Changing social organizations of care: a comparison of European policy reforms encouraging paid domestic work

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Published online: 27 March 2012
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Abstract In many European countries different types of policy reforms intending to encourage growth in the domestic service sector have been introduced. The methods and reforms differ but mainly the reforms intend to stimulate growth of a ‘new’ legal labour market sector within private households. This potential growth sector in combination with insufficient or declining welfare states, inclining female labour market participation and ageing populations could be viewed as explanatory factors to the increased demand for domestic services. A growing amount of those performing paid domestic work in European homes are migrant women with or without papers. The aim of this article is to create a model that enables comparisons of these reforms, with a special focus on changing social organizations of care for elders, children and other dependent persons. Included in the analysis are European countries that have introduced wide domestic service policy reforms as measurement to encourage growth in the domestic service sector, i.e. Austria, Belgium, Denmark, Finland, France, Germany and Sweden.

Keywords Domestic service reforms · Tax credits · Cash for care · Domestic work · Gender · Organization of care

Introduction

An ageing population, increasing unemployment figures, problems in reconciliation of work and family life and a

growing sector of informal employments are serious issues on almost all European governments’ agendas. In a wide range of countries different policy measurements have been introduced to meet these urgent policy problems, policy measurements that all encourage the development of a market of domestic services in private homes. Different types of public subsidies are used to make it cheaper and administrative simpler to pay child minders, nannies, elder carers, cleaners, relatives or domestic service workers for their services (Williams and Gavanas 2008; Ungerson and Yeandle 2007; Ungerson 1997). The methods of the reforms differ—cash for care, service vouchers, tax credits and tax incentives—but the reforms have in common that they intend to stimulate growth of a ‘new’ formal labour market sector within private households. The service sector is often emphasized as the most likely growth sector, currently contributing to >70 % of GDP and representing 70 % of the jobs in the European Union (EU) (Eurostat 2007). In later years, there has been a growing informal labour market within domestic services, which has drawn attention of European governments whereas a transformation of this informal domestic work into formal work could create job growth, especially among those with low education and weak connections to the labour market (Renooy 2007).

As these domestic service reforms become popular all-embracing policy solution to a long range of social problems it is necessary to scrutinise and analyse these reforms. Domestic services are clearly a gendered issue as cleaning, caring and cooking are still persistently viewed as women’s work, but it also have other social divisions inscribed in them, such as class and race (Graham 1991; Williams 1995; Lutz 2008, 2007; Parreñas 2001; Anderson 2000; Hochschild and Ehrenreich 2003; Peterson 2007; Kvist and Peterson 2010). It is therefore essential to study this issue from a gender, class and race perspective. The policy

Responsible Editors: T. Rostgaard and M. Zechner (Guest Editors) and H.-W. Wahl.

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implications of the domestic service reforms are two-folded on one hand are the labour markets consequences, with job growth and counteracting informal employments. On the other hand, the introduction of these reforms has consequences for the transformation of social organisation of care. The domestic service reforms could be viewed as altering the normative, economic and social framework of social care, in other words the activities and relations involved in meeting the physical and emotional needs of dependant persons (Daly and Lewis 2000). Domestic work have traditionally been defined by feminists as a common burden to all women, a unpaid day-to-day reproductive work of households, today with the increase of paid domestic workers in western homes this definition is no longer valid (Graham 1991; Yeates 2009). In this article, an approach for analysing these policy reforms is created that enables a wider comparative analysis of the domestic service reforms across national policy and welfare models.

There is a wide variation between countries as to how these reforms are labelled and motivated, and also which domestic chores are covered by these benefits. The reforms that in this article are called domestic service reforms are reforms that include a wide variety of domestic work that has traditionally been carried out within households on an unpaid basis, often by women. As will be illustrated, there is an important difference as to whether care for elders, children and other dependent persons is directly mentioned in the reforms or if the reforms are mainly articulated as targeted towards personal services for instance, cleaning, window washing and ironing for healthy adults (Waerness 1984). In practice such a distinction between care work and personal services are hard to make, cleaning, cooking and washing are often for instance carried on alongside child minding or care for elders (Lutz 2011). In this article, it is the articulation of the reforms that are in the centre of the analysis, which is not the practice of the domestic service reforms. Included in the analysis is a selection of European countries that on the one hand have introduced different kinds of extended domestic service reforms, and on the other hand represent different welfare regimes that are, Austria, Belgium, Denmark, Finland, France, Germany and Sweden.

The articulation of political reforms such as domestic service reforms is in this article viewed as political discourses that represent not just measures to solve social problems; intertwined in the articulation of the reforms lie interpretations and representations of the specific social problems they suggest need solving (Bacchi 1999, 2005). Through analysing and comparing these interpretations and representations within domestic service reforms and contrasting them in relation to established categorizations of European social care models, the ambition of this article is to create an approach for analyzing these policy reforms that facilitates an understanding of how the boundaries of

the European welfare states are shifting, and also how these shifts challenge understandings of public and private, paid and unpaid work in Western European homes.

Commodification of care

In many countries formalization of care work, in which care work is transferred from the family into formal public and professional care is not complete (Pfau-Effinger and Geissler 2005). New public management and neoliberal market politics have in recent decade's favoured marketization of elder- and childcare and have encouraged new ways of organizing care that could provide more cost-effective and cheaper care services, a commodification of care. The care organizations established through domestic service reforms are often considered to be more cost-effective because they offer services with fewer layers of welfare bureaucracy (Ungerson and Yeandle 2007). The domestic service reforms analysed in this article could be seen as illustrations of changing models of care organizations in Western societies and as a challenge to established labour laws and regulations. Informal care work is often performed undeclared; therefore, no employee labour laws or social security rights apply (Pfau-Effinger and Geissler 2005). Formally performed domestic service work is still less regulated than others forms of work performed outside employers' homes (Calleman 2007; Isaksen 2010).

Care gap and social care models

Many European countries are trying to restructure and redefine the divisions of care responsibilities, due to demographical changes and escalating costs for care (Bettio and Plantenga 2004; Daly 2001; Gershuny 2000). But the care gap does not look similar in all countries, depending on the extent of public care services. Esping-Andersen's (1990) clustering of the European welfare regimes has been influential and largely embraced, but also thoroughly criticized by gender researchers for its lack of gender perspective (Orloff 2009, 1993; Lewis 1992). Despite this criticism, the key concepts of the theory dealing with the relationships among the state, the market and the family have continued to influence many gender studies scholars (Lutz 2008; Isaksen 2010). Lutz symbolizes the European care regimes with a sliding scale. On one end are the traditional care regimes linked to conservative gender regimes, often exemplified by Germany or the southern European countries; on the other end, we have the more equal care and gender regimes, such as the Scandinavian countries (Lutz 2008). Even though placing European countries in clusters or regimes is problematic, some scholars agree that it is

possible to identify European care regimes. Anttonen and Sipilä (1996), Daly (2001), Bettio and Plantenga (2004) and Lister and Anttonen (2007) have identified certain features that different countries have in common, in terms of ways of organizing and volumes of social care services that justify referring to models or regimes.

Different domestic service reforms encouraging domestic services

To begin with two distinctly different models of benefit structure could be identified: the tax credit model and the voucher model. In countries where the tax credit model has been introduced, private persons who have incurred expenses for domestic services within their households can obtain a tax credit for part of the labour cost. This model is found in the Scandinavian countries analysed here, Denmark, Sweden and Finland. In some other European countries service cheques or vouchers have been introduced. The voucher system provides a simplification of employment regulations and social service and tax regulations that facilitate and simplify employment of domestic service workers or companies in private households. This model is found in France, Belgium, Austria and Germany. The models are not mutually exclusive, as in France, Belgium and Germany; it is also possible for households to receive a tax credit for domestic services.

The tax credit model

Denmark was the first Scandinavian country to introduce domestic service reforms. *Benefits for Domestic Services* (Hjemmeserviceordningen) was introduced in 1994 and made permanent in 1996.¹ The law on the benefit was circumscribed in 1999 and 2002, and severely restricted in 2004 by the Liberal-Conservatives, at which point the benefit was made available only to people who have reached the age of 65. The reform was mainly argued as a new way of dealing with unemployment (Platzer 2007). The proposal was thus introduced as a solution to the problem of unemployment and articulated as part of the Nordic welfare system (Kvist et al. forthcoming). Another

important objective of the reform was to reduce informal employment, provide better employment for less educated people and to give more welfare to families with children and elders (Pedersen 2009; Kvist et al. forthcoming).²

In Finland, domestic work has been tax deductible in some regions since 1997. The law on tax credits for domestic help and work was first pilot-tested in selected regions and then was made a permanent part of income tax legislation in 2001. The domestic service reform has been extended a number of times, in 2003 and 2005, and most recently in the spring of 2009, to include a wide variety of chores from domestic help to home improvement, care and information technology support (Kvist et al. forthcoming). The tax credit is applicable not only to domestic services performed within the taxpayer's own household but also to domestic services performed within elder relatives' homes, such as parents, parents-in-law, adopted parents, foster parents or other members of the elder generation of the family (Zechner 2010). Despite these generous domestic service laws in relation to eldercare, childcare is not included in the domestic service reform (Zechner 2010). The reform was mainly argued as a way of creating jobs in private enterprise and to stimulate a new labour market within the domestic service sector (Kvist et al. forthcoming). The reform was also argued as a way of reducing informal employment (Renooy and Kantanen 2009).

In 2007, a tax credit on domestic services was introduced in Sweden. According to the act, a person who has had expenses for domestic services can obtain a tax credit of 50 % on the labour cost, up to a limit. The work must be done in or close to the home, or in an elderly relative's home, by a person with a registered company. The aim of the reform was to enable the households to buy domestic services, to stimulate the growth of new companies within the domestic service sector and to reduce the undeclared work already performed in this sector.³ Further, it was argued that the reform would be beneficial to gender equality, as it would improve the possibilities for women to combine work with family life, reducing the double burden of domestic work from the households and improving women's opportunities to participate on equal terms in the labour market. According to the legislators a tax credit for domestic work would provide the opportunities for women

¹ Based on the analysis made in a conference paper (Kvist et al. 2009), in which the Danish case was analysed through the parliamentary debate and the government bill of 2003, when the reform was severely restricted. Also analysed was the First debate on Law Proposal nr. L 69: Proposal for a law on amendments of the law on domestic services (revising the groups of people eligible for the benefit). The benefit concerned domestic services such as garden work, snow clearance, shopping for daily goods, cooking, cleaning, laundry, and window cleaning and the subsidy was set at 50 % of the cost.

² In June 2011, the Danish Hjemmeserviceordning was dismantled, but a new scheme has been established (Servicefradrag) which gives access to a tax credit for all private persons who have incurred expenses for domestic services within their households. The chores included are cleaning, gardening, child-minding, reparation and renovation, i.e. the amount is similar 15.000 DKK can yearly be subtracted from your taxes, representing around 7.000 DKK in real subsidy. The policy process leading up to this reform is not analysed in this article.

³ The document in focus in the Swedish case is the government bill on tax credits for domestic services (prop. 2006/07:94).

to perform more work in the paid labour market, improving their position as professionals and providing economic self-sufficiency (Kvist et al. forthcoming).

Voucher model

France has some of the most far-reaching policies within the EU on encouraging growth within the domestic service sector (Windebank 2007). The French voucher system, called Chèque emploi service universel—CESU, came into force in 2006. Domestic services include domestic work, assistance for elders and disabled or dependent persons, childcare, help with schoolwork, small household repairs, gardening, assistance with administrative formalities, computer repairs, beautician services to dependent persons and care and walking of pets. The voucher system is further encouraged through significant tax and social security incentives. Buyers are entitled to 50 % tax credits on the domestic service they have paid for up to a limit that depends on household earnings. Further, there are reductions in employers' social security contribution and tax credits for companies, social welfare bodies and others that co-finance the CESU. The CESU was primarily motivated as a way of creating regular jobs, within a presumably growing domestic service market, especially for less educated people (Sansoni 2009). These vouchers could be used either to pay for domestic services supplied by authorized bodies or to remunerate an employment directly.

Belgium introduced a similar model of domestic service vouchers in 2001. *Titres-services* were introduced to reduce undeclared work, encouraging employment for unemployed persons (Renooy et al. 2004). An issuing company provides a form of payment, which enables the user to buy tax-deductible services; 30 % of the cost is tax deductible on services from approved companies. Domestic services include house and window cleaning, washing and ironing, small sewing jobs, preparation of meals and shopping, but care is not specifically or explicitly mentioned in the legislation. The services can only be bought from companies approved by the federal government (Sansoni 2009).

Austria also introduced domestic service cheques, *Dienstleistungsscheckgesetz*, in 2006, to tackle the informal economy in the household service sector and 'decrease illegal activities in this problematic segment of the labour market' (Adam 2009). Services included in the cheques are childcare, eldercare, simple gardening work, domestic cleaning and home maintenance.

The German government has introduced different models to encourage households to employ formal domestic workers. Earlier studies have shown that 11 % of all households in Germany employ domestic workers in undeclared work (Pfau-Effinger et al. 2009). In 1990, a tax deduction scheme

was introduced for households with children, elders or others in need of care. This scheme was extended to all households in 1997, simultaneous with the introduction of a service voucher, *Haushaltsscheck* (Jaehrling 2003). The scheme only applied to employment relationships with wages higher than a specified level.⁴ The employer may also deduct a certain amount of payment from taxes, the so-called *Dienstmädchenprivileg*, or maid privilege (Renooy et al. 2004; Renooy 2007).

As illustrated in Table 1, there is a striking variation in the creativity and set-up in the European domestic service reforms. Common to all the domestic service reforms is that the aim is to encourage growth within the domestic service sector. The main objectives of the reforms are quite similar: to reduce informal employment and to stimulate job growth in a sector with low qualifications for workers with weak labour market positions and ties. Even though there are some similarities, there are also great differences when comparing these different reforms and contextualizing them in relation to each country's social care model. It becomes apparent that it is not just how the reforms are structured that is interesting; it is also necessary to take into account within which kind of welfare state setting these reforms are established. To begin with, it is interesting to note the different domestic service reforms' roles in changing social organizations of care.

Domestic work or domestic care work

Denmark that was the first Scandinavian country to introduce specific domestic service reforms, limited the reforms' target group to those 65 years of age and older during a couple of years, but have now introduced a new domestic service reform aiming all tax paying citizens. In Sweden, the reforms have mainly been targeted towards personal services to all, not specifically as care, even though in later years, with the introduction of the Free Choice Act 2009 (Lag om valfrihetssystem Prop. 2008/09:29), older persons who receive state-provided home care can choose to hire domestic service companies to perform parts of their home care. In Sweden, Denmark and Belgium, child- or eldercare is not explicitly

⁴ This limitation was due to the so-called minor employment, which was introduced in Germany back in the 1970s. These minor employments were totally exempt from social security payments by both the employer and the employee. The employee did not need to pay tax and employers had to pay a lump-sum tax. These minor employments could be held on the side of normal, formal jobs and still be exempt from taxes and social security contributions (Renooy 2007). As the rapid growth of minor jobs started to threaten the financial basis of the social security system, a new proposal for minor jobs was suggested in 2002 by the Harz Committee. Three categories of mini-jobs were created, one of them especially levelled at the household sector.

Table 1 Domestic service reforms in Europe

Country	Year of introduction	Motives for reform	Type	Care work	Service provider
Denmark	1994	Job growth, job creation for groups with weak position in the labour market, reduce undeclared work	Tax credit	No	Company
Finland	1997	Job growth, reduce undeclared work	Tax credit	Yes	Company
Sweden	2007	Job growth, reduce undeclared work, gender equality	Tax credit	No	Company
France	1996	Job growth, reduce undeclared work	Voucher, tax credit, reduction of social security contributions	Yes	Company, individual
Belgium	2001	Reduce undeclared work, job growth, job creation for groups with weak position in the labour market	Voucher, tax credit	No	Company
Austria	2006	Reduce undeclared work	Voucher	Yes	Individual
Germany	1990 (limited) 1997 (all)	Job growth, reduce undeclared work	Voucher, tax credits, reduction of employer's tax and social security contribution	Yes	Individual

mentioned in the domestic service reforms; the reforms are mainly targeted towards personal services. Denmark, Sweden and Belgium already have extensive and established care arrangements and the domestic service reforms could mainly be viewed as a complement to established care arrangements or as a substitute for a declining welfare states where more care responsibilities have been shifted onto the households (Szebehely 2005; Calleman 2007). In France, Finland, Austria and Germany, childcare, eldercare or care for other dependent people is explicitly mentioned in the domestic service reform, and both personal services and domestic care of children and elders is tax deductible. Among these cases, Finland and France stand out with their generous definitions of domestic work tasks—cleaning, cooking, gardening and care for elders, to name a few, but also installation and support of information technology in the home, and also home improvement. Both Finland and France have well-established public care services for children. Eldercare services are also provided, in Finland mainly through public eldercare, and in France through religious and political organizations that are funded through public and private institutions (Anttonen and Sipilä 1996). In these cases, the domestic service reforms could be viewed as a complement to the already existing care forms and perhaps a way for grown children with higher incomes to provide more extensive care for their elderly parents (Zechner 2010).

In Austria and Germany, care work is also included in the domestic service reforms; in both these countries the social care model relies on the family to provide care for elders and children⁵ (Anttonen and Sipilä 1996; Bettio and Plantenga 2004; Duncan and Pfau-Effinger 2000). The domestic service reforms were introduced as a way to

tackle informal employment and facilitate the possibility for households to employ private workers in their homes.

Another interesting difference between the countries is whether the services must be bought through companies or the goal of the domestic service reforms is to make it simpler for households to employ domestic workers.

Domestic service companies or households as employers

Finally, an important difference is how the domestic services are purchased. This is specifically relevant in relation to how the domestic service work is regulated in the labour laws and which kind of work these reforms are creating. In some countries, the services are always purchased through companies or self-employed persons, which technically makes households service purchasers, not employers. This is the case in Denmark, Finland, Sweden and Belgium. In these cases, it is relevant to speak about state policy as actively stimulating domestic service entrepreneurship. Common to the above-mentioned countries is that the formal care strategies for both elders and children are relatively well developed (Isaksen 2010; Anttonen and Sipilä 1996). The domestic service reforms are in that sense a way of regulating an informal labour market sector, and also to including domestic service workers under established labour laws and regulation. In France, with its long traditions of domestic service reforms, it is possible both to buy domestic services from companies and also to employ someone in the household (Windebank 2006).

In Austria, France and Germany, the domestic service reforms are partly motivated as a way for private households to employ individuals to do domestic work in the

⁵ Foregone incomes are to some extent compensated by the state.

homes. In these countries, the social care model relies on the family to provide care for elder persons and children (Anttonen and Sipilä 1996; Bettio and Plantenga 2004; Duncan and Pfau-Effinger 2000). In these cases, the domestic service reforms could be seen as part of a transition of unpaid domestic work/informal employment in private homes to paid domestic work, a transition that could be described as developing from unpaid domestic work mainly performed by women or by persons with informal employment, to paid domestic work performed in the home by a person often with low wages and precarious work conditions, and poorly protected by labour laws and regulations (Lutz 2008; Anderson 2000; Calleman 2007; Williams and Gavanas 2008; Parreñas 2001). In Austria and Germany, we find the clearest case of domestic service reforms creating a labour market alongside the ordinary labour market, with special arrangements and special regulations.

Conclusions

In this article, the diverge characteristics of the different kinds of domestic service reforms are brought together with the social care models within which they are situated. The approach enables comparisons of the domestic service reforms across Europe and clarifies that these reforms could be seen as part of changing social organisation of care, even though these changes appear disparate depending on context. The development indicates that the domestic service reforms will be particularly important in relation to care for elder persons, as a complement to already established public care arrangement, as a privatised solution for especially wealthier groups, or as providers of care services replacing female provided unpaid care or informal care arrangements. The development of domestic service reforms could indicate a transformation away from formalisation and professionalization of care, instead we are witnessing a deregulation, individualization and privatization of these work tasks that often are performed in the obscure interspace between care work and personal services (Lutz 2011). Significant for paid domestic work is, self-evidently, that it is performed within the household. The household is a place that is constructed and understood in a particular way in society. The meaning of the household and the work performed within it are embedded in and permeated by social and cultural norms and symbols. In domestic services, the established norms and understanding of the meaning of public and private become transformed and contested. The understanding of paid work performed within the home challenges our modern understanding of work as something performed outside of home and also encourages us to pay for work that has previously been

performed without pay or sometimes quite poorly paid. In some ways paid domestic work becomes in-between work.

This is especially noticeable in the countries with domestic service reforms that enable private households to employ individuals to perform domestic work. This study is not adapted to the traditional work legislations and tax regulations; instead, its existence is dependent on exceptional rules and regulations, rendering this work exceptional (Peterson 2007; Mendez 1998; Calleman 2007; Pfau-Effinger and Geissler 2005). However, in the cases where there are established companies selling domestic services, domestic work is still being performed within the privacy of the homes and therefore not likely to be scrutinized by work inspections or other forms of external controls (Lutz 2007, 2008; Calleman 2007). The domestic service reforms empowers some women, enabling participation on the paid labour market, however, the often precarious work conditions and exceptional character of the domestic service work both empowers and disempowers the domestic workers (Kantola and Dahl 2005).

To conclude, it becomes apparent that in order to generate job growth and defeat informal employment, and also to solve the emerging care gap created when publicly provided care is lagging behind, some governments are willing to subsidize a labour sector with exceptional work conditions and regulations. Domestic work is not just another kind of work that easily fits into our established labour laws and regulations; it is a specific kind of work performed under specific circumstances (Lutz 2011, 2008). Despite the often precarious work conditions and problematic power relations built into the domestic service reforms, governments all over Europe are motivated to introduce them through the unchallenged notion of labour market participation as the solution to an expanding range of social problems (Rönnblom 2009). Commodification of domestic work not only preserves the gendered division of domestic labour; it also reinforces asymmetrical class and race relations between women and men, and also has significant importance on the social organization of care all over Europe.

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