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The sins of the parents: Conceptualising adult-oriented reforms to family policy

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Editorial note

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Abstract

A core element of a welfare state is the support that is provided to families with children, in recognition of the additional needs that dependent children create. Variation in the design, generosity and implementation of this provision is significant, reflecting underpinning perspectives towards children, families, and the state's role in supporting them. Recent work by Mary Daly developed a new typology of social policy towards children, differentiating between 'childhood-oriented', 'child-oriented' and 'family-oriented' policies. In this paper, we explore how far this typology enables us to classify recent significant changes to social security support for children within the UK. Historically, families in the UK have been able to access a means-tested minimum which was calculated on the basis of household need and therefore the total available increased with family size. Two policies, the 2013 benefit cap and the 2017 two-child limit, changed that; both policies sever the link between household need and social security entitlement.

We propose that an extension to Daly's typology is needed to make sense of these changes. We develop a new category of 'adult-behaviour-orientated' child-contingent policy, encapsulating policies that are directed towards children but made conditional on the behaviour of the adults in their household. We go on to analyse support for children across Europe through the lens of this extended framework. Significantly, we find the UK's approach to be unusual but not exceptional, with other examples across the continent of children being rendered invisible or semi-visible within social security systems that prioritise other goals than children's needs. It is significant that across diverse national contexts, support for children is being withdrawn (or is simply absent) because of the behaviours and circumstances of the adults in their household.

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Introduction

Social security support for households with dependent children routinely increases with family size (Daly and Ferragina, 2018). Such a design is responsive to the greater demands on the household that come with a larger family and fits within broad objectives for social security to reduce and alleviate poverty risks (Bradshaw, 2006; Rathbone, 1940). In the UK, however, recent years have seen significant changes to the way the social security system supports families with children, moving away from the principle that increased needs means greater support. The most obvious break with this principle was the introduction in 2017 of a 'two-child limit' on means-tested benefits (Sefton et al., 2019). In this paper we place this change in wider conceptual and comparative perspective.

To conduct this analysis the paper draws on a typology developed by Mary Daly (2020a) which differentiates between 'childhood-oriented', 'child-oriented' and 'family-oriented' policies towards children. The typology was designed to cover a wide range of social policies including both services and cash benefits. We find that while it captures some key aspects of social security well, the family-oriented category is too broad to make sense of recent changes in the UK - and also internationally. We propose an extension to the typology which better captures these shifts and which represents a key contribution of this paper. This extension creates a distinction within Daly's category of family-oriented policy between policy aimed at ensuring the family's needs are met at a basic level ('needs-oriented') and policy aimed at influencing adult behaviour ('adult-behaviour-oriented') (Watts and Fitzpatrick, 2018).

The paper's central argument is that financial support for children in the UK is not only not child-oriented, in Daly's framing, but, more than this, is increasingly conditional on the behaviour or decision-making of the adults in the family. While this phenomenon has some precedent among earlier

UK social security policies (namely, the wage stop in the 1970s (Elkes, 1974), recent changes have very sharply increased its dominance: we argue that almost all UK-wide support for children can now be classified as adult-behaviour-oriented – although we note that Scotland is forging its own path. We also find that this approach is unusual in the rest of Europe, with most countries continuing to combine child-oriented and needs-oriented policy. Crucially, however, the approach is not unique, and we identify a number of other examples, making our revision of Daly’s typology especially important.

At one level, the paper answers straightforward but important descriptive questions about the way European countries’ social security systems respond to differences in family size: is the UK alone in Europe in placing limits on the number of children who are eligible for social security support? This allows us to better understand the extent to which the two-child limit is internationally unique and/or part of a wider pattern. The treatment of family size within social security has received limited focus in research to date, though there are notable exceptions (Aidukaite and Senkuvienė, 2021; Bradshaw, 2006; Curran, 2021).

At the same time, the paper also considers what the two-child limit tells us more generally about the way that UK policymakers conceptualise support for children and whether this conceptualisation is replicated at all in other international contexts. In doing so we make a distinctive contribution to debates about the shape of children’s benefits. For the purposes of this paper we are less concerned with the question of adequacy (though this is, of course, crucial) but with the contours of these policies and what they reveal about the orientation of different states to different members of the household. We see our operationalisation and development of Daly’s typology in relation to social security benefits as providing a crucial complement both to existing work on the generosity of children’s benefits (Aerts et al., 2022; Bradshaw and Finch, 2003) and to debates around

means-testing versus universalism in provision of support for children (Daly and Ferragina, 2018; Van Lancker and Van Mechelen, 2015).

Our analysis also adds a new angle to debates about conditionality in cash transfers. Conditional Cash Transfer programmes (CCTs) are increasingly common in middle- and lower-income countries (Fernald, 2013; Ladhani and Sitter, 2020), with cash transfers for children conditional on human capital investment such as school enrolment or child health check-ups (Fernald et al., 2009; Fiszbein et al., 2009; Rasella et al., 2013). Such policies are relatively rare in Europe and are generally seen as less relevant where there are well-developed systems of family allowances and an established safety net for all. By contrast, conditionality of unemployment benefit support is widespread and has grown in intensity across industrialised countries (Geiger, 2017), with support dependent on job search behaviour and other requirements (Raffass, 2016). We suggest that we are observing a new form of conditionality in cash support for children: the attachment of adult-focused behavioural conditions to support that is aimed at children. This is a new and significant development that demands attention.

The paper is structured as follows. We begin with an introduction to Daly's typology, focusing in particular on the distinction she draws between child-oriented and family-oriented policy as particularly relevant when considering the shape and structure of financial support for children. We go on to test how far this distinction helps make sense of the two-child limit, and to argue that an extension to the typology is needed. We revisit the UK social security system and its recent history through the lens of this extended framework, before going on to apply it to child-contingent cash support for children across European Union countries.

1. Social policies for children: a typology

In her 2020 article 'Children and their Rights and Entitlements in EU Welfare States,' Mary Daly calls for better classifications and a more nuanced understanding of policy approaches to children, particularly in light of increased attention given to children in European policymaking. As she notes, child-focused policy in Europe has been motivated in part by commitments around children's human rights and in part by a social investment rationale (Morel and Palier, 2011), leading in practice to a wide range of different approaches and motivations which can be discerned behind social policy for children (Daly, 2020a). Her article develops a typology that distinguishes three broad approaches: children-oriented, family-oriented and childhood-oriented policy (see Table 1). Of most relevance for us here is the distinction between children- and family-oriented policy.

Table 1: An initial typology of social policies for children, adapted from Daly (2020)

| | Family-oriented | Children-oriented | | Childhood oriented |
|---|--|---|---|---|
| | | Child-focused | Child-centred | |
| Primary focus | Adults | Child & adults | Child & adults | Adults |
| Direct or indirect engagement with children | Indirect | Direct – recognition of children as a distinct group with needs | Direct – recognition of children as capable of defining their own needs | Indirect and direct |
| The entitlement | Income support for the family | Resources – income and services | Resources (income and services) and participation | Services for preparation for adult life |
| The desired outcome | Sufficiency of family income | Recognition and resourcing of children | Children's empowerment | A well-resourced childhood |
| Social security policy | Means-tested child benefits | Universal child benefits | Children involved in determining benefit levels | Uprating policy as it affects child benefits compared to pensions |
| | Child benefits that vary with family structure | Benefits paid directly to older children | | |

Note: reproduced from Daly (2020) Table 1. Row on 'Social security policy' has been added by authors. Shaded columns are the most relevant to this paper

Children-oriented policies recognise children as individuals with human rights and entitlements (Skevik, 2003). These policies engage directly with children as a distinct group, conferring recognition and entitlements on children in distinction to adults (Daly, 2010; Millar and Warman, 1996). Within this category, Daly identifies a sub-category of *child-centred* policy which sees children not only as holding rights but as subjects capable of identifying and articulating their needs; child-centred policy therefore aims to secure children's participation and empowerment, providing resources and opportunities to this end. Daly acknowledges that this is the "highest and hardest level to achieve" (Daly, 2020a: 356) and that European social policy has little relevant progress to report, though most EU member states have some participatory structures for children and young people in place at a national level, such as national youth parliaments or children's councils (Percy-Smith et al., 2015). In this respect, child-centred approaches serve an important normative function within the typology rather than being an approach that is seen in practice to any great extent anywhere in the EU.

More common within the children-oriented group are what Daly terms *child-focused* approaches which provide children with recognition and rights while treating them as objects rather than subjects of policy, i.e. without the higher requirement that children's own views and perspective on their needs are taken directly into account. The goal of child-focused policies is somewhat less ambitious – the recognition and resourcing of children, whereas the goal of child-centred policy is children's empowerment (see Table 1) (Brannen, 1999; Strandell, 2010). Daly proposes Swedish education study grants paid directly to young people aged 16-19 in education as an example of a cash benefit policy that fits the child-focused category.

In contrast to children-oriented policy, *family-oriented* approaches locate children within the familial context. Daly argues that the focus of family-oriented policies is on the adult world rather than directly on children. Here

sufficiency of family income is the core goal; children's welfare is addressed by "resourcing the family or parents and/or seeking to affect parental behaviour and institutions" (Daly, 2020a: 356). Need is understood as a characteristic of the family rather than the individual child (Frazer and Marlier, 2017). In relation to social security policy, an obvious example would be a means-tested child benefit for which eligibility and/or the size of the payment depends on household resources.

Finally, *childhood-oriented* policies consider children as an age group or age category and prioritise spending on them as such; children are resourced "as members of a generation, rather than as having value and claims as persons" (Daly, 2020a: 356). The emphasis here is on the temporal construct of *childhood* rather than on specific children and this approach thereby aligns with social investment arguments for spending on the early years of life (Esping-Andersen, 2002; Hemerijck, 2015). Daly sees childhood-oriented policies as being primarily about investment in services such as childcare and education, but the concept is also relevant in relation to social security (Kuitto, 2016): arguments for spending more on financial support for children as a whole, especially relative to spending on pensioners or working-age adults, could also be seen as childhood-oriented. In this paper, our focus is on the way that benefits for children are structured, rather than on the relative share of government expenditure, which makes the category of childhood-oriented policies less relevant to our analysis.

This framework is one of the most recent and significant attempts to make sense of different approaches to social policies for children. We adopt it as our starting point in the paper, recognising its value and wanting to add to and build on existing efforts to categorise variations in policy approaches. Daly herself encourages critical engagement with the typology, arguing that "as policy develops so too must our classifications of it" (2020a: 344), and concluding that "this paper has attempted to illustrate, rather than exhaust,

the possibilities of the relationship between children and certain social policies” (2020a: 357). We hope that this working paper continues this effort, further exploring the rationale behind differences in the treatment of children within social policies in different European contexts.

Daly’s typology is not the only effort to categorise social policy towards families with children. An alternative approach has been developed by Palme and Heimer (2021). There are considerable similarities in terms of the core distinctions drawn: Palme and Heimer’s concept of ‘family-oriented’ policy has strong overlap with Daly’s, although Palme and Heimer place even greater emphasis on the role of children’s voice.¹ We stick to Daly’s classifications and labels in the rest of the paper as more comprehensive and to avoid confusion, but we note that our proposed subdivision and new categorisation within Daly’s family-oriented category also applies to Palme and Heimer.

Daly’s typology was developed with a broad sweep of social policies in mind. We have begun to set out how it applies specifically to social security policies. In the next section, we test its application to social security in more detail by considering recent developments in the UK. Before conducting this analysis, we propose one immediate adaptation in interpretation. Daly implies that to be child-oriented, policy should resource children directly and separately from their parents. This is easier to envisage in relation to services such as education than to cash transfer policies (although even for services children must usually exercise their rights via adults; for example,

¹ Palme and Heimer’s (2021) central argument is that we should think about a move towards child-centred policies in terms of defamilization, echoing developments in relation to gender. As in Daly (2020a), a particular focus is placed on participatory rights as well as welfare provisions. The core distinctions drawn are between whether policies for children are direct or indirect, and whether they treat children as objects or subjects. If a policy reaches children indirectly (e.g. via parents), it is considered child-oriented if children have had a voice (for example, if support from social services is based on what a vulnerable child has said that they need) and family-oriented otherwise. If direct, it is child-centred if children have had a voice and child-investment otherwise. Thus, the concept of family-oriented policy is similar to Daly’s, although a policy can be child-oriented for Palme and Heimer even if indirect, as long as children have had a voice.

children remain dependent on adults for where their entitlement to education is taken up). In relation to cash transfers, the example of education study grants was given as a rather exceptional case. While we recognise the value of Daly's emphasis on children being directly resourced, we argue that there is something particular and distinct about policy that resources children *in their own right and regardless of family circumstances*, even if the resources are not paid directly to the children themselves. We therefore propose to consider universal child benefit as a child-oriented policy, as long as it is paid at the same rate for each child of a given age regardless of family income, size or household structure (see Table 1). The premise here is that such a policy design recognises children as individuals, even if parents are given an intermediary role in managing the resources intended for them.

In contrast, we understand family-oriented category to include any policy that is dependent on household means or otherwise takes account of household size or structure. Here the child does not have the entitlement to a given level of support as an individual; eligibility and/or the level of support is contingent on wider family circumstances.

2. Applying Daly's framework: Child-contingent support in the UK

We turn now to consider the current structure of social security support for children in the UK, exploring how far the child-oriented and family-oriented policy categories help us to make sense of recent changes. Our focus throughout is on child-contingent financial support: support that the child or her parents receive in the form of financial transfers because of the child's presence in the household. We concentrate on the UK precisely because of significant recent changes there in the structure of support for children.

Financial support for children has contained a means-tested element in the UK for a number of years, with the importance of means-testing growing over time from the late 1990s onwards (Hills, 2014). Presently, there are two main aspects to child-contingent support: Child Benefit (Bradshaw and Tokoro, 2014) and the means-tested 'child element' of tax credits and Universal Credit (Howard and Bennett, 2020; Millar and Bennett, 2017). There are also some policies that vary across the four nations, including Educational Maintenance Allowances and the new Scottish Child Payment as well as additional streams of support targeted at families with very young children.

Child Benefit is payable for all children in the UK up to 16 (and for 16-19 year olds in full-time approved education or training), but since 2013 it is gradually taxed back from higher rate taxpayers; households with an earner on £50,000 start to see the benefit clawed back through the High Income Child Benefit Charge, which reaches 100% of the entitlement at £60,000. Child Benefit is the longest standing aspect of child-contingent support in the UK, with roots in the universal Family Allowances introduced in 1948 for second and subsequent children. From 1979, Family Allowances became universal Child Benefit for all children, and from 1991 the weekly rate became more generous for first-borns than subsequent children.

During the period that Child Benefit was flat-rate and universal, from 1979-1991 (Timmins, 2017), we would have called it a child-oriented policy. But currently Child Benefit is dependent on both family income and parity (slightly higher for first-borns), so we classify it as a family-oriented policy.

The *child element of Universal Credit* (previously Working Tax Credit and Child Tax Credit, now being phased out) is the main system of means-tested support for households with no or low earnings in the UK (Machin, 2017). Families who have children and are entitled to these benefits receive a 'child element' as part of their monthly entitlement. This has become the

most important part of financial support for low-income families since tax credits were first introduced in the early 2000s; it is worth around 2.5 times the value of Child Benefit for a first child and around four times the value for a second child. There was originally a small additional 'family element' paid to all families with a child, meaning families got a little more for their first child than for later ones, but since April 2017 new claims no longer include the family element.

The bigger change that took place in April 2017 was the introduction of the two-child limit (Bradshaw, 2017; Sefton et al., 2019): the child element is now only paid for the first two children in the family, covering new births from that point forward. Thus support is now conditioned not only on household means but on the number of siblings a child has. The approach bears some similarity to another policy from the same decade, the 2013 'benefit cap', which places an overall limit on the amount of support a working-age family can receive in support from the state, with disability-related exemptions (DWP, 2014; Grover, 2022). Here the conditionality is linked to parental employment; families can only receive the full support they are calculated to need if they have a household member who is working (with exceptions for disability). These two policies seem to mark a significant break with the basic principles of the post-war Beveridgean welfare state: that of linking entitlement to assessed need (Reeves et al., 2022; Stewart et al., forthcoming).

Child-contingent support paid through UC and tax credits has been unambiguously family-oriented from the start. The payment has always been dependent on family income and also (because of the family element, which favoured first-borns) very mildly on the child's parity. The introduction of the two-child limit in April 2017 sharply increased the importance of parity – third and subsequent children now receive nothing. Significantly, though, the changes made in 2017 do not trigger a change in

how the policy would be seen by Daly's typology – it was family-oriented and remains so.

Education Maintenance Allowances: In Scotland, Wales and Northern Ireland, weekly Education Maintenance Allowances are paid directly to young people aged 16-19 who are in full-time non advanced education, dependent on family income (Middleton et al., 2004). As the payment is contingent on family income, household circumstances are relevant. Nonetheless, given that it is paid directly to the young person, and following Daly, we consider it child-oriented. England also had an EMA but it was scrapped in 2011.

Additional support for babies and young children Across the UK some additional support is available to families during pregnancy and early childhood, with some differences between Scotland and the other three nations. The support combines cash payments with a voucher or payment card system restricted to healthy foods. In all cases payments go to parents/carers, with only families in receipt of other means-tested benefits eligible. In England, Wales and Northern Ireland families having a first new baby can access the Sure Start Maternity Grant, which is a one-off lump sum payment to families with no other child under 16, paid around the time of birth. They can also access Healthy Start Vouchers for each child (Griffith et al., 2018): weekly vouchers or a payment card for a small weekly sum from the 10th week of pregnancy until a child turns four (double from birth to age 1), which can be used to buy milk, vitamins, fruit, vegetables and pulses. In Scotland the Best Start Grant makes three lump sum payments to families in receipt of benefits at key transition points for all children: the Pregnancy and Baby Payment (like the Sure Start Maternity Grant (2022)) which is available to all children (though double for first-borns), and two lump sum payments made between 2 and 3.5 years (the Early Learning Payment) and around the time a child starts school (the School Age Payment). Like Healthy Start Vouchers, Best Start Foods provides a prepaid

card to buy healthy foods during pregnancy and until a child turns 3. Finally, since 2021 Scotland has a new Scottish Child Payment which pays £20/week from birth to age six, for families in receipt of other means-tested benefits. In 2022 this payment was extended to children under 16.

Under Daly's typology, all aspects of this support for young children across the four nations can be classified as family-oriented. Payments are dependent on family circumstances (always on household income and in the case of the Sure Start Maternity Grant and Pregnancy and Baby Payment also on the presence of other children). Nothing here meets the definition of child-oriented support.

This means that, with the exception of the EMA in Scotland, Wales and Northern Ireland, all aspects of child-contingent support in the UK fall under the family-oriented category in Daly's framework. Yet this seems unsatisfactory. Intuitively, there are substantive differences in policy orientation encapsulated by the policies presented, and these are erased within the typology. For example, there is no difference in the categorisation of the Scottish Child Payment (a flat-rate means-tested payment for all children under sixteen and the child element of Universal Credit since 2017 (flat-rate and means-tested but only paid for the first two children in the family)). Both are conditioned on household means and paid to adults, so are all grouped together as family-oriented. But the fact that one is restricted to two children per family represents a marked departure in approach to support for children which it is important to capture. There are also questions about whether Healthy Start Vouchers (or Best Start Foods) – restricted to certain purchases and paid via vouchers or payment card – and the Scottish Child Payment – paid in cash – should be in the same category. The UK system clearly falls short of Daly's ideal of policy that centre's children's rights, and Daly's framework is valuable in helping us to identify this. Yet, as currently conceptualised, the family-oriented category covers a diverse and wide range of policies, which are underpinned

by distinctive and sometimes contrasting goals and approaches. With this in mind, and embracing the overarching utility of Daly's framework as a starting point, we now propose a refinement.

3. Refining Daly's framework: diversity within family-oriented policy approaches

Family-oriented policies locate children within the familial context, in contrast to child-oriented policy in which the child is the focal point. Daly (2020a) argues that the focus of family-oriented policies is on the adult world rather than directly on children. A core aim of her distinction between family-oriented and child-oriented policy is to show how little of social policy succeeds in truly centring the child, or even aims to do so. But while the separation of child-oriented policy is important, the family-oriented category is left doing a lot of work. Policy can treat children as situated within the family for a wide range of different reasons. Indeed, Daly states that family-oriented policy addresses children's welfare by "resourcing the family or parents and/or seeking to affect parental behaviour and institutions" (2020a: 356) – themselves very different pathways.

As children live primarily in families, and as resources are known to be shared within the family (albeit imperfectly), social policies that aim to ensure children's needs are met do well to take account of family circumstances. Targeting household income is an efficient way to reduce poverty using limited resources (Marx et al., 2013). While not *child-oriented* in Daly's framing, policy that is primarily concerned with ensuring all families have adequate resources to provide for their children, perhaps using means-testing to achieve this goal, may still be argued to be a way to promote and protect child rights, in particular the right of every child to an adequate standard of living. The original design of the child element of tax credits, like the current design of Scottish Child Payment, was aimed at

providing additional resources to lower-income families during a period in which consumption demands on the household are higher. A similar argument could be made for Child Benefit, even after the introduction of the High Income Child Benefit Charge.

We start our refinement of the family-oriented category by labelling policies such as those just mentioned as 'needs-oriented' (see Table 2). This sub-category is intended to cover those policies that aim to respond to household needs and to ensure adequate resources for households where children live (albeit recognising that such policies may in practice fall short of what is required). We consider policies to be needs-oriented if they take account of household needs and/or resources in determining either eligibility or the size of the payment. This includes benefits that are means-tested; that pay higher amounts for children in lone parent families; or where support per child increases with family size. These are all targeting mechanisms used to adjust support to take account of children's circumstances and pay more where needs are likely to be greater.

The two-child limit is very clearly not a needs-oriented policy. The introduction of this restriction on the number of children for whom means-tested support is provided was justified in terms of "fairness" between families in receipt of benefits and those supporting themselves solely through work (CPAG, 2021). At various points, the government has suggested that the two-child limit may lead families in receipt of benefits to make different choices about the number of children they have and/or may encourage them to increase hours in work (Reader et al., 2022). This policy seems to be focused on the adult world in a different way to other policies in the family-oriented category. It is not primarily designed to ensure a family has adequate resources to meet the needs of their children; indeed it explicitly introduces a sizeable wedge between needs and support. The two-child limit is designed with adult decision-making in mind – it seeks to support them in some choices (having one or two children) but not in

others. The link between the policy and adult decision-making is underlined by the 'rape clause' (DWP, 2022), which provides an exemption from the two-child limit if a baby was conceived under force or coercion – i.e. if the conception was not the mother's decision.

We therefore create a new category of 'adult-behaviour-oriented' policy to capture this: support that is child contingent (like all policies that we focus on in this paper) but at the same time oriented towards influencing, rewarding or penalising adult behaviour in some way. We want to include here all those policies that make support for children conditional on adult behaviour or decision-making. In cases where this occurs, this means that child benefits are seen as open to manipulation in the interests of influencing adults' behaviour or in order to achieve other policy goals beyond the immediate protection of children's standard of living and well-being. We identify three main types of adult decision that child-contingent policy may seek to influence: employment, partnership and fertility (Low et al., 2018). We classify children's benefits as adult-oriented if they are conditional on employment or job-seeking behaviour (e.g. if benefits are higher or only available for working parents, or if they are subject to withdrawal if parents do not comply with work search conditions). We also include within this category benefits that reward partnership or marriage. And we include benefits that are explicitly designed to discourage or penalise fertility (by structuring benefits in a way that rewards smaller families). Policies designed explicitly to *boost* fertility raise more difficulties in categorisation; because of the difficulties in separating policy that encourages fertility from policy that supports the family's needs we group these as needs-oriented. This is discussed further in the Appendix. Table 2 summarises our new distinction within the family-oriented category and the nature of policies that we group in each category.

Table 2: An extended typology of social security support for children, building on Daly (2020)

| | Family-oriented | | Children-oriented |
|--------------------------|--|--|--|
| | Needs-oriented | Adult-behaviour-oriented | Child-focused |
| Primary focus | Child & adults | Adults | Child & adults |
| Engagement with children | Indirect, child in the foreground | Indirect, child in the background | Direct – recognition of children as a distinct group with needs |
| The entitlement | Income support adjusted to family needs | Income support conditional on adult behaviour | Resources for the child |
| The desired outcome | Sufficiency of family income | Changing adult behaviour & decisions | Recognition and resourcing of children |
| Social security policy | <p>Child benefits vary according to household needs in one or more of these ways:</p> <ul style="list-style-type: none"> - Same value per child but means-tested - Higher per child in larger families - Higher in lone parent families <p>Weak needs-oriented policy:</p> <ul style="list-style-type: none"> - Tax allowances (unless support falls per child/capped) - Social insurance | <p>Child benefits are linked to one or more of these:</p> <ul style="list-style-type: none"> - Employment (conditional on work or job search) - Partnership (e.g. higher if married) - Fertility (support capped by number of children) <p>Weak adult-oriented policy:</p> <ul style="list-style-type: none"> - Benefits fall per child with family size - Benefits paid as vouchers not cash - Child related conditions | <p>Child benefits are universal and independent of family structure and size</p> <p>Benefits paid directly to older children, even if means-tested</p> |

All of this is not to say that adult-behaviour-oriented policy is by definition not ultimately concerned with children's welfare – it may be argued to be taking an alternative route to the same goal. Indeed, policies rooted in behavioural change objectives are frequently justified with recourse to arguments that changing behaviours will improve outcomes, for example on the grounds that adult worklessness is itself bad for children (Centre for Social Justice, 2006). But the immediate focus is on adult behaviour, and the goal of adequacy is over-ridden by priorities linked to adult behaviour. It is therefore accepted (albeit often implicitly) that children may be required to live in hardship if the adults in the household do not fulfil the expected conditions (Koch and Reeves, 2021). In relation to policy approaches towards lone parents in the UK in the late 20th century, Skevik writes that “the tension between securing need on the one hand and regulating behaviour on the other may often lead to a victory for the latter concern... The parent's behaviour is in the spotlight, and the child is hidden behind the parent.” (Skevik, 2003: 425). The core issue is about priorities and about visibility: who is at the forefront of policymakers' minds, or in the spotlight, and who is in the background when policies that affect children are designed. Our new adult-behaviour-orientated category helps us tease out policies where children have lower visibility, and are affected as a consequence of a policy focus on the adults in their household.

Our core extension to Daly's framework aims to recognise that structuring benefits with the aim of ensuring that children have adequate resources, regardless of their family circumstances, is conceptually distinct from structuring benefits to change, reward or punish adult behaviour. We argue that this is a vital adaptation to Daly's typology.

We recognise, however, that in practical terms the distinction may be difficult to discern, given that in part it relies on understanding the motivation of policy-makers, which is largely unobserved, certainly in a study covering many countries like this one. We consider potential issues

arising from this challenge in an appendix to this paper (see Appendix 1). This appendix also covers other possible questions about where particular policies may fit within the extended typology.

4. Revisiting child-contingent support in the UK using the extended typology

We now test out how our extended typology looks in relation to UK policy as it has developed since the beginnings of the post-war welfare state.

First, we find markedly little in the way of child-oriented policy looking across the UK, and over the period since the birth of the British welfare state (Timmins, 2017). Indeed we identify just three policies in the last 75 years that fall into this category, all of them short-lived: Child Benefit, during the period that it was universal and paid at the same rate for all children in the family (1979-1991); the Health in Pregnancy Grant, which extended the principle of child benefit into the last trimester of pregnancy (2009-2011); and the Education Maintenance Grant, discussed above (1999-2011, though continuing in Scotland, Wales and Northern Ireland).

By contrast, there is much more that qualifies as needs-oriented policy. The original design of universal Family Allowances clearly fits this category as it targeted more support to larger families: benefits were paid only for second and subsequent children from the introduction of the allowances in 1948 until the replacement of family allowances and child tax allowances by Child Benefit in 1979. The big investment of the New Labour years, the child tax credit system, also classifies as needs-oriented with its principle of 'progressive universalism': almost all families qualified for something with benefits rising substantially at lower income levels. The Sure Start Maternity Grant arguably also counts as a needs-oriented policy, introduced in 2002 as a one-off grant paid to expectant mothers in receipt of other

means-tested benefits, building on a less generous existing pregnancy grant, although it had very light conditionality attached (the form needed to be signed by a health professional, requiring either an ante-natal visit or a baby health check).

We can also see some elements of adult-oriented policy going back through the years, though relatively few in the period 1997-2010 (Lupton et al., 2016; Stewart, 2013). The Family Income Supplement (FIS) was introduced in 1971 as a means-tested wage supplement. We classify it as adult-behaviour-oriented both as a means-tested benefit only available to those in work, and because it favoured first-borns. (FIS was later supplanted by child tax credit, which had a different shape, offering as much to families out of work as in work.) Child benefit became weakly adult-behaviour-oriented when it was raised for the first child in 1991, a structure that remains in place to this day. In 2006 Healthy Start Vouchers were introduced, with their restriction to certain goods only.

The system in 2010 can therefore be classified as a mix of child-, needs- and adult-behaviour-orientations. But since 2010, we see a very clear shift towards domination by adult-behaviour-oriented policy (Lupton et al., 2015). Indeed, by the end of the subsequent decade, *all* social security policy for children can be argued to be adult-behaviour-oriented – a remarkable fact. The UK has policies fitting nearly every adult-behaviour-oriented category in Table 2 – and not much else. Existing child- and needs-oriented policies were either scrapped (the Health in Pregnancy Grant and aspects of tax credits including the Baby Tax Credit), or changed or restricted in such a way that they became adult-behaviour-oriented. (Scotland, as already highlighted, remains an exception, with needs-oriented policy in the shape of the new Scottish Child Payment and the series of Best Start Grants paid for children in early childhood and at school starting age, as well as the child-oriented EMA.)

First, policy increasingly favours smaller families (Stewart et al., forthcoming). A slight favouring of the first born was built into Child Benefit from 1991, as noted. But the 2017 introduction of the two-child limit on child tax credit and Universal Credit means means-tested benefits also now favour smaller families – and much more drastically so. Further, the Sure Start Maternity Grant is now capped at one child only in England, Wales and Northern Ireland (Scotland continues to pay for all children, but second and subsequent children receive half the amount).

Second, benefits are more restrictive for those who are not working, thanks to the benefit cap, which was introduced in 2013 and lowered in 2016 (Reeves et al., 2022). Working-age households with no adult member in work and no member claiming disability benefits face a cap on the total support they can receive. This means families not in paid work will not receive the full child tax credit, Universal Credit or child benefit to which they would otherwise be entitled.

Third, the replacement of six means-tested benefits, including child tax credit, with Universal Credit, has had a significant but little remarked effect: because Universal Credit is subject to work search requirements, with sanctions applicable, this makes the child elements also subject to these requirements. The child element is vulnerable to being removed along with the rest of the payment if adults do not fulfil their job search commitments.

Finally, Healthy Start Vouchers remain in place. Ironically, these are the only part of the system that are paid equally for all children, are not touched by adult-focused conditionality, and not affected by the benefit cap. It is interesting that they are also the only part of Labour’s legacy of support for children that remains intact.

We can see then that the two-child limit appears to be part of a wider trend in the treatment of child-contingent support in social security policy in the

UK (or at least in England). Social security payments for children are increasingly open to manipulation to achieve policy goals focused on adult decision-making. We also see the value of our proposed refinement to Daly's framework – the separation we propose within the adult-oriented category enables a more finely-grained and informative analysis of social security policies affecting children.

5. The two-child limit in comparative perspective

In the final two sections of this paper we turn to look at child benefits in other European countries. Is the growing domination of adult-behaviour-orientation a more general phenomenon in social security policy for children, or does it reflect UK exceptionalism?

To conduct the comparative analysis, we draw primarily on EUROMOD country reports (EUROMOD, 2022). EUROMOD is a tax-benefit microsimulation model for the European Union which brings together careful coding of the policy systems of all Member States with national microdata. Policy details and modelling decisions are set out for each country in reports prepared by national experts in collaboration with the EUROMOD team at the EU's Joint Research Centre. While intended primarily as a resource for EUROMOD users, these reports are valuable in providing a comprehensive, consistent and up-to-date source on social security policies in each country. The need to explain and justify modelling decisions means they provide a level of detail that is not found in other sources. We use the 2018-2021 reports that accompanied the release of EUROMOD I14.0+, extracting the details for 2021. In one case, that of Italy, where the system of child benefits was fully overhauled in 2022, we have used national details on the new system (Vidotto and Lucangeli, 2022).

Because the focus of EUROMOD is on household income the reports do not always record who within the household receives a benefit. For this reason

we do not attempt to look at whether benefits are paid directly to a child or a young person. On the other hand, the reports do generally record details about eligibility criteria including conditionality, though we cannot be sure these are complete.

We include all benefits which are child-contingent, i.e. dependent on the presence of children in the household. Maternity, paternity and parental leave benefits are excluded. One grey area relates to social assistance and unemployment benefits. In some countries these benefits include an allowance for children or other dependents while others do not, perhaps because of the existence of other sources of child-contingent support, universal or means-tested. There is potentially a consistency argument for including social assistance where there are child elements: the UK's Universal Credit has no direct equivalent in most other countries, where a combination of child benefits (universal and/or means-tested) plus a last-resort safety net played by social assistance cover the same role (Danson et al., 2015). On the other hand, including social assistance moves us away from our core focus on social security policies for children – although where social assistance is part of the overall picture it is interesting to see whether family size is treated in the same way as in the main child benefit system. We compromise by presenting our main results without social assistance, but also discuss the picture with social assistance included (with full results in an Appendix table). We make an exception for Spain, which in 2020 replaced Child Benefit with a Guaranteed Minimum Income system; this is included in the main results. The difference in some countries between the structure of the main child benefit systems and the structure of social assistance is itself revealing.

Table 3 distils the national details of the 27 Member States plus the UK (with Scotland shown separately) to give a broad picture of the orientation

Table 3: Classifying child benefits by orientation, EU countries plus UK

| Country | Child-oriented | Needs-oriented | | | | | | Adult behaviour-oriented | | | | Overall classification of main benefits | | |
|------------|---|------------------------------------|---------------------------------|-------------------|--|-------------------------------------|---|--------------------------|--------------------------|--|--|---|----------------|---|
| | Universal per-child payment independent of family circumstances | Universal, targets larger families | Universal, targets lone parents | Means-tested | Means-tested & targets larger families | Means-tested & targets lone parents | Tax allowances or social insurance benefits | Favours smaller families | Favours working families | Child benefits subject to adult conditionality | Child benefits subject to child-focused conditionality | | | |
| Austria | X, SG | X | | X (1-3s) | X | | | | | | | C+N | | |
| Belgium | X, BG | | | SG | X | | | | | | SG | C+N | | |
| Bulgaria | | | | SG | | | | | | X(f2), BG (f2), TA (c3) | X | A | | |
| Croatia | BG | | | X | X | X | TA | | | | | N | | |
| Cyprus | | | BG | | X | X | | | | X (f4 c4) | BG | N+A | | |
| Czechia | | | | | | | TA | | | BG (f1 c2) | X | N+A | | |
| Denmark | X | | X | X | | | | | | | | C+N | | |
| England/UK | | | | | | | | | | X (f1), X (c2), BG (c1) | X | X | BG, V (U4s) | A |
| Estonia | | X, BG | X | | | | TA | | | | | | N | |
| Finland | | X | | | | X | | | | | | | N | |
| France | | | X | X(U3s), BG, SG | X | | TA | | | | | | N | |
| Germany | | X | | X, UB | | | | | | | | | N | |
| Greece | | | | BG | X | | SI | | | | | | N | |
| Hungary | | X | | X | | | | | | | | BG | N | |
| Ireland | X | | | SG | | X | TA | | X | | | | C+N+A | |
| Italy | | | | X | X | | | | | | | | N | |
| Latvia | BG | X | | | | | TA | | | | | | N | |
| Lithuania | X, BG | X | | | X | | | | | | | | C+N | |

| Country | Child-oriented | Needs-oriented | | | | | | Adult behaviour-oriented | | | | Overall classification of main benefits |
|-----------------|---|------------------------------------|---------------------------------|-----------------------------|--|-------------------------------------|---|--------------------------|--------------------------|--|--|---|
| | Universal per-child payment independent of family circumstances | Universal, targets larger families | Universal, targets lone parents | Means-tested | Means-tested & targets larger families | Means-tested & targets lone parents | Tax allowances or social insurance benefits | Favours smaller families | Favours working families | Child benefits subject to adult conditionality | Child benefits subject to child-focused conditionality | |
| Luxembourg | X, SG | | | | | | | | | | | C |
| Malta | X, BG | | | X | | | | | | | | C+N |
| Netherlands | X | | | | | | | X (f1) | | | | C+A |
| Poland | X, SG | | | X, BG, SG | X | X | | | | | | C+N |
| Portugal | | | | X | X | X | TA | | | | SG | N |
| Romania | X | | | | | | | X (c4), TA (c4) | | | X | C+A |
| Scotland | | | | X, SG | | | | BG (f1) | | | | N |
| Slovak Republic | X, SG | | | X (secondary school), SG | | | | BG (f3) | | | SG | C+N |
| Slovenia | BG | X | | | X | | | TA (f1) | | | | N+A |
| Spain | | | | | BG | BG | TA | X (c3/4) | | | | N+A |
| Sweden | X | X | | | | | | | | | | C+N |

Notes:

X = Standard child benefits or family allowances

BG = Birth Grant

SG = schooling-related grants (usually annual or at key transitions)

V = Vouchers

TA = Tax Allowance

SI = Social Insurance benefits

SA = Social Assistance benefits

f (1) = favours 1 child family

c (2) = capped at 2 children

U3s = Under 3s only

of child benefit systems in different countries (excluding social assistance and unemployment benefit). Regular child benefits or family allowances (X) are represented separately from birth grants (BG) and from one-off or annual payments to support school expenses (SG). The columns show where countries have policies that fit the categorisation developed above, such that reading across the rows conveys a broad story about any given country's child benefits system (absent specific detail). For example, we can see that Austria pays universal child benefits that are the same regardless of position in the family (these benefits increase in size as children get older, not shown). Austria also has a universal school grant (paid annually). In addition, Austria pays means-tested supplements where there are young children in the household², and there are two supplements that target larger families, one universal and one means-tested. The Austrian system therefore combines elements of child-oriented and needs-oriented policy, with no examples of adult-behaviour-oriented policy.

Further down the table we can see a very different picture in Czechia. Czechia's main child allowance is means-tested, but it also increases in value (by close to 50%) if at least one person in the household has some income from employment (equal to or higher than the Minimum Living Standard of a single person). This makes it an adult-behaviour-oriented policy. Czechia's birth grant also classifies as adult-behaviour-oriented as it is paid for only two children, with a higher rate for the first child. Our decision to classify tax allowances as needs-oriented policy means Czechia does have one policy in the needs-oriented space. In Czechia's case this is a refundable tax credit which rises per child up to three children and is then worth the same amount per child. Overall then, Czechia can be summarised as combining needs-oriented and adult-behaviour-oriented policy.

Finally, Romania is an example of a country that combines child-oriented and adult-behaviour-oriented policy. Romania has a universal child benefit

² This is in fact a Viennese policy, the Viennese Family Bonus. Other regions may also have such family bonuses; EUROMOD models the Viennese Family Bonus for all Austria.

that is the same for every child. But its means-tested support allowance for families with children is capped at four children only. There is also a tax allowance for low earners which is also capped at a maximum of four dependents. A final feature of the Romanian system is that the support allowance can be withdrawn if children fail to attend school. As the table shows, this is a relatively rare example (one of only two) of child-related conditions being attached to family allowances other than school grants.

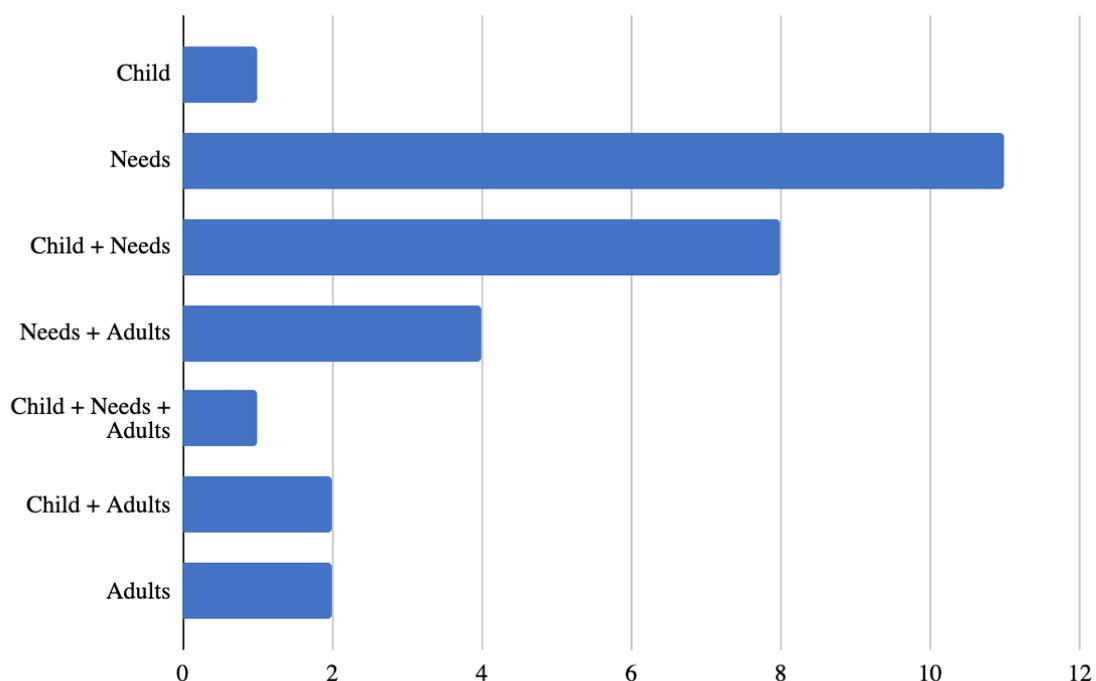
To give a more succinct summary, Figure 1 shows the overall categorisation of each country. We only include here the main child benefits, not birth grants or school grants. Only one country, Luxembourg, has all benefits falling into the child-oriented category. Luxembourg has several benefits for children including a child benefit, a tax bonus and a new school allowance; all are paid for each child irrespective of wider family structure or circumstances.³ Eight other countries combine child- and needs-orientation. The most common pattern is to have all elements of the system needs-oriented: 11 countries fall into this group. Of the 23 countries that have some form of needs-oriented policy, 17 are placed in this category at least in part because they have either universal or means-tested benefits that are more generous to larger families.

This leaves nine countries with some element of adult-behaviour-orientation in their policies. For most of these countries these policies are just a part of the picture of child support, alongside other policies that are needs- or child-oriented or both. We find only two countries – the UK (excluding Scotland) and Bulgaria – where we suggest all child benefit policies can be seen as falling into the adult-behaviour-oriented category. While the UK is not then unique in having such policies, it does seem to be

³ Luxembourg also has a means-tested 'expensive life allowance', the value of which increases for up to four dependents, with an income threshold that continues to rise with family size beyond that number. But this benefit replaces a heating allowance so has not been included for consistency; there are other heating and housing allowances in other countries which are not included.

highly unusual in having a system of financial support for children that is exclusively built on them. Bulgaria caps tax allowances at three and has a means-tested child benefit system that is most generous to the second child with support per child then falling, especially from the fourth child onwards. Child-related conditionality is also attached to all the main child benefits in Bulgaria.

Figure 1: The overall orientation of child benefit systems in Europe



We now unpack the adult-behaviour-oriented category a little by looking at the nature of this orientation across those countries that have been classified as having some aspect of it.

6. Adult-behaviour-oriented policies across Europe

The most common reason policies are classified as adult-behaviour-oriented is because of their favourable treatment of earlier born children in

the family (see Table 3). This is true of child benefits in six countries other than the UK: Cyprus, Spain, Romania, Bulgaria, the Netherlands and Slovenia (for the tax allowance). The table shows us both whether benefits merely favour earlier children (like UK Child Benefit) or actually cap support at a certain number (like the two-child limit). There are four countries where some aspect of support for children is actually capped. Only in two, Cyprus and Spain, is this the main form of child benefit available and both are somewhat complex cases. In Cyprus the main means-tested child benefit provides no extra support for children beyond four (though the income eligibility threshold continues to rise with additional children), but it is notable that the benefit is most generous to third and fourth children. In Spain, as noted, there is no longer a system of child benefit or family allowances, but there is a Guaranteed Minimum Income. This is paid for up to four dependents in the family – meaning it is capped at three in coupled households and four in lone parent households. Regional governments in Spain also have their own additional schemes, which in most cases are capped at six family members or fewer (in Murcia up to eight, and in the Canaries every child receives something extra). In Romania means-tested child benefits are also capped at four children, but there is a universal child benefit which is more than double the value of means-tested support. In addition, tax allowances in Bulgaria are capped at three children.

Three countries (Bulgaria, the Netherlands and Slovenia) show a weaker form of adult-behaviour-orientation in (somewhat) favouring earlier-born children in some way. Only in Bulgaria is this the main child benefit: this means-tested benefit is most generous to the second child and then falls in value, with considerably less per child for fourth and subsequent children. In the Netherlands, means-tested child benefits (the child-related budget) are very slightly favourable to the first child, but there is also a universal child benefit paid equally for all. Slovenian tax allowances favour the first child, but Slovenia also has a means-tested child benefit that becomes more generous as family size grows and a universal large family grant.

What of the other adult-behaviour-oriented categories? Two countries other than the UK have benefits that are favourable to working families. Czechia, discussed above, provides higher child allowances to households earning a certain amount from employment. Ireland, alongside universal child benefits and means-tested support for lone parents, provides a working family payment to families with children working at least 38 hours/fortnight (couples can combine their hours). While there is also support for children within Jobseekers Benefit, the rates per child in the Working Family Payment are more generous – meaning low-income working families are eligible for more support per child than families out of work.

Finally, the UK is the only country in which child benefits are subject to adult work-related conditionality. This therefore remains less common than child-focused conditionality, which is found in three countries. The UK appears to be the only country to provide some support in restricted vouchers rather than in cash. But in Romania children must be attending school to receive means-tested support allowance, and sanctions can be applied to the benefit. In Bulgaria, child benefit can be stopped if a pre-school child has more than 3 days absent without valid reasons or a school-age child misses more than 5 school hours without valid reasons.

If we turn our focus to social assistance (Bradshaw, 1997), the picture changes somewhat: many countries here have some adult-orientation, mostly in the shape of some form of work requirement. Furthermore, social assistance also varies in its treatment of extra children. This is interesting in showing a different approach being taken to additional children in families with the greatest level of needs, compared to the wider approach to children in general. Table 4 sums up treatment by family size for each country across different types of benefit – universal, means-tested and social assistance (the full picture can be found in Appendix Table 1]. As well as reinforcing Table 3's evidence on how common it is to have benefits that increase in generosity with family size, the table identifies a group of

countries in which children are less visible within social assistance support than they are within other, more generalised, forms of provision. These countries provide universal and/or means-tested benefits which are the same or rising in family size, but support for children in social assistance falls or is capped. It is striking that universal benefits are never capped. Only in the UK (where it is no longer fully universal) does Child Benefit fall in family size. Standard means-tested benefits are capped in four countries and fall in size in two others. But social assistance benefits are effectively capped in nine countries in addition to Spain and the UK, and fall with family size in one other. Three countries – Belgium, the Netherlands and Poland – appear to provide no recognition of children, or only of one child, within social assistance while having universal and/or means-tested provision for all. This could be because these latter benefits are available to help with the costs of children. But families requiring social assistance are by definition assessed as having particular needs, related to very low levels of household income. Sixteen countries provide per capita support within social assistance for all children, alongside wider universal or means-tested benefits.

Taken together, this comparative analysis reveals the extent and nature of adult-behaviour-oriented policies pursued across diverse European contexts. Ours is the first attempt to explore this orientation, both within UK recent social security history and in comparative perspective. We propose that there is a need for more research, both to better understand the motivations behind an adult-behaviour-oriented approach, and also to document its consequences - in particular the impact on affected children when adults' behaviour does not align with the state's requirements.

Table 4: Support per child as family size grows, by type of benefit

| | Universal benefits | Means-tested benefits | Social Assistance |
|-----------------|--------------------|-----------------------|-------------------|
| Austria | SAME | RISES | SAME |
| Bulgaria | -- | RISES & FALLS | SAME |
| Croatia | -- | RISES | SAME |
| Cyprus | -- | RISES & CAPPED (4) | SAME |
| Czechia | -- | SAME | SAME |
| Estonia | RISES | -- | SAME |
| France | -- | RISES | SAME |
| Germany | RISES | RISES | SAME |
| Hungary | RISES | SAME | SAME |
| Ireland | SAME | RISES | SAME |
| Latvia | RISES | -- | SAME |
| Luxembourg | SAME | -- | SAME |
| Malta | SAME | SAME | SAME |
| Portugal | -- | RISES | SAME |
| Slovenia | RISES | RISES | SAME |
| Sweden | RISES | -- | SAME |
| Belgium | SAME | RISES | CAPPED (1) |
| Denmark | SAME | SAME | CAPPED (Complex) |
| Finland | RISES | -- | CAPPED (3) |
| Greece | -- | RISES | CAPPED (5) |
| Italy | -- | RISES | CAPPED (3.5/5.5) |
| Lithuania | SAME | RISES | CAPPED (3) |
| Netherlands | SAME | FALLS | CAPPED (0) |
| Poland | SAME | RISES | CAPPED (0) |
| Romania | SAME | CAPPED (4) | FALLS |
| Slovak Republic | SAME | SAME | CAPPED (5) |
| Spain | -- | CAPPED (3/4) | <-- |
| UK | FALLS** | CAPPED (2) | <-- |

** Not strictly universal as Higher Income Tax Charge means fully taxed back from higher earners

Conclusions

Recent typologies of child-related policy draw analytical attention to how far European countries are from pursuing truly child-centred policy (Daly, 2020a; Palme and Heimer, 2021). This focus is significant, but the typologies currently group together policies of a very different nature, and in so doing conceal other key differences in social policies towards children. A central contention of our paper is that to date there has been an insufficient engagement with differences within a broad (and often dominant) category of 'family-oriented' social policies. We explore and discover significant differences within this category, and argue that more needs to be done both to analyse and document these differences and their impact. To enable this comparative and analytical work, our paper calls for a more nuanced breakdown of the family-oriented policy category (Daly, 2020a), proposing a distinction between policy that is 'needs-oriented' and policy that is 'adult-behaviour-oriented'. Our comparative analysis shows that most countries across Europe have a policy mix that combines child-oriented and needs-oriented policy. However, the analysis also reveals a significant strand of 'adult-behaviour-oriented' policies, which are evident across nine national contexts. These policies place adult behaviour foremost, rendering children less visible or in some cases entirely invisible. The consequence of a reliance on adult-behaviour-oriented policies is, almost inevitably, gaps in support which are likely to affect some of the families with the greatest needs – and of course the children within them.

The UK stands out from the rest of the field in relation to the dominance of adult-behaviour-oriented policy. Based on the definitions developed in the paper, we find that *all* of the UK's child-contingent benefits (other than in Scotland) classify as adult-behaviour-oriented, with policies falling into several of the adult-behaviour-oriented categories we operationalise here. This encompasses benefits that are more favourable to smaller families,

including a two-child limit on means-tested support; a benefit cap that incentivises employment (or penalises working-age families without a household member in paid work); work-search conditionality attached to the most significant child benefits; and the payment of some benefits in restricted vouchers. We identify Bulgaria as a second example where all policy can be seen as adult-behaviour-oriented, although more mildly: all benefits also favour smaller families, but not as drastically as in the UK, and all benefits are also subject to behavioural conditions but conditions that are focused on children's human capital development, such as school attendance. There are also a number of other countries that have some adult-behaviour-oriented policies alongside child-oriented and/or needs-oriented policy. Notably, three other countries include caps on means-tested support (though at three or four children, not two), while two countries have benefits structured such that low-income working families are favoured over those out of work.

When extending the scope of benefits covered to include the 'last resort' benefit of social assistance, we find even more evidence of adult-behaviour-orientation. This is not only because many countries attach work-related conditionality to social assistance receipt (Watts and Fitzpatrick, 2018); it also reflects the way social assistance treats children in families of different sizes. Several countries where universal and/or standard means-tested benefits are provided either equally per child or increase per child with family size take a different approach within social assistance, with only some children recognised. Caps are far more common in social assistance than in other types of benefit. We tentatively suggest that this indicates a differential visibility of children in the most vulnerable households in these countries, compared to the approach to children in the society in general.

This paper demonstrates the importance of attending to how far and whether social security policy towards children makes eligibility contingent on the behaviour of adults in a household. We were prompted to explore

this because of what is often described as an internationally unique policy - the UK's two-child limit. However, our comparative analysis shows that there are examples of adult-behaviour-oriented policy approaches in evidence across diverse national contexts. This will have significant ramifications for children's eligibility for support, and directly affects the scope of social security provision to respond to need. This means there is a clear and currently unmet need for more analysis and research attention on motivations behind adult-behaviour-oriented policy, whether there are wider similarities in policy approaches between countries in which children are rendered less visible by adult orientation, and the consequences for children in affected families. Efforts to this end would constitute an important new avenue for understanding social security support for children in comparative perspective (Daly, 2020b). This would complement the extensive literature, which focuses on comparing children's benefit packages by their level of universality and by their overall generosity (Nieuwenhuis and Van Lancker, 2020). We hope our paper can make a helpful starting point here, and one that provides a reminder of the importance of considering the level of visibility of children within family policies approaches more broadly.

Appendix Table A1: Classifying child benefits by orientation, Social Assistance benefits included

| Country | Child-oriented | Needs-oriented | | | | | Adult behaviour-oriented | | | | Overall classification (main benefits, not BG) | Overall classification, (main benefits + SA) | | | | |
|------------|---|------------------------------------|---------------------------------|----------------------|--|-------------------------------------|---|--------------------------|--------------------------|--|--|--|--|-------|-------|-----|
| | Universal per-child payment independent of family circumstances | Universal, targets larger families | Universal, targets lone parents | Means-tested | Means-tested & targets larger families | Means-tested & targets lone parents | Tax allowances or social insurance benefits | Favours smaller families | Favours working families | Child benefits subject to adult conditionality | | | Child benefits subject to child-focused conditionality | | | |
| Austria | X, SG | X | | X (1-3s) | X | | | | | SA | | C+N | C+N+A | | | |
| Belgium | X, BG | | | SG | X | | | | | | SG | C+N | C+N+A | | | |
| Bulgaria | | | | SG | | | | | | | | A | N+A | | | |
| Croatia | BG | | | X | X | X | TA | | | SA | | N | N+A | | | |
| Cyprus | | | BG | X, SA | X | X | | | | | | N+A | N+A | | | |
| Czechia | | | | | | | TA | | | | | N+A | N+A | | | |
| Denmark | X | | X | X | | | | | | SA | | C+N | C+N+A | | | |
| England/UK | | | | | | | | | | X (f1), X (c2), BG (c1) | X | X | BG, V (under 4s) | A | A | |
| Estonia | | X, BG | X | | | | TA | | | | | SA | | N | N+A | |
| Finland | | X | | | | X | | | | | | UB(f1, c3) | SA | | N | N+A |
| France | | | X | X (under 3s), BG, SG | X | SA | TA | | | | | | | N | N | |
| Germany | | X | | X, UB | | | | | | | | UB | | N | N+A | |
| Greece | | | | BG | X | | SI | | | | | SA(c5) | | N | N+A | |
| Hungary | | X | | X, SA | | | | | | | | | BG | N | N | |
| Ireland | X | | | SG | | X | TA | | | | X | UB | | C+N+A | C+N+A | |
| Italy | | | | X | X | | | | | | | SA (c3.5/5.5) | SA | N | N+A | |

| Country | Child-oriented | Needs-oriented | | | | | Adult behaviour-oriented | | | | Overall classification (main benefits, not BG) | Overall classification, (main benefits + SA) | |
|-----------------|---|------------------------------------|---------------------------------|--------------------------|--|-------------------------------------|---|--------------------------|--------------------------|--|--|--|--|
| | Universal per-child payment independent of family circumstances | Universal, targets larger families | Universal, targets lone parents | Means-tested | Means-tested & targets larger families | Means-tested & targets lone parents | Tax allowances or social insurance benefits | Favours smaller families | Favours working families | Child benefits subject to adult conditionality | | | Child benefits subject to child-focused conditionality |
| Latvia | BG | X | | SA | | | TA | | | | | N | N+A |
| Lithuania | X, BG | X | | SA | X | | | | | | | C+N | C+N |
| Luxembourg | X, SG | | | | | | | | | | | C | C |
| Malta | X, BG | | | X | | | | | | SA | | C+N | C+N+A |
| Netherlands | X | | | | | | | X (f1), SA(c0) | | | | C+A | C+A |
| Poland | X, SG | | | X, BG, SG | X | X | | | | | | C+N | C+N |
| Portugal | | | | X, SA | X | X | TA | | | | SG | N | N |
| Romania | X | | | | | | | X (c4), TA (c4), SA | | SA | X | C+A | C+A |
| Scotland | | | | X, SG | | | | BG (f1) | | | | N | N |
| Slovak Republic | X, SG | | | X (secondary school), SG | | | | BG (f3), SA | | | SG | C+N | C+N+A |
| Slovenia | BG | X | | | X | | | TA (f1) | | SA | | N+A | N+A |
| Spain | | | | | BG | BG, SA | TA | SA(c3/4) | | | | N+A | N+A |
| Sweden | X | X | | SA | | | | | | | | C+N | C+N |

Notes:

CB = Standard child benefits or family allowances

BG = Birth Grant

SG = schooling-related grants (usually annual or at key transitions)

V = Vouchers

TA = Tax Allowance

SI = Social Insurance benefits

SA = Social Assistance benefits

f (1) = favours 1 child family

c (2) = capped at 2 children

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