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## Working Paper

### Old Age Security of Women in the Twelve EC-Countries - To What Extent are Beveridge's Two Main Principles of Universality and Guaranteed Minimum Fulfilled?

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# Luxembourg Income Study Working Paper Series

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Richard Hauser, Gabriele Rolf and Frank Tibitanzl

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## Old-age Security for Women in Twelve EC-Countries - To what Extent Are Beveridge's Two Main Principles of Universality and Guaranteed Minimum Fulfilled?

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### 1. Introduction

The issue of individual social security for elderly women is gaining in importance. As far back as 50 years ago Beveridge tried to find a solution. His ideas were so pioneering that he was dubbed "the saint of the housewives"<sup>2</sup>. In a paper for a conference marking the 50th anniversary of the publication of the Beveridge Plan it seems appropriate to take up two main principles of the Plan - the principle of universality and the principle of guaranteed minimum - and use them as standards of reference in discussing and assessing the core old-age security systems of the twelve member states of the European Community<sup>3</sup>. The analysis will not deal with an assessment of the whole systems but will focus on gender differences in the provision of individual minimum benefits. This raises the question of whether there exist minimum arrangements in the various core systems, and whether such arrangements involve all elderly women and men in principle or whether they are confined to a few sub-groups. It can further be asked whether existing minimum arrangements are gender-neutral or whether it is more difficult for women than for men to meet the requirements for minimum benefits. And finally one may ask whether these benefits are adequate.

Answering those questions for the twelve EC countries calls for a twofold approach. On the one hand, we need a comparative empirical analysis of the income situation of elderly women and men based on their own pension incomes. This will show how large the share is of those whose own pensions do not even give them minimum income. But it should be stated from the outset that the pension incomes of persons who are old today may have been influenced by earlier institutional arrangements so that this analysis does not allow us to

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2 Harris 1977

3 It should be stressed that we intend to use the principles of the Plan as a standard of reference for comparative considerations, without appraising the Plan as a whole.

derive any immediate conclusions on the effects of current rules. On the other hand, we need an institutional analysis of the core systems for old-age security in the twelve member states in order to draw conclusions relative to the future minimum income of women in the various countries if the systems are not changed. This analysis can be simplified by developing a scheme showing all conceivable types of minimum benefit arrangements and classifying the minimum provisions of the various core systems accordingly. From this angle it will become clear to what extent the principles of universality and guaranteed minimum have been implemented in the core old-age security systems in each member state.

The analysis will be restricted to the core old-age security systems. As the core system we consider the most general basic mandatory old-age security system in each country. If in one country there exist several basic mandatory systems with equal or very similar rules covering large groups of the population, all of them are included. This definition is in line with Beveridge's ideas, but it implies that the conclusions drawn are restricted to the core systems. There may be other old-age security systems and other minimum provisions for the elderly in each country that are not dealt with. Only if there exist general social assistance regulations that also cover the elderly and that can be considered a substitute for minimum pension provisions in the core old-age security systems it is mentioned.

The paper is arranged as follows: In Section 2 we shall examine Beveridge's two main principles. In Section 3 follows an empirical analysis of the situation for elderly women and men in the mid-80s in respect of their achieving a minimum income, assuming that they have only their own pensions to live on. This analysis must be confined to six member states, due to a lack of data. In Section 4 we give a survey of conceivable types of minimum income regulations, starting from an ideal Beveridge system. This survey allows us to make some general statements on differences in obtaining minimum benefits between women and men, and on the deviations from Beveridge's two principles. A special aspect follows from the approach that this study first looks at the simplified case "without immigration", and then considers modifications arising from immigration. Section 5, finally describes the minimum benefit regulations contained in or attached to the various core old-age security systems for the Twelve and assigns them to the types developed in Section 4. The study concludes with a summary.

## 2. Beveridge's Two Main Principles of Universality and Guaranteed Minimum

Regarding old-age security, Beveridge proposes a clear division between state social policy and private provision. The state social policy should concentrate on the consistent prevention of poverty, and confine itself to this. Safeguarding one's standard of living should remain the goal of private provision. Social security policy should fulfil its assignment of consistent poverty prevention above all by implementing two principles in the core state system:

1. The universality of the social security system.
2. The guarantee of a national minimum by the social security system.

The two principles are so closely linked with Beveridge's plea for the "right" security instrument that one could also speak of a triangle of principles. For economic reasons (work incentives, propensity to save), but also because of values prevailing in the population, he held social insurance alone to be a suitable instrument. Universality was for him then the universality of social insurance; a guaranteed minimum for him should always be achieved through social insurance<sup>4</sup>.

The principle of universality demands that all citizens or residents are covered by the social security system. The universality of the system is usually seen in contrast to categorial (also called selective) solutions, which only include certain groups of citizens (blue-collar workers, white-collar workers, self-employed) or partial groups (e.g. employees up to an income limit, or certain self-employed professional groups)<sup>5</sup>. The concept of coverage needs to be defined more precisely following Beveridge's ideas. It could be misunderstood as including not only arrangements based on individual pensions of each citizen or resident but also derived forms, like co-insurance of relatives, or the granting of claims deriving from the fact of belonging to a family or household along with the actually insured person. If we take the principle of the Beveridge Plan as our standard, pension claims based on such derived forms, do not correspond to the principle of universality. Beveridge's principle fundamentally focuses on the individual legal claim, even though the Plan contains qualifying elements.

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4 The high rank of this connection for Beveridge becomes clear where conflicts arose between an effective poverty prevention and the principle of actuarial equivalence.

5 Universality and categoriality (selectivity) can, however, not just be understood as characteristics of exclusive opposites. The universal scope of a certain security system can also arise through the addition of different categorial systems (additive universality). In addition, multi-stage systems can combine universal and categorial elements, e.g. a universal basic security system and categorial additional systems for the "excess" area; Zacher 1991, p. 96ff.

Beveridge devotes relatively little space to justifying the principle of universality. It arises for him from the main goal of the social security system, the radical prevention of poverty. Since no category of employed or non-employed persons is anything like homogeneous in social and economic terms, it cannot be ruled out for any of these categories that a need for social security may arise for all or some members.

Another aspect for Beveridge is income redistribution, which he considers necessary to eliminate poverty<sup>6</sup>. The proposed reform gives priority to a strengthening of inter-temporal income redistribution through an extension of compulsory social insurance, based on contributions, but also recommends a strong (family policy) component of interpersonal redistribution, which should not be merely confined to a few categories of members of society.

A further argument follows from the goal of gearing an insurance-shaped old-age security system to a guaranteed minimum, without (seriously) infringing on the principle of actuarial equivalence. Many people, particularly women, repeatedly change back and forth between employment and non-employment. For this reason, if categorial insurance is only compulsory for employed persons, minimum contribution periods for a uniform old-age pension must be kept relatively low, so that almost everyone may indeed be granted a claim. This would necessarily be unjust towards persons permanently employed and paying compulsory contributions.

On the other hand, scaling the payment downwards would contravene the logic of the guaranteed minimum; an upwards differential should also be avoided to allow for private provision. One solution here is to make compulsory insurance independent of the personal employment history of the person concerned.

The universality of a security system ultimately aims at universality of payment in case of risk. The achieving of complete personal universality of a security system is all the more possible the less formal and de facto-obstacles to coverage are set up. If personal universality as intended by Beveridge is to be achieved by social insurance, this means that going beyond the introduction of a statutory insurance compulsory for all adult citizens or residents further prerequisites must be created. The reason is that it is necessary to guarantee a universal observance of compulsory contributions also for persons who, wholly or partially, temporarily or permanently, cannot afford the contributions. The scope of precautions to guarantee contribution payment depends on the relative burden they place on low incomes. The Beveridge Plan opted for contributions and payments independent of income, and this tolerates the fact that the relative burden must weigh more heavily, the

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6 Cf. Beveridge 1943, no. 11,14

lower the income. Given a universal statutory social insurance, the issue of guaranteed minimum security basically amounts to ensuring persons can pay their contributions during their working age even if not earning an income.

The questions of minimum provision discussed by Beveridge in the Plan can be summed up as follows: how can poverty be effectively prevented by means of an insurance-based old-age security system making additional means-tested welfare payments superfluous for everyone<sup>7</sup>.

When discussing the minimum level Beveridge originally aimed at the guarantee of a bare subsistence income<sup>8</sup>; in the case of old-age pensioners he finally proposed (provisional) payment rates that clearly exceed this bare subsistence level. The reasons were, among others:

- the intention to bring about concordance with benefits for other social risks, like unemployment, the incapacity to work, and retraining, for which higher subsistence levels had been calculated;
- consideration of public opinion, that the elderly should be given more than would merely cover their bare necessities<sup>9</sup>;
- the decision to include a lump sum for rent on the basis of national average expenditure.

It may be concluded that in referring to "subsistence level" Beveridge brought in a socio-cultural element although one cannot yet speak of an orientation to a relative poverty threshold<sup>10</sup>. Many of his thoughts regarding minimum level will have to be classified as strongly influenced by the social attitudes of the time.

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7 The goal of reducing welfare payments as far as possible is, according to Beveridge, against any variant of means-tested payments; it is also against elements which could even infect the security system with the taint of a means-test.

8 This is in contradiction to many statements by Beveridge revealing sympathy for consideration of socio-cultural aspects when establishing the minimum. However, he apparently feared the step to a level at which establishing this would be ultimately a question of political discretion; Harris 1977, p. 396 ff.

9 Beveridge 1943, no. 251

10 The Beveridge Commission tried to calculate the bare subsistence level (excluding the rent) by reference to scientific and official statements from the 1930s; they had recourse to scientific attempts to calculate different subsistence levels which had been undertaken, e.g., by S. Rowntree and the statistician A.L. Bowley, but also by official bodies in the 1930s. Beveridge set up a sub-committee to examine the question of minimum level, of which the above-mentioned experts were members; cf. Beveridge 1943, no. 196ff; Harris 1977, p. 397; minimum levels were established for single people of both sexes, and for couples of working age and in retirement.



### 3. A Six-Country Comparison of the Achievability of a Guaranteed Minimum on the Basis of Own Pension Income

The empirical approach with which we intend to examine gender differences raises two questions:

- (1) How high is the share of elderly women (over 64) who have their own pension as compared to elderly men (over 64)?
- (2) How high is the share of elderly women who, on the basis of their own pension income, are under a relative poverty line of 40%, 50% or 60% of the average equivalent income<sup>11</sup>, as compared to the share of elderly men?

For our study we have used data provided by the Luxembourg Income Study Project, which, however, is subject to a number of qualifications. Records are only available for six EC-member states, and the pension variables include own pensions and derived pensions (surviving dependants' pensions) from all old-age security systems. For this reason we can only present results for people who cannot as a rule receive own pensions and derived pensions simultaneously. These are married women and men. Although this approach does not cover all own pensions, it is at least possible to make a statement about married people reaching a socio-cultural minimum of subsistence based on their own pensions.

Table 1 shows the share of married elderly women and elderly men with own pensions for each of the six countries. In general, it can be stated that in every country a higher share of married elderly men receive their own pensions than do elderly women. The differences between countries are considerable, however. While in the United Kingdom there is almost as high a share of women (97.5%) as men (99.0%) receiving their own pensions, Luxembourg shows the greatest disparity (18,6% compared to 90.9%). The differences between women and men are clearly greater in the case of Germany (37,6 percentage points) and France (27,8 percentage points) than those recorded for Italy (14,9 percentage

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11 The equivalent income of a person derives from the net income of the household in which the person lives, divided by the sum of the equivalent weights of all persons in the household. On the equivalence scale used here the head of the household receives a weight of 1, each additional adult member a weight of 0.7 and each member under 18 a weight of 0.5. The average equivalent income is calculated by dividing the sum of the individual equivalent incomes by the number of persons. The grossed up results from the respective records for each country are used for this calculation. In order to cover a broad area of lower incomes and achieve comparability between countries three alternative poverty lines are used as benchmarks; this way it can remain open as to what line is closest to the respective socio-cultural subsistence level in each member country from the latter's viewpoint.

Table 1: Married women (65 years and older) and men (65 years and older) with own pension income<sup>1</sup> in six EC-Member States

1	2	3	4	5	6	7	8
country	reference year	all married women 65 and older in 1000 <sup>2</sup>	married women 65 and older with pension income in 1000 <sup>2</sup>	percentage of married women with pension income 4 as % of 3	all married men 65 and older in 1000 <sup>2</sup>	married men 65 and older with pension income in 1000 <sup>2</sup>	percentage of married men with pension income 7 as % of 6
France <sup>3</sup>	1984	1421	969	68.2	1964	1887	96.0
Germany	1984	1898	1103	58.1	2608	2496	95.7
Italy	1986	1567	1288	82.2	2620	2543	97.1
Luxembourg	1985	119	(22)	(18.6)	169	154	90.9
Netherlands <sup>4</sup>	1987	382	322	84.2	501	495	98.7
United Kingdom	1986	597	582	97.5	793	785	99.0

Notes:

- 1 Own pension income includes old age pensions from mandatory systems, and private pensions, but no disability pensions. In some countries own pensions also include supplements for other members of the family.
- 2 Grossed up, except for United Kingdom.
- 3 The variable "pension income" in the French dataset (in contrast to the Italian dataset) does not include income-tested pensions.
- 4 We suppose that in the Dutch dataset own pensions of married women are sometimes erroneously assigned to their husbands, since according to the legal regulations up to 1985 the pensions for both spouses were paid to the husband.

( ) = Number of survey cases under 20.

Source: Computations based on the LIS-datasets.

points) and the Netherlands (14,5 percentage points).<sup>12</sup> When interpreting these figures it should be noted, however, that not only own pensions from the core system are included but also own pensions from other systems, so that only comments regarding the fulfilment of the additive universality principle can be given. The general conclusion is that, in the year under consideration, in all countries the deviation from the universality principle is far greater for women than for men - with the exception of the United Kingdom.

A second question is whether the principle of guaranteed minimum is fulfilled by own pensions. This principle calls for a minimum individual income level below which no elderly person may be allowed to fall. This lowest level is, however, extremely difficult to define in an international comparison. Beveridge orients himself to a level not far above the bare subsistence level. In the international discussion on poverty, however, the demand usually raised for developed industrialised countries is the guarantee of a socio-cultural subsistence level that is defined as a country specific relative poverty line. If one undertakes an international comparison, aspects of comparability are more important than a meticulous consideration of nationally defined minima of subsistence. For this reason we have chosen a relative poverty line of 40% of equivalent income of each country as the basis for the empirical calculations. This is probably close to a modest socio-cultural subsistence minimum. In order to cover a broader range several additional lines between 40% and 60% of the equivalent income are also used alternatively as benchmarks.

Table 2 shows incomes at the 40% poverty line for each country as calculated from the LIS data sets. Additionally, the levels of non-income-tested minimum pensions for a minimum insurance period, for a 20 year insurance period and for a full insurance period are given. The last column presents the levels of income-tested pensions for those countries in which they exist. Since the elderly may receive own pensions from other old-age security systems, and since pensions may include family supplements these figures can only serve as background information to the results of Table 3 and Diagrams 1 and 2.

Table 3 shows the poverty figures of married elderly women and men, which would arise if they exclusively had to live from their own pensions. One can say right away that all elderly people without any own pensions must be counted as poor by this standard; they are included in the figures. Great disparities between women and men become apparent at the

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12 It is possible that in the Dutch data set some pensions of women are erroneously assigned to their husbands because this was legal prior to 1985.

**Table 2: Minimum pensions per annum for a single person in comparison with the income per annum at the 40%-poverty line in six EC-Member States (national currencies)**

country	reference year	income at the 40%-poverty line <sup>1</sup>	minimum pension in compulsory schemes <sup>2</sup>		income-tested pension <sup>2</sup>
			20 years insurance period	full insurance period	
France	1984	FF 21 461	FF 14 591	FF 27 359	FF 28 660
Germany	1984	DM 7 243	-	-	-
Italy	1986	LIT 3 621 000	LIT 5 203 900	LIT 5 203 900	LIT 2 803 600
Luxembourg	1985	LFR 155 441	LFR 130 092	LFR 260 196	-
Netherlands	1987	HFL 6411	HFL 5 422	HFL 13 554	-
United Kingdom	1986	£ 1753	£ 912	£ 2 012	-

<sup>1</sup> Computations based on the LIS-datasets.

<sup>2</sup> Sources:

*France*: Chadelat, J.-F./Pellissier, G. 1986: Les retraites des Français. Diversité et complexité des régimes, Paris, p. 93-104.

*Italy*: Rodà, Giuseppe 1987: Le Pensioni, Milano, 2nd ed., p. 242-243.

*Luxembourg*:

*Netherlands*: Euregio-Mozer-Kommission (ed.) 1987: Die deutsche und niederländische Sozialversicherung. Eine vergleichende Darstellung, Gronau/Enschede, p. 23.

*United Kingdom*: Commission of the European Communities (ed.) 1986: Social Protection in the member states of the Community, 14. ed., situation on July 1st 1986 and evolution, Leuven, p. 71.

Table 3: Fictitious poverty ratios<sup>1</sup> of married women (65 years and older) and men (65 years and older) based on their own pension income<sup>2</sup> by various poverty lines in six EC-Member States

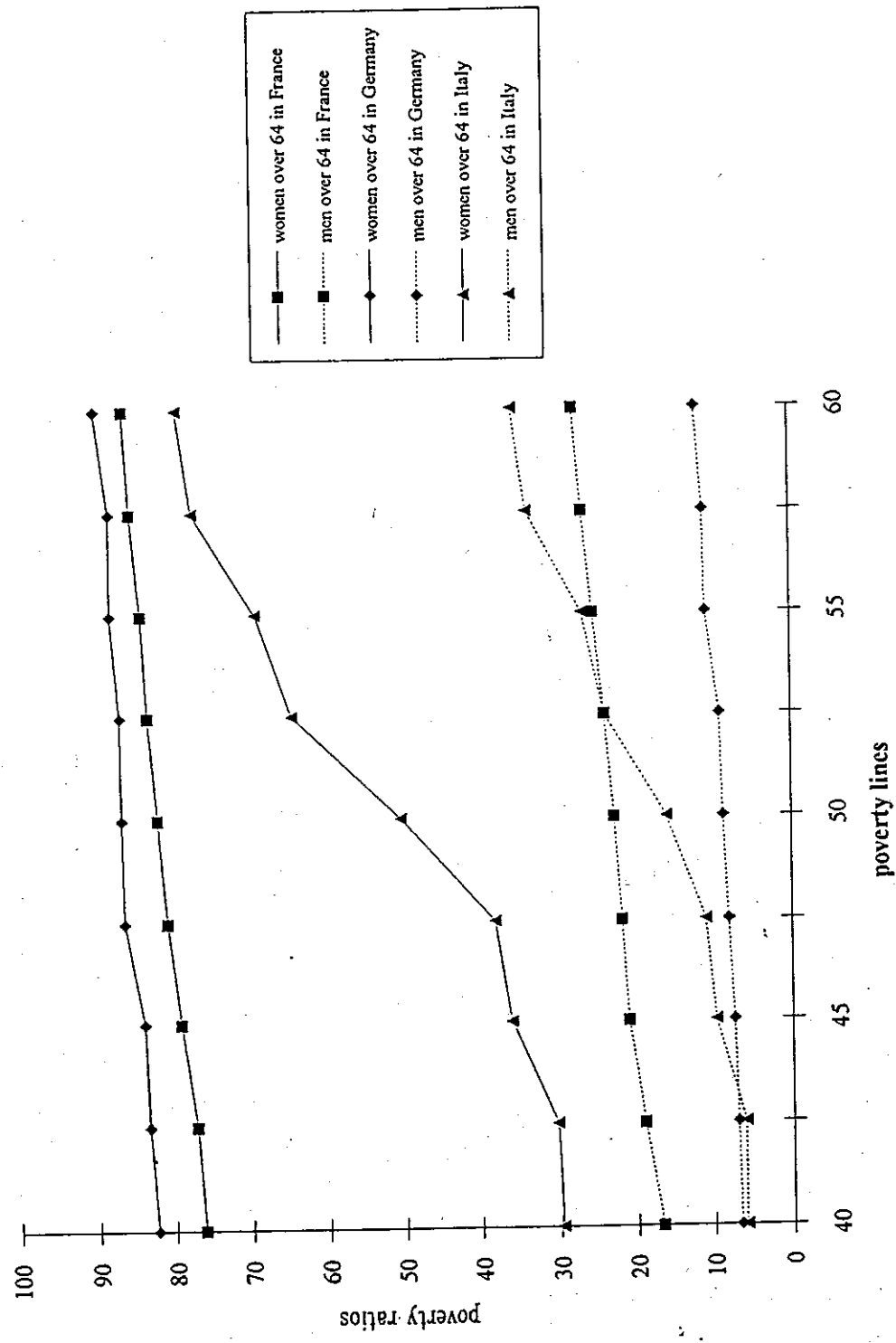
1 country	2 reference year	3 40%-poverty line		5 50%-poverty line		6 60%-poverty line		7 60%-poverty line		8
		women	men	women	men	women	men	women	men	
France <sup>3</sup>	1984	76.2	16.7	82.1	22.7	86.2	27.7	86.2	27.7	
Germany	1984	82.4	6.7	86.8	8.6	89.9	11.8	89.9	11.8	
Italy	1986	29.7	6.1	50.4	15.9	79.2	35.5	79.2	35.5	
Luxembourg	1985	89.0	9.9	91.2	12.6	93.4	13.3	93.4	13.3	
Netherlands <sup>4</sup>	1987	15.8	1.3	15.8	1.3	15.8	1.3	15.8	1.3	
United Kingdom	1986	83.6	4.7	92.5	24.1	94.6	45.9	94.6	45.9	

Notes:

- 1 In percent of all married women or men.
- 2 Own pension income includes old age pensions from mandatory systems, and private pensions, but no disability pensions. In some countries own pensions also include supplements for other members of the family.
- 3 The variable "pension income" in the French dataset (in contrast to the Italian dataset) does not include income-tested pensions.
- 4 We suppose that in the Dutch dataset own pensions of married women are sometimes erroneously assigned to their husbands, since according to the legal regulations up to 1985 the pensions for both spouses were paid to the husband. If this conjecture is true, the poverty ratios for Dutch women would be lower.

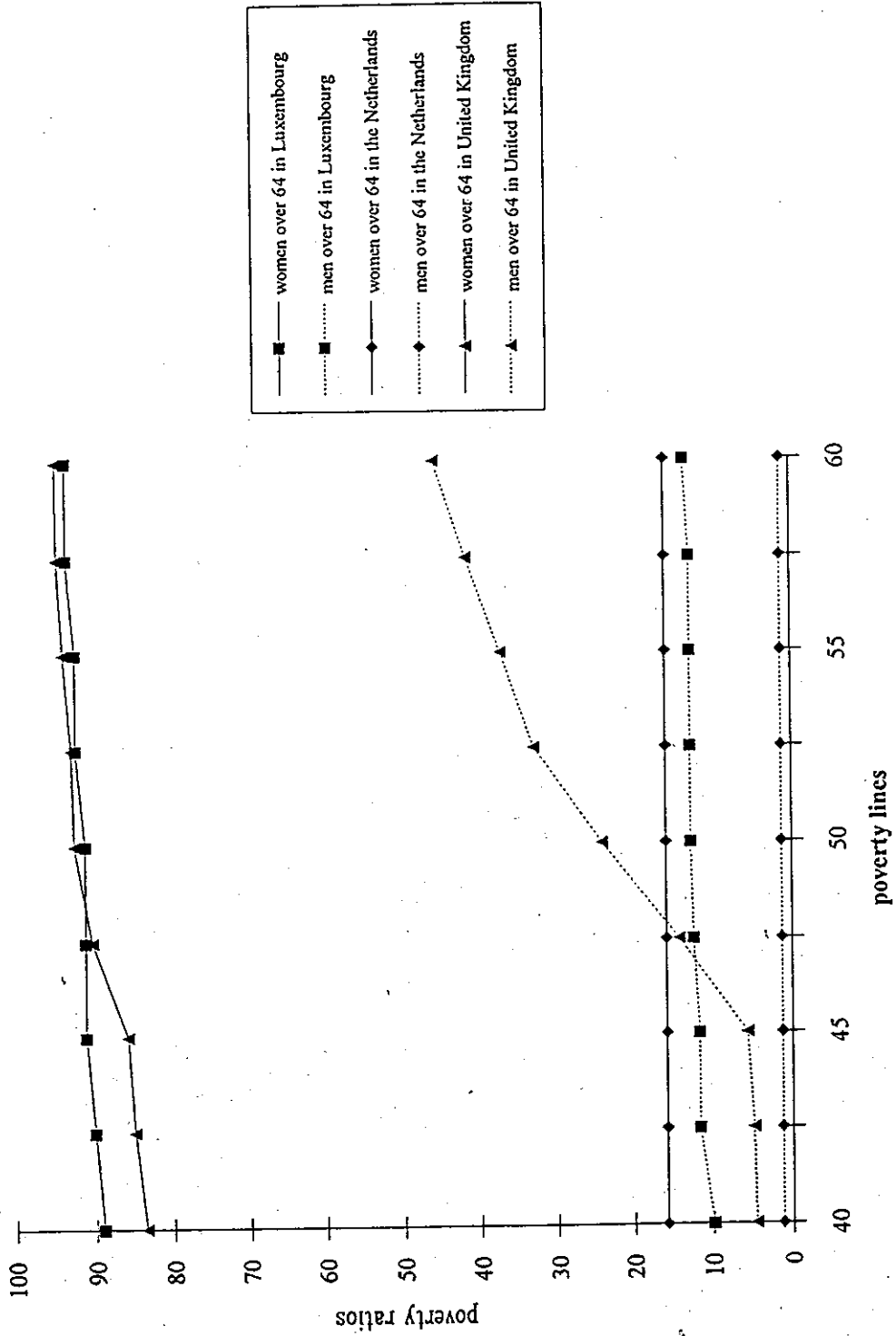
Source: Computations based on the LIS-datasets.

Diagram 1: Fictitious poverty ratios of married elderly women and married elderly men by various poverty lines in France, Germany and Italy



Source: Computations based on the LIS-datasets.

Diagram 2: Fictitious poverty ratios of married elderly women and married elderly men by various poverty lines in Luxembourg, the Netherlands and United Kingdom



Source: Computations based on the LIS-datasets.

lowest level of 40%. With the exception of France<sup>13</sup>, the figures for men are below 10%, while the figures for women in four countries are over 75%. Only in Italy (29.7%) and the Netherlands (15.8%) the difference between women and men is not so extreme. From this one can conclude that at least in four countries the principle of guaranteed minimum - interpreted here as 40% of the average equivalent income - is not fulfilled for the vast majority of women. In contrast, such a minimum is achieved for the vast majority of men. However, on the basis of available data it cannot be decided to what extent this minimum is reached through minimum payments from pension systems or through pensions exceeding this and ensuring a certain standard of living. Moreover, it should be remembered that the women and men were exclusively assigned their own pensions; in other words, maintenance provided, or to be provided, by their spouses has not been taken into account.

If one moves from the 40% to the 50% and the 60% level there are still major disparities between figures for women and men - with the exception of the Netherlands; there are, however, clear differences in the way figures rise. Diagrams 1 and 2 show the differences in the rise in figures for women and men with a gradual increase in the poverty lines. While the Dutch figures for women and men are constant - this indicates a very high and widespread minimum pension - the Italian women's figure rises sharply, reaching almost the level of the other four countries. The ratios for men rise most in Italy and the United Kingdom. This indicates that especially in Italy and the United Kingdom the minimum pension levels have been exceeded.

From this analysis it can be concluded that the pension systems of five of the six countries are far away from gender-neutrality. Elderly women still depend to a large extent either on maintenance or on survivor's pensions.

The importance of survivor's pensions can be gathered from Table 4 that shows poverty ratios of single elderly women living alone. The fictitious poverty ratios are calculated from their total pension income.

Compared to the fictitious poverty ratios for married women in Table 3 the poverty figures for single women on all poverty lines are much lower and of a similar magnitude as the figures for married men; the particularly low figure for the Netherlands on all three benchmarks is striking, as is the particularly strong rise in Italy from the 40% to the 60% level. The French figures are again too high, since it was not possible to include the

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13 By contrast to the other countries, pension supplements dependent on income and need are not contained in the pension variables of France, but subsumed under other income-tested transfers. If all income-tested transfers were added to the own pensions the poverty rates for France would be lower (11,9 for men and 68,1 for women at the 40%-poverty line). Since other income-tested transfers are also added in here, which are excluded in the other countries, these figures are now somewhat too low.



**Table 4: Fictitious poverty ratios<sup>1</sup> of single women<sup>2</sup> (65 years and older) based on their total pension income<sup>3</sup> by various poverty lines in six EC-Member States**

1	2	3	4	5
country	reference year	40%-poverty line	50%-poverty line	60%-poverty line
France <sup>4</sup>	1984	23.8	31.3	43.5
Germany	1984	9.1	17.0	25.4
Italy	1986	4.6	14.4	39.5
Luxembourg	1985	12.1	20.6	30.5
Netherlands	1987	1.4	1.4	1.4
United Kingdom	1986	3.7	56.4	77.0

**Notes:**

- 1 In percent of all single women (65 and older).
- 2 Divorced, separated, widowed and never married women living in one-person-households.
- 3 Total pension income includes old age pensions and survivor's pensions from mandatory systems, and private pensions, but no disability pensions.
- 4 In the French dataset (in contrast to the Italian dataset) the variable "pension income" does not include income-tested pensions.

Source: Computations based on the LIS-datasets.

pension supplements based on need and income. One may conclude that the addition of derived pensions for elderly women living alone reduces greatly the differences between elderly widows and men. But it is still not enough to guarantee a socio-cultural subsistence minimum around the 40% level for all women. Only in the Netherlands this goal seems to be reached almost fully.

#### **4. Main Types of Minimum Income Provisions for the Elderly and their Relation to Beveridge's Principles of Universality and the Guaranteed Minimum**

Minimum income provisions for the elderly can differ greatly. One must distinguish between minimum income provisions covering the whole population and special arrangements for the elderly. Minimum income provisions for the whole population, e.g. negative income tax, universal demogrants or generalised social assistance regulations giving an individual right of assistance to each citizen, are not under consideration here, although they would also guarantee minimum benefits for the elderly.

##### **4.1. Minimum Income Provisions for a Country without Immigration**

If one confines oneself to minimum income provisions for the elderly, the differences can be systematised with the aid of several criteria. Here we will first refer to a country without immigration. The first differentiating feature relates to whether the individual or the family has a claim to minimum benefits; if it is the family, that means that after the death of the holder of the original claim the members of the family will receive derived claims. The typical forms are widows', widowers', and orphans' pensions. The second distinguishing feature can be seen as the way of calculating the benefit. If this is done individually, the amount is simply geared to the needs of the claimant. If it is family-related, however, the level of the benefit has to take account of all members of the core family, or at least the married couple. In this case the typical form are supplements for the household. A third distinguishing feature is of particular importance - the dependence of the amount on other incomes during the current period. Three forms may be distinguished here: first, independence of current income, second, dependence on other pensions or other income of the recipient of the minimum benefit, third, dependence on other income of the couple or the whole core family. Income dependence means here that the minimum benefit is reduced by the amount of the other current income.

A claim to a minimum pension in one's old age can be justified in two ways: through

membership in a society (residence or citizenship) or through membership in a social insurance scheme, which as a rule calls for the payment of contributions. The contributions can be more or less oriented to the principle of actuarial equivalence or can resemble an additional tax. Typically, however, minimum residence periods during working age or minimum insurance periods are a condition for drawing a minimum pension.

Finally, the financing of minimum pensions for the elderly can be settled in different ways. It can either be full-scale financing from contributions on the pay-as-you-go principle, or it can be financed completely from taxes; mixed forms are also conceivable.

The combination of these different features lead to the main types of minimum income provisions for the elderly, which are shown in Table 5.

A social insurance system for old age, covering all citizens or residents of a country from the time they come of age and obliging all to pay the same absolute amount of contributions, we call an ideal Beveridge system. These contributions are calculated on the principle of actuarial equivalence in such a way that in a person's old age an individual and income-independent minimum pension can be paid amounting to the socio-cultural subsistence minimum. The minimum insurance period to reach this subsistence minimum is equal to the maximum insurance period possible. In Table 5 the ideal Beveridge system is shown as Type I. As explained above in Section 2, the ideal Beveridge system shifts the problem of minimum benefits to the contribution side; young adults, the unemployed, the sick, those who are incapacitated, people caring for children, non-working wives and single parents from lower and medium income brackets are particularly affected by this.

Solutions to this problem may be sought on the contribution or the benefit side. Types II to V in Table 5 represent the solutions found in the 12 member countries. They lead to different deviations from the ideal Beveridge system.

In the case of Type II the problem is solved by finance from tax resources, retaining the universality principle and the principle of the guaranteed minimum independent of current income. Finer differences result from the fact that the calculation of benefit can be individual (Type A) or family related (Type B), and financing can be from general tax revenue or from contributions similar to taxes.

Type III represents the typical categorial social insurance for old age. The universality principle has not been implemented here because compulsory insurance only applies to those who are earning, or even only for employees. A minimum pension for insured persons can be integrated for those who fulfil certain minimum conditions (e.g. a minimum period of insurance). Differences can exist in benefit calculation, income independence and

Table 5: Types of minimum income provisions for the elderly

Type	Criteria	Minimum benefit claim by		Level of benefit related to		Relation to current income			Qualifying conditions		Financing dominated by	
		individual	family	individual	family	independent	tested on own pension income	tested on family income	minimum insurance period	residence during working age	contributions	general taxes
I	Ideal Beveridge System	X		X		X			X		X	
II	Tax financed minimum pension											
	Type A	X		X		X				X (minimum period and pro rata temporis)		X
	Type B	X			X	X				X (pro rata temporis)	X <sup>2</sup>	
III	Minimum pension integrated in contributory categorial social pension system											
	Type A	X		X			X		X		X	
	Type B	X			X	X			X		X	
	Type C	X			X	X		X	X			X
IV	Income-tested pension supplement	X			X			X	X	X (minimum period)		X
V	Income-tested minimum pension											
	Type A	X		X				X	X	X (minimum period)		X
	Type B	X			X		X	X	X	X (minimum period)		X
	Type C		X		X			X	X	X (minimum period)		X

1 Or dependent of the own income and the income of the spouse. Or dependent of the own income and the household income.

2 These contributions are similar to taxes.

the financing of minimum pensions; Types A, B and C result from this. Such an old-age security system does not guarantee any subsistence level either to those persons not covered by compulsory insurance or to those who do not fulfil the minimum conditions. This Type III, therefore, merely offers a partial solution to the problem of a guaranteed minimum, on the benefit side.

Income-tested pension supplements represent Type IV. Since they are only granted in addition to a pension and as a function of family income, they deviate in another way from Beveridge's universality principle, while still corresponding to the principle of the guaranteed minimum, as long as only weak minimum conditions have to be met in order to obtain them. Both the financing and the benefit side are brought in here to solve this.

Income-tested minimum pensions for the elderly (Type V) constitute a further variation of minimum income provisions in old age. They can either be integrated into the old-age security system, or separated from it, and lie either below or at the same level of other minimum pensions. If only weak minimum conditions are to be fulfilled they can guarantee a subsistence level for almost all elderly people, while deviating from the universality principle due to income dependence and in some sub-cases due to the family connection. Here, too, the problem of a guaranteed minimum in old age is solved on the benefit side, the resources usually being raised by general taxes.

#### **4.2. The Effectiveness of Minimum Income Provisions for the Elderly in Case of Immigration**

An additional problem arises when the possibility of immigration is considered. Persons who immigrate during their working age or later and have not brought sufficient pension claims with them, or were not given credit for periods of insurance in the framework of European Community regulations for migrant workers, have no chance to acquire a minimum pension claim if the system is strictly based on a pro rata temporis-principle.

The ideal Beveridge system (Type I) offers no solution for all who immigrate during working age or later, since the pro rata temporis-pension will not reach a subsistence level. In these cases this system does fulfil the universality principle, but it violates the principle of guaranteed minimum.

The tax-financed minimum pension (Type II) which is granted in accordance with the period of residence, likewise offers sufficient minimum benefits in old age only to young immigrants. For all older immigrants, including those of pension age, it does not fulfil the

principle of a guaranteed minimum.<sup>14</sup>

In case of minimum pensions being integrated into categorial social insurance systems (Type III), it depends on the minimum conditions to be fulfilled whether immigrants can receive a minimum pension on reaching retiring age. As a rule, only younger or middle aged immigrants who take up work will be able to fulfil the minimum conditions, which also contain minimum insurance periods. With this type of minimum pension regulation the universality principle is thus even more restricted for immigrants than for people who have lived all their lives in the country or have immigrated from EC countries.

In case of Type IV (income-tested pension supplement) and Type V (income-tested minimum pensions) the chances are better that they will provide a subsistence level for older immigrants and perhaps even for people immigrating at pension age. This applies when minimum conditions are only weak or when, in the case of family-related assessment, at least one member of the family fulfils the minimum preconditions. Such minimum provisions for the elderly thus deviate less from the principle of a guaranteed minimum.

#### **4.3. Differences between Women and Men in the Effectiveness of Minimum Income Provision for the Elderly**

Previous considerations now allow us to make a few general conclusions on differences between women and men in terms of the effectiveness of minimum income provisions. Here we again assume that no immigration takes place.

In the ideal Beveridge system (Type I) and with the tax-financed minimum pension (Type II) there is no difference between women and men regarding an individual and sufficient claim. In the case of an income-tested pension supplement (Type IV) and the income-tested minimum pensions (Type V) no difference arises regarding the amount either, since minimum periods of residence during working age can be fulfilled by women and men in the same way. Even if there is an individual claim, due to the dependence on family income there is still a restriction; in the case of couples, the husband may have the priority. In the case of minimum pensions of Type III it will probably be much more difficult for women to meet the minimum requirements, due to their typical interruptions of working life and the frequent shorter periods of insurance related to this. Clear differences must thus be expected with these minimum income provisions. Naturally, the differences are greatest between women and men in the compulsory insurance systems, which merely cover the gainfully

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<sup>14</sup> Except there exists the possibility of additional payments for the period during which the person did not live in the country.

employed, assess the pension level exactly according to years of earning and earned income and do not contain a minimum pension arrangement. In such systems for many women it is not possible to achieve a socio-cultural subsistence minimum on the basis of their own pensions.

## **5. Minimum Income Provisions for the Elderly in the Twelve EC-Member States**

The last step in our analysis is an attempt to classify the minimum income provisions contained in the twelve core systems of old-age security, and to characterise them from the viewpoint of gender differences in securing a minimum income for the elderly. Particular features due to immigration will be excluded here, too.

### **5.1 Definitions**

In order to be able to assign the core old-age security systems of the twelve EC-member states to certain types of minimum income provisions for the elderly it is necessary to focus the concept of "minimum pension" more sharply. A minimum pension is considered to exist when

- (i) the conditions to receive it are fairly easy to fulfil and
- (ii) the level of the minimum pension can be considered adequate to live on.

Conditions that are fairly easy to fulfil are, in our view, the requirement of permanent residence in a country or a minimum insurance period of no more than 20 years.<sup>15</sup> The 20-year period was chosen since it corresponds to about half of the potential employment or insurance period of the people in the countries under examination. We then term the pension level adequate when it is at least as high as the level of general social assistance (welfare) or the level of the income-tested minimum pensions which exist in some countries<sup>16</sup>.

The following brief description of the minimum income provisions for the elderly within or

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15 The insurance period includes years in which contributions were paid and other years which are considered insurance years as defined in the respect regulations, eg. periods of child raising, unemployment etc.

16 Whether the level of social assistance or of income-tested pensions suffice to live on - as judged by an outside observer - is not examined here.

in addition to the core old-age security systems in the 12 EC countries focuses on the differences in prerequisites for obtaining a minimum pension between women and men, so that a kind of "rank order" of the core old-age security systems under consideration can be drawn up regarding the goal of universal minimum income provisions and gender-neutrality.

## **5.2 Type II Systems: Residence Based Minimum Pensions**

In the case of a longterm presence during working age the core old-age security systems of Denmark<sup>17</sup> and the Netherlands<sup>18</sup> guarantee a pension sufficient for both women and men to live on in their old age. There are differences in how strictly the period of time is defined that the person is required to live in the two countries. While in the Netherlands a person of working age must in principle have lived there all the time, in order to receive a full pension in old age, in Denmark four fifths of the potential residence period suffice. By contrast with the Netherlands, where the level of a full pension corresponds exactly to the level of social assistance, in Denmark the full pension is noticeably over the general level of social assistance. In both countries the full pension is reduced pro rata temporis for missing years of residence. In case of need elderly persons in the Netherlands are referred to social assistance, while in Denmark an income-tested pension supplement is interposed. This is designated for special purposes, however, and cannot be spent freely. Since the criterion of "residence period" does not discriminate between the sexes, one can assume that the goal of a guaranteed minimum in old age is achieved almost universally. Denmark can be classified as Type II A and the Netherlands as Type II B, because in the latter case financing is based on contributions; albeit these contributions are very similar to taxes.

## **5.3 Type III Systems: Minimum Pensions Integrated in Contributory Categorical Social Pension Systems**

Six countries (Portugal, Greece, Italy, Spain, France and Ireland) have some sort of minimum pensions integrated into their contributory categorical social pension systems. These countries are dealt with here although some of them have additional minimum income provisions.

From the group of core old-age security systems with integrated minimum pensions the

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17 Folkepension



Portuguese<sup>19</sup> and Greek<sup>20</sup> systems pose the lowest demands for claims to minimum old-age pensions. In both countries it is enough to fulfil a minimum insurance period, that is considerably lower than half of a potential working life. In Portugal the minimum insurance period is 120 months. Since 14 monthly contributions can be paid per year it only takes 9 years to be able to claim an unconditional minimum pension in one's old age. Women with interrupted working lives can also fulfil this condition relatively easily. In the Greek core old-age security system the minimum insurance period is 4050 contributory days (= 13.5 years), which is somewhat higher than Portugal. As in Portugal, however, this excludes time spent bringing up children.

In the Italian<sup>21</sup> and Spanish<sup>22</sup> core old-age security systems the claim to a minimum pensions depends on an income test in addition to attaining a minimum insurance period. In both systems a minimum of 15 insurance years are required; in Spain there is the additional precondition that there must be at least two years of insurance within the last eight years before the pension application. Women who have definitively left working life for family reasons in early middle age thus a priori fall out of the group of potential recipients. For the minimum insurance period Italy gives credit for child-raising periods of six months per child, and in Spain it is one year. That means that it is harder to fulfil the requirement of the minimum insurance period for women with children in Italy than in Portugal and in Greece. This applies all the more to Spain. In addition, the Italian and Spanish minimum pensions are income-tested. The two countries have in common that the income test only considers the individual income of the pensioner and assessment is individualised. In Spain the individual principle is broken to the extent that a family-related income test and assessment is foreseen for pensioners with economically dependent spouses<sup>23</sup>.

Besides the minimum pension of the core system that is dependent on contributions, in all four southern EC states there, additionally, is an income-tested social pension for the elderly. With the exception of Greece, where it is administered by a special old-age security system responsible for farmers, this social pension is administered by the respective core old-age security system. The income-tested social pension is meant for non-insured persons and those who do not fulfil the requirements of the core system. It is financed by taxes. The level of social pension in Greece, Italy, Spain and Portugal is clearly under the respective minimum pension of the core systems. In Greece and Portugal the income-tested social pensions are considered to low to live on. By contrast, in Italy the social pension (in

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18 Algemene Ouderdomswet

19 Regime Geral de Segurança Social

20 IDRIMA KINONIKON ASFALISSEON

21 Assicurazione Generale Obbligatoria per l'Invalidità, la Vecchiaia e i Superstiti

22 Régimen General de la Seguridad Social

23 For example, a spouse with neither a minimum pension nor any other income.

conjunction with specific supplements for indigent social pensioners) claim to correspond to the right laid down in Article 38,1 of the Italian constitution that indigent citizen should be provided for adequately by the state. In Spain too the income-tested social pension can be regarded as a socio-cultural subsistence minimum; unlike in Italy, there are no special supplements required here though. It should be stressed that the social pension in all cases is an individual claim, although the income test is oriented to the family context. This means that in the four southern EC countries married women have their own income in their old age, not just when they get an old-age pension but also in the event of need.

The French<sup>24</sup> system is similar in some points to that of the southern member states. The minimum insurance period required in the French core old-age security system is extremely low - only one insurance quarter<sup>25</sup> - yet a minimum pension sufficient to live on and independent of other current income is only granted in the event of a complete insurance history. This means 150 insurance quarters, which as a rule correspond to 37.5 years of insurance. In case of incomplete insurance the full minimum pension is reduced pro rata temporis. In case this is not enough to live on, it is raised by an income-tested supplement (Type IV) to a level roughly corresponding to the full minimum pension. Non-insured persons have also their own claim to income-tested pensions payments of the same amount from the core old-age system (Type V B-pension). The French minimum pension system is thus so organised that married women with incomplete insurance periods receive their own money to live on if their family incomes are inadequate. If family incomes are adequate they are economically dependent on their spouses, since they receive only a reduced pension.

The contributory pensions paid by the Irish core old-age security system<sup>26</sup> also fulfil the criteria we have laid down for a minimum pension. However, the conditions are only just met in some cases, as will be shown. The following remarks concentrate on the requirements for retirement benefit from the age of 66 (old-age pension), which are somewhat easier to meet than those for a pension from the age of 65 (retirement pension). The precondition for obtaining old age pensions is starting to pay insurance contribution before the age of 56, years of age, a minimum contributory period period of 156 working weeks and an annual average of at least 20 weekly contributions. The amount of an old-age pensions depend on the average number of contributions of the insured persons, without there being a proportional connection between the two factors, however. A pension for an annual average of 20 weekly contributions is only 10% lower than with an annual average of 48 or more weekly contributions. In that the average number of contributions is

24 Régime Général de la Sécurité Social

25 A maximum of four quarters are counted per year, as long as annual earnings are at least as high as the statutory minimum wage over 800 working hours.

calculated on the basis of the actual and not of potential insurance history, the Irish system favors later entry to an insurance scheme. Women taking up work at an advanced age can thus relatively easily acquire their own claim to a pension high enough to live on. Even over a potential period of 50 years (starting insurance at 16, retiring at 66) 20 contributory years barely suffice for an annual average of 20 weekly contributions.

In addition to the minimum pension of the core pension system there exists a social pension which is available to elderly persons who are not insured or do not fulfil the requirements for the minimum pension of the core system. This social pension is income-tested with respect to family income and financed by general tax revenue. It is about 7% lower than the minimum pension of the core system.

#### 5.4 Old-Age Security Systems Without Minimum Pensions

Although there are many parallels between the organisation of the core old-age security systems in Ireland and the United Kingdom<sup>27</sup>, they differ considerably regarding the fulfilment of the goal of universal minimum security in old age. In the National Insurance scheme of the UK 90% of potential working life have to be covered by contributions or other qualifying years in order to receive category A retirement pension. If at least 25% of the required years have been covered the full pension is reduced pro rata temporis. Since even the full pension is somewhat below the level defined in the regulation for income support a reduced pension is not enough to live on. The national insurance scheme of the UK thus provides no minimum old-age pension in the sense of our definition. This also applies to persons who interrupt their employment temporarily to bring up children or provide voluntary nursing care. For these persons 20 years sometimes suffices to obtain a full pension. The pension for wives who have no claim to a pension or only a claim to a reduced pension (category B retirement pension) does not fulfil the criteria laid down for a minimum pension since it is only 60% of their husbands' pension and, therefore, is under the level of income support for individuals.

The Luxembourg<sup>28</sup> and Belgian<sup>29</sup> core systems of old-age security do not grant a minimum pension according to our definition, either.

At least 40 years of insurance are needed in Luxembourg to draw a full pension. In the case

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26 Contributory Old-Age Pension Scheme

27 National Insurance Contributory Benefits

28 Régime Contributif d'Assurance Pension

29 Caisse Nationale des Pensions de Retraite et de Survie

of an incomplete period it is reduced pro rata temporis, though only to a certain level, since the minimum period for an old-age pension is 20 years. Women with one (two or three) child(ren) require only 14 (12 or 10) working years to claim half a minimum pension. But the latter is lower than the guaranteed minimum of subsistence (Revenu Minimum Garanti), which is paid in case of hardship on fulfilment of certain conditions.

In Belgium too a full pension is only paid in the case of a complete insurance period. For women this is 40 and for men 45 years. This difference in claim requirements follows from the differing retirement age for women and men. Women who have worked all their lives part-time cannot claim a minimum pension even after 40 years, as part-time work is counted proportionately. Only persons with a continuous fulltime earning career can benefit from a special arrangements of the Belgian core old-age security system, which provides them with pensions that are clearly above the level of income-tested guaranteed income for the elderly (Révenu Garanti pour Personnes Agées). But this is not a minimum pension according to our definition. On the other hand, however, the Belgian old-age security system provides an income-tested non-contributory minimum pension for all the elderly (Type V B), that guarantees a minimum of subsistence.

The German core system of old-age security<sup>30</sup> has no minimum pension, apart from the social supplement that is paid to pensions in the former East German Länder for a transitional period. In the framework of the core system an important element is the so-called "pension based on minimum income", which under certain conditions leads to a higher assessment of insurance periods before 1992. The preconditions for receiving this are relatively high from a woman's point of view, at least 35 qualifying years, even though account is taken of time spent raising children to the age of 10 and voluntary nursing care.

One would get a biased impression of the minimum income provisions for the elderly in the UK, Luxembourg and Germany if one neglected the fact that in each of these countries there exists a general social assistance regulation that also provides indigent elderly with a minimum of subsistence.

An overview of the minimum income provisions for the elderly in the twelve EC-countries is given in Table 6.

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30 Gesetzliche Rentenversicherung

Table 6: Classification of the minimum income provisions for the elderly in the EC-Countries<sup>1</sup>

Type	Country	Denmark	Netherlands	Portugal	Greece	Italy	Spain	France	Ireland	United Kingdom	Luxembourg	Belgium	Germany
I. Ideal Beveridge System													
II Tax financed minimum pension													
Type A		X <sup>2</sup>											
Type B			X <sup>2</sup>										
III Minimum pension incorporated in contributory categorical social pension system													
Type A						X							
Type B				X	X				X				
Type C							X	X					
IV Income-tested pension supplement		X				X							
V Income-tested minimum pension													
Type A				X	X	X							
Type B							X	X				X	
Type C									X				
Availability of general social assistance for the elderly		X	X							X	X		X

<sup>1</sup> This table shows only the core systems.  
<sup>2</sup> Based on a long term residency.

## 6 Summary

The findings of our comparative study can be summarised as follows. The implementation of an ideal Beveridge system based on his two principles in conjunction with social insurance in a country without immigration would guarantee own pension reaching the socio-cultural subsistence level for each resident without income testing. It would be gender-neutral. If immigration in middle age or later from non-EC countries is taken into consideration even the ideal Beveridge system does not guarantee a minimum for each resident of a country in old age.

An empirical analysis of individual pensions for women and men in six EC countries shows that in four countries (Italy, France, Germany and Luxembourg) there is a considerably lower share of women with own pensions than men, while in Britain and presumably in the Netherlands the differences are slight. Only in the Netherlands, however, does the amount of minimum old-age pension lie over 40% of average equivalent income, while there would be high poverty levels in the other countries if women only had their own pensions to live on.

On the basis of five criteria a typology of minimum income provisions for the elderly can be developed showing the situation in the EC countries. Deviations from Beveridge's principles arise above all when the principle of universality is limited, excluding population groups, abandoning individual claims or introducing income testing. The theoretical analysis shows that differences between women and men are much smaller as residence time replaces insurance time and as other minimum requirements become less important. Classifying the various core old-age security systems in EC countries reveals three groups. The first one comprises Denmark and the Netherlands, which have introduced residence-based minimum pensions. The second group is made up of Portugal, Greece, Italy, Spain, France and Ireland, which have contributory minimum pensions requiring only minimum insurance periods of less than 20 years. Some of these contributory minimum pensions are not income-tested, while others are. In addition to that all these countries grant non-contributory income-tested minimum pensions to older persons who do not meet the minimum requirements for a contributory minimum pension. The United Kingdom, Luxembourg, Belgium and Germany belong to the third group with no contributory minimum pension in their core old-age security system, but they all provide a minimum of subsistence for the elderly either by a general social assistance regulation or by a special social assistance regulation for the elderly (Belgium).

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