

The Nordic Model of Father Quotas in Leave Policies: a Case of Policy Transfer?

Jana Windwehr, Ann-Zofie Duvander, Anne Lise Ellingsæter, Gudny Björk Eydal, Ziva Humer and Hideki Nakazato

Abstract

This contribution asks whether the most recent innovation of Nordic family policies, the so-called father quota, has been an object of policy learning in countries that followed the Nordic example of leave policies earlier, such as Germany, Slovenia, and Japan. Our case studies show that analyses of policy learning, especially in the social field, need to take into account the specific contexts and actor constellations in ‘export’ and ‘import’ countries. Rather than representing a blueprint, the Nordic father quotas have served as an inspiration within messy and fragmented processes of policy learning leading to hybrid arrangements in import countries.

Introduction

In the whole OECD area, an almost universal weakening of the male breadwinner model has occurred (Daiger von Gleichen and Seeleib-Kaiser 2018; Ferragina and Seeleib-Kaiser 2014). The emerging dual earner – dual carer model of the Nordic welfare states, aimed at the equal engagement of mothers and fathers in paid and unpaid work, has gained attention in international policy debates (e. g. Gornick and Meyers 2008; Lister 2009). Policies supporting mothers as earners, including the socialization of family care responsibilities, in which the Nordic countries were pioneers, have become more extensive in many countries. The more recent Nordic welfare state innovation – the so-called father quotas – of individual, non-transferable leave entitlements given to each parent to make parents share caregiving more equally is on the move, as reflected, for example, in the 2019 Council of the European Union adoption of the *Directive on Work-Life Balance for Parents and Carers*. The directive includes an individual right to four months of parental leave, of which two months are non-transferable between the parents and paid. Member states have three years to adopt laws etc. to comply with the directive. The two non-transferable months in the directive are formally

gender-neutral but will in practice mainly imply a father quota, as mothers most often already use their length of quota.

There is a growing literature on father quotas where some countries, including Germany, Slovenia, and Japan, are understood to have attempted a ‘Nordic turn’ in emulating such policies (e. g. Erler 2009; Karinus and Stropnik 2009; Rush 2015). We see the father quota as a new and interesting focus for comparative social policy analysis that might contribute to new knowledge about policy dynamics, and more particularly to the growing importance of policy transfer in family policy reforms. In recent years, some contributions have already addressed this new field. These new perspectives locate the study of fatherhood within the broader comparative literature on welfare state regimes (Johansson and Andreasson 2016; Eydal and Rostgaard 2016). Nordic models of fatherhood and parental leave have evolved over several decades (Ellingsæter 2018; Rush 2017). The parental leave schemes of Nordic welfare states with father quotas imply changing norms and expectations of what fatherhood entails and in addition are found to enable gender equality in families and labour markets (Arnalds, Eydal and Gíslason 2013; Brandth and Kvande 2018; Duvander and Lammi-Taskula 2011). But differences between Nordic countries have also been pointed out, not least in development over time, coherence of policy and eligibility of father quotas (Ellingsæter 2014; Leira 1992).

The study of the spread of father quotas is particularly interesting since these rather radical policies have originated and matured within the specific Nordic welfare state context, where they seem to work well – father quotas are used in practice and have contributed to new fatherhood norms. The question is what happens when this type of parental leave model is transferred into other country contexts – what are the possibilities, limits and framework conditions when instituting father quotas?

We investigate this question in a comparative case study where father quotas in Iceland, Norway, and Sweden are compared with countries that have implemented some father quota variant – in particular Germany, but also Japan and Slovenia. First, can we talk about a Nordic father quota model? Second, what do the current father quota variants in Germany, Japan and Slovenia look like, and what were the driving forces behind their introduction? How did Nordic quota ideas and experiences influence policy processes in these countries?

Analytical Framework: Policy Transfer, Neo-institutionalist Insights and the Specificities of Father Quotas

The literature on policy transfer and learning will be used here to understand the possibilities, limits, and framework conditions of cross-national policy ‘imports’ and ‘exports’. This strand of research, however, is still rather diverse. For the purpose of this paper, we use the by now almost classical definition by Dolowitz (2000), who understands policy transfer as ‘a process by which knowledge of policies, administrative arrangements, institutions, and ideas in one political system is used in the development of similar features in another’ (Dolowitz 2000). Policy transfer can then be seen as one way to explain policy convergence.

However, a widely held assumption is that there are limits of any transfer process with a view to social policies: ‘Domestic social and employment regimes cannot be directly changed from the outside’ (Heidenreich 2009, 19). Due to the complexity of welfare state programs, path dependencies including institutional and structural restraints, ideological differences and the technical, financial, administrative resources etc., policy transfers take place within a complex setting that often prevents the copying of alleged ‘best solutions’.

Regime theory and the neo-institutionalist concept of path-dependency, i. e. the continued importance of political choices once taken and the mechanisms that keep policies on the same path (Mahoney 2000), have therefore dominated the study of welfare state development in recent years. Institutions have been viewed as difficult to change, they are mostly seen as stable politics only periodically punctuated by external shocks (Mahoney and Thelen 2010). While path dependency and ‘frozen landscapes’ of welfare state arrangements represent the normal operating mode from this point of view, change becomes more probable in situations where weaknesses of the previous system become visible. At such ‘critical junctures’, routines are discredited as they no longer promise to explain real developments, to provide adequate solutions to current challenges, and thereby to deliver the desired outcomes. In such a setting, political and societal resistance can more likely be overcome, leading to modifications or the leaving of the established path (e. g. Saurugger and Terpan 2016; Vis, van Kersbergen and Hylands 2012).

From our point of view, this is where neo-institutionalist assumptions of change occurring mostly at critical junctures and insights from the policy transfer literature meet: inspirations

from other countries, from subnational units etc. can be incorporated in reform processes especially in situations where the original policies are already challenged.

Dolowitz and Marsh (2000, 13) further distinguish four different types of policy transfer:

- copying (a full takeover of the model)
- emulation (the takeover of ideas behind a certain measure only)
- synthesis (of different policies)
- inspiration (where the final result does not correspond to the original).

Policy transfer in the field of family policy, including the evolution of earmarked leave for fathers, takes place within an especially deep-rooted national, religious and cultural context, making a partial transfer of policies much more likely than a full takeover of other countries' solutions. Our comparison involves policy learning and transfer among cases that are rather similar (three Nordic countries) and quite different (Germany, Japan, Slovenia), which is advantageous for a 'contextualized comparison'. The fact that images of family, motherhood and fatherhood differ markedly among (several clusters of) industrialized countries sets boundaries for learning processes, at least in the medium term, and might help to explain seemingly incomplete reforms and incremental convergence only. This makes father quotas in parental leave systems a natural candidate for the phenomenon of 'messy' policy transfer across dissimilar contexts.

While the 'involved' father is becoming an ideal in many Western societies, the introduction of policies to facilitate men's increased involvement in childcare reflects different models of welfare provision and levels of ideological commitment (Dermott and Miller 2015; Johansson and Andreasson 2016). The Nordic countries stand out with their earmarked, well compensated parental leave for fathers. Reflecting changing expectations of what fathers can and should do, policies do not only facilitate fathers' care activities, but also provide 'discursive tools', where e. g. the terminology of a 'daddy quota' signals paternal responsibility (Dermott and Miller 2015, 187). However, substantial variations in Nordic parental leave systems are often overlooked (Johansson and Andreasson 2016). Other countries have followed suit, often with less generous policies, indicating some broad shifts in expectations of fathering beyond breadwinning. Evidently, the development of father quotas interacts with structures and cultures of broader society, influencing what is regarded as possible and desirable (Dermott and Miller 2015).

Diane Stone (2017) challenges the existing literature on policy transfer that indeed often presumes that when policy transfer occurs internationally, best practices or superior standards are being transferred, that is, the policy success of one country is being transferred to another. She wants to abandon the linear perspective of country A sending a certain policy to country B (e. g. Nordic countries exporting their father quotas to other countries) and to shift to a stronger analytical focus on the messy processes of hybrid policies emerging from multiple exemplars, as well as the messy interpretative processes when importing countries translate and amend transferred policies. We adopt these criticisms as well as the idea of ‘messy’ processes of policy transfer in which existing local as well as borrowed ideas and instruments come together in complex processes of drafting and implementation and result in new hybrid policies.

FIGURE 1

Methodology

Our choice of countries was made on the basis that Iceland, Norway, and Sweden are three Nordic welfare states that have instituted three-months father quotas. These are the most generous and advanced models of Nordic fatherhood, gender egalitarianism and parental leave. Use of father quotas is high, and one may describe a common model of parental leave and fatherhood policy, even though differences are also present. As a second step, we have chosen ‘import countries’ which have changed their leave policies substantially in recent years but have a very different background: our main case is Germany, an ideal type of European conservative corporatism where the family policy regime has undergone major changes in the past two decades, including an – albeit rather soft – father quota element. In order to illustrate variation in policy paths and processes in countries with framework conditions very different from Germany, we also include Japan as an East-Asian welfare state and Slovenia as a Central-Eastern European country with a socialist family policy legacy.

In order to trace whether and how policy transfers from the Nordic countries have indeed taken place in these three cases, we first delineate a ‘Nordic model of leave and fatherhood policies’ by comparing the three selected Nordic countries’ current arrangements, their respective origins as well as possible intra-Nordic references and learning processes. For Germany, Japan, and Slovenia we also present the current state of leave arrangements with a special focus on father quotas and then compare the paths that these three countries have

taken, especially whether there is evidence for learning from the Nordic countries. To that end, we trace references to and overlaps with the Nordic model in national discourse (parliamentary debates, media) and documents (e. g. by reform commissions).

Father quotas and the Nordics

Schemes and Take-up: Similarities and Differences

Although today's (2020) paid parental leave schemes in the Nordic countries share basic similarities, there are also variations by length, payment, quotas, and flexibility in usage (see Table 1). In all three countries, the term father quota is in fact not quite accurate as the quotas are formally – but much less so in practice – gender-neutral and fathers and mothers have a similarly long quota or reserved period of at least twelve weeks, like in Sweden, while Iceland has seventeen weeks from 2020, and Norway fifteen weeks since 2018, even if the length has changed back and forth in the last decade, coinciding with the changes in Norwegian government (Ellingsæter 2018). The rest of the leave period can be shared between parents as they wish. As the length of leave is almost twice as long in Sweden as compared to Iceland, there are large variations also in how much leave is available to fathers. The relatively shorter leave in Iceland is proposed to be extended, as are also the months reserved for each parent (Alþingi 2019), while in Sweden and Norway there is no strong debate for extending the leave or the father quota further.

In all the countries eligibility is by work or residence, but in Norway, fathers' access to leave is conditioned on the mother's economic activity before and after the birth of the child. Such conditioning is in stark contrast to Iceland and Sweden where fathers' rights to leave are purely individual. The parental benefit is based on earnings replacement in all countries and can be said to be fairly well paid in all three countries, but ceilings and benefits for non-employed parents do vary (Duvander et al. 2019). Another important dimension of the parental leave is flexibility, which varies between the countries. They all provide some flexibility, but the Swedish policy is the most flexible in the sense that leave can be used throughout the preschool years (Duvander et al. 2019, Arnalds et al. 2013).

The parental leave use among both mothers and fathers is high in all Nordic countries, but the different set-ups make a difference. In Sweden, practically all mothers use parental leave, and when the father quota was introduced in 1995, the share of fathers using leave during the first two years of the child's life increased overnight from forty-four percent to seventy-seven

percent (Duvander and Johansson 2012). Today, almost nine out of ten fathers use leave, and often longer than the quota with an average of over one hundred days. In Norway, fathers' take-up has followed each quota extension/cut closely (Schou 2019), so when the father quota was cut from fourteen to ten weeks in 2014, fathers reduced their take-up, at least temporarily. Also in Iceland, practically all mothers use their quota and most of the joint period. From the year 2001, over ninety percent of all fathers have made use of their quota, from 2003-2009 taking about a hundred days, but the number of days taken by fathers decreased to eighty-five to ninety - days after the 2008 financial crisis when benefit levels were cut due to austerity measures (Arnalds, Duvander, Eydal, and Gíslason 2019).

Different Trajectories – which Role of Nordic Cooperation?

Today, all three Nordic countries have a clear aim of gender equality closely tied to the set-up of parental leave, including father quotas, but their trajectories to the current situation were different. Sweden's family policy has its origin in the 1930s as part of the development of the welfare state, but the origin of today's parental leave can be traced to the 1960s with growing concerns over gender equality. In the beginning of the 1970s, debates over gender equality ended in cross-party support for a dual earner policy, where the earlier maternal leave was replaced by a parental leave (Lundkvist 2011). Parental leave was also motivated by a high demand for female labour in a fast expanding public sector (Stanfors 2007). When the level of mothers' labour force participation increased, the focus shifted to fathers' participation in childcare. The parental leave was incrementally prolonged in the coming decades at the same time as fathers' share of the leave increased slowly until the father quota was introduced in 1995. Opposition to the quota soon weakened and prolongations of the quota were introduced in relative political consensus (Duvander and Johansson 2012).

In Norway, the Social Democrats instituted a family policy shift towards supporting working mothers and the aim of gender equality in the mid-1970s, which was met with opposition from the center-right parties. When in 1977 maternity leave was converted into parental leave, fathers' access to benefits was conditioned on the mothers' eligibility. Few fathers took any parental leave, but it was stated as an important goal that fathers 'take a real responsibility for the daily care of children' (White paper no. 70 (1991–1992), 30). Thus, in 1993, a non-transferable father quota of four weeks was introduced, at the same time as the leave length was extended. The right-wing parties (Conservative Party and Progress Party)

contested its enactment. Struggles between quota advocates and opponents continued, resulting in both expansion and entrenchment in the quota length (Ellingsæter 2020).

Iceland has historically taken a different path compared to the other Nordic countries, with smaller welfare expenditure and less public support to families. Iceland enacted its first legislation on universal entitlement to three months of paid parental leave in 1981, but the period was gradually extended to six months between 1988 and 1990. Mothers could transfer thirty days to the father, but that hardly ever happened (Eydal and Gíslason 2008). In the year 2000, a new legislation was enacted, giving each parent the entitlement to a three months quota and then both parents three joint months that they can decide how to share. The aim of the law is twofold, ‘to ensure children’s care from both parents and to enable both women and men to co-ordinate family life and work outside the home.’ The bill was presented by a coalition government right of the center and there was strong consensus in support of the law (Arnalds et al. 2013). The law is also seen as a more radical shift in comparison to more gradual change in Norway and Sweden.

The family policies of the three countries have for a long period emphasized gender equality, first by facilitating mothers’ work but soon turning the focus to fathers’ childcare participation. Children’s rights have increasingly been emphasized: for example, the aim of the current Norwegian parental leave is to secure children a good and safe start into life, and to enable mothers and fathers to combine childcare and employment (Prop. 74L (2017–2018)). Another tendency over time is to ensure gender-neutral rights to also same-sex parents (Arnalds et al. 2013).

The public and policy debates have varied. In Sweden, it is fair to say that the individualized basis of parental leave rights is an unchallenged part of the Swedish welfare state and national social insurance, while ‘details’ like the number of reserved months for each parent and the benefit levels may be discussed (Government Commission 2017). In Norway, both the length and existence of the father quota have been debated. The 2018 increase in the father quota to fifteen weeks caused a polarized public debate (Ellingsæter 2020). Parental choice was one of the opponents’ arguments, while mothers’ opportunity to breastfeed according to recommendations was another. The Icelandic debate has been concerned with length and, after the crisis, the restoration of the level of benefits. As the leave has been relatively short, the care gap is a major issue and in the last decades, both longer quotas and

longer leave have been discussed and promised by various political parties (Eydal and Gíslason 2014).

Despite differences in timing and the set-up of father quotas and the corresponding debates, there is no doubt that policies in the Nordic countries influence each other. This takes place by various formal channels, such as the Nordic Council of Ministers, including its cooperative body Nordic information on gender (NIKK.no), and the Nordic Gender Equality Fund (see Norden.org). The solid collaboration at all levels facilitates knowledge exchange and makes it very likely that Nordic discussions lead to similar outcomes in many policy areas. One of the prioritized policy areas for collaboration is gender equality, and another is children and young people. Informational briefs in the style of promoting the idea of a unique Nordic model in this field are also part of this discourse, e. g. the Nordic Council's campaign 'Create your own Nordic gender effect'. Such discussions and framings of gender equality have for a long time been focused on fathers' roles. A recent example can be found in the publication 'The state of Nordic fathers'. In addition, it is important to mention the annual collection of Nordic harmonized statistics including for example the labour market participation and fathers' parental leave use.

A cultural closeness, a to a large part similar language base and history also make the less formal collaboration lively. There is an open Nordic labour market, an open academic area and close connections between researchers in most fields, not least the one relevant here. Therefore, Nordic comparisons are legion, not least within the field of family policy (see for example Duvander and Ellingsæter 2016; Gíslason and Eydal 2011). In many family policy documents, it is common to review arrangements in the other Nordic countries (e. g. Official Government Commission Report (NOU) 2017). For example, in 2008, a Norwegian commission proposed a three part division of leave, explicitly based on the 'Icelandic model' (Official Government Commission Report (NOU) 2008). So even within the Nordic context, clear differences in the set-up of parental leave and the father quotas exist, but also some policy transfer among the Nordic countries themselves. Family policy in general and father quotas more specifically are frequently used as a major showcase for a common Nordic idea of fatherhood. Below the line, although Nordic policies are characterized by emulation and convergence over time, and although national political struggles exist, a common basic understanding has been vital in shaping policy processes and outcomes. At the same time, the Nordic approach in this field has been 'exported' to other countries as well, both passively

and unconsciously and in a more intentional sense in recent years, e. g. by the Nordic Council of Ministers' attempt to sort of 'brand' a Nordic fatherhood policy model.

TABLE 1

Father quota variants: Germany, Slovenia, and Japan

Germany: Scandinavian Style

Germany with its former Western part has often been regarded as a paradigmatic representative of the male breadwinner model (e. g. Lepperhoff 2014, 59). After major family policy reforms in the early 2000s, however, today's leave arrangements in Germany basically resemble the Nordic model with some notable exceptions. While both parents can take up to three years of leave of which twenty-four months can be taken up to the child's eighth birthday and enjoy employment protection rights in this period, the paid leave is paid for twelve months plus two partner months for the other parent since 2007. Thus, from a critical point of view, the German father quota is not a quota in a strict sense but more of a bonus since with twelve months remaining for the other parent (in most cases the mother), the punishment for not making use of the quota is rather weak. The replacement rate is sixty-five or sixty-seven percent (depending on previous income levels) of last year's net income with a minimum of €300 (for non-employed parents, students etc.) and a maximum of €1,800. The benefit is funded through general taxation.

The proportion of fathers taking parental leave is slowly but steadily increasing: While only three and a half percent of fathers took any leave in 2006, the proportion was thirty-six percent in the second quarter of 2015, albeit with large regional differences (Reimer et al. 2018). Yet, the great majority, almost eighty percent of fathers, did not use more than their two partner months (ibid.). However, this number had decreased to sixty percent in 2017. Fathers who combine leave with part-time work take longer leave than in the basic version (about seven months compared to three) (German Bundestag 2018).

Although the coalition agreement between the Social Democratic (SPD) and the Green Party in 1998 already foresaw a re-orientation of family policy, it was the following Grand Coalition that finally introduced them. However, the timing suggests that the former government's work did have a decisive influence. The official justification of the new law (German Bundestag 2006, 16/1889) mentions rather diverse aims: creating a stable financial

situation and a protected space for families with small children as well as a true choice in terms of reconciliation of work and family for mothers and fathers, preventing poverty risks including pension gaps, increasing birth rates and (rather implicitly) encouraging fathers to take a more active part in childrearing. The latter aim is then explicitly addressed in the 2014 reform (German Bundestag 2014, 18/2583). Public opinion was largely positive, in spite of controversial debates concerning possible incentives and redistributive consequences (with the wage replacement scheme favoring middle and high income families). The introduction of partner months was also frequently criticized as an intrusion of the state into family life and parents' division of (care) work (Huebener et al. 2016). Others were more nuanced in welcoming the two partner months as a bonus but stressing that the state should not prescribe families how to divide childcare and work between the parents by a more far-reaching quota (CDU/CSU 2007). However, ten years later the parental leave is widely accepted and father months have slowly but steadily been used more extensively in the past few years (Huebener et al. 2016).

Domestic motivations for the parental leave reform including the father months were the lack of fertility incentives given by the former and often high-cost family policy arrangements (Lepperhoff 2014: 59), a rise in female employment, changing role models and family structures, persistent criticism concerning free choice for parents, electoral considerations and demographic necessities. Frequent references to the Nordic countries (and sometimes France), e. g. in expert opinions such as the influential one on a sustainable family policy by Rürup and Gruescu (2003) or the Seventh Family Report by the Ministry for Families, Senior Citizens, Women and Youth (BMFSFJ 2006) suggest a strong element of 'learning from the North'. Trips to Sweden (and France) by representatives of German politics and administration were also made during preparation. However, with a view to the father quota itself, references are fewer. One example is an expert opinion to the ministry in charge which points at the Nordic model and recommends the introduction of reserved months for fathers since "such a measure supports gender equality in childrearing in two ways. Not only the relief of mothers but also chances for the participation of fathers are improved." (Prognos AG 2005, own translation)

In plenary sessions of the German Bundestag, then family minister Ursula von der Leyen stressed the positive effect of the controversy on partner months in fueling a debate on the role of fathers in childrearing: "The partner months are a true option, which means you can

take them or leave it. [...] Thereby, we encourage fathers who want to take time for their child.” (German Bundestag 2006, Plenary Protocoll 16/40, 3712, own translation) This approach was welcomed in general terms by most speakers but also criticized by among others Karin Binder representing the Left Party: “Two so-called father months are but a small contribution. Much remains to be done in terms of equal participation in both family work and employment for men and women. [This is] a Scandinavian-light version.” (ibid., 3725, own translation) Thus, especially in the preparation of the reform and to some extent also the political process, an orientation towards the Nordic countries and particularly Sweden occurred.

The same holds true for the debate on the renewed reform (including the possibility to combine parental leave and part-time work and the extension to twenty-four months plus four partner months) in 2014. While e. g. Nadine Schön representing the Conservatives stressed in the parliamentary session that “we do not want to prescribe families how to live, how to organize the reconciliation of work and family. In our country, every family can decide on their own.” (German Bundestag, Plenary Protocoll 18/55, 5076, own translation), others pointed at the Scandinavian role model again. Most prominently, Franziska Brantner of the Green Party stressed that reconciliation worked better in Sweden than in Germany and especially fathers took a greater share in family work (ibid., 5082, own translation).

The German parental leave can indeed be classified as a ‘Scandinavian-style’ instrument (Blome 2017, 103), albeit with some differences concerning the maximum duration, minimum benefit and financing mode. Both the reform process with its frequent references to Nordic experiences and models in public documents and expert discourses – although policy learning was not much debated in the broader public – and the resulting leave arrangement make a case for policy transfer, albeit fragmented and resulting in a synthesis of former national and ‘imported’ new policies. This can be illustrated by the fact that other elements of the former German family policy model remained unchanged, for example, no re-orientation has taken place concerning individual taxation, and as pointed out above, the ‘punishment’ for not making use of the quota remains limited. Furthermore, there is no comparable debate on expanding the father quota as in some of the Nordic countries. Thus, Nordic policies and experiences are selectively used to support one’s own measures in a national and cultural context with its images of family, mother- and fatherhood – an inspiration rather than a blueprint.

Slovenia: Socialist Legacy – Inspired by Sweden

The parental leave scheme in Slovenia is regulated by The Parental Protection and Family Benefits Act, consisting of three and a half months of maternity, one month of paternity and eight and a half months of parental leave. Since 2014, parental leave has been an individual right of both parents, with just over four months per parent (the father is allowed to transfer all of his leave to the mother while the mother may transfer a hundred days to the father). One may say that Slovenia has a one month father quota and about five months mother quota. The paternity leave benefit is individual and non-transferable and amounts to a hundred percent of average monthly earnings (up to a ceiling of two and a half times the average salary in Slovenia – about 2,900 Euro net per month) (Stropanik 2019). Its main aim was to enable fathers to take an active role in caring for a child from an early age as explained by the Ministry of Labour, Family, Social Affairs and Equal Opportunities. Paternity leave as part of family policy improvements related to the EU accession period was introduced gradually between 2003 and 2005 with three months of which only fifteen days were paid, and fathers were entitled to use them until the child's sixth month. The remaining seventy-five unpaid days, of which the state covered only the compulsory contributions for the minimum salary, could be used until the child's third year. Paternity leave, at least the paid part of it, was widely accepted by fathers in Slovenia. Roughly four in five fathers took fifteen days of paternity leave, while less than one in five took the unpaid part as well (Stropanik and Humer 2016). Therefore, in 2014, the paid part of paternity leave was extended to one month, which can be taken as full or part-time leave. The first fifteen days need to be taken in the child's first six months and the remaining fifteen days before the end of the child's first year of elementary school. To be eligible for full wage-compensated maternity, parental and paternity leave, the parent has to be employed for at least twelve months in the last three years before leave.

In Slovenia, the 'dual career family model' (Lister et al. 2007) has been a reality since the end of the Second World War with high participation of mothers in full-time employment. As a former socialist country entering a new political and socio-economic system in 1991, Slovenia kept the socialist legacy of extensive and affordable publicly subsidized quality childcare and full paid maternity and parental leave, which were preserved and extended with paternity leave in the process of joining the EU in 2004 (Humer 2018). The paternity leave was introduced under a liberal government, with support from other political parties.

However, early traces of the policy recognition of the father's role in childcare can already be found in collective agreements in the socialist period with one to three days of fully paid absence from work when the child is born.

So has there been some element of policy transfer from the Nordic countries to Slovenia? Fathers' entitlement to parental leave has indeed been in effect since 1975 following the Swedish model of leave. Two female politicians, Alva Myrdal from Sweden and Vida Tomšič from Yugoslavia, met several times in the first half of the 1970s for discussions on family policy. Sweden legislated the right of fathers to parental leave in 1974 as the first country in the world, while in accordance with this example, Slovenia introduced the possibility of transferring the use of parental leave to the father upon the written consent of the mother in 1975 (Korintus and Stropnik 2012). The possibility of sharing full-paid parental leave among parents, inspired by the Swedish leave model, was an important political innovation, since it included ideas of gender equality and promoted the fathers' role in caring for the child in Slovenia (Jogan 2001). However, the possibility to share the leave among parents was never really transformed into practice since only 0,4% of men used parental leave in 1994 (Jogan 1998, 5; 2001). But with the introduction of paternity leave in Slovenia, Sweden as a role model was emphasized one again. The Swedish father quota was debated in academic and public discourse, especially the importance of having a fully paid paternity leave. E. g., Jogan (2001, 192) pointed out that the "Swedish model can be used as an example how to eliminate (potential) financial punishment of families if [the] father uses paternity leave."

Japan: European Inspiration – Employer Opposition

Although Japan is well-known for its persisting male breadwinner model, today, it is top-ranked regarding generous provisions of paid parental leave to fathers (Chzhen, Rees, and Gromada 2019, 10). Parental leave in Japan can be taken by each parent until a child is twelve months old; it is an individual entitlement that can be used by both parents at the same time. Leave can, however, be extended until the child is fourteen months old if both parents take some of the leave. This sharing-bonus of two months is comparable to a quota for each parent conditioned on that both parents use the leave. During leave, an income-related benefit at sixty-seven percent is provided for six months and a lower payment (fifty percent) for the rest of the period.

Parents can use paid leave simultaneously, but there is no additional unpaid parental leave,

which is different from the Nordic parental leave schemes, thus indicating less flexibility in the Japanese system. However, a parent can extend leave from work for the child's first twenty-four months when childcare has been requested but was not forthcoming or the other parent was unable to care for the child.

Despite amendments made to increase fathers' take-up since the 2000s, their take-up is very low. Only seven and a half percent of male workers who became fathers in 2017-2018 had started or applied for parental leave the following year (2019 Basic Survey of Gender Equality in Employment Management). However, the take-up has increased at a faster pace after 2010. Before that, the proportion never exceeded two percent.

The current parental leave scheme applicable to employees regardless of occupation or gender was introduced in 1992. Before this, there had been repeated efforts to introduce parental leave, referring to research on European countries and recommendations by international organizations such as the ILO and the United Nations. In 1990, representatives of the four opposition parties visited Europe, including the UK, Sweden, West Germany, France, Italy, and Belgium, to study parental leave systems in order to prepare a detailed proposal. When the parental leave bills were discussed in 1990, the Japanese Federation of Employers' Associations presented 'Opinions on Parental Leave Issues'. The employers opposed both legislation on economic compensation and the extension of leave entitlements to fathers (Itohisa 1990), and the parental leave scheme started without economic compensation.

Although leave entitlement was gender-neutral from the start, workers were entitled to take this leave only when their partner was not on leave or not at home as a primary carer of the child. The debate around the introduction and the amendments mostly focused on how women would be able to engage in childrearing without losing their job or income. The situation soon changed, and in the 2000s, most statements about further amendments of the parental leave scheme in the Diet sessions referred to fathers' low take-up and the need to increase it (Nakazato 2019).

In debates about parental leave in Diet sessions in early 2000s, politicians (especially from the opposition) and government officials (in reply to the questions) frequently mention Sweden and Norway to compare fathers' take-up, levels of leave benefit, and father quotas.

In Sweden, for example, the so-called 'Papa Quota' system has been established, in which men and fathers are required to take compulsory parental leave under a mandatory quota system. Isn't the MHLW

considering reforming the system?

(Masako Owaki, Democratic Party of Japan, Upper House Committee on Health, Labour and Welfare Committee, June 14, 2004)

However, the government was reluctant to introduce a new system.

I think we need to take a little more time to consider whether or not it is appropriate for our country to suddenly introduce a system like the one in the Nordic countries.

(Tadaharu Goto, Director-General of the Equal Employment, Children and Families Bureau, Ministry of Health, Labour and Welfare, Upper House Committee on Health, Labour and Welfare Committee, June 14, 2004)

In the discussion about the 2010 amendment introducing the sharing-bonus of two months called ‘Papa Mama Parental Leave Plus’, Germany as well as Sweden and Norway have been mentioned in the context of success in increasing fathers’ take-up by introducing a father quota. A ministry official explicitly stated in the Diet Committee that it was designed after the German model.

Papa-mama parental leave Plus is based on the Papa-Quota system in the countries such as Germany. When both parents take parental leave, the leave period can be extended until the child is one year and two months old.

(Akira Kitamura, Director-General of the Equal Employment, Children and Families Bureau, Upper House Committee on Health, Labour and Welfare Committee, June 23, 2009)

The Minister of Health, Labour and Welfare referred to Sweden, Norway, and Germany in his explanation about the purpose of the bill.

In Nordic countries, Sweden and Norway, the take-up rate is already close to ninety% or seventy to eighty-percent, and in Germany, the rate has increased considerably since the introduction of the Papa Quota system. (Yoichi Masuzoe, Minister of Health, Welfare and Labour, Upper House Committee on Health, Labour and Welfare Committee, June 23, 2009)

I think father's months are two months both for Germany and Sweden, so we have decided to start from the first step by setting a period like this

(Yoichi Masuzoe, Lower House Committee on Health, Labour and Welfare Committee, June 12, 2009).

Thus, such frequent references to the Nordic countries as well as Germany – with its system that was, as we argued, itself inspired by the Nordic model – make a strong case for an element of policy transfer in the Japanese case. However, take-up rates are still low and employer opposition strong, showing that Japan has started from very different framework conditions on the labour market which render an import of policy solutions difficult.

Transfer of a Nordic model of father quotas?

This study explores the dynamics of policy transfer with a view to father quotas within the parental leave system, originating in the Nordic countries where this policy invention has been a success judging from take-up, acceptance as well as growth of father caring. Despite some variation within the Nordic countries concerning the concrete design of father quotas, we are interested in the possibilities, limits and framework conditions of earmarked leave for fathers when picked up by other countries. We investigate the spread of father quotas in a comparative case study of the quota origin countries – Iceland, Norway and Sweden – and countries understood to have taken a ‘Nordic turn’ in developing father quotas with a main emphasis on Germany, but also with examples from Japan and Slovenia. What were the driving forces for change in these countries and to what extent did Nordic ideas and experiences influence policy processes in those countries? How has the policy been received?

The theoretical assumptions on policy transfer point out various ways that this may happen, including copying, emulation, synthesis and inspiration (Dolowitz and Marsh 2000), while others point out the non-linear, ‘messy’ character of such processes where a successful policy is not always interpreted and adopted as intended, where hybrids may be the outcome and where the import always has to be translated into a specific context (Stone 2017). By our contextualised comparison, we attempt to nuance the understanding of policy traveling in the field investigated.

The Nordic countries, with their long tradition of cooperation including a common labor market and cooperation committees in almost every policy field, illuminate framework conditions facilitating a high level of learning from each other and may serve as ‘tutors’ in the larger EU context. Given tight Nordic cooperation in general, family policy ideas have flowed between the countries. Ideas and goals of gender equality first focused on women’s possibilities to work but later on fathers’ caring for children as well. Iceland, Norway and Sweden have different set-ups of parental leave, but they all have successfully adopted father quotas, they all emphasize gender equality, and it is clear that policy learning among them has taken place. Moreover, father quotas and the focus on gender equality are well-integrated into the broader social policy model in these countries, as evidenced by universal public childcare, income-related benefits for parental leave and an individual and gender-neutral approach to parenting. Interestingly, a common focus on father quotas and the intention to

‘brand’ them as a Nordic policy innovation seem to be rather independent from differences in detail, e. g. concerning eligibility criteria, among the Nordic countries themselves.

In Germany, the new parental leave scheme including its two-months father quota shares a series of common features with the Nordic model, and this together with frequent references to especially Sweden delivers good support for the policy transfer hypothesis, although references to the Nordic countries were less visible in the broader public than in expert debates and reports. The situation of the early 2000s with a demographic pressure that was perceived as increasingly dramatic can surely be seen as a critical juncture in which a search for and the introduction of solutions from abroad becomes more likely, not least because of decreasing domestic opposition. The concept of fathers’ rights has then slowly but steadily been used more extensively in the subsequent years and was one explicit motivation for the 2014 reform.

Nevertheless, the father quota is part of a layering process, where other elements of the family policy model remain intact. Persisting resistance against abolishing tax deductions for married couples as well as the constitutional protection of marriage show that Germany still supports traditional family forms as an institution (Scholze 2012, 22). The father quota itself with its relatively short length of two months, implying little ‘punishment’ for not making use of the father months, has partly been criticized as a ‘Nordic light’ approach. Thus, a synthesis of former national and ‘imported’ policies is the result, using the Nordic model as more than an inspiration, but less than a blueprint. However, the increasing take-up rates of fathers point in the direction of slow but steady convergence with the Nordic countries.

Slovenia implemented a model of parental leave that shows some parallels with the Swedish one as early as in the 1970s with the possibility of sharing among parents, which was an important step towards gender equality in Slovenia. However, in practice only a small percentage of fathers actually used some parental leave in socialist times. Thus, while there are parallels in terms of emphasizing the role of fathers in childcare, it cannot be concluded that Slovenia ‘imported’ the Nordic model of father quotas. Later, the introduction of paternity leave in Slovenia is more an expansion of this earlier policy than a true ‘import’, but was also promoted by joining the European Union, and again the Swedish father quota served as a model for Slovenia. However, the main idea of the father quota as based in the Nordic model, aiming at gender equality and active fatherhood, is only partially implemented in

Slovenia. The paternity leave as a nontransferable right is much shorter than maternity leave and also the only proactive policy mechanism fostering greater involvement of men in childcare.

The statutory parental leave scheme in Japan has dramatically changed in recent years into a generous parental leave based on individual rights to the father and the mother. Like in Germany, demographic pressure can be seen as a major driving force behind a new openness to ‘imported’ solutions. The new scheme has been developed with reference to the Nordic model and contains provisions similar to their quotas, but it also has unique features, especially related to the very different framework conditions on the labour market and of childcare provision. Despite the introduction of bonus months for fathers similar to the leave schemes in Germany and some of the Nordic countries and the intention to catch up with the high take-up rates for fathers in the Nordic countries, an increase in fathers' leave take-up seems difficult in Japan. The process of policy transfer with a view to the father quota and the parental leave scheme in general is difficult to fit in a single category. The introduction of the statutory parental scheme can be classified as inspired by the Nordic model, but without economic compensation and later supplemented by several amendments. The father quota was explicitly introduced by copying the German bonus months system. However, as framework conditions differ markedly, some adjustments such as the special extension of leave to cover the shortage of childcare were necessary, which may in fact deteriorate the purpose of the father quota. From this point of view, Japan represents both a case of only partially successful synthesis and of messy policy transfer.

The reception of the Nordic father quota policy in Germany, Slovenia, and Japan may be illustrated as a transfer of possibilities. There are a lot of formal similarities (see table below), but the three countries have not adopted the Nordic quota without adjusting to the respective specific context. Also the reception has been gradual and take-up slow, especially in Japan. Germany probably comes closest to the idea of policy transfer. There are some differences in both system design and societal acceptance, but clear references to the Nordic countries were made in the process. Fathers are also increasing their uptake, although still at a much lower level than in the Nordic countries. Slovenia adopted a generous and formally gender-equal parental leave policy quite early, but there is little evidence of policy transfer in the past few years. One may thus characterize Slovenia as a case of ‘early’ learning from and exchange with Sweden, mixed with Socialist legacies that have also been very important. Japan may be

seen as a case of incomplete learning under difficult and partly incompatible framework conditions. There has been an evident will to learn from the North or Europe more generally, but the labour market conditions are in strong conflict with the parental leave system including the father quota. The Japanese policy is both generous and gender-equal, but so far has been severely underused.

We thus see clear evidences that policy transfer is indeed affected by political and societal resistance, traditions, the willingness of those concerned (take-up), knowledge-spreading among parents and among employers. In addition, other components within and outside family policy will be important for the success of a policy import. For instance, both childcare availability, quality and cost, parents' working conditions, and job protection during leave will be of importance. This makes a case for Stone's (2017) assumption of 'messy' processes of policy transfer that cannot be understood without taking into account the specific framework conditions, traditions, 'windows of opportunity' and actors involved in each such case.

We conclude that there are many ways that policies may travel and transform when making their way from one country context to another. The examples in this study indicate that within the contested fields of family policy and gender equality we are more likely to expect variation and diversity than convergence in the short run. However, long term consequences and effects of incremental change may very well lead to an adoption of gender-equal parenting.

TABLE 2

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Figure 1.

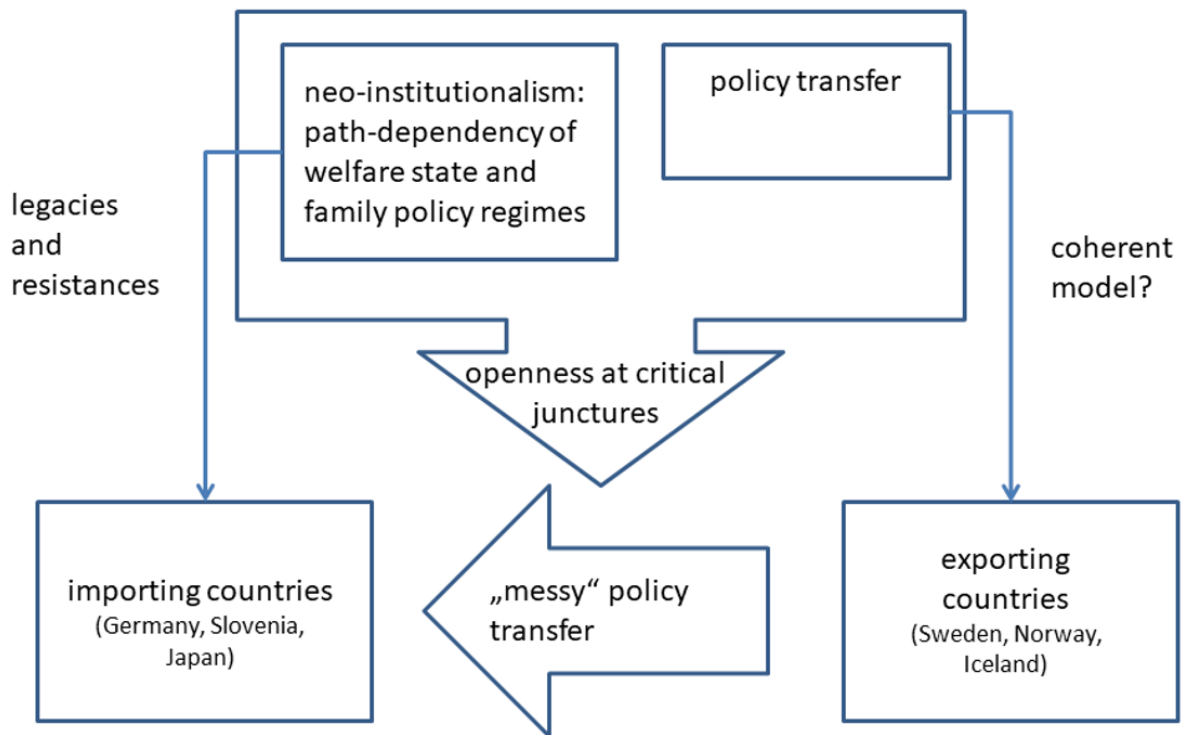


Table 1. Comparison of the father quota legislation in Iceland, Norway, and Sweden

	Iceland	Norway	Sweden
Parental leave introduced	1981	1978	1974
Length at introduction	3 months	4.2 months	6 months
Length in 2019	9 months	11.7/14 months	16 months
Father quotas introduced	2000	1993	1995
Length of father quota in 2019	3 months	3.75 months	3 months
Length of mother quota in 2019	3 months	3.75 months	3 months
Wage replacement level	80 percent to ceiling	100/80 percent to ceiling	77.6 percent to ceiling
Fathers' share of parental leave use (2016)	29 percent	19 percent	28 percent

Source: Compiled by the authors, based on data from country reports at leavenetwork.org .

Table 2. Overview of leave schemes and father quotas in Germany, Slovenia, and Japan

	Germany	Slovenia	Japan
Introduction of new parental leave scheme	2007 (amendment 2015)	2014 (implementation in 2018)	2010 (amendment 2014)
Father quota	Yes (two months)	Thirty days of paternity leave	Yes. Individual entitlement for one year + two partner months
Take-up	About 35.7 percent (2015), majority takes only two months (59.7 percent) (2018) but rising proportion	In 2018, approximately 80 percent of fathers used two weeks of leave but only 25 percent more than two weeks	Overall take-up by fathers was 6.16 percent of which 36.3 percent took for days or less; about 35.1 percent five days to two weeks; slightly less than twenty returned after one month or more (2018)
References to Nordic model	Frequently in government reports, justification of laws, and academic debate	Reference to Swedish model of parental leave scheme in the 1970s and personal exchange at that time	Frequent references in Diet debates to Sweden and Norway, “research travels”
Domestic factors (reinforcing)	Need for female employment, low birth rates, and societal/electoral demand	Sharing childcare between parents with the recognition of fathers’ caring role	Need for female employment, low birth rates, and recognition of fathers’ caring role
Domestic factors (constraining)	Traditional role models and the concept of individual choice	Traditional gendered role models and some resistance by employers in terms of work–life	Traditional role models at home and workplaces and uncoordinated scheme design to cope with the shortage

Type of policy transfer	Synthesis, some convergence, including take-up of fathers, and other traditional elements remain	balance Inspiration by the Swedish model of leave in the mid-1970s and promoted by the process of joining the EU, path-dependent “logical” expansion later	of childcare places Emulation of ideas behind the Nordic parental leave scheme and “second-order learning” concerning father quota (by copying German bonus months model)
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