Sagmeister, 2019), becoming more clearly distinguishable in maternity leaves above six months long or even spanning the first year of a child's life. Such leaves can now be found in Czechia, Croatia, Greece, Ireland, Slovakia, the UK, Serbia, and Bulgaria. These entitlements are also often not exclusive to mothers, and this might make them difficult to distinguish from parental leaves (Blum et al., 2018). The point can be made even more explicit in the case of Slovakia where maternity benefit was already available to fathers and in a 2022 reform 28





weeks maternity benefits were reserved for them (Dančíková, 2022). In addition, maternity leaves can be available not just to fathers, but also to grandparents. This entitlement is not new; Bulgaria has had this option since the 1960s (Mihova, 2015). Grandparents' rights are not a historical artefact either with Hungary expanding grandparents' access in 2020 (Gábos & Makay, 2020).

Paternity leaves on the other hand, are not always necessarily taken shortly after the birth of a child, making it challenging to conceptually distinguish them from father-specific parental leaves. This deviation from the LR&R's definition has also recently been put into sharp focus as it also does not conform to the EU Directive 2019/1158 on work-life balance. For instance, in Estonia the paternity leave could be potentially exhausted before the birth occurs (Pall, 2023) and in Poland the leave can be taken until the child is 12 months old (European Commission, 2024). In five EU states, the designated paternity could be taken after the child is six months old (European Commission, 2024).

On the other hand, when Germany needed to transpose the EU Directive 2019/1158, the minister in charge made the argument that even if a right to paternity leave does not exist, two months of Germany's parental leave are earmarked and this should be a sufficient entitlement to cover the paternity leave requirement, subsequently letting the deadline pass without a design change (Pircher et al., 2024). Saarikallio-Torp and Miettinen (2021) also make a distinction neither included in the definition outlined above, nor clearly made in the scientific literature, between a birth-related leave period meant to be taken with the mother also being at home around birth and a paternity/parental leave that requires fathers to take care of children independently.

The parental leave definition is perhaps too broad, unable to indicate much about what type of rights are on offer. The difference between an individual transferable and non-transferable rights or family rights is significant but they are comfortably covered by the same umbrella term. To give an example with iterations of parental leave in the same country, Slovenia had a family right named '*dopust za nego in varstvo otroka*', or 'leave for childcare and protection', until 2014 when it introduced an individual but transferable right to a 'parental leave' ('*starševski dopust*') (Stropnik, 2014). The mother was allowed to transfer 100 days, while the father could transfer all his entitlement. The transfer allowance was equalised in 2023, making sure the father has some leave reserved (Stropnik, 2023). All these changes are recognisable as changes to a parental leave but the implications for gender equality for example are starkly different.

The lack of differentiation between parental and other leaves presents a challenge for existing rights. If we are to follow strictly the established definitions, Bulgaria's 'leave to take care of a child under the age of two' cannot be a parental-type leave, despite it often being recorded as one (for example, Blum et al., 2023). The right is transferable from the mother, therefore not equally open to both parents. At the same time, the 'unpaid leave for care of a child' in Bulgaria is very similar to Portugal's parental leave but it is designated as childcare leave outside of the main three parts. Both rights are unpaid individual entitlements (six months per parent in Bulgaria, four in Portugal) until the child reaches eight in Bulgaria or six in Portugal. Similarly, the design of UK's parental leave is more reminiscent of a carer's leave. 'Parental leave' in this case can only be taken for four weeks per year similar for example to the one week a year carer's leave in Greece (Hatzivarnava-Kazassi & Karamessini, 2023) and Ireland (Köppe & Szelewa, 2023).

Finally, the established terminology is not gender neutral. This is relevant when discussing terminological precision since the term 'paternity leave' inaccurately portrays that these leaves are





for the father only. Such a restriction is becoming more and more rare and now 14 out of the 26 EU countries grant this entitlement to second parents such as co-mothers (European Commission et al., 2024). Native leave terminology has for quite some time been moving away from the established terminology and towards a gender-neutral language with examples including ‘partner’s leave’ in New Zealand and ‘initial/additional parental leave’ in Portugal (Blum et al., 2023). ‘Birth leave’ is also now popular and can be found in six EU countries (European Commission et al., 2024). While in previous years changes in leave regulations were more focused on ‘paternity leaves’, now change is affecting all leave periods with a tendency to move away from a traditional ‘maternity leave’ (Blum et al., 2023). In fact, 2022 alone saw two reforms of ‘maternity’ that re-named and shortened the entitlement in Finland (Närvi et al., 2022) and Estonia (Pall, 2022). To achieve a more sustainable international terminology, the terms we use now would need to be examined and recalibrated. This might not be a straightforward process, but exploring the native terminology and accompanying entitlements could prove to be a valuable first step towards a more inclusive, precise, and coherent terminology.

### 4.3 Native terminology diversity

The present effort is largely exploratory in nature. We wanted to encompass as much of the native term diversity as possible and selected 30 European countries representing a variety of family policy systems (Ciccia & Verloo, 2012; Saraceno & Keck, 2010). These terms, alongside leave design, reflect the various origins and diverse developments of leave policies in different countries. We collected data on the native terminology and accompanying generosity, types of entitlement, and flexibility options for each distinct type of leave right on offer. LR&R reviews (2013-2023) were indispensable for our efforts and our main source of data. Detailed data on changes in any aspect were gathered for the last five years and we additionally checked for terminology changes specifically in the last decade. Leave design reforms were recorded to give us the opportunity to track how terms (do not) respond to adjustments in entitlement.

We found the terms ‘maternity’, ‘paternity’, and ‘parental’ leave might be misleading in cases where they need to encompass countries with less or more than three leave periods. As touched on before, the separation of leave periods into three distinct parts does not always correspond to the legislated leave periods in different countries. For example, Iceland only has one main leave period ‘*fæðingararlov*’ (‘birth leave’) which is then divided into quotas. Iceland however is also one of the countries offering an unpaid period of ‘childcare leave’ (called ‘parental leave’ in the native terminology) (Arnalds et al., 2023). Norway similarly has ostensibly one named period termed ‘*Foreldrepengeperioden*’ (‘parental allowance period’) but there is also an unpaid ‘childcare leave’ (Bungum & Kvande, 2023) which could also be thought of as a second, albeit unpaid, ‘parental leave’. Serbia on the other hand only offers two ‘maternity leaves’. One conforms more closely to the idea of a short birth-related leave (‘*porodiljsko odsustvo*’). The second ‘maternity leave’, the term for which translates to ‘childcare leave’, lasts for 8.2 months and could fully be transferred to the father (Pantelić, 2023). On the other end of the spectrum, Bulgaria offers as much as five distinct periods of leave, not counting a carer’s type leave for 60 days per year (Dimitrova et al., 2023). Two of them are ‘paternity’ type entitlements, the second one introduced only last year (Dimitrova et al., 2022). The final example we want to give here is Ireland where a 2019 reform introduced a second ‘parental’ type right (Daly & Szelewa, 2020). This layering pattern of development,





characteristic of all family policy (Daly & Ferragina, 2018) would stretch the ability of even broadly defined periods to accommodate the proliferating rights seen in recent years.

#### 4.4 Changes in native terminology in the last 10 years

Here we detail the rights recorded under the three main leaves defined in LP&R reviews. Native leave terminology is dynamic, and the pace of change has picked up in the last five years. A lot of the frantic pace of leave reform in recent years can be attributed to states' efforts to transpose the EU Directive 2019/1158 on work-life balance (European Commission, 2024). It is also worth noting that despite the deadline for implementation passing in 2022, problems still remain, and changes are still coming (ibid.). Even looking further back for native terminology changes, the policy landscape was not frozen. In the last decade, there were at least 20 terminology changes in total. Some were introductions, when a new right is being created for the first time, while others represented a substitution of a previous term.

Terminology changes were often introduced to signify inclusion of same-sex parents or to update the terminology to a gender neutral one. For example, France changed the name of its 'paternity leave' in 2013 from '*congé de paternité*' to '*congé d'accueil à l'enfant*', or 'leave for looking after a child', to indicate same-sex couples were now eligible for this leave (Fagnani et al., 2013). Sometimes, however, the name change comes after the inclusive right is already established and clarifies who can access the entitlement. In 2019, the Netherlands adopted '*geboorteverlof*' ('birth leave') (den Dulk & Yerkes, 2019) and in 2022, Belgium introduces '*congé de naissance*' ('birth leave') in place of '*congé de paternité*' (Mortelmans & Fusulier, 2022).

The Netherlands also accompanied the term change with an expansion in entitlement (den Dulk & Yerkes, 2019), but it is Spain's 2019 reform that gives a clear example of opportunistic change, where a significant re-calibration of leave rights is accompanied by a terminology replacement. While the transition to a more gender neutral 'birth and care' leave is an important signifier for a new policy direction, Spain's reform also included expanded flexibility options, and a doubling of the paid leave reserved for fathers and co-mothers (Meil et al., 2019). Similarly, Finland introduced significant reforms in 2022 also accompanied by a gender-neutral terminology; the 'paternity leave' was abolished, and the formal 'maternity leave' was replaced by '*raskausvapaa*' (pregnancy leave) (Närvi et al., 2022). It might also happen that ostensibly gender-neutral language is changed to the established terminology when the right starts to more closely resemble what is expected of the design. For example, Greece changed the name of its 'parental leave' from '*Άδεια Γέννησης Τέκνου*' (childbirth leave) of 2 days to '*Άδεια πατρότητας*' (paternity leave) for 14 days in 2021 (Hatzivarnava-Kazassi & Karamessini, 2021). Terminology changes might also come with a change of the ministry responsible for the leave. For example, during the 2022 reform in Estonia, the 'childbirth leave' for the birth parent was transferred from the Health Insurance Fund to the Social Insurance Board and renamed as '*emapuhkus*', or 'maternity leave' (Pall, 2022).

Sometimes terms are used to amplify a desired message and emphasise one aspect of the leave design (Baird & O'Brien, 2015). The United Kingdom's 'additional paternity leave' was first introduced in 2010 as a transferable period of maternity leave that also required the woman return to work (Mitchell, 2023). In 2015 however, the policy was adjusted and renamed to 'shared parental leave' (O'Brien et al., 2015). The entitlement remained transferable and many of the previous





constraints in payment level were kept, which appeared to be at odds with the government's stated intentions for care sharing and flexibility (Baird & O'Brien, 2015). However, a design change coming with 'shared parental leave' was the opportunity for the mother to share it once she has transferred the entitlement, should the father transfer some back (Mitchell, 2023).

Finally, new terms could be introduced alongside existing ones, such as the case in Ireland and Bulgaria. In 2019, Ireland added a new two week paid 'parent's leave' on top of the existing unpaid 'parental leave', while extending the latter by four weeks (Daly & Rush, 2019). 'Parent's leave' conforms to the definition of parental leave, being available until the child is 52 weeks of age and having to be taken after the maternity leave. Bulgaria's 2022 reform saw the introduction of an addition father-exclusive 'leave for care/upbringing of a child' ('отпуск за отглеждане на дете'). This two-month entitlement sits on top of the fifteen calendar days already afforded by the pre-existing 'отпуск по бащинство', or 'paternity leave', but is subject to different conditions (Dimitrova et al., 2022).

#### 4.5 Native terms classification

We now turn to exploring the most recent native terms in more detail and begin to contextualise native terminology. Our data for this section is for 2023, recording the original language leave names provided by LP&R experts in their latest review. To illustrate the existing diversity, we then classify the native terms recorded under the three established types of leave regulation according to the meaning in the original language.

Native terms that map onto 'maternity', 'paternity' or 'parental' are still prevalent and the entitlements can sometimes be separated into three distinct periods. We designate these terms as 'role' focused; that is, they are explicitly tied to the parental role that men and women assume after birth. As established in previous sections, some countries can enshrine only one distinct right to a 'parental' leave, or they can also offer native term variations of 'maternity' and 'paternity'. However, we also find that even when leave is separated into three periods that conform to the established definitions, native terms often refer to the activity of care or the event of childbirth rather than the parents. In that, native terms sometimes reveal a more child-centric language than the established terminology suggests. Examples here can include Bulgaria's 'leave to take care of a child' ('отпуск за отглеждане на дете'), Hungary's 'allowance to support childcare' ('gyermekgondozást segítő ellátás'), or 'child maintenance leave' in Lithuania ('vaiko priežiūros atostogos'). Further weakening the parental role emphasis of the accepted terminology is the fact that all the above examples include the provision for grandparents to assume the caring role instead. Here language and design imply a familial mode of care and shift the focus from parents' absence from the workplace to the child needs. The examples above also refer to rather long entitlements, stretching into the toddler stage, but this does not have to be the case for child-centric terminology. Other examples include France's 'leave for looking after a child' ('congé d'accueil à l'enfant') granted to the parent not giving birth to take any time in the first six months of a child's life and Hungary's 'csecsemőgondozási díj' ('infant care payment') that serves as a maternity type of leave. We classify these types of native terminology as 'action' focused terms referring to the activity of care giving, upbringing, or education. In practice, distinguishing between these activities is difficult in the native languages; the word 'отглеждане' in Bulgarian for example, while implying care, also contains aspects of education and upbringing.





The last type of terms we find is event focused. An example here is Croatia's '*rodiljni dopust/ rodiljna pošteta od rada*' and the similar term in Serbia's '*porodiljsko odsustvo*'. They share the same root and the word meanings in both cases pertain to the person or act of giving birth. Words referring to pregnancy are also included here. For example, Bulgaria's transferable 'maternity leave' ('*омниск поради бременност и раждане*') can be literally translated to 'leave because of pregnancy and birth', similarly to Latvia's '*grūtniecības un dzemdību atvaļinājums*' ('pregnancy and childbirth leave'). '*Raskausvapaa*' in Finland and '*nėštumo ir gimdymo*' in Lithuania are other examples that focus on pregnancy. All the above terms refer to maternity type leaves, but event-focused terminology, specifically 'birth leave', can also extend to paternity type periods (Belgium and the Netherlands both offer '*geboorteverlof*' for the parent not giving birth) or 'parental leaves' (Iceland's '*fæðingarorlof*'). In these cases, the language emphasised the event of a birth of a child as the reason for granting leave.

Each period recorded under 'maternity', 'paternity' and 'parental' leaves sections in the LP&R's 2023 review (Blum et al., 2023) can here take a role, action or event classification according to the meaning encoded in the native terminology. Appendix A provides a detailed table recording the native terminology for each leave as well as the designation assigned. We elected to distinguish between gendered role terms ('maternity' and 'paternity' denoted as 'r') and the gender neutral 'parental' names ('R'). Care-focused and similar action related terms are marked as 'A', while 'E' denotes event-based leave terms. Figure 1 shows the assigned designation for all 30 European countries, ordered by degree of deviation from the expected 'rrR' type (see Figure 2).

Our focus is on illustrating the presence of roles, actions, or events type terms but we also note down the sequence and number of distinct leave periods. While we end up with 17 different combinations of terms, our approach is obfuscating yet more diversity in entitlement and can only serve as a general terminological overview. For instance, for the purposes of direct comparison with established terminology, we follow the three-part separation. In that, we similarly leave out some additional leave periods that might be available. Additionally, where two distinct periods exist in the same 'spot' and do not share meaning, we have made a judgment on which letter to assign, guided by which right is more generous. We are chiefly focused on native terms for the leave right itself and when there is a difference between it and the name for the benefit payment, we assign a type based on the former. The table does not necessarily show where the leave terms are positioned in regard to the three main parts when only two or less periods are present. For example, Finland and Sweden both take the 'ER' combination showing the existence of two leave periods, one taking an event-focused term 'E' followed by the other referring to a gender-neutral parental role 'R'. However, Finland's 'pregnancy leave' refers to a period reserved for the parents that gives birth and Sweden's short 'leave in connection with the birth of a child' is for the other parent. Both then offer a 'R' type parental leave with quotas.







**Figure 2.** Terminology classification table. The table shows the terminology designation for each country in our sample.

"Role"-exclusive terminology	Mixed terminology	"Event"-exclusive terminology	"Action"-exclusive terminology
Austria "rrR"	Belgium "rER"	Iceland "E"	Hungary "AA"
Czechia "rrR"	Luxembourg "rER"		Spain "AAA"/"EEA"
Estonia "rrR"	Netherlands "rER"		
Greece "rrR"	Croatia "ErR"		
Ireland "rrR"	France "rAR"		
Italy "rrR"	Romania "rrA"		
Poland "rrR"	Finland "ER"		
Slovenia "rrR"	Sweden "ER"		
United Kingdom "rrR"	Latvia "ErA"		
Switzerland "rr"	Lithuania "ERA"		
Germany "rR"	Bulgaria "EAA"		
Slovakia "rR"	Serbia "EA"		
Portugal "RRR"			
Denmark "R"			
Norway "R"			

Notes:

1. Spain: the first two periods, '*permiso y prestación por nacimiento y cuidado del menor*' combine 'A' and 'E' type terms.
2. Bulgaria's 'paternity' type leave here refers to the newly introduced longer entitlement reserved for fathers.
3. Denmark's four leave periods originate from the same law, previously a 'childbirth leave' '*barselsorlov*', now '*Orlov*', or simply 'leave'.
4. In Hungary the native terms refer to benefit but include the leave entitlement.
5. In the Netherlands '*zwangerschaps- en bevallingsverlof*' refers both to birth and maternity.
6. When the native term refers both to the type of leave and who it is intended for, the graph displays the type. Ex: Portugal has a distinct period named '*licença parental exclusiva do pai*' ('father's only parental leave') is recorded as 'R' instead of 'r'.
7. Romania's '*concediul de maternitate*' is made up of a 'birth leave' ('*concediul de sarcină* ') and a 'confinement leave' ('*concediul de lăuzie*').

Source: Data for the native terms and translation taken from the '19th international review of leave policies and research' (Blum et al., 2023).

#### 4.6 Types of native terminology

The 'rrR' combination we find in nine countries mirrors the established terminology. A good example here are Italy's terms: '*congedo di maternità*' (maternity leave), '*congedo di paternità*' (paternity leave), and '*congedo parentale*' (parental leave). The leave design in Italy also closely follows the definitions of leave periods provided in the introduction with relatively limited reform activity in the recent past. Most of the adjustments have focused on a gradual increase in '*congedo*







*di paternità*’, culminating in the ten working days leave available since 2022 when the paternity entitlement also became permanent (previously subject to annual renewal in the budget) (Addabbo et al., 2022). The situation in the United Kingdom is similar with a lack of path breaking reforms in terminology or design even if a clear classification can be more challenging. The United Kingdom does have a latent fourth term, ‘shared parental leave’, that is however nested inside the maternity leave provision. It is worth noting that Czechia has a strikingly similar design when it comes to its ‘maternity leave’ (*materska dovolena*) but forgoes adding a new term for the shareable entitlement. Poland and Ireland also have additional terms not reflected in their ‘rrR’ designation. While Ireland’s ‘parent’s leave’ shares the role type of terminology with its ‘parental leave’ counterpart, Poland’s omitted ‘*urlop wychowawczy*’ pertains to education or upbringing (Kurowska et al., 2023). Encountering only a minority of cases where the literal meaning of native terminology maps neatly onto the most used international designations underscores the scope of other options already present in European countries.

Pure types, or designations comprised of only one term type in whatever quantity, are also worth examining. Norway is a quintessential example of a generic ‘parental’ type leave with quotas (Blum et al., 2023). One of the pioneers in this type of leave arrangement (Eydal et al., 2015), Norway has also increased the individual portions of its leave at the expense of the family quota in 2018 (Brandt & Kvande, 2019). But even in Norway’s case, a precise classification can be elusive. Norway does have an additional entitlement of two weeks with payment subject to collective agreements. Commonly referred to as ‘*pappapermisjon*’, this is a leave period explicitly designed to assist the person giving birth and can be taken by someone else besides the other parent (Bungum & Kvande, 2023). Portugal on the other hand is here presented with three leave periods (‘RRR’) but they are all subsumed under a generic ‘parental’ terminology. The terms ‘maternity’ and ‘paternity’ leaves were erased from legislation in 2009 (Wall & Leitão, 2009). The entitlement once called ‘*licença de maternidade*’ turned into ‘initial parental leave’ (*licença parental inicial*) which came with an increase in duration and a further 30-day sharing bonus if the other parent takes some of that leave alone (Leitão et al., 2023; Wall & Leitão, 2008). Spain transitioned to a gender-neutral terminology a decade later than Portugal and went with a combination of action and event type terms: ‘birth and childcare leave(s)’ reserved for both parents and a ‘parental’ type leave also referring to care ‘*excedencia por cuidado de hijos*’. Starting in 2019, Spain rapidly increased the entitlement available to the parent not giving birth, while shrinking the time mothers can transfer from their leave (Meil et al., 2019). The reform was concluded in 2021 with the full equalisation of leave entitlements for parents (Meil et al., 2021). Pre-Portugal’s 2009 leave reforms, the two countries shared important commonalities, but Spain’s focus rested on flexibility, while gender equality in leave taking was higher on the agenda in Portugal (Wall & Escobedo, 2009). If a decade behind, Spain introduced its own gender-neutral terminology reform and now goes further than Portugal in defining parents have access to equal leave rights. The two countries also share a distinct gender-equalising interpretation of (breast)feeding leaves. Spain’s ‘*permiso de cuidado del lactante*’ and ‘*dispensa para amamentação e aleitação*’ in Portugal, both part time nursing care leaves, are available for fathers as well as mothers (Blum et al., 2023).

Hungary represents the other ‘A’-only terminology in our sample. ‘*Csecsemőgondozási díj*’ (‘infant care payment’), a fully paid non-transferable leave for the mother, is followed by ‘*gyermekgondozási díj*’ (a family right for insured parents), both referencing only the activity of care. There exists a leave





entitlement for the father, recently increased to ten days, but it has no separate name in the legislation (Gábos & Makay, 2023). Two more leave terms exist, for uninsured parents and for families with more than three children, but they also follow the 'A' type designation. Taken together, the leaves are a generous entitlement lasting until the child is three (or eight in the case of three or more children), allowing parents to work while receiving the benefits. Hungary's example and the direct comparison with Spain's 'AAA' terminology is useful in at least two ways. Firstly, it is simply worth noting that a terminology might be gender-neutral while the design implications are not and vice versa. This discussion will be further developed in the next section but for now we can extend a cursory overview of design and terminology in Spain, Hungary, and Slovenia. Action terminology is inherently gender neutral, placing the emphasis on the child rather than the parents. Spain combines it with a fully gender-equal entitlement, while Hungary does not. Slovenia on the other hand, closely mirrors the established terminology, including gendered roles for parents with '*materinski dopust*' (mother's leave), '*očetovski dopust*' (father's leave) and '*starševski dopust*' (parental leave). Yet, Slovenia's regulation goes further than Hungary to ensure care is shared with a (gender) 'equality-transforming leave' design (Dobrotić & Stropnik, 2020). The two countries have historically shared some commonalities in design and political justifications around leave, but the seed of their differences also go back decades. While Slovenia has long discussed the interests of mothers, Hungary has placed a definitive focus on the rights of children when it comes to leave policy rationale (Korintus & Stropnik, 2009). Thus, a very particular understanding of children's interests is reflected in care-focused terminology and embodied in design. In the Hungarian case, terminology is closely tied to political rhetoric: recent Fidesz family reforms repeatedly emphasise children wellbeing, while leaving the role of men in care 'fully unaddressed' (Kováts, 2020), a gap in rhetoric reproduced in the leave for fathers remaining nameless. The example of Hungary is also useful for underscoring that, even though many of the terminology adjustments have happened in recent years, native terms that do not reference parental roles can also be quite old. Hungary's 'allowance to support childcare' ('*gyermekgondozást segítő ellátás*') and '*gyermekgondozási díj*' (childcare award) date back to the 1960s and 1980s respectively (Korintus & Stropnik, 2009). Rather than solely the result of a contemporary movement away from gendered language that has left behind the previously established terminology, a level of mismatch has long been present.

This is further evidenced by the final 'pure' term category of event-focused leave. Iceland's 'birth leave' has kept the shape of entitlements largely unchanged since the early 2000s with non-transferable periods and a family portion subsumed into one leave (Deven & Moss, 2005). In 2006, legislation was amended to remove language indicating the parent's sex (Arnalds et al., 2023). When it comes to design, the political consensus on the principle of quotas and a shared period has been comparatively high for a long time in Iceland (Eydal et al., 2015), but the road to its latest reform was nonetheless arduous. Extending the overall leave duration has been on the table since 2007 (Eydal et al., 2015) but implementation deadlines and the desired quotas allocation have frequently shifted (Eydal & Gíslason, 2020). Finally, the regulation was changed in 2021 to allocate six months of 'birth leave' per parent but six weeks can be transferred to the other parent (Eydal & Gíslason, 2021). The only explicit distinction between parents in Iceland comes in the form of a two-week obligatory period for the one giving birth to be taken from their overall quota and the option to use some leave before the birth.





Iceland's leave was a salient example for another long reform process culminating in recent changes. Finland's pre-2022 design was somewhat of an outlier in the Nordics and the political debate on increasing the father-specific entitlements has been lively for years (Eydal et al., 2015). A prominent proposal in the 2010s was a 6+6+6 parent's quotas and a family right model based on the Icelandic leave design at the time, but political disagreements slowed and amended the eventual reform (Eerola et al., 2019). Prior to the changes, Finland mirrored the established terminology and generally conformed to its definitions with *'äitiysvapaa'* (maternity leave) providing four months for the mother, *'isyysvapaa'* (paternity leave) offering nine weeks to the father or co-mother, and a family entitlement *'vanhempainvapaa'* (parental leave) (Miettinen et al., 2021). A fourth, childcare leave type period, named *'hoitovapaa'* (care leave) was also provided and remained intact. The reforms of 2022 saw the abolishment of *'isyysvapaa'* with the increased entitlement for co-parents being subsumed into *'vanhempainvapaa'* (Lammi-Taskula et al., 2023). *'Äitiysvapaa'* was remodelled into a 'pregnancy leave' (*'raskausvapaa'*) and shortened. The congruent changes in terminology and design served to minimise gender differences in language as well as in entitlement.

Also, in 2022, Bulgaria enacted an interesting reform which can alternatively be read as resulting in two 'paternity' type leaves or as an addendum to its two existing 'parental leaves'. With the designation of 'EAA' for the three main leave parts, Bulgaria ostensibly makes no mention of roles, gendered or otherwise, but the terminology and design are more intricate. Examining the leave arrangements in some detail can further evidence arguments raised thus far, and it suggests recent ad hoc changes can strain the ability of any synthetic terminological separation to precisely reflect leave function. Firstly, similarly to Hungary, Bulgaria's mismatch in meaning between native and established terms is old. The 'maternity leave' there refers to the event of birth and to pregnancy. The term in its current form *'отпуск поради бременност и раждане'*, or 'leave for pregnancy and birth', dates back to at least the 1960s (Mihova, 2015). Similar to Hungary and many other CEE states (Dobrotić & Stropnik, 2020), it was chiefly fertility concerns that informed leave policy direction and the 'Decree for Increase of Fertility' from 1968 postulated one of the longest leaves found at the time as well as provided an option for leave to be used by the father (Mihova, 2015). The first 'paternity' type leave, *'отпуск по бащинство'* which is still available for 15 days, was provided much later and follows the established definitions and nomenclature. In transposing the EU Directive 2019/1158 on work-life balance however, Bulgaria added the rather descriptive *'отпуск на отглеждане на дете до осемгодишна възраст от бащата'* (leave for care/upbringing of a child under eight years of age by the father), designated here as an 'A' term. If verbose, the native terminology here clearly outlines what the leave is for (care), who takes it (the father) and when (until the child is eight). This terminology follows closely the already established one for 'parental' type leaves in Bulgaria of which there are two. *'Отпуск на отглеждане на дете до двегодишна възраст'*, a transferable entitlement paid at the minimum wage until the child is two, and *'неплатен отпуск на отглеждане на дете до осемгодишна възраст'* which is a 'unpaid leave for care of a child under eight'. Both would take an 'A' type designation in our classification with their emphasis on care work and they embrace a descriptive naming convention focused on specificity and function.

The new 'paternity' type leave mentioned above sits on top of the previously present entitlements in a curious way. It borrows the naming convention of the two 'parental' leaves, but it is a distinct





entitlement reserved for the father making it more of a ‘paternity leave’. More importantly, this right is not independent but tightly connected to all other leaves. If the father has taken two months or more of other leaves, the right to ‘leave for care...by the father’ is exhausted and lost (Dimitrova et al., 2023). Should the father wish for a longer involvement in care, he needs the birth mother to forgo some of her entitlements. The unique restriction, combined with the possibility to take the entirety of leave only once the child is in school, fulfils the minimum requirements of the European directive but then tries to ensure gender equality in care goes no further than that. Here Bulgaria provides an interesting parallel to how Poland implemented the same Directive 2019/1158. Referencing the high age cut-off provided for by the directive, the Polish government at the time of implementation emphasised that fathers could take their designated nine weeks after the child has grown up a bit (Pircher et al., 2024). In that, the Polish government first pushed against the gender equalising goals of the Directive 2019/1158, then reframed the reforms as a conservative approach to family roles (ibid.).

These examples might indicate that an awareness of age restrictions needs to factor in terminological discussions of leave design. Saarikallio-Torp and Miettinen (2021) have recently raised an adjacent point in arguing that ‘fathers’ leaves’ take at least two forms based on different ideologies and with different implications. Their interpretation of the difference between ‘paternity’ and father quotas in ‘parental leaves’ is also rooted in function. The term ‘birth-related’ father’s leave is used to differentiate leaves temporally restricted to the time around birth, to be taken with the mother, as opposed to father’s quotas aimed for solitary care taking at some later point (Saarikallio-Torp & Miettinen, 2021). The cursory example of Bulgaria extends the temporal consideration inherent in that argument by bringing out the difference in implications between a leave constrained to the toddler stage and one that can stretch beyond pre-school age.

Finally, despite the proliferation of distinct leave periods in Bulgaria, it is easy enough to determine and describe who is entitled to what leave, when, and under what conditions. The formal native terminology certainly adopts a descriptive approach; the difficulty lies in examining the same entitlements in the constraints of a tripartite terminology.

The last examples we will examine here are of countries with a full mixture of terms. Lithuania and Latvia have very similar typology of terms: ‘ERA’ and ‘ErA’ respectively. The leave designs fit nicely in the established definitions for ‘maternity’, ‘paternity’ and ‘parental’ leaves but the terminology does not. The first term in both cases refers to the event of childbirth and to pregnancy, the second terms pertain to roles, and the third one concerns the activity of care. Both countries introduced changes to the design of their ‘care leaves’ in 2023 but were otherwise light on leave adjustments in the period under consideration. Lithuania’s ‘*vaiko priežiūros atostogos*’ (child’s maintenance leave), previously a family entitlement, now has two non-transferable months per parent (Braziene & Vysniauskiene, 2023). Similarly, Latvia’s ‘*bērna kopšanas atvaļinājums*’ (childcare leave) now provides two months of benefit reserved for each parent (Upite, 2023). These two cases are good examples to summarise the native terminology by separate leave periods. When not referring to a ‘maternity’ role, the leaves for the birth parent are most often referring to the event of birth itself. These terms are often old, but Finland’s 2022 conversion to an ‘E’ type term suggests the emerging attention placed on reforming ‘maternity’ type leaves (Blum et al., 2023) could also be bringing changes in terminology. The naming convention for the other parent is more diverse and in recent years as many as five native terms have shifted from a gendered paternal role to a gender neutral





‘E’ or ‘A’ type term. Previously, these terms would establish and explicitly reinforce the role of fathers in care giving but as the leaves became open to same sex partners, the terminology adjusted to include them. Finally, ‘parental’ type leaves, when not referring to a role, would very often opt for language suggesting care.

The tentative exploration of native terms and leave reforms supports the assertion that the language developed for leaves tends to connect both to policy legacy (Moss & O’Brien, 2006) and to present policy intent (Baird & O’Brien, 2015). Native terminology can be diverse, ornate, and shifting but it alludes to political visions of parenthood roles, who ought to fulfil them and when, and of proper ways to ensure child wellbeing. The continued examination of who gets to access leave policies, when, and under what conditions warrants more space than we can afford it here. Nonetheless, we can note a flourishing area of study in which recent works have called for a nuanced consideration of inclusivity in leave (see Dobroćić, 2022; Dobroćić & Blum, 2020; Dobroćić & Iveković Martinis, 2023; Ferragina, 2023; Javornik & Kurowska, 2017; Kurowska, 2021; McKay et al., 2016). Taken together, these scholarly efforts make for a powerful argument against a universalised view of leave policy. The access to these policies alongside the characteristics and substance of entitlements shift according to employment status (see Kowalewska, 2017), employment history (Dobroćić & Blum, 2020), immigration status (Duvander & Koslowski, 2023), and family structure (Kaufman et al., 2022). Put simply, there is not one ‘maternity leave’ in any given country case; empirical precision and terminological specificity necessitate the consideration of multiple perspectives.

#### 4.7 Discussion

It is worth outlining here that while native terms might generally be quicker to adjust to changing entitlements than the internationally established terminology, neither option precisely corresponds to the actual rights on offer nor is able to consistently communicate policy design elements often considered crucial for analysis. In communications where specificity and precision are valued and a consistent correspondence between idea and object is needed, both approaches might be undesirable. In this concluding section, we build on our initially stated premise that terminology matters and further suggest terminological decisions are best guided by a deep and systematic understanding of real-world leave design variations. Such a contextualisation of existing language should serve as a reminder that terms, native and synthetically constructed alike, are prone to oversimplification and obfuscation, and are never semantically neutral (Gerring, 1999).

An integral part of leave terminology are the additional designators often employed to specify not simply what part of the legislation is under discussion but also what kind of entitlement is being considered. The most prominent example is ‘unpaid’, ‘paid’ or ‘well-paid’ leave. In the case of Iceland for instance, the entire duration of the ‘birth leave’ is well-paid, while the additional ‘*foreldraorlof*’ is an unpaid entitlement. Often however, the payment designator covers only a part of the leave entitlement period. For example, only part of the parental leave period in Sweden (‘*föräldrapenning*’), is compensated (Duvander & Löfgren, 2023); this is one of many instances where the benefit legislation is separate from the leave right. In other cases, using the designator necessitates assumptions about parental behaviour as payment itself allows for flexibility and parental agency. Austria’s ‘parental leave’ duration is fixed, while containing a flat-rate benefit option, which varies in duration and payment level according to parents’ wishes, and an income-







related benefit, each with their own native terms. Czechia's '*rodicovska dovolena*' (or 'parental leave') shares a very similar design, with a separate payment entitlement called '*rodicovsky prispevek*' fluctuating according to parental decisions (Kocourková, 2023).

Another intrinsic part of leave terminology is a designator that specifies access to leave, such as 'individual' or 'family/shared' rights. 'Father-only' or 'available [for]' can fulfil a similar purpose, while '(non-)transferable' can act as a subcategory of 'individual' rights. The 'care'-based native terms detailed above contain all these variations.

We can also differentiate 'default bearers' of a right, in other words the parent who is presumed to be the holder of the right to leave. In such cases, while 'care' is ostensibly a gender-neutral term, the context is not neutral about where the responsibility for care actually lies. Serbia's and Bulgaria's leaves 'to take care of a child' are both transferable entitlements, but the default right-bearer is the mother. Hungary's care terms refer to an individual, non-transferable 'infant care payment' reserved for the birth parent and additional family rights; but while in this case, care does not default to the mother, family and transferable rights have in practice only limited potential for a gender-equalising effect (Dobrotić & Stropnik, 2020).

Romania's '*concediul pentru creșterea copiilor*' (leave for rearing of the child) (Popescu & Radogna, 2023) offers an example of an in-between right that can be challenging to fit in the established terms. Two months of the family entitlement can be taken by the parent who does not claim the right to take leave. But if he or she does not do so, the leave is reduced from its default duration, until the child is two years old, to 22 months (Popescu & Radogna, 2023). These 'bonus' rights, generally created to foster gender equality, are not rare and represent an incentive for the parents to modify the use of leave where it is a family entitlement.

In the case of Iceland, there are only individual rights: for a 'first parent' and a 'second parent'. While other options for the designation of parents are certainly available, the indefinite language used here is intentional. Neither the 'birth leave' ('*fæðingarorlof*') nor the childcare-type leave are specified for mothers and fathers (Arnalds et al., 2023). Rather, the rights are not gender-restricted and both parents have an equal right to take leave, irrespective of the gender formation of the couple, with no difference in duration between a different-sex, same-sex female, or same-sex male couple. This 'birth leave' in Iceland, therefore, is a right that is unaltered by the composition of the child's family, a rare instance, with only Sweden achieving the same level of gender-inclusive legislation in Europe (Wong et al., 2020).

As much as we can find cases where native terminology has changed in recent years to reflect leaves inclusive of same-sex (female) couples, the correspondence remains imperfect; co-mothers are indeed covered- but under 'paternity leaves' in the UK and Ireland. The Netherlands' 'birth leave', despite sharing terminology with Iceland, refers specifically to the right of a partner granted when they are married to or co-habiting with the birth mother (den Dulk & Yerkes, 2023). Such conditions also exist in the case of Austria's '*Väterfrühkarenz*' and Bulgaria's '*otpusk po bashtinstvo*', both referring to fatherhood, which in practice narrows the meaning to those fathers that also live with the birth mother (Dimitrova et al., 2023; Schmidt & Schmidt, 2023). The fact that not all leave rights are independent was noted earlier using the example of recent changes in Bulgaria where claiming one entitlement reduces another right.





When it comes to transferable entitlements, such as the ‘shared parental leave’ in the UK, the access for the second parent is necessarily predicated on the eligibility of the default right bearer. A related example of interdependence exists in Norway. The second parent’s access to their quota of the leave is predicated, in part, on the first parent’s eligibility. For example, should the mother be employed for less than six of the past ten months or have not been earning enough in the previous year, the father has lost access to his entire quota; it is only very recently that eight weeks out of the father’s 15- or 19-week quota has been granted irrespective of the mother’s eligibility thus giving fathers in Norway an independent parental leave right (Bungum & Kvande, 2023). Very similar conditions existed in Austria until 2000 (Sagmeister, 2019). In these cases, one parent’s leave might be individual but not necessarily independent. This distinction can be important when leaves are studied from the perspective of diverse families with precarious eligibility.

A final implicit aspect of the terminology in use is timing. The established terminology and definitions have a time aspect with ‘maternity leaves’ coming first, then ‘paternity leaves’ generally to be taken during the post-natal maternity leave period, followed by ‘parental leaves’ and perhaps ‘childcare leaves’. This expectation can certainly be misleading as we have discussed, for example in the case of Estonia’s *‘isapuhkus’* (father’s leave) that could be taken in its entirety before the birth or even after the end of the paid portion of ‘parental leave’ (*‘vanemapuhkus’*), before the child is three years (Pall, 2023). As we have seen, native terms also tend to shift as the child grows with action-based terms such as care leaves generally following event-based ones such as pregnancy and birth.

Native terms also provide an additional time period: all instances of native ‘pregnancy leaves’ we found contain an element of leave time to be taken before the birth. Finland’s ‘pregnancy leave’ needs to start no later than 14 days before the due date, the ‘pregnancy and maternity’ leave in the Netherlands requires a minimum of 4 weeks pre-birth, Bulgaria’s ‘leave for pregnancy and birth’ 45 calendar days, the ‘pregnancy and childbirth’ leave in Latvia 56 calendar days; and while Lithuania’s ‘pregnancy and childcare leave’ is not compulsory, 70 of the 126 calendar days can only be taken pre-birth. We here note the consistency of match between a design aspect and native terms, but other examples of entitlements exclusively saved for the pre-birth period exist. Specifying pre- or post-birth leave can be empirically important, as the entitlement that must be taken before the time of birth varies widely from none to the 8 weeks in Austria’s ‘maternity leave’ (Schmidt & Schmidt, 2023) and Lithuania’s 10 weeks (Braziene & Vysniauskiene, 2023).

In summary, native leave terms are only slightly better than established convention when it comes to a consistent correspondence between terminology meaning and substantial rights across contexts. Amongst the birth parent-centric leaves, the subset of countries that share a ‘maternity’ designation in their native languages show a level of design variation, similar to that of the established ‘maternity leave’ category. Outliers such as Serbia and Bulgaria, where the duration of birth parent’s leaves contradicts the definition of a relatively short health measure, are indeed removed from the ‘maternity’ category when we consider the native terms. Yet, the long transferable nature of these rights has more in common with the traditionally named ‘maternity leave’ in the UK than the UK’s design has with Belgium’s *‘moederschapsverlof/congé de maternité’* or *‘Mutterschutz’* in Austria and Germany. At the same time, the very low level of payment in UK’s ‘maternity leave’ separates it from the highly paid mother-default transferable leaves of Serbia, Bulgaria, or Czechia.







The lack of ‘maternity leave’ terms and, instead, the focus on gender-neutral parental entitlements, most common in Nordic countries, are the result of a similar developmental path. Similarly, care-focused terms are mostly concentrated in CEE countries and largely correspond to long, generous family entitlements. The exception here is Spain that also reached care-focused terminology but followed a different path and in a different time. When writing about the leave design of CEE countries, Saxonberg (2015) notes that many of their ‘parental leaves’ have evolved from previous ‘extended maternity leaves’. Indeed, flat-rate payment design and a lack of other incentives for fathers can make this a change in name only and ‘in practice they have remained as ‘extended maternity leaves’ (Saxonberg, 2015, pp. 512). Much has changed in the design of leaves in the countries Saxonberg (2015) was examining at the time. However, this argument can serve as a warning against the ‘mist and veil of words’ (Berkeley, 2012) and a call for term use led by design and function.

Taken together, the combination of designator and base term variations allows leave terminology to get as cumbersome as the author (and readers) can bear; elaborate descriptions might be needed to achieve specific goals. Yet, familiarity, utility and resonance, all vital for concepts in social sciences (Gerring, 1999), are important for terminological decisions. Native terms, as much as they can uniquely identify rights, might not be practical. Their usage alongside established terms, however, could alleviate some of the shortcomings, while maintaining the differentiation ability (e.g. Dobrotić & Iveković Martinis, 2023). Alternatively, a recalibrated terminological apparatus could provide a better solution, balancing parsimony and precision, coherence and familiarity, to achieve a flexible and sustainable terminology.





## 5. A harmonised terminology: Is it desirable? Is it feasible?

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The focus of this short concluding section is on leave for parents with young children, which we define here as children up to the age of six years (the age of compulsory schooling in most countries in Europe) and older children in the case of leave to care for short-term illnesses. As noted above, other types of leave are emerging, including leave for the care of children (not just young children) and adults with long-term care needs, which might take the umbrella term of ‘carer’s leave’; and leave for personal problems or crises (that is, in addition to the widespread existing availability of leave for reasons of personal illness), which might take the umbrella term of ‘self-care leave’ or ‘leave to care for self’.

We do not see a strong case for proposing that individual countries adopt a harmonised terminology. This is not necessary, not feasible and would in any case help to render invisible the values, assumptions and purposes behind leave policies and their design. We do, however, propose that a harmonised terminology would assist when it comes to presenting comparative information on leave policies in different countries and conducting analyses of such information. Indeed, it is clearly essential that such harmonisation exists if valid and useful comparisons are to be made. Though in any discussion of the results of such analyses, it is important to emphasise the diversity of terminology that exists and, indeed, to always give the terms actually in use when referring to the leave policies of any individual countries – and to do so not only in an English translation but also in that country’s own language.

What to include within the category ‘leave for parents with young children’? We propose any form of statutory leave, paid or unpaid, available for parents of any child under the age of six years. This definition would include leaves designated as ‘maternity leave’, ‘paternity leave’, ‘parental leave’ and ‘childcare leave’ or ‘homecare leave’, as well as leaves that have similar effects but are differently designed or titled (e.g., ‘parental benefit period’ (Norway), ‘initial parental leave’ (Portugal), ‘parent’s leave’ (Ireland), ‘birth and childcare leave’ (Spain)). It would also include breastfeeding leave and leave to care for a child for health reasons. We propose that all such leaves making up leave for parents with young children should be covered by the umbrella term of ‘parenting leaves’ and not ‘caring leaves’, because parenting includes more than what is generally meant by the term ‘care’, e.g. conveying values and also because caring includes potentially more diverse people than just own children. This term is also adopted by the editors of the recent Research Handbook on Leave Policy:

We use the term parenting leaves as an umbrella term to encompass all types of leave, which allow parents to take care of (younger) children. Such an umbrella term is necessary in the face of the actual variety of both terms and forms of leave we find in different national settings (Dobrotić, Blum and Koslowski, 2022, p. 4).

Developing this concept of parenting leave, we propose that tables comparing countries drop attempts to show and compare ‘maternity leave’, ‘paternity leave’, ‘parental leave’ and ‘childcare leave’ or ‘homecare leave’; terminologies actually in use no longer conform sufficiently to this



typology to make it usable. Instead, comparative tables should show aggregated results for parenting leave, divided into ‘mother only’ leave, ‘father only’ leave, ‘family’ leave (transferable maternity leave would come under the ‘family’ heading) and ‘total’ leave. The only exclusions from these aggregated results for parenting leave would be leave for (breast-)feeding and leave to care for a child for health reasons, which as contingent leaves (i.e., leaves that are conditional or dependent on certain conditions) should appear separately.

As an illustration, a comparative table on parenting leave for a dual-earner, two parents-family model might be presented with the following terminologies:

**Table 1:** Illustration of how a comparative table might be presented using the proposed terminology

		Non-contingent parenting leave (months)					Contingent parenting leave	
		Mother	Father	Family	Total		(Breast-)feeding	Health reasons
Country	A					yes		
	B					no		

Key:

A: paid at any level + unpaid

B: well-paid (e.g. at two-thirds of earnings)

The same comparative table should be used to illustrate parenting leave rights for one-parent families and one earner two-parents’ families. The illustrative table above only includes basic information on presence, duration and (payment) generosity of parenting leave policies; symbols could be added to qualify information, such as whether or not it is obligatory to take part of leave or whether earnings-related payments are capped at an upper limit. Other information could be added, either to the existing table or in a separate one, such as more detail on (breast-)feeding leave and leave to care for a child for health reasons (e.g. if it is defined as a maximum number of days per year or per spell); incentives for fathers to use parenting leave; types of flexibility available in parenting leave; and eligibility (more challenging to include but potentially very important). From a child perspective, it would be useful to inform how much of ‘total leave’ can be taken consecutive or simultaneously amongst parents (the latter also termed as double days).

Using this form of harmonisation to present comparative information on parenting leaves gives comparable information about how much leave is available. It would help to overcome biased results when analysing the impact of leave policies on working and family lives in cross-national analysis, as we have identified in our literature review. It does not, though, give a picture of how leave policies are structured in different countries, i.e., what individual leaves make up the overall parenting leave. This information could be provided in a separate table or figure, setting out for each country each type of leave (including the name given to each one) with an indicator of its purpose.





## References

- Addabbo, T., Cardinali, V., Giovannini, D. & Mazzucchelli, S. (2022). Italy country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2022](#).
- Addati, L. (2015). Extending maternity protection to all women: Trends, challenges and opportunities. *International Social Security Review*, 68(1), 69-93. <https://doi.org/10.1111/issr.12060>
- Addati, L., Cassirer, N. & Gilchrist, K. (2014). *Maternity and paternity at work: Law and practice across the world*. Geneva: International Labour Organisation.
- Addati, L.; Cattaneo, U. & Pozzan, E. (2022). *Care at Work. Investing in care leave and services for a more gender equal world of work*. Geneva: International Labor Organization.
- André, S., Cammu, N. & Meuleman, E. (2025). Fathers, Families, and Society: A Two-Decade Systematic Literature Review on the Contexts and Consequences of Paternity and Parental Leave for Fathers. *Social Sciences* 14: 168. <https://doi.org/10.3390/socsci14030168>
- Arnalds, Á., Eydal, G. B. & Gíslason, I. (2023). Iceland country note. In S. Blum, I. Dobrotić, A. Kowslawski and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Baird, M. & O'Brien, M. (2015). Dynamics of parental leave in Anglophone countries: the paradox of state expansion in liberal welfare regimes. *Community, Work & Family*, 18(2), 198-217. <https://doi.org/10.1080/13668803.2015.1021755>
- Baird, M., Hamilton, M., Dinale, D., Gulesserian, L. & Heron, A. (2022). Broadening our conception of leave: leave to care for self or others over the life course. In I. Dobrotić, S. Blum and A. Koslowski (eds.) *Research Handbook on Leave Policy: Parenting and social inequalities in a global perspective*. Cheltenham: Edward Elgar, 368-383.
- Berkeley, G. (2012). *The Works of George Berkeley*. Vol. 1 of 4.
- Blum, S., Dobrotić, I., Kaufman, G., Koslowski, A. & Moss, P. (2023). [19th International Review of Leave Policies and Related Research 2023](#). DOI: 10.25365/phaidra.431
- Blum, S., Koslowski, A., Macht, A. & Moss, P. (2018). [International Review of Leave Policies and Research 2018](#).
- Brandt, B. & Kvande, E. (2019). Norway country note. In A. Koslowski, S. Blum, I. Dobrotić, A. Macht and P. Moss (eds.), [International Review of Leave Policies and Research 2019](#).
- Brandt, B. & Kvande, E. (2020). *Designing Parental Leave Policy. The Norway Model and the Changing Face of Fatherhood*, Bristol University Press, Bristol.
- Braziene, R. & Vysniauskiene, S. (2023). Lithuania country note. In S. Blum, I. Dobrotić, A. Kowslawski and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Bueno, X. & Oh, E. (2022). How Do Men Talk about Taking Parental Leave? Evidence from South Korea, Spain, and the United States. In M. Grau Grau et al. (eds.), *Engaged Fatherhood for Men, Families and Gender Equality, Contributions to Management Science*, Springer, 165-179.
- Bungum, B. & Kvande, E. (2023). Norway country note. In S. Blum, I. Dobrotić, G. Kaufman, A. Koslowski and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Ciccia, R. & Verloo, M. (2012). Parental leave regulations and the persistence of the male breadwinner model: Using fuzzy-set ideal type analysis to assess gender equality in an enlarged Europe. *Journal of European Social Policy*, 22(5), 507-528. <https://doi.org/10.1177/0958928712456576>
- Cunha, V. & Marinho, S. (2018). Negotiating Work-life Balance, Gender Equality and Parenting: Drivers and Ambivalences in Dual-earner/Dual-carer Couples. *Quaderns De l'Institut Català d'Antropologia* 34, 60-86.
- Daly, M. & Ferragina, E. (2018). Family policy in high-income countries: Five decades of development. *Journal of European Social Policy*, 28(3), 255-270. <https://doi.org/10.1177/0958928717735060>
- Daly, M. & Rush, M. (2019). Ireland country note. In A. Koslowski, S. Blum, I. Dobrotić, A. Macht and P. Moss (eds.), [International Review of Leave Policies and Research 2019](#).
- Daly, M. & Szelewa, D. (2020). Ireland country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2020](#).





- Dančíková, Z. (2022). Slovak Republic country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2022](#).
- De la Porte, C., Im, Z.J., Pircher, B. & Szelewa, D. (2023). The EU's work-life balance Directive: Institutional change of father-specific leave across member states, *Social Policy Administration*, 57(4), 549-563. <https://doi.org/10.1111/spol.12920>
- De la Porte, C., Larsen, T. P. & Szelewa, D. (2020). A Gender Equalizing Regulatory Welfare State? Enacting the EU's Work-Life Balance Directive in Denmark and Poland. *The ANNALS of the American Academy of Political and Social Science*, 691(1), 84-103. <https://doi.org/10.1177/0002716220956910>
- De Rose, L.F., Goldscheider, F., Brito, J.R., Salazar-Arango, A., Corcuera, P., Corcuera, P.J., Gas-Aixendri, M. (2019). Are Children Barriers to the Gender Revolution? International Comparisons. *European Journal of Population* 35, 987–1021. <https://doi.org/10.1007/s10680-018-09515-8>
- Dearing, H. (2015). Does parental leave influence the gender division of labour? Recent empirical findings from Europe. *Working Papers / Institut für Sozialpolitik*; 1/2015. <https://doi.org/10.57938/2df9b520-453b-4199-8713-a727c2f191de>
- Dearing, H. (2016). Designing gender-equalizing parental leave schemes - what can we learn from recent empirical evidence from Europe? *Zeitschrift für Familienforschung*, 28(1), 39-64. <https://doi.org/10.3224/zff.v28i1.22920>
- den Dulk, L. & Yerkes, M. (2019). Netherlands country note. In A. Koslowski, S. Blum, I. Dobrotić, A. Macht and P. Moss (eds.), [International Review of Leave Policies and Research 2019](#).
- den Dulk, L. & Yerkes, M. (2023). Netherlands country note. In S. Blum, I. Dobrotić, A. Kowslowksi and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Deven, F. & Moss, P. (2005). Leave Policies and Research Reviews and Country Notes.
- Dimitrova, E., Kotzeva, T. & Ilieva, K. (2022). Bulgaria country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2022](#).
- Dimitrova, E., Kotzeva, T. & Ilieva, K. (2023). Bulgaria country note. In S. Blum, I. Dobrotić, A. Kowslowksi and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Dobrotić, I. & Blum, S. (2020). Inclusiveness of Parental-Leave Benefits in Twenty-One European Countries: Measuring Social and Gender Inequalities in Leave Eligibility. *Social Politics: International Studies in Gender, State & Society*, 27(3), 588-614. <https://doi.org/10.1093/sp/jxz023>
- Dobrotić, I. & Iveković Martinis, A. (2023). Inclusiveness and Flexibility of Work-Life Balance Policies. In: *rEUsilience Working Paper Series*. <https://doi.org/10.31235/osf.io/da463>
- Dobrotić, I. & Stropnik, N. (2020). Gender equality and parenting-related leaves in 21 former socialist countries. *International Journal of Sociology and Social Policy*, 40(5/6), 495-514. <https://doi.org/10.1108/ijssp-04-2019-0065>
- Dobrotić, I. (2022). The (in)equality dynamic of childcare-related policy development in post-Yugoslav countries. *Journal of European Social Policy*, 32(3), 270-286. <https://doi.org/10.1177/09589287221088167>
- Dobrotić, I. (2023). Parenting Leave Policies and Their Variations: Developments in OECD countries. In Mary Daly et al. (eds.), *The Oxford Handbook of Family Policy Over the Life Course*, Oxford University Press, 678-694. <https://doi.org/10.1093/oxfordhb/9780197518151.013.32>
- Dobrotić, I., Blum, S. & Koslowski, A. (2022). Introduction. In I. Dobrotić, S. Blum and A. Koslowski (eds.) *Research Handbook on Leave Policy: Parenting and social inequalities in a global perspective*. Cheltenham: Edward Elgar, 1-13.
- Duvander, A. Z., Lappegård, T., Andersen, S. N., Garðarsdóttir, Ó., Neyer, G. & Viklund, I. (2019). Parental leave policies and continued childbearing in Iceland, Norway, and Sweden. *Demographic Research*, 40, 1501-1528.
- Duvander, A.-Z. & Koslowski, A. (2023). Access to parenting leaves for recent immigrants: a cross-national view of policy architecture in Europe. *Genus*, 79(8). <https://doi.org/10.1186/s41118-023-00187-9>
- Duvander, A.-Z. & Löfgren, N. (2023). Sweden country note. In S. Blum, I. Dobrotić, G. Kaufman, A. Koslowski and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Earle, A., & Heymann, J. (2019). Paid parental leave and family-friendly policies: An evidence brief. Online. Retrieved January 10, 2025. <https://www.unicef.org/documents/paid-parental-leave-and-family-friendly-policies>





- Earle, A., Raub, A., Sprague, A. & Heymann, J. (2023). Progress towards gender equality in paid parental leave: an analysis of legislation in 193 countries from 1995–2022. *Community, Work & Family*, 1-21. <https://doi.org/10.1080/13668803.2023.2226809>
- Eerola, P., Lammi-Taskula, J., O'Brien, M., Hietamäki, J. & Räikkönen, E. (2019). Fathers' Leave Take-Up in Finland: Motivations and Barriers in a Complex Nordic Leave Scheme. *SAGE Open*, 9(4). <https://doi.org/10.1177/2158244019885389>
- Engeman, C. & Burman, S. (2022). Signs of the gender revolution's second phase? Historical and cross-national development of fathers' leave provisions. *Social Policy Administration*, 57(5), 626-641. <https://doi.org/10.1111/spol.12882>
- Escobedo, A. & Moss, P. (2025). Parenting leave and gender in Spain: terminology, rationale and design. *Community, Work & Family*, 1–11. <https://doi.org/10.1080/13668803.2025.2481861>
- Escobedo, A. & Wall, K. (2015). Leave policies in Southern Europe: continuities and changes, *Community, Work & Family*, 18(2), 218-235. <https://doi.org/10.1080/13668803.2015.1024822>
- EU (1992). Council Directive 92/85/EEC of 19 October 1992 on the introduction of measures to encourage improvements in the safety and health at work of pregnant workers and workers who have recently given birth or are breastfeeding. Available at: <https://eur-lex.europa.eu/eli/dir/1992/85/oj/eng>
- EU (2007). Treaty of Lisbon amending the Treaty on European Union and the Treaty establishing the European Community, signed at Lisbon, 13 December 2007 (Document C2007/306/01). Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC\\_2007\\_306\\_R\\_0001\\_01](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2007_306_R_0001_01)
- EU (2012). Charter of Fundamental Rights of the European Union (2012/C 326/02). Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC\\_2007\\_306\\_R\\_0001\\_01](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2007_306_R_0001_01)
- EU (2019). Directive (EU) 2019/1158 of 20 June 2019 on work-life balance for parents and carers. Available at: <https://eur-lex.europa.eu/eli/dir/2019/1158/oj/eng>
- EU (2021). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the strategy on the rights of the child. COM/2021/142 final. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0142>
- EU (2021). Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child Guarantee. ST/9106/2021/INIT. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32021H1004>
- EU (2022). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European care strategy. Available at: COM/2022/440 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52022DC0440>
- European Commission, Directorate-General for Justice and Consumers, Burri, S., De la Corte-Rodríguez, M., Böök, B. & van Hoof, F. (2024). The transposition of the Work-Life Balance Directive in EU Member States (II): considerable work still to be done. Publications Office of the European Union. Available at: <https://data.europa.eu/doi/10.2838/33291>
- Eydal, G. & Gíslason, I. (2020). Iceland country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2020](#).
- Eydal, G. & Gíslason, I. (2021). Iceland country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2021](#).
- Eydal, G. B., Gíslason, I. V., Rostgaard, T., Brandth, B., Duvander, A.-Z. & Lammi-Taskula, J. (2015). Trends in parental leave in the Nordic countries: has the forward march of gender equality halted? *Community, Work & Family*, 18(2), 167-181. <https://doi.org/10.1080/13668803.2014.1002754>
- Fagnani, J., Boyer, D. & Thévenon, O. (2013). France country note. In P. Moss (ed.), [International Review of Leave Policies and Research 2013](#).
- Ferragina, E. (2023). Understanding Family Policy Transformation in the Light of Critical Political Economy. In M. Daly, B. Pfau-Effinger, N. Gilbert and D. Besharov, *The Oxford Handbook of Family Policy Over the Life Course* (201-223). Oxford University Press. <https://doi.org/10.1093/oxfordhb/9780197518151.013.10>







- Finch, N. (2021). Inclusive citizenship and degenderization: A comparison of state support in 22 European countries. *Social Policy and Administration*, 55(7), 1224-1243. ISSN 1467-9515.  
<https://doi.org/10.1111/spol.12716>
- Flora, P. & Heidenheimer, A. J. (1981). *The development of welfare states in Europe and America*. Transaction Books.
- Fuwa, M. & Cohen, Ph.N. (2007). Housework and social policy. *Social Science Research*, 36(2), 512-530.  
<https://doi.org/10.1016/j.ssresearch.2006.04.005>
- Gábos, A. & Makay, Z. (2020). Hungary country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [\*International Review of Leave Policies and Research 2020\*](#).
- Gábos, A. & Makay, Z. (2023). Hungary country note. In S. Blum, I. Dobrotić, A. Kowslowksi and P. Moss (eds.), [\*International Review of Leave Policies and Research 2023\*](#).
- Geist, C. & Cohen, Ph.N. (2011). Headed Toward Equality? Housework Change in Comparative Perspective. *Journal of Marriage and Family*, 73(4), 832-844. <https://doi.org/10.1111/j.1741-3737.2011.00850.x>
- Gerring, J. (1999). What Makes a Concept Good? A Criterial Framework for Understanding Concept Formation in the Social Sciences. *Polity*, 31(3), 357-393. <https://doi.org/10.2307/3235246>
- Haas, L. & Rostgaard, T. (2011). Fathers' rights to paid parental leave in the Nordic countries: consequences for the gendered division of leave. *Community, Work & Family*, 14(2), 177-195.  
<https://doi.org/10.1080/13668803.2011.571398>
- Hatzivarnava-Kazassi, E. & Karamessini, M. (2021). Greece country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [\*International Review of Leave Policies and Research 2021\*](#).
- Hatzivarnava-Kazassi, E. & Karamessini, M. (2023). Greece country note. In S. Blum, I. Dobrotić, G. Kaufman, A. Koslowski, and P. Moss (eds.), [\*International Review of Leave Policies and Research 2023\*](#).
- Hays, S. (1996). *The Cultural Contradictions of Motherhood*. New Haven und London: Yale University.
- Heymann, J., Sprague, A. & Raub, A. (2023). *Equality within our lifetimes: How Laws and Policies Can Close - or Widen - Gender Gaps in Economies Worldwide*. Oakland, CA: University of California Press.
- Hook, J.L. (2010). Gender Inequality in the Welfare State: Sex Segregation in Housework, 1965–2003. *American Journal of Sociology*, 115(5), 1480–1523. <https://doi.org/10.1086/651384>
- ILO (2000). Maternity Protection Convention, 2000 (No.183). Available at:  
[https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C183](https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C183)
- ILO (2000) Maternity Protection Recommendation, 2000 (No. 191). Available at:  
[https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:R191](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R191)
- ILO (2022). *Care at work. Investing in care leave and services for a more gender equal world of work*. Annex. Country-level data, definitions, methodology and sources. Geneva: International Labour Organization. [PDF](#)
- Javornik, J. & Kurowska, A. (2017). Work and Care Opportunities under Different Parental Leave Systems: Gender and Class Inequalities in Northern Europe. *Social Policy & Administration*, 51(4), 617-637.  
<https://doi.org/10.1111/spol.12316>
- Karu, M. & Tremblay, D.-G. (2018). Fathers on parental leave: An analysis of rights and take-up in 29 countries. *Community, Work and Family*, 21(3), 344–362.  
<https://doi.org/10.1080/13668803.2017.1346586>
- Kaufman, G. & Grönlund, A. (2021). Displaying parenthood, (un)doing gender: parental leave, daycare and working-time adjustments in Sweden and the UK. *Families, relationships and societies*, 10(2), 213-229.  
<https://doi.org/10.1332/204674319X15683716957916>
- Kaufman, G., Auðardóttir, A. M., Mazrekaj, D., Pettigrew, R. N., Stambolis-Ruhstorfer, M., Juros, T. V. & Yerkes, M. A. (2022). Are parenting leaves available for LGBTQ parents? Examining policies in Canada, Croatia, France, Iceland, the Netherlands and the United Kingdom. In *Research handbook on leave policy* (325-337). Edward Elgar Publishing. <https://doi.org/10.4337/9781800372214.00035>.
- Kocourková, J. (2023). Czech Republic country note. In S. Blum, I. Dobrotić, G. Kaufman, A. Koslowski and P. Moss (eds.), [\*International Review of Leave Policies and Research 2023\*](#).
- Köppe, S. & Szelewa, D. (2023). Ireland country note. In S. Blum, I. Dobrotić, G. Kaufman, A. Koslowski and P. Moss (eds.), [\*International Review of Leave Policies and Research 2023\*](#).







- Korintus, M. & Stropnik, N. (2009). Hungary and Slovenia: long leave or short? In Sheila Kamerman, and Peter Moss (eds), *The politics of parental leave policies: Children, parenting, gender and the labour market*, Bristol: Policy Press, 125-158. <https://doi.org/10.1332/policypress/9781847420671.003.0009>
- Kováts, E. (2020). Post-Socialist Conditions and the Orbán Government's Gender Politics between 2010 and 2019 in Hungary. In D. Gabriele and R. Julia (eds.), *Right-Wing Populism and Gender* (75-100). <https://doi.org/doi:10.1515/9783839449806-005>
- Kowalewska, H. (2017). Beyond the 'train-first'/'work-first' dichotomy: How welfare states help or hinder maternal employment. *Journal of European Social Policy*, 27(1), 3-24. <https://doi.org/10.1177/0958928716673316>
- Kurowska, A. (2021). The Contextualized Inclusiveness of Parental Leave Benefits. *Social Inclusion*, 9(2), 262-274. <https://doi.org/10.17645/si.v9i2.3846>
- Kurowska, A., Godlewska-Bujok, B. & Michoń, P. (2023). Poland country note. In S. Blum, I. Dobrotić, A. Kowslawski and P. Moss (eds.), [\*International Review of Leave Policies and Research 2023\*](#).
- Lammi-Taskula, J. (2009). Nordic mothers and fathers on leave: Towards equal sharing? In Signurdardottir, E. (ed.), *Parental leave, care policies and gender equalities in Nordic countries* (21-24), Copenhagen: Nordic Council of Ministers.
- Lammi-Taskula, J. (2022). Young Parents on Parental Leave in the Nordic Countries. Finnish Institute for Health and Welfare (THL). Discussion paper 13/2022. Helsinki, Finland 2022. Available at: <https://www.julkari.fi/handle/10024/144170>
- Lammi-Taskula, J., Miettinen, A. & Närvi, J. (2023). Finland country note. In S. Blum, I. Dobrotić, A. Kowslawski and P. Moss (eds.), [\*International Review of Leave Policies and Research 2023\*](#).
- Leitão, M., Wall, K., Correia, R. & Atalaia, S. (2023). Portugal country note. In S. Blum, I. Dobrotić, A. Kowslawski and P. Moss (eds.), [\*International Review of Leave Policies and Research 2023\*](#).
- Leon, M. & Millns, S. (2007). Parental, Maternity and Paternity Leave: European Legal Constructions of Unpaid Care Giving. *Northern Ireland Legal Quarterly*, 58(3), 343-358.
- McKay, L., Mathieu, S. & Doucet, A. (2016). Parental-leave rich and parental-leave poor: Inequality in Canadian labour market based leave policies. *Journal of Industrial Relations*, 58(4), 543-562. <https://doi.org/10.1177/0022185616643558>
- Meil, G. (2013). European men's use of parental leave and their involvement in child care and housework. *Journal of Comparative Family Studies*, 44(5), 557-570.
- Meil, G., Escobedo, A. & Lapuerta, I. (2021). Spain country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [\*International Review of Leave Policies and Research 2021\*](#).
- Meil, G., Lapuerta, I. & Escobedo, A. (2019). Spain country note. In A. Koslowski, S. Blum, I. Dobrotić, A. Macht and P. Moss (eds.), [\*International Review of Leave Policies and Research 2019\*](#).
- Meil, G., Romero-Balsas, P. y Rogero-García, J. (2017). Why parents take unpaid parental leave. Evidence from Spain. In V. Cesnuytè, D. Lück and E. D. Widmer (eds.), *Family Continuity and Change. Contemporary European Perspectives*, Palgrave Macmillan Studies in Family and Intimate Life, 247-270. DOI 10.1057/978-1-137-59028-2
- Meil, G., Wall, K. Atalaia, S. & Escobedo, A. (2022). Trends towards de-gendering leave use in Spain and Portugal. In Dobrotić, I., Blum, S. & Koslowski, A. (eds.), *Research Handbook on Leave Policy*, Edward Elgar Publishing, Cheltenham, 219-231.
- Miettinen, A., Salmi, M. & Lammi-Taskula, J. (2021). Finland country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [\*International Review of Leave Policies and Research 2021\*](#).
- Mihova, G. (2015). Fertility increase in the focus of democratic policy in Bulgaria. *Papers of BAS*, 2(1-2).
- MISSCEO (2024). Mutual Information System on Social Protection of the Council of Europe: Available at: <https://www.coe.int/en/web/european-social-charter/missceo-database>
- MISSCEO (2024a). MISSCEO Comparative tables. Available at: <https://www.coe.int/en/web/european-social-charter/missceo-comparative-tables>
- MISSOC (2024). Missoc Database. Available at: <https://www.missoc.org/missoc-database/>
- MISSOC (2024a). Missoc Glossary. <https://www.missoc.org/glossary/>
- MISSOC (2024b). Missoc Correspondent's Guide. Available at: [https://www.missoc.org/documents/CorrespondentsGuide\\_EN.pdf](https://www.missoc.org/documents/CorrespondentsGuide_EN.pdf)





- Mitchell, G. (2023). Shared Parental Leave: Can Transferable Maternity Leave Ever Encourage Fathers to Care? *Industrial Law Journal*, 52(1), 149-178. <https://doi.org/10.1093/indlaw/dwac015>
- Mortelmans, D. & Fusulier, B. (2022). Belgium country note. In S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2022](#).
- Moss, P. & Deven, F. (2020). Leave Policies in Europe: Current Policies, Future Directions. *International Journal of Sociology and Social Policy*, 40 (5/6), 429-440. <https://doi.org/10.1108/IJSSP-04-2019-0063>
- Moss, P. & O'Brien, M. (2019). United Kingdom: leave policy and an attempt to take a new path. In P. Moss, A.-Z. Duvander and A. Koslowski (eds.), *Parental Leave and Beyond: Recent International Developments, Current Issues and Future Directions* (57-74). Bristol University Press. <https://doi.org/10.46692/9781447338796.004>
- Moss, P. & O'Brien, M. (2006). *International Review of Leave Policies and Related Research* (Vol. 57). Department of Trade and Industry.
- Musick, K., Bea, M. D. & Gonalons-Pons, P. (2020). His and her earnings following parenthood in the United States, Germany, and the United Kingdom. *American Sociological Review*, 85(4), 639-674. <https://doi.org/10.1177/0003122420934430>
- Närvi, J., Lammi-Taskula, J., Salmi, M. & Miettinen, A. (2022). Finland country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2022](#).
- Neyer, G. (1997). Die Entwicklung des Mutterschutzes in Deutschland, Österreich und der Schweiz von 1877 bis 1945. In U. Gerhard (ed.), *Frauen in der Geschichte des Rechts. Von der frühen Neuzeit bis zur Gegenwart*. Verlag C.H. Beck, München, 744-58.
- O'Brien, M. & Uzunalioglu, M. (2022). Parenting leave policies and a global social policy agenda. In I. Dobrotić, S. Blum, A. Koslowski (eds.), *Research Handbook on Leave Policy*, Cheltenham: Edward Elgar Publishing, 67-81. <https://doi.org/10.4337/9781800372214.00015>
- O'Brien, M. & Wall, K. (eds.) (2017). *Comparative Perspectives on Work-Life Balance and Gender Equality. Fathers on Leave Alone*, Springer, Life Course Research and Social Policies, 6. DOI 10.1007/978-3-319-42970-0\_7
- O'Brien, M. (2009). Fathers, parental leave policies, and infant quality of life: International perspectives and policy impact. *The Annals of the American Academy of Political and Social Science*, 624, 190-213 <http://www.jstor.org/stable/40375960>
- O'Brien, M., Koslowski, A. & Daly, M. (2015). United Kingdom country note. In P. Moss (ed.), [International Review of Leave Policies and Research 2015](#).
- OECD (2024). OECD family database, PF 2.1. Available at: <https://www.oecd.org/els/family/database.htm>
- Olsson, M.I.T. et al. (2023). Gender Gap in Parental Leave Intentions: Evidence from 37 Countries, *Political Psychology*, 44(6), 1163-1192. <https://doi.org/10.1111/pops.12880>
- Pall, K. (2022). Estonia country note. In A. Koslowski, S. Blum, I. Dobrotić, G. Kaufman and P. Moss (eds.), [International Review of Leave Policies and Research 2022](#).
- Pall, K. (2023). Estonia country note. In S. Blum, I. Dobrotić, A. Kowslowksi and P. Moss (eds.), *International Review of Leave Policies and Research 2023*.
- Pantelić, M. (2023). Serbia country note. In S. Blum, I. Dobrotić, G. Kaufman, A. Koslowski and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Pircher, B., De La Porte, C. & Szelewa, D. (2024). Actors, costs and values: the implementation of the Work-Life Balance Directive. *West European Politics*, 47(3), 543-568. <https://doi.org/10.1080/01402382.2023.2181504>
- Pizarro, J. & Gartzia, L. (2024). Paternity leave: A systematic review and directions for research, *Human Resource Management Review*, 34(1) (2024). <https://doi.org/10.1016/j.hrmr.2023.101001>
- Popescu, R. & Radogna, R. M. (2023). Romania country note. In S. Blum, I. Dobrotić, A. Kowslowksi and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Riederer, B. & Berghammer, C. (2019). The Part-Time Revolution: Changes in the Parenthood Effect on Women's Employment in Austria across the Birth Cohorts from 1940 to 1979. *European Sociological Review* (2), 284-302. <https://doi.org/10.1093/esr/jcz058>
- Rostgard, T. & Ejrnæs, A. (2023). Denmark country note. In S. Blum, I. Dobrotić, A. Kowslowksi and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).





- Saarikallio-Torp, M. & Miettinen, A. (2021). Family leaves for fathers: Non-users as a test for parental leave reforms. *Journal of European Social Policy*, 31(2), 161-174. <https://doi.org/10.1177/0958928721996650>
- Sagmeister, M. (2019). Autonomy and Equality in the Context of Parental Labour Rights: A Legal Gender Studies Approach to Mandatory Parental Leave Policies. *University of Vienna Law Review* (3), 93-123. <https://doi.org/10.25365/vlr-2019-3-1-93>
- Saraceno, C. & Keck, W. (2010). Can we identify intergenerational policy regimes in Europe? *European Societies*, 12(5), 675-696. <https://doi.org/10.1080/14616696.2010.483006>
- Saxonberg, S. & Szelewa, D. (2021). Reexamining Degenderisation: Changes in Family Policies in Europe. *The Palgrave Handbook of Family Sociology in Europe*, Springer International Publishing, 179-204. [doi.org/10.1007/978-3-030-73306-3\\_9](https://doi.org/10.1007/978-3-030-73306-3_9)
- Saxonberg, S. (2015). The indirect future influence of the EU on post-communist family policy. *Social Policy and Administration*, 49(4), 512-529. <https://doi.org/10.1111/spol.12145>
- Schmidt, E.-M. & Schmidt, A. (2023). Austria country note. In S. Blum, I. Dobrotić, G. Kaufman, A. Koslowski and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Son, K. (2023). The Origin of Social Policy for Women Workers: The Emergence of Paid Maternity Leave in Western Countries, *Comparative Political Studies*, 57(1), pp. 69-100 <https://doi.org/10.1177/00104140231169024>
- Stropnik, N. (2014). Slovenia country note. In P. Moss (ed.), [International Review of Leave Policies and Research 2014](#).
- Stropnik, N. (2023). Slovenia country note. In S. Blum, I. Dobrotić, G. Kaufman, A. Koslowski, & P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Suwada, K. (2017). It was Necessary at the Beginning to Make This Whole Revolution. Men's Attitudes to Parental Leaves in Sweden and Poland. *Men and Masculinities*, 20(5), 570-587. <https://doi.org/10.1177/1097184X17727571>
- Tobin, J. (2019). Introduction: The Foundation for Children's Rights. In *The UN Convention on the Rights of the Child: A Commentary* (1-20). Oxford University Press. <https://doi.org/10.1093/law/9780198262657.001.0001>
- UN Committee on the Rights of the Child. 2003. General Comment no. 5. General measures of implementation of the Convention on the Rights of the Child. Geneva, Switzerland.
- UNICEF (2024). Implementing and monitoring the Convention on the Rights of the Child. Available at: <https://www.unicef.org/child-rights-convention/implementing-monitoring>
- United Nations (1989). Convention on the Rights of the Child. Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>
- Upite, I. (2023). Latvia country note. In S. Blum, I. Dobrotić, A. Kowalski and P. Moss (eds.), [International Review of Leave Policies and Research 2023](#).
- Wall, K. & Escobedo, A. (2009). Portugal and Spain: two pathways in Southern Europe. In P. Moss and S. Kamemann (eds.), *The politics of parental leave policies*, Bristol, Policy Press, 207-226. <https://doi.org/10.51952/9781847427779.ch013>
- Wall, K. & Leitão, M. (2008). Portugal country note. In P. Moss and M. Korintus (eds.), [International Review of Leave Policies and Related Research 2008](#).
- Wall, K. & Leitão, M. (2009). Portugal country note. In P. Moss (ed.), [International Review of Leave Policies and Related Research 2009](#). Employment Relations Research Series no. 102. London: Department for Business, Innovations and Skills.
- Wong, E., Jou, J., Raub, A.M.Y. & Heymann, J. (2020). Comparing the availability of paid parental leave for same-sex and different-sex couples in 34 OECD countries. *Journal of Social Policy*, 49(3), 1-21. <https://doi.org/10.1017/S0047279419000643>





## ANNEX 1: Literature Reviewed in Chapter 4

- Addati, L. (2015). Extending maternity protection to all women: Trends, challenges and opportunities. *International Social Security Review*, 68(1), 69-93. <https://doi.org/10.1111/issr.12060>
- Addati, L.; Cattaneo, U. & Pozzan, E. (2022). *Care at Work. Investing in care leave and services for a more gender equal world of work*. Geneva: International Labor Organization.
- André, S., Cammu, N. & Meuleman, E. (2025). Fathers, Families, and Society: A Two-Decade Systematic Literature Review on the Contexts and Consequences of Paternity and Parental Leave for Fathers. *Social Sciences* 14: 168. <https://doi.org/10.3390/socsci14030168>
- Blum, S., Dobrotić, I., Kaufman, G., Koslowski, A. & Moss, P. (2023). [19th International Review of Leave Policies and Related Research 2023](#). DOI: 10.25365/phaidra.431
- Brandt, B. & Kvande, E. (2020). *Designing Parental Leave Policy. The Norway Model and the Changing Face of Fatherhood*, Bristol University Press, Bristol.
- Bueno, X. & Oh, E. (2022). How Do Men Talk about Taking Parental Leave? Evidence from South Korea, Spain, and the United States. In M. Grau Grau et al. (eds.), *Engaged Fatherhood for Men, Families and Gender Equality, Contributions to Management Science*, Springer, 165-179.
- De la Porte, C., Im, Z.J., Pircher, B. & Szelewa, D. (2023). The EU's work-life balance Directive: Institutional change of father-specific leave across member states, *Social Policy Administration*, 57(4), 549-563. <https://doi.org/10.1111/spol.12920>
- De Rose, L.F., Goldscheider, F., Brito, J.R., Salazar-Arango, A., Corcuera, P., Corcuera, P.J., Gas-Aixendri, M. (2019). Are Children Barriers to the Gender Revolution? International Comparisons. *European Journal of Population* 35, 987–1021. <https://doi.org/10.1007/s10680-018-09515-8>
- Dearing, H. (2015). Does parental leave influence the gender division of labour? Recent empirical findings from Europe. *Working Papers / Institut für Sozialpolitik*; 1/2015. <https://doi.org/10.57938/2df9b520-453b-4199-8713-a727c2f191de>
- Dearing, H. (2016). Designing gender-equalizing parental leave schemes - what can we learn from recent empirical evidence from Europe? *Zeitschrift für Familienforschung*, 28(1), 39-64. <https://doi.org/10.3224/zff.v28i1.22920>
- Deven, F. & Moss, P. (2005). *Leave Policies and Research Reviews and Country Notes*.
- Dobrotić, I. (2022). The (in)equality dynamic of childcare-related policy development in post-Yugoslav countries. *Journal of European Social Policy*, 32(3), 270-286. <https://doi.org/10.1177/09589287221088167>
- Dobrotić, I. (2023). Parenting Leave Policies and Their Variations: Developments in OECD countries. In Mary Daly et al. (eds.), *The Oxford Handbook of Family Policy Over the Life Course*, Oxford University Press, 678-694. <https://doi.org/10.1093/oxfordhb/9780197518151.013.32>
- Dobrotić, I. & Blum, S. (2020). Inclusiveness of Parental-Leave Benefits in Twenty-One European Countries: Measuring Social and Gender Inequalities in Leave Eligibility. *Social Politics: International Studies in Gender, State & Society*, 27(3), 588-614. <https://doi.org/10.1093/sp/jxz023>
- Duvander, A. Z., Lappegård, T., Andersen, S. N., Garðarsdóttir, Ó., Neyer, G. & Viklund, I. (2019). Parental leave policies and continued childbearing in Iceland, Norway, and Sweden. *Demographic Research*, 40, 1501-1528.
- Earle, A., Raub, A., Sprague, A. & Heymann, J. (2023). Progress towards gender equality in paid parental leave: an analysis of legislation in 193 countries from 1995–2022. *Community, Work & Family*, 1-21. <https://doi.org/10.1080/13668803.2023.2226809>
- Engeman, C. & Burman, S. (2022). Signs of the gender revolution's second phase? Historical and cross-national development of fathers' leave provisions. *Social Policy Administration*, 57(5), 626-641. <https://doi.org/10.1111/spol.12882>
- Escobedo, A. & Wall, K. (2015). Leave policies in Southern Europe: continuities and changes, *Community, Work & Family*, 18(2), 218-235. <https://doi.org/10.1080/13668803.2015.1024822>
- European Commission, Directorate-General for Justice and Consumers, Burri, S., De la Corte-Rodríguez, M., Böök, B. & van Hoof, F. (2024). *The transposition of the Work-Life Balance Directive in EU Member States*





- (II): considerable work still to be done. Publications Office of the European Union. Available at: <https://data.europa.eu/doi/10.2838/33291>
- Finch, N. (2021). Inclusive citizenship and degenderization: A comparison of state support in 22 European countries. *Social Policy and Administration*, 55(7), 1224-1243. ISSN 1467-9515. <https://doi.org/10.1111/spol.12716>
- Fuwa, M. & Cohen, Ph.N. (2007). Housework and social policy. *Social Science Research*, 36(2), 512-530. <https://doi.org/10.1016/j.ssresearch.2006.04.005>
- Geist, C. & Cohen, Ph.N. (2011). Headed Toward Equality? Housework Change in Comparative Perspective. *Journal of Marriage and Family*, 73(4), 832-844. <https://doi.org/10.1111/j.1741-3737.2011.00850.x>
- Haas, L. & Rostgaard, T. (2011). Fathers' rights to paid parental leave in the Nordic countries: consequences for the gendered division of leave. *Community, Work & Family*, 14(2), 177-195. <https://doi.org/10.1080/13668803.2011.571398>
- Hays, S. (1996). *The Cultural Contradictions of Motherhood*. New Haven und London: Yale University.
- Hook, J.L. (2010). Gender Inequality in the Welfare State: Sex Segregation in Housework, 1965–2003. *American Journal of Sociology*, 115(5), 1480–1523. <https://doi.org/10.1086/651384>
- Karu, M. & Tremblay, D.-G. (2018). Fathers on parental leave: An analysis of rights and take-up in 29 countries. *Community, Work and Family*, 21(3), 344–362. <https://doi.org/10.1080/13668803.2017.1346586>
- Kaufman, G. & Grönlund, A. (2021). Displaying parenthood, (un)doing gender: parental leave, daycare and working-time adjustments in Sweden and the UK. *Families, relationships and societies*, 10(2), 213-229. <https://doi.org/10.1332/204674319X15683716957916>
- Lammi-Taskula, J. (2022). Young Parents on Parental Leave in the Nordic Countries. Finnish Institute for Health and Welfare (THL). Discussion paper 13/2022. Helsinki, Finland 2022. Available at: <https://www.julkari.fi/handle/10024/144170>
- Meil, G. (2013). European men's use of parental leave and their involvement in child care and housework. *Journal of Comparative Family Studies*, 44(5), 557-570.
- Meil, G., Wall, K., Atalaia, S. & Escobedo, A. (2022). Trends towards de-gendering leave use in Spain and Portugal. In Dobrotić, I., Blum, S. & Koslowski, A. (eds.), *Research Handbook on Leave Policy*, Edward Elgar Publishing, Cheltenham, 219-231.
- Moss, P. & Deven, F. (2020). Leave Policies in Europe: Current Policies, Future Directions. *International Journal of Sociology and Social Policy*, 40 (5/6), 429-440. <https://doi.org/10.1108/IJSSP-04-2019-0063>
- Musick, K., Bea, M. D. & Gonalons-Pons, P. (2020). His and her earnings following parenthood in the United States, Germany, and the United Kingdom. *American Sociological Review*, 85(4), 639-674. <https://doi.org/10.1177/0003122420934430>
- O'Brien, M. & Wall, K. (eds.) (2017). *Comparative Perspectives on Work-Life Balance and Gender Equality. Fathers on Leave Alone*, Springer, Life Course Research and Social Policies, 6. DOI 10.1007/978-3-319-42970-0\_7
- O'Brien, M. (2009). Fathers, parental leave policies, and infant quality of life: International perspectives and policy impact. *The Annals of the American Academy of Political and Social Science*, 624, 190-213 <http://www.jstor.org/stable/40375960>
- Olsson, M.I.T. et al. (2023). Gender Gap in Parental Leave Intentions: Evidence from 37 Countries, *Political Psychology*, 44(6), 1163-1192. <https://doi.org/10.1111/pops.12880>
- Pizarro, J. & Gartzia, L. (2024). Paternity leave: A systematic review and directions for research, *Human Resource Management Review*, 34(1) (2024). <https://doi.org/10.1016/j.hrmr.2023.101001>
- Saxonberg, S. & Szelewa, D. (2021). Reexamining Degenderisation: Changes in Family Policies in Europe. *The Palgrave Handbook of Family Sociology in Europe*, Springer International Publishing, 179-204. [doi.org/10.1007/978-3-030-73306-3\\_9](https://doi.org/10.1007/978-3-030-73306-3_9)
- Son, K. (2023). The Origin of Social Policy for Women Workers: The Emergence of Paid Maternity Leave in Western Countries, *Comparative Political Studies*, 57(1), pp. 69-100. <https://doi.org/10.1177/00104140231169024>

