

KITEKINTÉS / OUTLOOK

The divergence of paternity leave across EU countries is surprising: a study for 2023

Meglepő eltérések az apasági szabályozás intézményében az Európai Unió országai között: egy 2023-as tanulmány

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KEYWORDS: paternity leave; EU countries; descriptive and comparative analysis

ABSTRACT: Paternity leave is a relatively modern element of parental leave, the form and organization of which depends on the individual preferences of each government and reflects the socio-economic, cultural and political situation in a given country. Although the European Union as a whole represents a unifying element in a number of national economic application issues, significant differences can be identified in the setting of paternity leave. The description of these disparities is the subject of this paper. The synthesis and analysis of the institute of paternity leave in the 27 EU countries is methodologically a surprisingly difficult topic, which has not yet been treated analogously and can be considered very interesting due to the trend of gender equality in the upbringing of children. The aim of the paper is a descriptive analysis of the legislative anchoring of the institute of paternity leave in the 27 countries of the European Union and the subsequent comparison of the length of paternity leave and the financial amount of the state contribution for 2023. However, research on the legislative data was very difficult.

The concept of "paternity leave" is not the same in all the countries examined. It was necessary to look for and verify similar social benefits that were identical to the institute of paternity leave. The language barrier was also related to this problem. Nevertheless, it was possible to identify the necessary data on paternity leave and to make a subsequent comparison. Discussion on the topic is difficult due to the review nature of the article. As already mentioned, a study of this kind has not yet been published. So far, the studies published on the topic of paternity leave have related to psychosocial factors and the importance of the father's participation in the care and



strengthening of emotional ties after birth and in the subsequent period. In the theoretical part of the paper, the authors also present the opinions of foreign authors who deal with the importance of the father's presence in postnatal care and thus emphasize its quantitative and qualitative importance in subsequent upbringing. The use of paternity leave in the EU countries is also depending on the amount of the state support, which varies. This is one of the major obstacles to taking paternity leave. The results of the survey showed that some countries (e.g. Spain) support the institute of paternity leave much more and the paternity leave allowance financially is not reduced from the total salary. The length of paternity leave must also be taken into account, along with the amount of the allowance. A gender-balanced relationship between father and mother in the upbringing and care of a newly born child can be observed in Finland, where the length of maternity and paternity leave is identical. The third position belongs to Bulgaria. The period of paternity leave can be interrupted in all three countries, and the age at which it is mandatory to take paternity leave is also among the more flexible ones.

The cross-country comparisons showed a wide dispersion of partial parameters of the paternity system in the individual EU countries, both in the length of paternity leave and in the amount of the contribution that fathers take as part of paternity leave. At the same time, similarities were found in both examined factors, which could be an inspiration for the eventual unification and modification of this social policy instrument throughout the EU.

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KULCSSZAVAK: apasági szabadság; európai uniós országok; leíró és összehasonlító elemzés

ABSZTRAKT: A „apasági szabadság” a szülői szabadság viszonylag modern eleme, amelynek formája és szabályozása az egyes kormányok preferenciáitól függ, és tükrözi az adott ország társadalmi-gazdasági, kulturális és politikai helyzetét. Bár az Európai Unió számos nemzeti gazdasági intézmény esetében egységesítő szerepet tölt be, az apasági szabadság szabályozásában jelentős különbségek figyelhetők meg az EU országok között. E különbségek bemutatása a tanulmány tárgya. Az apasági szabadság intézményének szintézise és elemzése a 27 EU-tagállamban módszertanilag meglepően nehéz témának bizonyult, mivel nagyon eltérő a szabályozása, ami különösen érdekesnek tekinthető a nemek közötti egyenlőség gyermeknevelésben betöltött szerepének erősödő trendje miatt.

A tanulmány célja az apasági szabadság intézményének jogszabályi rögzítését leíró elemzése a 27 uniós országban, valamint az apasági szabadság időtartamának és a 2023-as állami támogatás összegének összehasonlítása. A jogi adatok feltárása azonban rendkívül nehéz volt. Az „apasági szabadság” fogalma nem egységes a vizsgált országokban, ezért szükség volt olyan hasonló társadalombiztosítási juttatások keresésére és hitelesítésére, amelyek megfeleltek az apasági szabadság intézményének. Ehhez a problémához kapcsolódott a nyelvi akadály is. Ennek ellenére sikerült az apasági szabadságra vonatkozó szükséges adatokat azonosítani és az összehasonlítást elvégezni.

A témáról szóló vita a tanulmány összefoglaló jellege miatt nehézkes. Amint már említettük, ilyen jellegű vizsgálat eddig még nem látott napvilágot. A korábbi tanulmányok az apasági sza-

badság témájában elsősorban pszichoszociális tényezőkkel, valamint az apa részvételének fontosságával foglalkoztak a születés utáni gondozásban és az érzelmi kötelékek erősítésében. A tanulmány elméleti részében a szerzők külföldi szakértők véleményét is bemutatják, akik az apa születés utáni jelenlétének jelentőségét vizsgálják, hangsúlyozva annak mennyiségi és minőségi szerepét a gyermeknevelés későbbi szakaszaiban. Az apasági szabadság igénybevétele az EU-országokban nagymértékben függ az állami támogatás összegétől, amely eltérő mértékű. Ez az egyik fő akadálya az apasági szabadság kihasználásának. A felmérés eredményei azt mutatták, hogy egyes országok (pl. Spanyolország) jóval nagyobb mértékben támogatják az apasági szabadság intézményét, és az apasági szabadság idejére járó juttatás nem csökken a teljes fizetéshez képest. Fontos figyelembe venni a szabadság időtartamát is az ellátás összegével együtt. A nemek közötti kiegyensúlyozott szerepvállalás jó példája Finnország, ahol az anyasági és apasági szabadság időtartama megegyezik. A harmadik helyen Bulgária áll. Mindhárom országban megszakítható az apasági szabadság időtartama, és az igénybevétel kötelező életkora is a rugalmasabb szabályozásúak közé tartozik. Az országok közötti összehasonlítás jelentős szórást mutatott az apasági szabadság rendszerének részparamétereiben az egyes EU-országok között – mind az időtartamot, mind az igénybe vehető támogatás összegét illetően. Ugyanakkor hasonlóságok is felfedezhetők voltak a vizsgált tényezőkben, amelyek inspirációt nyújthatnak e társadalompolitikai eszköz egységesítéséhez és módosításához az Európai Unió egészében.

Introduction

Paternity leave is a specific type of parental leave that allows men - fathers to take time off work to (co-)care for their newborn or adopted child for a certain period of time and to be actively involved in the child's early development. An equally important aspect of this benefit is also the promotion of gender equality in parental responsibilities and the desire to support and share parental responsibilities with the partner. The ideas and basic principles of paternity leave were introduced in the late 1970s and early 1980s by some Scandinavian countries and Belgium, followed by other modern countries, and since then paternity leave policies have continued to evolve and spread to other countries around the world. The aim of the paper is a descriptive analysis of the legislative anchoring of paternity leave in the 27 countries of the European Union and the subsequent comparison of the length of paternity leave and the financial amount of the state contribution for 2023. The achievement of the set goal was limited by the unavailability of up-to-date and unambiguous information, which mostly concerned only national issues and was presented in the mother tongue of the country concerned. This most likely explains the absence of a similar text within the current scientific community.

Given the regionally defined issues affecting EU Member States, the following section focuses on the EU directive on family life support and offers insights into the perception of the EU as a whole on the involvement of fathers in the upbringing of newborn children. The third section of this article contains literature research, and is based mainly on a discussion of the reasons and benefits of paternity leave for society as a whole. The following section is devoted to the methodology used and how the necessary data was obtained. At the same time, a summary table of the

individual parameters of paternity leave in all 27 EU countries for the year 2023 is presented. The fifth chapter is an analysis of selected paternity leave indicators with the aim to objectively identify countries that are "generous" towards paternity leave and by setting up their paternity leave system they declare their desire to support the active involvement of fathers in the care of their newborn children. The last section is devoted to the discussion and conclusion, where the limitations of the research and the presented findings are also highlighted.

Paternity leave in the EU

The pursuit of work-life balance is a noticeable trend today. Employers themselves often try to help their employees to find a work-life balance, for example by allowing their employees to work from home, adjusting their working hours or giving them sick days. From time to time, however, the legislator decides that employers need to be encouraged in this endeavour through new legal norms: the Labour Code contains a number of provisions that support work-life balance. 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 (hereafter Directive 2019/1158/EC) is an expression of that effort (Kopecký 2022).

The biggest complications in terms of work-life balance arise in the case of women, who have lower employment and remuneration than men. Women who have children may not only have to manage work-life balance but also have to incorporate caring responsibilities that may make full-time work unmanageable. This Directive is therefore intended to encourage men to become more involved in family responsibilities, thus making motherhood easier for women (Directive 2019/1158/EC). According to Article 4 of Directive 2019/1158/EC, Member States shall take the necessary measures to ensure that fathers or equivalent second parents, where and to the extent they are recognised by national law, have the right to 10 working days of paternity leave to be taken on the occasion of the birth of a child. Member States may decide whether to allow paternity leave to be taken partly before or after the birth of the child and whether to allow it to be taken in flexible ways. The right to paternity leave may not be subject to a requirement of length of service or duration of employment. The right to paternity leave shall be granted irrespective of the personal or marital status of the worker as defined by national law.

Theoretical background

The topic of paternity leave and the position of fathers in childcare in general has been a topic of discussion in recent years, not only in the public sphere but also in terms of the scientific literature. Fathers' participation in childcare is not only important in promoting gender equality, but can also be important for a better upbringing of the child. To encourage fathers' involvement and participation in childcare, in the 1990s Norway and other Scandinavian countries developed their parental leave systems so that employed fathers had the same access to paid parental leave as mothers (Naz 2010). According to Petts (2018), taking paternity leave or the length of paternity leave is associated with the increased involvement of the father in the child's upbringing. With the birth of a child and the emergence of parenthood and the building of new family ties, the time parents devote to the family is a major factor that determines the quality and quantity of their involvement in child-rearing. Results further suggest that longer leave periods are associated with more involvement in developmental tasks and childcare when children are infants, as well as during the first few years of children's lives (Petts, Knoester 2018). Also, the analysis of Meil et al. (2023) shows that longer paternity leave is associated with greater involvement of fathers in care work and housework, although only in the former case is the effect sustained in the long run. Behavioural patterns set at this critical time of family relationship building can persist for years: for example, according to Nepomnyaschy and Waldfogel (2007), fathers who took 2 or more weeks of leave from work after childbirth were more involved in direct childcare (e.g., changing) even after 9 months. Based on the research by Romero-Balsas (2015) on a sample of 600 fathers who had at least one child since 2007, it was found that paternity leave promotes greater involvement of fathers in childcare.

Recent studies suggest that paternity leave can contribute to the stability of the parental relationship. Paternity leave can signal fathers' commitment to greater investment in family life, which can reduce the burden on mothers and strengthen parental relationships (Petts, Carlson, Knoester 2020; Petts, Knoester 2019). The economically and socially favourable parameters of paternity leave significantly increase the proportion of men taking paternity leave. At the same time, it has been observed that children's school performance improves as a result of the active and responsible involvement of fathers in their upbringing, particularly in families where the father has a higher educational qualification than the mother (Cools, Fiva, Kirkeboen 2015). In addition, a study by Séjourné et al. (2012) pointed out that lack of father involvement in infant care may be significantly related to the intensity of maternal depression after childbirth.

Studies by Amin, Islam and Sakhonchik (2016) show that female employment in private firms is significantly higher in countries that strictly mandate paternity leave than in countries that do not. The study provides an estimate of 6.8% for

this difference. The research was conducted in 33,302 firms in 53 developing countries. Earle et al. (2023) find that the share of the countries providing paid paternity leave globally quadrupled from 13% to 56% between 1995 and 2022, while the share of those providing paid maternity leave increased from 89% to 96%. Nevertheless, significant gender differences in the length of leave remain: only 6% of the total paid leave available to families was reserved for fathers, and a further 11% of paid leave was available to either parent. According to Andersen (2018), paternity leave reduces the gender wage gap within the households, leading to higher wages for mothers.

In addition to the impact of paternity leave on child rearing and development, family relations and the labour market, other traditional lines of research in the field of family policy and paternity leave can be traced. These are mainly comparisons of the development of current policies, or research on the determinants of fathers' decisions on paternity leave from a geographical or economic perspective. In this respect, Daly and Ferragina (2018) examined family policies since 1960, including paid and unpaid paternity leave in 23 developed countries and concluded that Sweden, Belgium, Luxembourg and Spain are the leaders in this field. Marynissen et al. (2019) focused on the pioneering countries Sweden and Belgium while compared fathers' behaviour in relation to paternity leave. They found that in Belgium fathers' decisions about paternity leave were determined by the microeconomic logic of minimising opportunity costs, while in Sweden income level of the father and the nature of his employment were the key factors. Gender equality between partners in terms of their contribution to the household budget was also a determinant of paternity leave in Sweden. Eerola et al. (2019) examined fathers' attitudes towards paternity and parental leave in another Nordic country, Finland. They found that 80% of fathers in this country used some form of parental leave, with the key determinants of this choice being the man's job, the partner's education, family income, the man's desire to have some time off from work, and the man's desire to allow his partner to return to work or school. Several studies, however, have suggested that fathers who take up parental leave also take more responsibility for childcare (Eerola, Närvi, Lammi-Taskula 2022). A reform in another Scandinavian country, Denmark, increased paternity leave pay in 1998. According to Druedahl, Ejrnæs, Jorgensen (2019), this reform increased women's share of women in the labour income within the household by about 1.2% in the years after childbirth. This effect is mainly driven by women employed in the private sector. In Spain, which is also a pioneering country, in 2007 a two-week non-transferable paternity leave with 100% wage replacement, while in 2021, the Spanish "Dads' Month" were introduced and became the social norm for 80% of the employed fathers (Jurado-Guerrero, Muñoz-Comet 2021).

The topic of the development of family policy, including paternity policy, is also relevant in the countries of Central and Eastern Europe, where it is set in the context of the historical development of social and family policy in the post-

communist countries. Thus, on the one hand, the countries of Central and Eastern Europe today constitute an interesting area for research on the development of social policy, but in the early 1990s, it was precisely the transformation, the highly fluid nature of policies and the rapid dynamics of reforms that discouraged some authors from the systematical research of family policy and ex-post clustering of these countries (Szelewa, Polakowski 2008). Support for the individual principles exists in post-communist countries for the notion that the state should be responsible for the social and economic well-being of its inhabitants and for state regulation of the economy, while support is high for some market economy principles, such as free competition and private ownership. In other words, support for some kind of social market seems to prevail among people living in post-communist countries, based on the notion that the state should combine a market economy with relatively generous social policies (Sirovátka, Guzi, Saxonberg 2019).

Robila (2012) generally describes the direction of parental leave in Eastern Europe after the fall of communism as a departure from the attempt to combine motherhood and a woman's career, which was typical of the communist era. Authors such as Robila (2012) and Saxonberg and Szelewa (2007) refer to this direction of development as 'refamilialisation'. As part of this refamilialisation, widely accessible public facilities for children under the age of three began to be reduced and policy focused more on providing financial allowances and extending the length of parental leave so that women could stay at home to care for their children. Thus, many countries in the region have adopted a model that puts men in the role of breadwinner and emphasizes motherhood, childcare and child-rearing as the role of women. Also according to Michoň (2015), family policy in the 'Visegrad' countries has usually been labelled as 'familialistic' because of policies that favoured parental care of young children.

This general pattern of family allowances in Central and Eastern Europe promoted a rather stereotypical division of labour between men and women and did not include incentives such as paternity leave. Since the 1970s, fathers in socialist countries had the possibility to be on parental leave with the mother's consent (Dobrotić, Stropnik 2020). However, the low rate of parental leave uptaken by fathers reflected the dominance of the male-breadwinner model in most families. It was further reinforced by the gender pay gap, which remains one of the widest in the EU (Šťastná, Kocourková, Šprocha 2020; Eurostat 2017). The paternalist welfare system of communism could not simply be dismantled overnight, especially in times where costs of economic transition would primarily be paid by poorer social classes (Cerami 2010). Nevická, Hamulák, Krippel (2021) compared the positions of fathers in the Czech Republic and Slovakia in relation to parental leave and found that the system in the Czech Republic is more similar to the model recommended by the EU, which balances childcare between both parents.

The process of introducing so-called 'paternity' as an exclusive right of fathers started relatively late, mostly after 2000, during the negotiations on the accession of some countries to the EU (Dobrotić, Stropnik 2020). At the same

time, Saxonberg and Sirovátka (2006) found that Czechs and Poles strongly support gender equality in the household and are positive about the view that men should be more involved in housework and childcare, even more so than, for example, Western Europeans. Duda et al. (2022a) cite the introduction of paternity leave from 2010 as one of the reasons why Polish fathers are more interested in childcare than fathers in the Czech Republic, because in the Czech Republic "paternity" leave was enacted only eight years later. Institution of paternity leave is one of the important instruments of family policy in both countries. In the future, we can expect more fathers in the Czech Republic to be interested in paternity leave (childcare), as shown by the development in Poland. The amount of the allowance in Czech Republic is completely inadequate given the current financial needs of families with children, as is the length of paternity leave, which could be at least four weeks. It would certainly be beneficial to take the example of Poland and provide the possibility of varying the use of paternity leave over the one year of the child's age (Duda et al. 2022b).

According to a study by Saxonberg and Maříková (2023) involving 79 Czech and Slovak families, about one third of fathers would ideally want to share part of the leave time while no mothers support this. Furthermore, most men would prefer to share the leave time if there were no economic loss, while few mothers support the idea. Apparently, mothers do not trust fathers. Our interviews give reason to believe that if well-paid father quotas were introduced and more fathers went on leave, mothers would start to trust fathers. The paternity benefit in Slovakia is also higher than in the Czech Republic, amounting to 75% of the daily assessment base per calendar day. In the Czech Republic, the paternity post-natal care benefit is 70% of the daily assessment base per calendar day. However, the Czech Republic has been providing the paternity post-natal care benefit since 1 February 2018, while Slovakia only introduced this benefit on 1 November 2022 (Duda et al. 2023). Bencsik and Juhász (2012) conducted quantitative and qualitative research in Hungary: according to their results it is not unheard of that fathers in Hungary go on so-called childcare or "paternity" leaves: they leave the labour market and take care of their children at home mostly for family commitments. According to Csák and Fényes (2023), children's school performance improves as a result of active and responsible involvement of fathers in their upbringing. Paternity leave is discussed also in other articles by authors from Hungary (Drjenovszky, Sztáray Kézdy 2023, 2025).

The situation is specific in Germany, where paternity leave has only been introduced since 2024. Until 2023, fathers took parental leave. Stöwhase and Shipanova (2016) examined seasonal effects in the use of paternity leave in Germany. The results show that paternity leave within parental leave is taken more frequently in the summer, regardless of when exactly the child is born. Moreover, seasonal effects are more pronounced when the total leave is shorter.

Methodology and data

The main objective of our study is to compare the institution of paternity leaves in the EU countries in 2023 (within the limits of the relevant and available indicators) and to highlight its mutual differences and similarities. This objective could not be achieved without a synthesis of partial information on individual national paternity parameters. Finding this information was crucial, but at the same time it was very difficult and in many moments impossible.

Data on paternity leave in each of the 27 EU countries¹ were individually searched on the web portals of the public institutions of the respective countries (most often in the relevant laws and on the websites of the social security system) and verified, combined or supplemented with data provided by the EU (paternity leave) or OECD (family database) (Table 1). Where the relevant data could not be found within the national sources, these were supplemented from the OECD database². In addition, a number of characteristics were given in individual national languages, where translation alone could lead to misunderstanding or misrepresentation of a particular data point. The comparison of the paternity institution only in 2023 is justified by the facts that many EU countries only introduced paternity leave in 2022 and it often changes formally across the countries in different ways while tracking previous parameters is not always possible. In this context, we reflect on paternity conditions that prevailed in 2023: in some countries paternity leave also changed during 2023, so we present here the information that dominated in terms of duration over that period. Despite the above data collection procedures, some data could not be traced. Finally, it should be added that although great effort has been made to interpret factual and up-to-date information within this text, there is the potential for some information to be incorrect. However, this risk does not diminish the value of the topic, as a similar comparative study has not yet been presented to the scientific community.

Table 1 visualizes the data displayed in the empirical section. For a more comprehensive comparison, original data have been adjusted into 3 indicators: (I) duration of paternity benefit was converted to a weekly basis³; (II) amount of paternity benefit compared to the assessment base is shown as an average benefit rate in percentage terms⁴; and (III) full-rate equivalent indicator (shown in weeks), which is not displayed in the table but is discussed in the following chapter. This is a calculated index that shows how many weeks the paternity leave theoretically lasts in a given country during which the recipient is entitled to an income of 100%⁵. It can be said that the higher the value of this indicator, the more generous is the setting of the paternity benefit (in terms duration and amount) in a given country towards the beneficiaries. At the same time, it provides us with a simple tool for comparing paternity across the group of countries studied in this research. The actual calculations have been rounded to one (or two) decimal places, and the data are primarily presented for the situation where one healthy child is born.

Table 1.: Paternity leave in the EU countries (2023)
 Apasági szabadság az EU-országokban (2023)

Country	Duration of the paternity benefit	Weekly basis (number of weeks)*	Amount of the paternity benefit from the assessment base	Average rate of the benefit (%)**	Possibility of interrupting the paternity leave	Time rule for taking paternity leave (up to what age of the child)	Year of introduction of paternity leave***	The term paternity leave in the national language
Belgium	20 days	2.9	first 3 days 100%, next 17 days 82%	84.7	Yes	onset within 4 months of the child's birth	1978	congé paternité
Bulgaria	2 months and 15 days	10.7	90% (15 days), 780 BGN (2 months)	87.6	Yes	onset until the child is 8 years old	2009	отпуск по бащинство (otpusk po bashinstvo)
Czech Republic	14 days	2	70% of the reduced daily assessment base per calendar day	70	No	onset within 6 weeks of the child's birth, exceptionally until the child is 1 year old	2018	otcovská dovolená
Denmark	14 days	2	various, cannot be specified	50.7**	not traceable	onset within 14 days of the child's birth	1984	fædreorlov
Estonia	30 days	4.3	various, cannot be specified	100**	not traceable	onset 30 days before the expected birth and up to three years of age of the child	2002	isapuhkus
Finland	160 days	22.9	various, cannot be specified	62.8**	Yes	onset from birth to 2 years of age of the child	1978	vanhempainvapaa

Country	Duration of the paternity benefit	Weekly basis (number of weeks) *	Amount of the paternity benefit from the assessment base	Average rate of the benefit (%)**	Possibility of interrupting the paternity leave	Time rule for taking paternity leave (up to what age of the child)	Year of introduction of paternity leave***	The term paternity leave in the national language
France	25 days	3.6	various, cannot be specified	91.4**	Yes	onset from birth until the child is 6 months old	2002	cong� de paternit�
Croatia	10 weekdays (15 days in multiple births)	2	100%	100	No	onset from birth until the child is 6 months old	2022	o�inski dopust
Ireland	2 weeks	2	fixed amount 262�/week	25.7**	No	onset from birth until the child is 6 months old	2016	paternity leave
Italy	10 weekdays + 1 extra day (20 days in multiple births)	2	100%	100	not traceable	onset from birth until the child is 5 months old	2012	congedo di paternit�
Cyprus	2 weeks	2	100%	100	No	within two weeks after the end of the mother's maternity leave	2017	�δεia πατρ�ριτας (�deia patr�ritas)
Lithuania	30 days	4.3	77.58%	77.6	Yes	onset from birth until the child is 1 year old	2016	t�vyst�s atostogos/t�vyst�s i�moka

Country	Duration of the paternity benefit	Weekly basis (number of weeks)*	Amount of the paternity benefit from the assessment base	Average rate of the benefit (%)**	Possibility of interrupting the paternity leave	Time rule for taking paternity leave (up to what age of the child)	Year of introduction of paternity leave***	The term paternity leave in the national language
Latvia	10 days	1.4	80%	80	not traceable	onset from birth until the child is 6 months old	2004	paternitātes atvairinājums / paternitātes pabalsts
Luxembourg	10 weekdays (in multiple births entitlement to full paternity leave for each child)	2	first two days 100%, from day 3 individually	100**	yes, but there must be an agreement between the employer and the employee, otherwise no	onset from birth until the child is 2 months old	2018	congé de paternité
Hungary	10 days (days in multiple births 12 days)	1.4	100% for the first five days and 40% of wages thereafter	70	Yes	onset within two months after the birth or adoption of the child	2002	apaszági szabadság
Malta	10 days	1.4	100%	100	not traceable	onset within the first 15 days of the child's birth	2022	leave tal-paternità

Country	Duration of the paternity benefit	Weekly basis (number of weeks) *	Amount of the paternity benefit from the assessment base	Average rate of the benefit (%)**	Possibility of interrupting the paternity leave	Time rule for taking paternity leave (up to what age of the child)	Year of introduction of paternity leave ***	The term paternity leave in the national language
Germany	the paternity leave concept has not been introduced in Germany in 2023							
Netherlands	6 weeks	6	100% in the first week, 70% in the next 5 weeks	75	Yes	1 week to use up within 4 weeks after birth, then 5 weeks to use up within 6 months after birth	2001	vaderschapsverlof
Poland	2 weeks	2	100%	100	Yes	onset from birth until the child is 12 months old	2010	urlop ojcowski
Portugal	28 days	4	100%	100	yes	7 days, immediately after the birth of the child 21 days, within 42 days after birth	2009	licença parental inicial exclusiva do pai

Country	Duration of the paternity benefit	Weekly basis (number of weeks)*	Amount of the paternity benefit from the assessment base	Average rate of the benefit (%)**	Possibility of interrupting the paternity leave	Time rule for taking paternity leave (up to what age of the child)	Year of introduction of paternity leave***	The term paternity leave in the national language
Austria	1 month	4.3	various, cannot be specified	24.4**	n not traceable	onset from birth until the end of the mother's employment ban	2019	vaterschaftsurlaub (papamonat)
Romania	10 week-days, can be extended by 5 working days for each additional child	2	100%	100	Yes	leave can be taken at any time after childbirth up to eight weeks of age	2000	concediul paternal
Greece	14 days	2	100%	100	n not traceable	paternity leave may (a) be granted either 2 days before the expected date of birth, with the remaining 12 days granted in whole or in part immediately after the birth of the child; (b) all of the paternity leave is granted after the date of birth of the child	2000	adeia patrititas (Άδεια πατρότητας)

Country	Duration of the paternity benefit	Weekly basis (number of weeks) *	Amount of the paternity benefit from the assessment base (%)	Average rate of the benefit (%)**	Possibility of interrupting the paternity leave	Time rule for taking paternity leave (up to what age of the child)	Year of introduction of paternity leave ***	The term paternity leave in the national language
Slovakia	14 days	2	75	75	Yes	onset within 6 weeks of the child's birth	2022	otcovská dovolenka
Slovenia	15 days (in multiple births is extended for another ten days)	2.1	100	100	not traceable	onset from birth until the child is 3 months old	2002	očetovski dopust
Spain	16 weeks	16	100	100	Yes	onset from birth until the child is 1 year old (the first 6 weeks must be used immediately, the next 10 weeks can be used until the child is one year old)	2007	permiso de paternidad
Sweden	10 days days in multiple births 20 days)	1.4	78	78	not traceable	onset from birth until the child is 2 months old	1980	pappaledighet

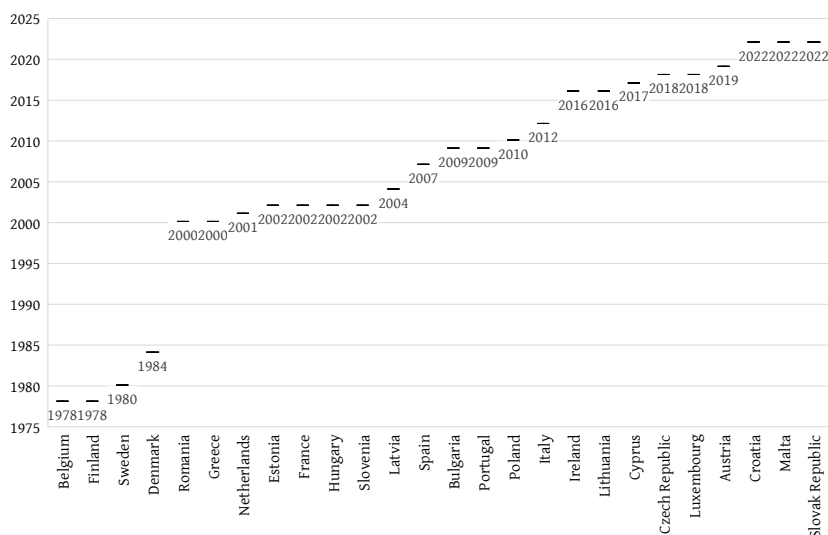
Source: based on references [3-4], [6], [8], [11-13], [24], [27], [29-31], [33-34], [36-37], [44-46], [51-53], [59], [62], [66-69]

* conversion to number of weeks (i.e. 7 days), ** taken from the OECD family database in many cases, *** the year of introduction (although it was not always comprehensive paternity leave as we know it today)

Paternity leave in EU countries: description and analysis

As mentioned above, the first principles of paternity were introduced in the states of Northern Europe and in Belgium (Figure 1). Romania and Greece introduced paternity leave 16 years later, followed by other countries. In 2022, the last EU members to implement the leave were Croatia, Malta and Slovakia. Germany is the only one to introduce the institution of paternity leave as such only in the recent year (2024). There is no geographical-economic logic (beyond the Scandinavian countries right at the beginning) in the implication of paternity leave.

Figure 1.: Year of introduction of paternity leave in 26 EU countries
Az apasági szabadság bevezetésének éve az EU 26 tagállamában



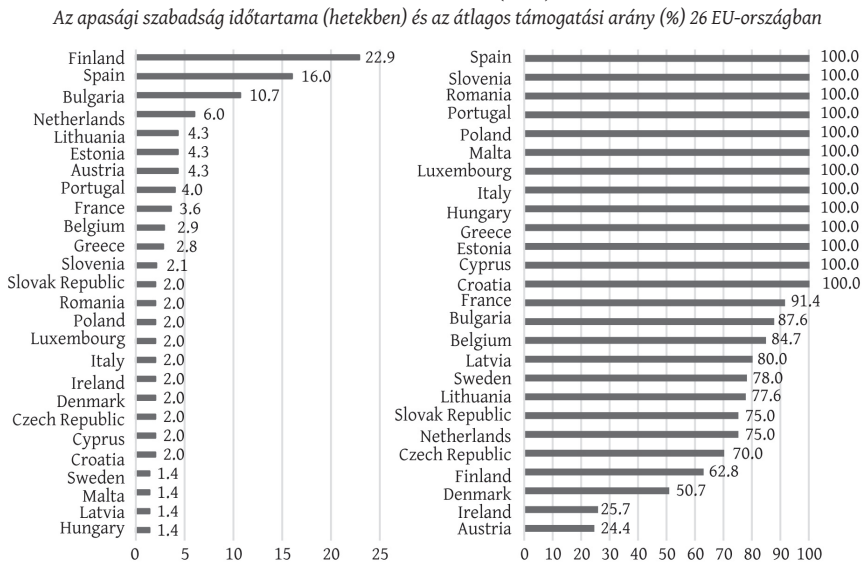
Source: authors' compilation based on a combination of sources

Duration of paternity leave (see the first part of Figure 2) averaged 4.2 weeks in 2023 for the countries surveyed, largely due to the outliers of Finland (over 22 weeks) and Spain (16 weeks). The modus and median of this indicator is 2, i.e. the normal length of paternity leave in EU countries is 2 weeks. The shortest possible duration of paternity leave is 10 days, i.e. 1.4 weeks. Let us add here that it is usually possible to divide the time spent on paternity leave into two or more periods (in 12 cases): for 9 countries it was not possible to find this information and 5 countries do not allow this option at all. Beyond that, the most common rule is that fathers must take paternity leave within 6 months of the birth of the child (see Table 1).

Another parameter concerns the recalculation of the rate received by men on paternity leave (see the second part of Figure 2). This is a percentage of the value

that fathers normally receive in the form of cash income per month. In 12 countries, this rate is 100%, i.e. replacement income of men on paternity leave financially is not different from the normal one. In Ireland and Austria, recipients of paternity pay are expected to receive the least, but here data were taken from the OECD because it was not possible to determine this percentage directly from the original data⁶. This rate averaged 82.8% across all the 26 countries, with a median of 89.5%.

Figure 2.: Duration of paternity leave (in weeks) and average payment rate (%) in 26 EU countries (2023)



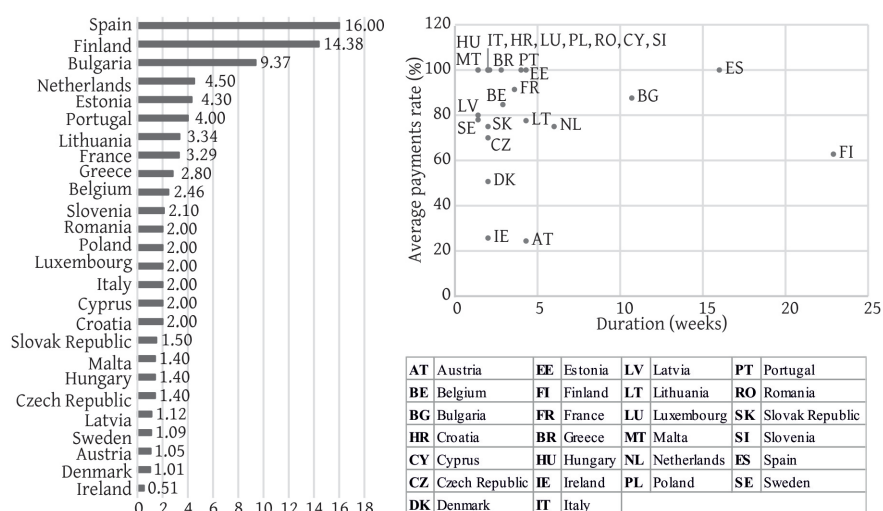
Source: authors' compilation based on a combination of sources

As there can be significant differences between the duration of paternity leave and the rate paid to paternity leave recipients across countries, it is problematic to say whether it is better if the recipient receives 100% but the paternity leave lasts only 2 weeks, or the recipient receives 80% for 4 weeks. Therefore the two indicators are presented together and graphed in interaction (Figure 3). Logically, it can be said that the "generosity" of the paternity leave system is greater the longer it lasts and the higher its financial valuation in relation to the wages foregone. It means that countries perform better on paternity leave the further they are from the origin of the two main axes (second part of Figure 3), or as measured by the full-rate equivalent indicator at its highest value (first part of Figure 3). In this way, the relationship of the state to the institution of the family and to the support of the role of fathers in society is clearly manifested. Through this index, the best performing country in terms of

the paternity system is Spain, which provides fathers with 16 weeks of 100% financial compensation. A fully gender-balanced relationship between father and mother in the upbringing and care of a newborn child is found in Finland, where the length of maternity and paternity leave is identical. However, the father receives only about 63% of the financial compensation for the lost wages. The third position belongs to Bulgaria. In all these three countries recipients can interrupt the period of paternity leave, and the child's age at which paternity leave is due is also among the higher ones.

Figure 3.: Full-rate equivalent and interaction of indicators of paternity leave in 26 EU countries (2023)

Teljes összegű egyenérték és az apasági szabadság mutatójának összefüggése 26 EU-országban

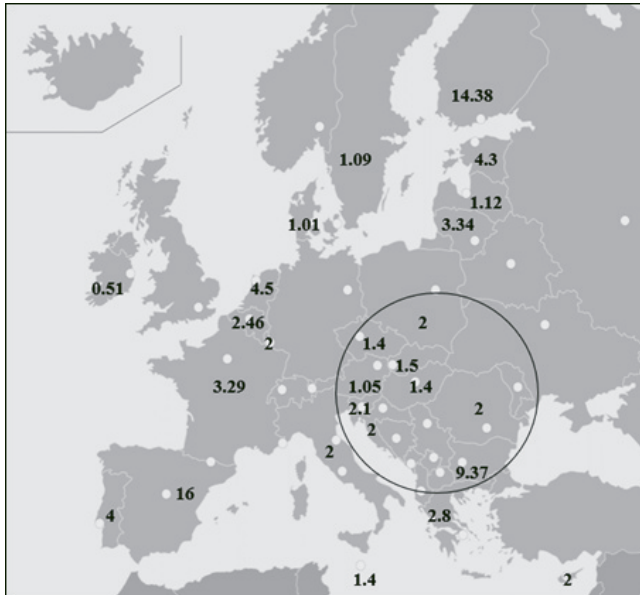


Source: authors' compilation based on a combination of sources

The figure above shows that the paternity systems were independent of the geographical arrangement of the countries in Europe, and on the face of it, unrelated to the economic or political situation of the country in question (Figure 4). Econometric similarities cannot be identified between the Scandinavian, Baltic, Southern European or Benelux countries. Former Eastern Bloc countries show some degree of similarity in the full-rate equivalent parameter, with its value ranging from 1.05 to 2.1. The exception is Bulgaria, which is significantly higher in the value of the indicator: Bulgaria's full-rate equivalent is at 9.37 and fathers can take more than 10 weeks of leave there. There is an even greater degree of agreement across the Visegrad Four countries (Czech Republic, Slovakia, Hungary and Poland), with indicator values ranging between 1.4 and 2. These relatively low values result from the short duration of the 'leave', which does not allow for long-term care of the newborn child but covers only the critical first weeks. In all

countries, the possibility of taking paternity leave is linked to employment or participation in social security system. The father must be employed, self-employed or pay insurance voluntarily. Interestingly, these four countries did not integrate paternity pay into their social systems at the same time: Slovakia introduced it 20 years after Hungary and Poland (both countries introduced paternity pay in 2002). In the Czech Republic, paternity pay came to life in 2018. In the Visegrad Four countries, as well as in other European countries, paternity leave is designed to support the family primarily in the early weeks of the child's life, although the extent and conditions vary across the countries depending on national legislation and social systems. Paternity leave and allowance have both symbolic and practical value, reflecting the efforts to support families and emphasise the importance of fathers' involvement in childcare.

Figure 4.: Full-rate equivalent of paternity leave in 26 EU countries (2023)
 Az apasági szabadság teljes összegű egyenértéke 26 EU-országban



Source: authors' compilation based on a combination of sources

As a potential follow-up research on the evolution of the parameters of the institution of paternity, it would be interesting to see how individual countries in the two-dimensional space of the right graph of Figure 3 have moved over time and whether any common trends in modern approaches to fatherhood can be identified. However, tracking down the necessary data would be very difficult. Further research could complement the existing one (presented here) by analysing public spending on paternity pay as a share of the total social security budget, including an analysis of the actual take-up among potential beneficiaries.

Confronting these findings with those presented here could provide a more appropriate and comprehensive picture about the attitude of a given state and its citizens towards the institution of paternity leave.

Discussion and conclusion

Discussion of the topic is difficult due to the review nature of this article. As already mentioned, no similarly designed study has been published to date. Previous studies were concerned with determining the reasons and interrelationships why fathers take paternity leave and how this affects the whole family, mainly the children and their mothers. A comprehensive analysis for all 27 EU countries in terms of any paternity leave variables is missing.

Finally, it is necessary to highlight the limitations of the research and the findings. Given the continuous development of family policy, it can be assumed that the individual determinants of paternity leave in EU countries will change continuously (e.g., see the case of Germany). This would be directly reflected in the analysis and the conclusions drawn from it. Therefore, it should be noted that the content of this article only applies to 2023. The research uncertainty also relates to the data itself (see the related section). It has not always been possible to directly trace specific data from national documents and systems of individual countries and confront them against other sources for their relevant verification: these had to be fully taken from the OECD, even with the risk that the data may not be objectively correct and may have errors.

The cross-country comparisons showed a wide dispersion of partial parameters of the paternity system in the individual EU countries, but at the same time, certain similarities that could be an inspiration for the potential unification and adjustment of this social instrument throughout the EU could also be observed: the paternity benefit should be at the level of 100% compared to the assessment base and its duration should be (at least) 2 weeks.

In conclusion, paternity leave is of great importance in strengthening family relations and creating positive bonds between father and child. Existing research confirms that fathers' participation in childcare is of undeniable importance in strengthening family ties and promoting the healthy psychosocial development of the child. Another factor that cannot be ignored in the modern society is that the decision to take paternity leave or not depends on the family's financial situation. For these reasons, some EU countries (e.g. Spain, Croatia, Poland) are also more socially empathetic and provide fathers with the same amount of paternity leave as their salary. Length of paternity leave and flexibility in drawing it also make a difference. Spending two weeks with the newborn child may help mothers in the six-week period to focus on their needs and the needs of the child, but it is not enough to strengthen the parental relationship between

the father and the newborn child. Spain, Finland and Bulgaria are the countries that give fathers more space to share the care of their newborn children. Most EU countries allow fathers to take paternity leave for ten days after the birth of the child, and in some countries up to six months or up to a year of the child's age.

The results of the descriptive analysis show how EU countries are able to use the family policy instrument – paternity leave – in strengthening and consolidating family ties and how they respond to the needs of both parents to participate in child rearing. The results, which were difficult to obtain from legislative sources or from the official websites of the social security offices in the EU countries, provide a good base for further qualitative research.

Notes

1. A specific situation arose in Germany where there was no paternity leave in 2023: it only became applicable in 2024. In 2023, fathers "shared" the care of their children under the so-called parental leave for fathers. For this reason, Germany was not included in the comparative analysis.
2. Unfortunately, we have found that even the data from the OECD Family Database are not always correct: this is the case, for example, in the Czech Republic.
3. Duration of paternity leave was reported in different formats in different countries: e.g. in working days, calendar days, weeks, etc.
4. The average rate reflects both the amount of paternity benefit compared to the assessment base and the duration of the claim. Where the rate could not be determined mathematically, it was taken from the OECD family database.
5. Mathematically, the full-rate equivalent can be defined as duration/average payments rate*100.
6. It is therefore questionable whether the data is actually relevant.

Acknowledgement

This paper was supported by the project SGS/19/2024 “Social security systems in selected European countries with a focus on maternity, paternity and parenthood“.

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