

ORIGINAL ARTICLE

Shared residence and social security policy: A comparative analysis from 13 countries

Mia Hakovirta¹ | Daniel R. Meyer² | Mari Haapanen³

¹University of Turku, Department of Social Research and INVEST Research Flagship Center, Turku, Finland

²University of Wisconsin – Madison, Social Work and Institute for Research on Poverty, Madison, Wisconsin, USA

³University of Turku, INVEST Research Flagship Center, Turku, Finland

Correspondence

Mia Hakovirta, University of Turku, Department of Social Research and INVEST Research Flagship Center, Assistentinkatu 7, 20014 Turku, Finland.
Email: miahak@utu.fi

Funding information

Research Council of Finland, Grant/Award Numbers: 338282, 294648, 345546

Abstract

Increasingly, children live in both parents' homes equally after parental separation, but little is known about whether social security policy supports these shared-residence families. We propose that a determination of support for shared residence in various policies can be based on two criteria: whether both parents can receive benefits and whether the total amount received is greater than what would have been received if children lived with only one parent. We categorise support for shared residence in child benefits, housing assistance, social assistance, and guaranteed child support in 13 countries (Australia, Belgium, Denmark, Estonia, Finland, France, Iceland, New Zealand, Norway, Poland, Sweden, the United Kingdom, and the United States), using a 2017 questionnaire, policy documents, and previous research. Norway is the only country supporting shared residence in all four policy domains; three countries do not support shared residence in any. Policies on shared residence across domains are inconsistent. This research highlights the need to clarify policy for these families and to consider whether parents who manage shared parental responsibilities post-separation should be assisted in new ways.

KEYWORDS

child benefit, guaranteed child support, housing benefit, joint physical custody, shared care, shared residence, social assistance

INTRODUCTION

After parental separation, the traditional living arrangement was for a child to live primarily with one parent (typically the mother). An arrangement in which children live

approximately equal time with both parents (which we call shared residence) has increased in recent decades (Hakovirta et al., 2023; Smyth, 2017; Steinbach et al., 2020; Zilincikova, 2021). This family arrangement provides a challenge to welfare states and the way that income support is provided to families. Current social security policies were often designed to help separated families but, because it was presumed that after the separation there would be one main carer (resident parent) and one non-resident parent (Gauthier, 1996), the focus was on parents who have primary responsibility for children. Little is

Abbreviations: Caf, Caisse nationale des allocations familiales; SNAP, Supplemental Nutrition Assistance Program; SOU, Statens offentliga utredningar; SSAC, Social Security Advisory Committee; SSC, The Social Security Committee; TANF, Temporary Assistance for Needy Families; UNDP, United Nations Development Programme; UNICEF, United Nations Children's Fund.

This is an open access article under the terms of the [Creative Commons Attribution](https://creativecommons.org/licenses/by/4.0/) License, which permits use, distribution and reproduction in any medium, provided the original work is properly cited.

© 2024 The Authors. *International Journal of Social Welfare* published by Akademikerförbundet SSR (ASSR) and John Wiley & Sons Ltd.

known about whether both parents have access to benefits when there is substantial sharing of time.

The one policy area in which there has been the most information about how families whose children share residence are treated is child support (child maintenance) policy; emerging research in this area shows there are substantial inconsistencies across countries in how shared residence is considered in this domain (Hakovirta, Meyer, & Skinner, 2022). More broadly, it seems that contemporary social and family policies often struggle to keep up with changing family patterns (Berger & Carlson, 2020; Meyer & Carlson, 2014; Miho & Thévenon, 2020).

Of all the varied configurations of family in contemporary society, shared residence of children is of concern with respect to social policies for several reasons. First, increasing frequency makes these families a group of special interest, and the arrangement is also becoming more common among families with lower incomes in some countries (Berman & Daneback, 2022). Second, families with shared residence incur additional total costs compared to families in more traditional sole custody arrangements, as both homes need to be of sufficient size to accommodate the children (Bartfeld & Chanda, 2023; Lazear & Michael, 1988). In a context in which many families with children are struggling economically (United Nations Children's Fund [UNICEF], 2023), the social security system may need to be responsive to any type of family with extra expenses. Third, shared residence presents difficulties in determining eligibility for programs and benefits levels since such determinations often depends on identifying the exact composition, size, and living arrangements of families, even if family categories are not as stable or discrete as assumed (Berger & Carlson, 2020). For example, should benefits that are limited to families with children be available to only one or to both parents if they have shared residence? Even for benefits not limited to families with children, any income-tested program will encounter complications because income testing typically requires a precise number of individuals in the benefit unit, which is not simple in shared-residence cases (Meyer & Carlson, 2014).

To examine the complexity of these issue, we investigated if and how four social security policy areas addressed shared residence in 2017 in 13 countries: Australia, Belgium, Denmark, Estonia, Finland, France, Iceland, New Zealand, Norway, Poland, Sweden, UK, and US (Wisconsin). To explore variations in policy, we selected a diverse set of European and Anglo countries with different welfare state models and different levels of shared residence, as described below.

Because shared residence is not common in some countries, we did not expect all countries to have consistent policy approaches across different types of benefits. If

they did, we could have focused on whether a given country supported shared residence across policy areas (and then analyse whether countries' approaches to shared parenting mapped onto well-known welfare state regimes). Instead, our primary analysis focuses on discrete policy areas and whether similarities existed (in 2017) within a country across policy areas. We follow this by a brief discussion of potential explanations of a country's overall approach (including whether the overall approaches are similar in countries within a welfare regime).

This paper describes policy mechanisms countries are using regarding shared-residence families, but does not necessarily argue that countries *should* support such policies. Policymakers need to consider a variety of factors in addition to concerns about equality and equity for different family arrangements (our focus here), including impacts on public expenditures and the goals of various policies. Some policymakers may also consider whether they want to be seen as supporting separated families rather than traditional single-household families.

One of our contributions is a conceptualisation of how different policy areas *could* support families with shared residence, differentiating between no support, some (moderate) support, and considerable support. We consider four important policy areas for separated families: child benefits (child allowances), housing benefits, social assistance, and guaranteed child support. These benefits provide important income for separated parents (Bradshaw & Finch, 2002). Our second contribution moves beyond conceptual discussions to document whether 13 countries support shared residence in these four policy areas. While previous research on shared residence has primarily focused on whether it is associated with positive outcomes for children (and, to a lesser extent, for parents), we present a novel analysis of the policy contexts in which families with shared residence are situated. This type of contextualisation has not been done to date.

PRIOR LITERATURE

To provide background for our study, we begin with an overview of key similarities and differences across the 13 selected countries, followed by a review of the sparse literature on how families with shared residence are treated in social security and family policy.

Prevalence and characteristics associated with shared residence

Differences in the threshold used to distinguish sole and shared residence, and the population considered, make

TABLE 1 Shared residence, welfare state regimes and gender equality in 13 countries.

Country	Prevalence of children in separated families with shared residence (%)		Welfare state regime		Gender equality index
	Most recent comparative estimate (2021) ^a	Earlier comparative estimate (2002–2010) ^b	Esping-Andersen (1990, 1999)	Korpi (2000)	Country ranking (of 170) ^c
Australia			Liberal	Market-oriented	19
Belgium	19.6	13.5	Conservative	Traditional family support	10
Denmark	13.7	9.5	Social democratic	Earners-carer	1
Estonia	9.7	2.3		Traditional family support	28
Finland	23.8	5.2	Social democratic	Earners-carer	6
France	14.5	7.2	Conservative	Traditional family support	22
Iceland		11.7		Earners-carer	8
New Zealand			Liberal	Market-oriented	25
Norway		8.8	Social democratic	Earners-carer	2
Poland		1.9			31
Sweden	42.5	20.9	Social democratic	Earners-carer	4
United Kingdom		6.6	Liberal	Market-oriented	27
United States		4.9	Liberal	Market-oriented	44

^aShows percentage with equal time with both parents of all children with separated parents from Hakovirta et al. (2023).

^bShows percentage with equal time with both parents of children age 11, 13, and 15 with separated parents from Steinbach et al. (2020).

^cCountry rankings from UNDP (2022).

cross-country comparisons of prevalence difficult.¹ Table 1 shows the proportion of children with equal-time residence arrangements from two sources that used consistent definitions across countries. The table shows substantial variation: the most recent estimates (from 2021) from six of our countries on the proportion of children in separated families who spent equal time with both parents range from 10% in Estonia to 43% in Sweden (Hakovirta et al., 2023). Estimates from the early 2000s provided information on a broader range of countries and also showed substantial variation, with relatively higher levels of shared residency in Sweden, Belgium, and Iceland, and lower levels in Estonia and Poland (Steinbach et al., 2020). These columns cannot be directly compared to ascertain whether shared residence is growing because the units of analysis differed; however, the limited comparable data on prevalence show substantial increases over time across several countries (Hakovirta

et al., 2023) and within particular countries (Meyer et al., 2022; Smyth, 2017; Smyth & Chisholm, 2017).

Some research has examined characteristics of families with shared residence. One consistent finding in the literature is that across countries families with higher socioeconomic status (higher income, education levels, or employment) are more likely to have shared residence (Garriga et al., 2021; Meyer et al., 2022; Poortman & van Gaalen, 2017; Vanassche et al., 2017; Zilincikova, 2021). However, the research also shows that even families without high incomes are increasingly using shared residence (Kitterød & Wiik, 2017; Meyer et al., 2017; Sodermans et al., 2013). This highlights the importance of understanding policies that provide income or housing support for economically vulnerable families with shared residence.

Country differences in general policy approaches and gender equality

Esping-Andersen (1990) analysed features of social policy in 18 countries and proposed that these countries clustered into three types of welfare regimes. His pathbreaking analysis has been extensively discussed, critiqued, and expanded (Powell et al., 2018), with a key criticism

¹An additional definitional difficulty is what unit to count in determining the proportion of time with a parent, whether to count overnights or also count time during the day that is equivalent to an overnight. Few studies discussed the unit used; when information was presented, overnights were used (Hakovirta et al., 2023).

being that the analysis paid only limited attention to issues of gender (Bambra, 2007; Orloff, 2009).² Table 1 shows that the countries we studied come from all of his original three regimes (i.e., Liberal, Conservative, Social democratic). Moreover, Table 1 also shows how countries are characterised in a typology of family policy that was partly based on policies supporting gender equality (Korpi, 2000). To further highlight the role of gender, Table 1 also shows the ranking of our countries using a Gender Equality Index from the United Nations (United Nations Development Programme [UNDP], 2022). This multi-dimensional index includes country scores in health, political representation, education, and labour force participation. While all our countries score in the top one-third of ranked countries worldwide, there was nevertheless a considerable distance between our first (Denmark) and our last ranked country (USA, 44th place). In summary, the countries selected differed in the prevalence of shared residence, general approaches to welfare policy, and levels of gender equality; as such, we anticipated they may also differ in if and how their social security benefits accommodate shared residence.

Problems with benefits for parents with shared residence in selected countries

Three country-specific studies highlight approaches to providing benefits to families with shared residence and some of the corresponding problems. In 2014, Meyer and Carlson published an edited volume in the *ANNALS of the American Academy of Political and Social Science* that included several articles and commentaries on a variety of types of family complexity and its implications for public policy and society, focusing on the United States. The volume showed that shared residence was ignored in many policies affecting families with children. For example, the cash social assistance program for families with children in the United States, Temporary Assistance for Needy Families (TANF), is a federal-state partnership. TANF is available only for families with children, but there has been no federal guidance on whether parents with a shared-residence child are both eligible or only one parent is eligible. In the Supplemental Nutrition Assistance Program (SNAP), a federal program that is the main source of in-kind support for the lowest-income U.S. families, children can be counted in

one (and only one) household, even if they spend exactly half their time with each parent. Similarly, shared residence is acknowledged but discouraged in the supports for families delivered through the federal income tax system; a child can be claimed in only one taxpaying unit, and there are a series of complicated 'tiebreaker' rules to determine which parent can claim a child who lived equal time with both parents. One of the problems this has created is there can be a large discontinuity in benefits for a small change in time; Meyer and Carlson (2014, p. 267) commented: 'one overnight [per year] can mean eligibility or ineligibility for a program that provides more than \$5,000 a year to some families'.

There have been similar findings in the United Kingdom. The Social Security Advisory Committee (SSAC) (2020) issued a report on how social security treats parents with a shared-residence child. They concluded that when parents separate, there is a general presumption that there is only one main carer, so only one parent is entitled to receive child-related benefits, while the other parent can only receive the benefits for single adults, which are much less.

A different type of problem has been identified in Australia (Keebaugh, 2003). The Australian family tax benefits' and child support policy's 'care test' splits the benefit between parents if each parent cares for the child. But by explicitly tying income sources to a particular level of parental care, the policy may contradict the principles that children have a right to care from both parents and that both parents have a responsibility to provide ongoing financial support to their children, regardless of the precise proportion of overnights. It also contradicts a longstanding principle in Australian policy, that parental care should not be reduced to a dollar value.

Access to benefits for parents with shared residence in comparative research

A few studies have explored how shared residence is treated across countries. Hakovirta and Rantalaiho (2011) showed variation between Finland, Norway, and Sweden in the treatment of post-separation families that shared residence. Norwegian and Swedish family policy systems were flexible, and family policy enabled parents to share benefits in a way that supported shared-residence arrangements. In Finland, however, family policy had not responded to family change and most often only one parent had access to the benefits. Merla et al. (2021) compared family policies' support in post-separation shared residence in Belgium, France, and Italy. They concluded that in Belgium shared parenting is recognised and supported by family policies. The individualisation of rights strongly influenced this recognition. In contrast, by targeting the family entity, French policies have given a central place to

²Esping-Andersen's work is most relevant for three of the four policy dimensions considered here: child benefits, social assistance, and guaranteed child support. His work has been adapted and extended to studying housing benefits (Kemeny, 2001; Stephens, 2016). However, countries within the same housing policy regime do not always have similar housing outcomes (Dewilde, 2017).

negotiations between parents, which in some cases can exacerbate unequal power relationships within ex-couples. Italian policies also required parents to find their own arrangements, and parents needed to choose which of them will be the one and only beneficiary of support.

Recently one broader comparative paper (Miho & Thévenon, 2020) focused on family policy strategies with respect to a variety of family forms across OECD countries; their work included a little information on policies for parents with shared-residence arrangements. In most countries, an appropriate legal framework ensuring that parents practicing shared residence would be treated equally in the tax/benefit system did not exist.

The policy area about which we know the most in terms of shared residence is child support. Claessens' and Mortelmans' (2018) analysis of eight countries revealed that shared-residence arrangements were accounted for in child support in various ways, some of which can be highly accepting and others disadvantageous for shared-residence families. They suggested that broader policy concerning gender equality does not consistently translate into child support policies. Hakovirta, Meyer, and Skinner (2022) considered whether child support requirements in shared residence were consistent with family policy models. They found that in equal-time shared residence, some countries made complete annulment of obligations, others made more specific adjustments to reduce child support obligations, and others made no change to the obligation. Moreover, child support policy on shared-residence families did not fit the predictions coming from a typical family policy typology (Korpi, 2000).

In summary, previous research has highlighted that in many countries, shared residence is ignored within policy areas. The one policy area in which shared residence has been most systematically acknowledged is child support, but the adaptations to shared residence do not fit typical family policy models, suggesting the accommodations in child support may be contradictory to other elements of family policy (Hakovirta, Meyer, & Skinner, 2022). There has been little comparative research on whether shared residence is supported in family benefit systems beyond some initial work in Nordic countries and a three-country comparison (Merla et al., 2021). Because shared-residence agreements are becoming more common, a new assessment of how this arrangement is treated in several policy areas, across a wider range of countries, is needed.

FRAMEWORK: HOW COULD POLICY SUPPORT SHARED RESIDENCE?

Our first dimension to consider for whether a policy supports (or accommodates) shared residence is based on

eligibility. We examined whether *both parents can receive a benefit*, or whether the benefit is limited to one parent. If a benefit is limited to only one parent, we considered this as not supporting shared residence.

The second dimension is the level of support; here we differentiated between some support and considerable support by assessing whether the *total benefit available to both shared-residence parents can be more than what it would be if residence were primarily with one parent*. Situations in which the benefit is exactly equal we considered to be 'some' support. 'Considerable' support was defined as situations in which the total benefit is greater than it would have been if there had been residence primarily with one parent. Receiving a larger total benefit could be achieved directly and transparently if a shared-residence child is counted as a full member in both households and benefits increase as the number of children increases. Additionally, a larger benefit could be the result of more implicit policy rules. For example, income-tested benefits typically consider income compared to a threshold based on family size; families with incomes below the threshold are eligible for benefits, and often more benefits can be received by those with larger families. If a shared-residence child counts as a full member of both households, both families would be larger, the threshold based on family size would be higher, and eligibility for families would be more likely. This would also mean that some shared-residence families received more in total than if the child could be counted in only one family.

A potential distinction could be made based on the definition of shared residence used. For example, if a country has a special provision for those with shared residence, is this available only to those with exactly equal time, or also to those with considerable (but not equal) time? Does a shared-residence provision apply only if there is a formal legal agreement on the child's living arrangement, or does it also apply to more informal arrangements? Our results note differences in the definition of shared residence, but we did not consider the flexibility of the definition of shared residence as a key feature of our framework, as our primary interest is in how those with formal arrangements for equal time are treated.

In summary, we use a simple framework to identify the level of support for shared residence, first identifying whether both families can receive a benefit; if they cannot, it counts as no support. We differentiate between some support and considerable support based on whether total benefits in shared residence are greater than sole-custody benefits.

In the remainder of this section, we provide a brief description of each policy area and then discuss how the dimensions in our framework could be applied within that area. The key factors are summarised in Appendix A.

Child benefits

Child benefits are intended to contribute to the costs incurred in raising children. Benefits can take a variety of forms; for example, we include both a cash transfer paid directly to the recipient households/children and a tax benefit administered through the income tax system. Child benefits are not generally income-tested, but even within the category of 'universal' child benefits, there can be considerable variation in the design and implementation details of different programs, with important implications for how they work in practice (Bradshaw & Finch, 2002; Van Lancker & Van Mechelen, 2015).

Historically, child benefits have been paid to only one parent when parents separate (Hakovirta & Rantalaiho, 2011). If a country aims to support shared residence, it would allow both parents to receive a portion of child benefits. But if countries wanted to go further and provide considerable support, they could offer a larger total in child benefits when a child shares residence with both parents to address the extra costs that parents incur when children live equally in two households (Lazear & Michael, 1988).

Housing allowance

Income-related housing allowances are widely viewed as instruments of housing policy that enable households to live in an acceptable standard of accommodation at a price they can afford (Griggs & Kemp, 2012). Alternatively, housing benefits can be seen as a means by which households can reduce out-of-pocket expenses for housing (Kemp, 2000). Conceptualising housing allowances as income support highlights the point that, either implicitly or explicitly, they provide a form of social security. Housing benefits are administered differently in different countries. In some, housing units are owned by the government and awarded to lower-income individuals and families who meet various eligibility criteria, who then pay rent based on their income. (The number of people in the family can determine the size of the unit awarded, particularly the number of bedrooms.) Another approach is that lower-income individuals and families find housing in the private market but are given vouchers or cash with which to pay a portion (or all) of the rent.

Regardless of the form of the benefit, the official count of the number of family members is an important feature. If the government owns housing, the number in the family may set the size of the dwelling (i.e., the number of bedrooms) awarded. If the government is paying all or a portion of the rent in the private market, only units of a certain size may be fully reimbursed for a given

family size. If a country does not count a shared-residence child in both parental units, this could result in a child having bedroom space in only one parent's dwelling, equivalent to not allowing both parents to receive the benefit. As a result, we considered this 'no support'. A second dimension on which to assess supportiveness is whether the child counts as a full household member in each household in the income test (considerable support), versus counting the child in each household, but based on the fraction of time spent, rather than as a 'whole child' (some support). Counting a child in both units effectively means the total benefit (bedrooms in both units) is greater than if the child counted in only one unit.

Social assistance

Social assistance provides social protection for people in economic need, and it is often regarded as a residual part of social security (that is, the last resort, available to those not covered by other programs) (Bahle et al., 2010). Social assistance can take a variety of forms (cash or near-cash, like food assistance) and be delivered in different ways (directly or through the tax system). In this category we did not consider programs that are intended to support work (e.g., child care assistance or tax benefits only for workers), as these are not conceptually last-resort programs.

To identify countries that provide no support we considered whether there are rules resulting in one and only one family counting a child with shared residence as being in their household. Differentiating between some and considerable support was based on whether the total benefit is larger in shared-residence cases than the benefit that would be received by the parents if the child does not share residence.³ The typical way that benefits would be higher would be if a child were counted as a full member of both households (which increases the eligibility threshold and the benefit level, compared to if the child only counts partially or not at all.)

Guaranteed child support

One key policy that may improve the economic well-being of separated parents with children is child support/

³Because benefits are greater if income is less, the precise test of whether total benefits are higher in shared residence or sole residence needs to consider parents with equal incomes. Otherwise, the total for a shared residence family would be greater than if the higher-income parent had sole custody, but lower than if the lower-income parent had sole custody, and this would merely be a feature of benefits that change with income, rather than demonstrating support for shared residence.

child maintenance, the financial contribution paid by a non-resident parent to a resident parent for supporting children after separation. We did not study general child support policy here because it is primarily regulating a private transfer, since the source of the income transferred is an individual parent, not the government.

However, countries having a particular type of guaranteed child support program could support shared residence. Guarantee programs provide a minimum amount of child support from the government if the noncustodial parent does not pay the full amount due. In some countries, the amount guaranteed is only the amount ordered (or some proportion of it) (Hakovirta, Cuesta, et al., 2022). In these countries, shared residence is relevant only for general child support policy (whether there is an order and its amount), but not to the guarantee program itself. In other countries, the guaranteed amount can be higher than the order or even available if there is no order; this ‘top up’ is intended to provide an amount that the family needs if the order is very low. In this type of guaranteed program, shared residence is important. Support for shared residence would be demonstrated by allowing both parents to receive the guarantee in shared-residence cases. Countries could go even further, to considerable support, by providing more in total support to those with shared-residence than if the child lived with only one parent.

DATA AND METHODS

We primarily used data from a questionnaire collected in 2017 reflecting the policy environment in that year. The questionnaire was collected from expert informants in 15 countries (for details see Hakovirta & Haapanen, 2020). Respondents were carefully selected to be academic scholars with previous experience in cross-country policy description projects similar to this one.⁴ In most countries, there was only one informant, but in Denmark and France two people completed the questionnaire together. Further discussion with informants was used to clarify some answers, and the data were supplemented with a review of policy documents collected from various official sources as well as the previous research literature to confirm accuracy.

In countries where social security and family policy differ substantially across subnational units, we asked

informants to select a particular unit. The U.S. informant reported on Wisconsin, a state close to the median in population, per capita income, and pre-tax/transfer poverty for working-age households with children; its income support system is somewhat more generous than other states (Bruch et al., 2023) and it is the state with the most information about the prevalence of shared residence (Meyer et al., 2022). While federal program rules are consistent across states, Wisconsin's policy may differ in other areas from other states.

This expert informant technique is used in many comparative social policy studies (Bradshaw, 2012; Corden, 1999; Eardley et al., 1996; Ferrarini et al., 2013; Hakovirta, Meyer, & Skinner, 2022; Skinner et al., 2007). As each informant was an expert in the field of enquiry in their own country, it eased the task of data collection and validation and thereby helped provide a deeper interpretation of the policy framework and the operational rules and processes.

In the questionnaire, informants were asked how parents who share residence were treated in housing benefits, social assistance, and ‘any other social benefits (e.g., tax reductions, universal child allowances, guaranteed child support)’. In addition, we generated fictitious families that varied in their circumstances and asked the national informants to estimate how these families would be treated by the tax and benefit system in their country. Because we used two methods to ascertain how shared-residence families are treated (information on the general rules and then how a specific family would be treated), this clarified information and increased accuracy.

We analysed the answers of national informants in 13 countries, excluding two countries for which data were incomplete. Based on these responses, in each policy area we assigned countries into one of three categories—providing no support, some support, or considerable support for shared residence—using the above framework and highlighting variations in approaches. The analysis was descriptive. Methodologically, our approach was a policy analysis focusing primarily on eligibility and benefit levels for various programs. We focused on the treatment of shared-residence families, considering both explicitly codified and implicit features of programs.

RESULTS

Child benefits

Table 2 provides information on how shared residence is treated in child benefits. We categorised seven countries as not supporting shared residence. In all these countries,

⁴The questionnaire built on a previous questionnaire commissioned by the UK government to consider various approaches to child support policy (see Skinner et al., 2007). Many of the countries used in that study were also used here; some of the same national informants were used.

TABLE 2 Support for shared residence in child benefit.

Country	Level of support: no, some, or considerable	Who can get child benefits if shared residence	Selected requirements to share child benefits
Australia	Some support	One or both parents	Child lives more than 35% in each parent's home
Belgium	No support	Only one parent, mother or the parent who received child benefit before separation	–
Denmark	No support	Only one parent, parent with child's residency	–
Estonia	No support	Only one parent, parent with child's residency	–
Finland	No support	Only one parent, parents can decide	–
France	Some support	One or both parents	Parents or authorities can decide
Iceland	No support	Only one parent, parent with child's residency	–
New Zealand	Some support	One or both parents	Child lives more than 33% each parent's home. Benefit split based on days of care
Norway	Some support	One or both parents	Juridical agreement on shared residence and parents' consensus
Poland	Some support	One or both parents	Parents' consensus
Sweden	Some support	One or both parents	Formal joint custody means benefit must be split unless parents direct otherwise
UK	No support	Only one parent, the parent designated as the 'parent with care', even if the child spends more time with the other parent	–
US (Wisconsin)	No support	Only one parent	–

child benefits can only be paid to one of the parents when parents have separated. Rules about which parent can receive benefits differ. Child benefits in Belgium are paid to the mother, or the parent to whom the child benefits were paid before the parents separated. In Finland, child benefits are paid to the parent who has primary responsibility of the child or with whom the child lives, and parents can agree on the parent that will be paid. In Denmark, Estonia, and Iceland, the parent with whom the child officially lives receives child benefits. In the UK, child benefits are paid to the parent who is considered the primary carer for a child, even if actual overnights are less (SSAC, 2020). In the United States Child Tax Credit benefits are administered through the income tax system and a complicated set of rules dictate which parent can claim the child if the child spends an equal number of overnights with each.

We characterised six countries as providing some support for shared residence. In France, Norway, Poland, and Sweden, child benefits can be split between parents. In France, parents can decide whether child benefits are paid to either parent or to both parents. If parents disagree, both parents receive part of the child benefits. In

Norway, single parents have the right to child benefits for one child more than they have. In shared-residence cases, if the parents have a written agreement, they can split this extra benefit, but the total received is the same as if the parents did not have shared residence. In Poland, parents may split the benefits if there is consensus; otherwise, child benefits go to the parent who applies first. In Sweden, if parents have a legal joint-custody agreement, child benefits are split and paid to both parents unless the parents declare that only one of the parents is to be the recipient. In Australia and New Zealand, the threshold for shared residence is lower (33%–35%), and a difference from the other countries is that the benefits are not necessarily shared equally but can be divided based on detailed percentages of time.⁵

In no country is the total combined amount of child benefits for both parents greater when there is shared residence than when there is sole residence. Thus, no

⁵In Australia, the Family Tax Benefit can be split between parents; however, the parenting payment is available only to the primary parent. Because a portion of child benefits can be received by both parents, we count this as support.

country is explicitly acknowledging in the child benefits program that shared residence brings additional costs, and we did not characterise any country as providing considerable support for shared residence.

Even among the countries that we characterised as no support, some practices give flexibility to separated families. For example, in Finland, parents may decide on a different beneficiary of child benefits for different children and the recipient can also be changed. In Belgium, parents have the opportunity set up a joint child account, called *Kindrekening*, to which child benefits can be paid and then either parent can use this account to pay the child's expenses.

Housing allowances

Table 3 shows how housing allowances incorporate both parents when their child shares residences. The housing allowance policies in six countries did not support shared residence. This generally meant that a child counts in only one household, and no adaptations are made for the space children would need in two dwellings.

Considerable support is provided in seven countries. In all of these countries, children living in two homes

may be taken into account in the housing allowance of both parents; as a result, families are eligible for a larger unit than if the child lived solely with one parent. Eligibility rules do vary across these countries, however. In Australia, housing assistance is a component added to income support payments (e.g., Parenting Payment Single) or Family Tax Benefit and is higher if you have dependent children at least 35% of the time. In Belgium, for both parents to count a child for rent subsidies, the child needs to live in each household 3 days a week or every other week. When this threshold of time is met, the generosity of the housing allowance will increase. In France, each parent can receive a housing allowance in cases of shared residence. The amount is calculated based on the period during which each parent has the child in his or her own home during the year (*Caisse nationale des allocations familiales [Caf]*, n.d.). In Sweden, housing allowance considers the number of children in the household and, since 2018, both parents can receive housing allowance incorporating a shared-residence child if they have a formal joint-custody arrangement. Norway is somewhat unusual in that the housing unit is based only on the declaration of the parents in terms of who lives together, so a child could be claimed by both parents and receive benefits accordingly.

TABLE 3 Support for shared residence in housing allowance.

Country	Level of support: no, some, or considerable	Child can be counted in both parents' household	Eligibility criteria
Australia	Considerable support	Yes	The child lives with the parent at least 35% of the time
Belgium	Considerable support	Yes	The child lives with the parent 3 days a week and co-parenting agreement
Denmark	No support	No	–
Estonia	No support	No	–
Finland	No support	No	–
France	Considerable support	Yes	Declaration of shared residence
Iceland	Considerable support	Yes	Parents who have their children living with them for a minimum of 30 days per year may register them as household members even though they are domiciled with the other parent
New Zealand	No support	No	–
Norway	Considerable support	Discretion	Beneficiary's own declaration of members of the household
Poland	No support	No	–
Sweden	Considerable support	Yes	Shared custody formal agreement
UK	No support	No	–
US (Wisconsin)	Considerable support	Yes	Shared custody formal agreement and child lives 50% of time with each parent

Social assistance

In 10 of the 13 countries, only one parent can receive social assistance for a child, so shared residence is not supported, as shown in Table 4. The eligible parent can be based on the child's official residence or the parent who is considered primarily responsible for the child's care. In the United States (Wisconsin) or Australia, there is no clear rule as to which parent can apply for social assistance (i.e., TANF and SNAP in the U.S.; Parenting Payment in Australia). According to informants, either the parents can agree on the matter or the parent who applies for it first may be the one to receive support.

Support is provided for shared residence in three countries—Belgium, Finland, and Norway—in that the child can be considered living in two household and both parents can have access to social assistance if other eligibility criteria are met. In Belgium, a child can be considered for social assistance if the child lives with the parent at least 3 days a week. In this circumstance, the program treats the parent as being an equal combination of a family (with a child) and a single individual (without a child) and the benefit is half of the social assistance amount from the family schedule and half of the amount of a single person (and thus the total for shared residence is the same as for sole custody). In Finland, for parents with shared residence the child's social assistance amount is

divided between the parents, but the total amount is no greater than if there were sole custody. We treated this as providing some support (but not considerable support) for shared residence as conceptually no extra benefits are provided to the shared-residence family, only a recognition that a child lives in the household part-time.

In Norway, if the child is with the parent for 15 days a month or more, the child is included in the parent's social assistance in the same way as in the case of the parent with whom the child is registered. An alternative option in Norway is that non-resident parents who receive social assistance will receive a supplement for every day or overnight the child stays with them. These cannot be received simultaneously, but the combined benefit under shared residence is more than the combined benefit under sole care, so we consider this as considerable support for shared residence.

Guaranteed child support

Four countries do not have a guarantee program, as shown in Table 5. Among the countries that do, seven of them had no clear strategy for responding to shared residence, either because they only guarantee the amount of the order, or because we did not find explicit rules for the supplemental portion of the guarantee. We considered this as not supporting shared residence.

TABLE 4 Support for shared residence in social assistance.

Country	Level of support: no, some, or considerable	Child can be counted in both parents' household	Eligibility criteria and notes
Australia	No support	No	Unstated as to which parent can receive in shared residence
Belgium	Some support	Yes	The child lives with the parent at least 3 days a week
Denmark	No support	No	–
Estonia	No support	No	–
Finland	Some support	Yes	Parents with shared residence can get benefits, but total is not greater than if they did not share
France	No support	No	–
Iceland	No support	No	–
New Zealand	No support	No	–
Norway	Considerable support	Yes	Parents with in-person contact (and therefore, with shared residence) get additional benefits
Poland	No support	No	–
Sweden	No support	No	–
UK	No support	No	–
US (Wisconsin)	No support	No	Unstated as to which parent can receive in shared residence

TABLE 5 Support for shared residence in guaranteed child support.

	Guaranteed child support	
	Level of support: no, some or considerable	Guaranteed child support can be paid to both parents? Additional benefits for shared residence?
Australia	No guaranteed child support program	
Belgium	No support	Not paid to both parents
Denmark	No support	Not paid to both parents
Estonia	No support	Not paid to both parents
Finland	No support	Not paid to both parents
France	No support	Not paid to both parents
Iceland	No support	Not paid to both parents
New Zealand	No guaranteed child support program	
Norway	Considerable support	Can be paid to both parents, total benefits can be greater
Poland	No support	Not paid to both parents
Sweden	Some support	Can be paid to both parents, total benefits the same as sole custody
UK	No guaranteed child support program	
USA (Wisconsin)	No guaranteed child support program	

Sweden and Norway are exceptions. In Sweden, guaranteed child support consists of full support (a maximum amount) and supplementary support (a top-up if the obligated amount is lower than full support). Since 2001, both parents could receive half the full child support guarantee if the parents' incomes are low and the child shares residence (Statens offentliga utredningar [SOU], 2011, pp. 78–80). Because the total amount for shared and sole residence is the same, we considered Sweden as providing some support for shared residence, but not considerable support. In Norway, in shared-residence cases, both parents can receive guaranteed support if both parents have incomes below the threshold where guaranteed child support can be claimed, but this is rare. Still, because it is possible for parents with a shared-residence child to receive more in total than under sole custody, we counted this as considerable support.

Summarising social security policy and shared residence

A main contribution of this paper is the analysis of whether four different policy areas within 13 countries support shared residence. Table 6 provides a summary of our main results.

Considering the child benefits policy area, we characterise seven countries as not supporting shared residence, six countries as providing some support, and no country offering considerable support. The countries offering some support allow both parents to receive child benefits

for a shared-residence child, but no extra benefits are provided in recognition of the extra costs borne by parents who have this arrangement. The second policy area, housing assistance, has seven countries providing considerable support for shared residence. This support typically takes the form of a shared-residence child being counted in both parental households, so that a dwelling of sufficient size is subsidised. The remaining six countries we count as not supporting shared residence via housing assistance. The third area, social assistance, has 10 countries that do not support shared residence. In these countries a shared-resident child can be counted in the unit of only one parent. Two countries have some support for shared residence; they allow eligibility for both parents but do not provide additional benefits. One country, Norway, provides considerable support for shared residence by providing additional social assistance benefits. Finally, four countries do not have a guaranteed child support program, and seven have a program but it does not support shared residence. We characterise one country, Sweden, as providing some support in allowing both parents to receive this benefit. Norway offers considerable support in that extra total benefits are possible for shared-residence families.

The last column in Table 6 shows a simple index of support for shared residence. We counted an area with 'some support' as 1 and 'considerable support' as 2, and then divided by the number of program areas considered. Higher scores thus showed more support for shared residence. Norway received the highest index score, 1.75, as it was rated as supporting shared residence in each policy area. Moreover, these characterisations show Norway as

TABLE 6 Summary of support for shared residence.

	Child benefit	Housing assistance	Social assistance	Guaranteed child support	Index ^a
Australia	Some support	Considerable support	No support	No program	1.0
Belgium	No support	Considerable support	Some support	No support	0.75
Denmark	No support	No support	No support	No support	0
Estonia	No support	No support	No support	No support	0
Finland	No support	No support	Some support	No support	0.25
France	Some support	Considerable support	No support	No support	0.75
Iceland	No support	Considerable support	No support	No support	0.50
New Zealand	Some support	No support	No support	No program	0.33
Norway	Some support	Considerable support	Considerable support	Considerable support	1.75
Poland	Some support	No support	No support	No support	0.25
Sweden	Some support	Considerable support	No support	Some support	1.0
UK	No support	No support	No support	No program	0
US (Wisconsin)	No support	Considerable support	No support	No program	0.67

^aWithin each policy domain, no support = 0; some support = 1; considerable support = 2. The sum across domains is then divided by the number of relevant domains (i.e., countries without a guaranteed child support program are divided by 3; countries with a program are divided by 4).

the only country that gave considerable support for shared residence in more than one domain. Denmark, Estonia, and the UK were characterised as the least supportive, as within each policy shared residence is not supported (children are counted in one and only one household; leaving parents with shared-residence agreements with fewer supports and sometimes difficult decisions to make about which parent can receive various benefits). All other countries had a combination of policy areas where they supported shared residence and other areas where they did not. Thus, our analysis highlights not only that separated parents in some countries who want to share residence of their children face challenges within the social security system, but also that there are inconsistencies within countries in how families with shared residence are treated across policy areas.

What might account for country differences in the level of support for shared parenting after separation? A detailed analysis was beyond our scope, so we offer three ideas, comparing the index in Table 6 to the characteristics of countries in Table 1. First, as policymakers observe more shared residence, they may change policies to accommodate it and even support it, leading to countries with the highest prevalence of shared residence having the most policy support (as we have measured it). However, the data did not provide strong support for this, as Norway, the country with our highest score of support, had less shared residence in 2002–2010 than Denmark (Steinbach et al., 2020), which we showed as having no support. Similarly, Finland had the second highest level of shared residence in the 2021 estimates (Hakovirta et al., 2023), but provided little support for shared residence.

Second, support for shared-residence parenting may be related to the traditional classification of welfare state regimes (Esping-Andersen, 1990). For example, liberal regimes, with their preference for market solutions and a residual welfare state, might be particularly unlikely to have additional government expenditures related to supporting shared residence. However, the traditional welfare regimes do not appear to be strongly related to our index. For example, while the highest levels of support for shared residence are found in two countries typically considered as social democratic regimes (Norway and Sweden), the third highest score is linked to a liberal regime (Australia), and a conservative regime (France) is tied for the next highest score. The lack of correspondence fits with a long line of research arguing that the traditional approach does not sufficiently consider issues of gender (Orloff, 2009). More recent clustering that accounts for gender did not map consistently onto our index either (Bambra, 2007). Still, future research explicitly focusing on whether groups of countries have similar approaches to supporting shared residence would be useful.

Related, a third idea is that countries with more gender equality will provide more support for shared-residence parenting, as these countries may emphasise parents' equal responsibility for earning and caring (Thomson & Turunen, 2021). While a full analysis was far beyond the scope of this article; we conducted a simple exercise to examine whether our index of support is correlated with the index of gender inequality from the UNDP (2022) shown in Table 1. While the correlation is negative (-0.27), it is not statistically significant ($p > 0.10$). The limited number of observations may lead to this result; we believe more focused and detailed research would be useful.

CONCLUSIONS, LIMITATIONS, AND IMPLICATIONS

This article provides one of the first examinations of whether and how the policies of several countries respond to a growing family form, shared residence of children after separation. One contribution of this paper is conceptual, as we consider how a country might support shared residence and propose a simple categorisation of whether shared residence is supported within four policy domains. Our second contribution is in documenting the level of support in 13 countries in these domains. Our analysis concludes that only one country, Norway, supports shared residence in all policy domains; moreover, it is the only country to give considerable support in more than one policy domain. Across countries, the primary mechanism for supporting shared residence is allowing both parents to receive benefits. However, our results also highlight a lack of clear policy strategy regarding parents with shared residency, and few consistent rules across domains and across countries about how to determine in which unit a particular child should be counted. Apparently, the observation of Gauthier (1996) that family policy is not 'comprehensive, explicit, [or] well-coordinated' (p. 4) still holds more than 25 years later.

These conclusions should be seen in the light of four main limitations. First, our conceptualisation is simple and straightforward, which we believe is appropriate for an area of emerging research and policy. Still, further elaboration may be useful. Second, our analyses of policies are limited. We primarily focus on eligibility within single domains and use limited information on the precise level of benefits and no information on how benefits may fit together. Whilst information comes from informants in each country who have expertise in social policy, and we were often able to verify information through printed documentation, this was not always possible. As a result, we may have mis-characterised a country's policies if there are policy nuances that are not readily apparent or if how policies work in practice differs from stated policy. Related, Wisconsin's state-level policies do not represent the nation and, even outside the United States, there may be differences within a country that we have not considered. Third, any comparative analysis faces challenges of incorporating depth if several countries are being considered. This analysis of 13 countries is therefore limited to a high-level comparison; additional research considering fewer countries but in greater detail (Merla et al., 2021) would be a useful complement to this work. Finally, we analyse only four policy areas and there are other areas of policy that could be considered. For example, if a country provides paid leave to care for a sick child, is this leave available to both parents if they share residence, or only one? If a country provides an income-

tested child care subsidy, whose income is counted in cases of shared residence?

Overall, our results showing inconsistencies across policy areas within a country and the lack of stated policy within some countries suggest that policymakers examine how families with shared-residence agreements in a variety of policy domains. As this family type becomes more common, it becomes more important that policies are more explicit about how these families are to be treated within benefit programs. Ignoring these families, leaving the treatment of these families completely up to the discretion of caseworkers, or implementing first-come first-served rules raise fundamental issues of fairness and equity.

Whilst our results argue for policy explicitness, they do not inherently argue for countries to have more supportive shared-residence policies. In our view, that conclusion would need to be based on the needs of shared-residence families, evidence for the impact of this family arrangement on children and parents, and assessments of the trade-offs involved in increasing support for these families versus other potential uses of public funds. However, some research has shown positive impacts on parents and children of shared-residence arrangements (Berman & Daneback, 2022; Steinbach, 2018). As such, policymakers could examine whether rules discourage families from shared-residence agreements or limit the benefits available to families that share residence. Policymakers could go even further and reconfigure policies to actually provide considerable support for shared-residence families.

The precise method of supporting shared residence may vary across countries and even across policy domains within a country. Because this is a relatively new family form, policy experimentation may be needed, and attempts may require later modification. For example, in Sweden, the supports for low-income shared-residence families in housing benefits and guaranteed child support have been determined to be duplicative. The guaranteed child support program for shared-residence parents was scheduled to be abolished by 2021; in the future, the goal is to support low-income shared-residence families primarily through the housing benefit system in Sweden (The Social Security Committee [SSC], 2017). The details of policy reform may prove difficult, especially since we do not yet have a detailed understanding of the level of extra costs faced by shared-care families, even though this has been a policy concern for over 20 years (Melli & Brown, 1994). Even so, this research highlights the need for improvements in how social security policy helps parents manage shared parental responsibilities post-separation.

FUNDING INFORMATION

This work was supported by the Research Council of Finland grant agreement numbers 294648, 338282 and 345546.

CONFLICT OF INTEREST STATEMENT

There are no conflicts of interest to declare.

DATA AVAILABILITY STATEMENT

The participants of this study did not give written consent for their data to be shared publicly, so data is not publicly available. The data that support the findings of this study are available from the corresponding author, Mia Hakovirta, upon reasonable request.

ETHICS STATEMENT

We use data from a questionnaire reflecting the policy environment in each country, policy documents collected from various official sources, and the previous research literature. The data do not include personal, sensitive or confidential information from individuals. According to the ethical review in human sciences in Finland this kind of data is not required to seek an institutional ethics approval before commencing a data collection (see signed letter).

PERMISSION TO REPRODUCE MATERIAL FROM OTHER SOURCES

This article does not use of any previously published material.

REFERENCES

- Bahle, T., Pfeifer, M., & Wendt, C. (2010). Social assistance. In F. G. Castles, S. Leibfried, J. Lewis, H. Obinger, & C. Pierson (Eds.), *The Oxford handbook of the welfare state* (pp. 449–461). Oxford University Press.
- Bambra, C. (2007). Defamilisation and welfare state regimes: A cluster analysis. *International Journal of Social Welfare*, 16(4), 326–338. <https://doi.org/10.1111/j.1468-2397.2007.00486.x>
- Bartfeld, J., & Chanda, T. (2023). Economic outcomes of shared placement among divorced mothers in Wisconsin. *Social Service Review*, 97(4), 719–754. <https://doi.org/10.1086/726593>
- Berger, L. M., & Carlson, M. J. (2020). Family policy and complex contemporary families: A decade in review and implications for the next decade of research and policy practice. *Journal of Marriage and Family*, 82(1), 478–507. <https://doi.org/10.1111/jomf.12650>
- Berman, R., & Daneback, K. (2022). Children in dual-residence arrangements: A literature review. *Journal of Family Studies*, 28(4), 1448–1465. <https://doi.org/10.1080/13229400.2020.1838317>
- Bradshaw, J. (2012). The case for family benefits. *Children and Youth Services Review*, 34(3), 590–596. <https://doi.org/10.1016/j.childyouth.2011.10.009>
- Bradshaw, J., & Finch, N. (2002). *A comparison of child benefit packages in 22 countries*. <https://www.york.ac.uk/inst/spru/pubs/pdf/rrep174.pdf>
- Bruch, S. K., Van Der Naald, J., & Gornick, J. D. (2023). Poverty reduction through federal and state policy mechanisms: Variation over time and across the United States. *Social Service Review*, 97(2), 270–319. <https://doi.org/10.1086/724556>
- Caisse nationale des allocations familiales (Caf). (n.d.). Les aides personnelles au logement. <https://www.caf.fr/allocataires/aides-et-demarches/droits-et-prestations/logement/les-aides-personnelles-au-logement>
- Claessens, E., & Mortelmans, D. (2018). Challenges for child support schemes: Accounting for shared care and complex families. *Journal of European Social Policy*, 28(3), 211–223. <https://doi.org/10.1177/0958928717753592>
- Corden, A. (1999). *Making child maintenance regimes work*. Family Policy Studies Centre.
- Dewilde, C. (2017). Do housing regimes matter? Assessing the concept of housing regimes through configurations of housing outcomes. *International Journal of Social Welfare*, 26(4), 384–404. <https://doi.org/10.1111/ijsw.12261>
- Eardley, T., Bradshaw, J., Ditch, J., & Gough, I. (1996). *Social assistance in OECD countries: Synthesis report*. <https://eprints.whiterose.ac.uk/73427/>
- Esping-Andersen, G. (1990). *The three worlds of welfare capitalism*. Princeton University Press.
- Esping-Andersen, G. (1999). *Social foundations of postindustrial economies*. Oxford University Press.
- Ferrarini, T., Nelson, K., Korpi, W., & Palme, J. (2013). Social citizenship rights and social insurance replacement rate validity: Pitfalls and possibilities. *Journal of European Public Policy*, 20(9), 1251–1266. <https://doi.org/10.1080/13501763.2013.822907>
- Garriga, A., Turunen, J., & Bernardi, L. (2021). The socioeconomic gradient of shared physical custody in two welfare states: Comparison between Spain and Sweden. In L. Bernardi & D. Mortelmans (Eds.), *Shared physical custody: Interdisciplinary insights in child custody arrangements* (pp. 181–206). Springer. https://doi.org/10.1007/978-3-030-68479-2_9
- Gauthier, A. H. (1996). *The state and the family: A comparative analysis of family policies in industrialized countries*. Oxford University Press.
- Griggs, J., & Kemp, P. A. (2012). Housing allowances as income support: Comparing European welfare regimes. *International Journal of Housing Policy*, 12(4), 391–412. <https://doi.org/10.1080/14616718.2012.711987>
- Hakovirta, M., Cuesta, L., Haapanen, M., & Meyer, D. R. (2022). Child support policy across high-income countries: Similar problems, different approaches. *The Annals of the American Academy of Political and Social Science*, 702(1), 97–111. <https://doi.org/10.1177/00027162221119959>
- Hakovirta, M., & Haapanen, M. (2020). Vignette data in a comparative child maintenance study. INVEST Working Papers 2/2020, University of Turku. <https://urn.fi/URN:ISBN:978-951-29-7998-1>
- Hakovirta, M., Meyer, D. R., Salin, M., Lindroos, E., & Haapanen, M. (2023). Joint physical custody of children in Europe: A growing phenomenon. *Demographic Research*, 49, 479–492. <https://doi.org/10.4054/DemRes.2023.49.18>
- Hakovirta, M., Meyer, D. R., & Skinner, C. (2022). Child support in shared care cases: Do child support policies in thirteen countries reflect family policy models? *Social Policy and Society*, 21(4), 542–559. <https://doi.org/10.1017/S1474746421000300>
- Hakovirta, M., & Rantalaiho, M. (2011). Family policy and shared parenting in Nordic countries. *European Journal of Social Security*, 13(2), 247–266. <https://doi.org/10.1177/138826271101300203>
- Keebaugh, S. (2003). Discounting care: Shared care and social security policy. *Australian Feminist Law Journal*, 18(1), 152–178. <https://doi.org/10.1080/13200968.2003.11106928>

- Kemeny, J. (2001). Comparative housing and welfare: Theorising the relationship. *Journal of Housing and the Built Environment*, 16(1), 53–70. <https://www.jstor.org/stable/41107163>
- Kemp, P. A. (2000). The role and design of income-related housing allowances. *International Social Security Review*, 53(3), 43–57. <https://doi.org/10.1111/1468-246x.00077>
- Kitterød, R. H., & Wiik, K. A. (2017). Shared residence among parents living apart in Norway. *Family Court Review*, 55(4), 556–571. <https://doi.org/10.1111/fcre.12304>
- Korpi, W. (2000). Faces of inequality: Gender, class, and patterns of inequalities in different types of welfare states. *Social Politics: International Studies in Gender, State and Society*, 7(2), 127–191. <https://doi.org/10.1093/sp/7.2.127>
- Lazear, E. P., & Michael, R. T. (1988). *Allocation of income within the household*. University of Chicago Press.
- Melli, M. S., & Brown, P. R. (1994). The economics of shared custody: Developing an equitable formula for dual residence. *Houston Law Review*, 31, 543–584.
- Merla, L., Izaguirre, L., & Murru, S. (2021, September). To what extent do family policies support post-separation shared custody arrangements? Comparative evidence from Belgium, France, and Italy. Paper presented at *IPPA conference*, Barcelona, Spain. <https://lirias.kuleuven.be/4020718?limo=0>
- Meyer, D. R., Cancian, M., & Cook, S. T. (2017). The growth in shared custody in the United States. Patterns and implications. *Family Court Review*, 55(4), 500–512. <https://doi.org/10.1111/fcre.12300>
- Meyer, D. R., & Carlson, M. J. (2014). Family complexity: Implications for policy and research. *The Annals of the American Academy of Political and Social Science*, 654(1), 259–276. <https://doi.org/10.1177/0002716214531385>
- Meyer, D. R., Carlson, M. J., & Alam, M. M. U. (2022). Increases in shared custody after divorce in the United States. *Demographic Research*, 46, 1137–1162. <https://doi.org/10.4054/demres.2022.46.38>
- Miho, A., & Thévenon, O. (2020). Treating all children equally? Why policies should adapt to evolving family living arrangements. In *OECD social, employment and migration working papers No. 240*. OECD Publishing. <https://doi.org/10.1787/83307d97-en>
- Orloff, A. S. (2009). Gendering the comparative analysis of welfare states: An unfinished agenda. *Sociological Theory*, 27(3), 317–343. <https://doi.org/10.1111/j.1467-9558.2009.01350.x>
- Poortman, A. R., & van Gaalen, R. (2017). Shared residence after separation: A review and new findings from The Netherlands. *Family Court Review*, 55(4), 531–544. <https://www.doi.org/10.1111/fcre.12302>
- Powell, M., Yörük, E., & Bargu, A. (2018). Thirty years of the three worlds of welfare capitalism: A review of reviews. *Social Policy and Administration*, 54(1), 60–87. <https://doi.org/10.1111/spol.12510>
- Skinner, C., Bradshaw, J., & Davidson, J. (2007). *Child support policy: An international perspective*. <https://www.york.ac.uk/inst/spru/pubs/pdf/rrep405.pdf>
- Smyth, B. M. (2017). Special issue on shared-time parenting after separation. *Family Court Review*, 55(4), 494–499. <https://doi.org/10.1111/fcre.12299>
- Smyth, B. M., & Chisholm, R. (2017). Shared-time parenting after separation in Australia: Precursors, prevalence and postreform patterns. *Family Court Review*, 55(4), 586–603. <https://doi.org/10.1111/fcre.12306>
- Social Security Advisory Committee (SSAC). (2020). *Separated parents and the social security system*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/866253/ssac-ocasional-paper-22-separated-parents-and-the-social-security-system.pdf
- Sodermans, A., Matthijs, K., & Swicegood, G. (2013). Characteristics of joint physical custody families in Flanders. *Demographic Research*, 28, 821–848. <https://doi.org/10.4054/demres.2013.28.29>
- Statens offentliga utredningar (SOU). (2011). Fortsatt föräldrar – Om ansvar, ekonomi och samarbete för barnets skull. <https://www.regeringen.se/rattsliga-dokument/statens-offentliga-utredningar/2011/06/sou-201151/>
- Steinbach, A. (2018). Children's and parents' well-being in joint physical custody: A literature review. *Family Process*, 58(2), 353–369. <https://doi.org/10.1111/famp.12372>
- Steinbach, A., Augustijn, L., & Corkadi, G. (2020). Joint physical custody and adolescents' life satisfaction in 37 North American and European countries. *Family Process*, 60(1), 145–158. <https://doi.org/10.1111/famp.12536>
- Stephens, M. (2016). Using Esping-Andersen and Kemeny's welfare and housing regimes in comparative housing research. *Critical Housing Analysis*, 3(1), 19–29. <https://doi.org/10.13060/23362839.2016.3.1.250>
- The Social Security Committee (SSC). (2017). Nytt särskilt bidrag inom bostadsbidraget för barn som bor växel-vis. https://www.riksdagen.se/sv/dokument-lagar/arende/betankande/nytt-sarskilt-bidrag-inom-bostadsbidraget-for_H501SfU6
- Thomson, E., & Turunen, J. (2021). Alternating homes – A new family form – The family sociology perspective. In L. Bernardi & D. Mortelmans (Eds.), *Shared physical custody: Insights in child custody arrangements* (pp. 21–35). Springer. https://doi.org/10.1007/978-3-030-68479-2_2
- United Nations Children's Fund (UNICEF). (2023). *Innocenti Report Card 18: Child poverty in the midst of wealth*. UNICEF Innocenti – Global Office of Research and Foresight. <https://www.unicef.org/globalinsight/reports/report-card-18-child-poverty-amidst-wealth#report>
- United Nations Development Programme (UNDP). (2022). *Human development report 2021–22: Uncertain times, unsettled lives: Shaping our future in a transforming world*. https://hdr.undp.org/system/files/documents/global-report-document/hdr2021-22pdf_1.pdf
- Van Lancker, W., & Van Mechelen, N. (2015). Universalism under siege? Exploring the association between targeting, child benefits and child poverty across 26 countries. *Social Science Research*, 50, 60–75. <https://doi.org/10.1016/j.ssresearch.2014.11.012>
- Vanassche, S., Sodermans, A. K., Declerck, C., & Matthijs, K. (2017). Alternating residence for children after parental separation: Recent findings from Belgium. *Family Court Review*, 55(4), 545–555. <https://doi.org/10.1111/fcre.12303>
- Zilincikova, Z. (2021). Children's living arrangements after marital and cohabitation dissolution in Europe. *Journal of Family Issues*, 42(2), 345–373. <https://doi.org/10.1177/0192513X20923721>

How to cite this article: Hakovirta, M., Meyer, D. R., & Haapanen, M. (2024). Shared residence and social security policy: A comparative analysis from 13 countries. *International Journal of Social Welfare*, 1–16. <https://doi.org/10.1111/ijsw.12647>

APPENDIX A: CATEGORISATION OF SUPPORT FOR SHARED RESIDENCE WITHIN POLICY AREAS

Key factors	No support	Some support	Considerable support
<p>Child benefit</p> <p>The amount of the benefit and whether it is possible to get the benefit</p>	<p>Paid only to one parent (zero for the other parent)</p>	<p>Divided (a portion of the benefit goes to both of the parents, under specific rules)</p>	<p>Divided (a portion of the benefit goes to both of the parents, under specific rules) but combined benefit is greater than when child lives primarily with one of the parents</p>
<p>Housing assistance</p> <p>Whether shared-residence child counts in the housing unit</p> <p>The way shared residence enters into the income test</p>	<p>Child cannot be counted in both units</p> <p>Child assigned only to one household in the income test</p>	<p>Counting the child in both units</p> <p>Counting the child in each household in the income test, but based on the amount of time spent, rather than as a 'whole child'</p>	<p>Counting the child in both units</p> <p>Count the child as a full household member in each household in the income test</p>
<p>Social assistance</p> <p>Whether shared-residence child counts in both household</p> <p>The way shared residence enters into the income test and the level of benefit</p>	<p>Counted only in one household</p>	<p>Child can be considered in both households, but only in exact proportion to the amount of time spent.</p> <p>If the total combined benefit for parents with equal incomes was the same if a child lived completely with one parent or split time between the two</p>	<p>Child counts in both households as more than the exact proportion of time</p> <p>If the total combined benefit would be greater for parents if a child had shared residence compared to sole residency</p>
<p>Guaranteed child support</p> <p>Whether it is possible to receive guaranteed child support</p>	<p>No specific rules concerning shared residence cases</p>	<p>Providing the guarantee to one parent in shared-residence cases in which there was no child support order</p>	<p>Having conditions/rules under which both parents are eligible for the guarantee and combined guarantee is greater than when child lives primarily with one of the parents</p>