

**UNIVERSALITY AND
SELECTIVITY IN INCOME
SUPPORT:
A COMPARATIVE STUDY IN
SOCIAL CITIZENSHIP**

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Abstract

This paper is concerned with social citizenship as the basis of rightful entitlement to the benefits of the welfare state, and with differences in the way in which it is expressed in the income support systems of different countries. Citizenship is variously associated with equality of status, universality in the distribution of benefits and entitlement to a social minimum. The paper compares outcomes measures with respect to citizenship in the old age pension systems of six countries: Australia, the United Kingdom, the United States, Germany, Norway and Sweden, with respect to inclusiveness, selectivity, income composition and the remediation of poverty.

1 Introduction

Social citizenship is widely understood as the guarantee of some degree of equality, in the form of material resources, provided on a basis of right through the programs of the democratic welfare state. That is, social citizenship refers to the achievement of a minimum standard of living guaranteed by virtue of membership in the nation community and underpinned by its political institutions. Beyond this, however, agreement about its meaning is less clear and not always shared. In particular, the nature and degree of equality identified with citizenship are open to differences of interpretation.

The concept of citizenship has underpinned much of recent scholarship about the formation of the welfare state. It has been important in the discussion of the relation between the polity and the economy in welfare state development, in the formation of political alliances, and most particularly in the shaping of divergent welfare state types (Myles, 1989; Esping-Andersen, 1990; Baldwin, 1990). Others, however, have questioned whether citizenship matters, in the sense at least of challenging assumptions that the form of welfare state instruments necessarily determines distributive outcomes (Ringen, 1987; Mitchell, 1991).

The present paper is the first step in a larger project reviewing universality and selectivity in income support, and its goal is accordingly modest. It is concerned simply with reviewing the constituents of citizenship as they apply in the case of income support, and in particular as they concern the identification of citizenship with universality in the allocation of benefits. Given this interest, its focus is on the basis of citizenship for claimancy, rather than on the implications of citizenship for political mobilisation and the shaping of welfare state development. Its method is comparative, reviewing similarities and differences in the way social rights of citizenship are framed in six advanced welfare states. The countries to be considered are Australia, (West) Germany, Norway, Sweden, the United States (US) and the United Kingdom (UK). These have been chosen as representing the various types and combinations of income support system, and to include countries whose welfare states are strongly identified with the principles of universality and selectivity. These countries are also ones for which comparative data have been

developed through the Luxembourg Income Study (LIS) (Smeeding et al., 1990).

Universality, selectivity, and welfare state forms more generally find their strongest expression in old age pension systems. These tend to be the most long-standing areas of modern welfare state provision, and to account for largest share of their resources. As Guillemard (1983: 3) puts it, ‘the so-called welfare state is first of all a welfare state for the elderly’. Moreover old age has long been identified as one of the two life cycle periods when the risk of poverty is greatest (Hedstrom and Ringen, 1990: 77). This risk has been addressed by the welfare state in varying ways and to varying degree. Old age pensions thus provide an appropriate case study area in which to consider the meaning of social citizenship in the outcomes of welfare state provision.

The paper to follow is a meditation on citizenship as the idea applies to income support provision in old age and as these systems are reflected in the outcomes of old age pension support in a number of countries. The argument first reviews interpretations of citizenship associated with the level of development of the welfare state, and then turns to the identification of citizenship with universality in the provision of welfare state benefits and models of social policy. This discussion develops the proposition that citizenship entails a duality between social rights as representing equality of status as a member of the nation community and equality in the more material form of access to the resources sustaining a minimum standard of well-being. The paper then reviews evidence on the outcomes of social policy provision in six countries and the sense in which these outcomes may be identified with citizenship in needs-based, insurance-based and citizenship-based forms of welfare state provision in old age. These linkages are less unitary than might be supposed.

2 Interpretations of Citizenship

As it applies to the social rights of the welfare state, citizenship has been subject to a variety of interpretations. Perhaps this reflects the open texture of Marshall’s seminal essay on ‘Citizenship and Social Class’ (1963), which has given insights to a remarkably diverse group of thinkers about the welfare state. Marshall’s thesis is well known. He argued that the provisions of the welfare state represent a new dimension of

citizenship, 'social rights' created on the basis of, but also in problematic tension with, the civil and political rights of citizenship. These ideas have appealed to scholars of diverse theoretical persuasions, who in turning them to their various purposes have given the idea differing resonances.

My concern here is not to argue about what Marshall really meant, nor to enter debates with his many interpreters and critics (Barbalet, 1988; Turner, 1986; Hindess, 1987). More simply, I wish to point to some of the implications of the idea of citizenship as it applies to the social security systems of a number of countries, and in particular as it applies to income support in old age. The discussion begins with a brief review of some of the ways in which citizenship has been interpreted in the discussion of welfare state development. Of concern here are the criteria that have been used to define and identify the emergence of citizenship in the historical development of welfare states.

The least demanding interpretation of citizenship associates it with the replacement of poor laws and the institutions of the workhouse, outdoor relief and discretionary charity by the first, pre-modern forms of social provision which began to be instituted at the end of the nineteenth century. These developments did not mark the first emergence of the notion of welfare as a right, which had rather been intrinsic to feudal relations of mutual service and obligation. It is commonly pointed out, for the UK case at least, that the replacement of the Speenhamland system was undertaken precisely in order to curtail such customary rights (Esping-Andersen, 1990: 36). The distinctiveness of the systems of means-tested social assistance introduced in some countries and of social insurance in others lies in their supplanting punitive conditions for poor relief by forms of social provision which did not entail the loss of civil or political rights of citizenship (Marshall, 1963; Orloff, 1993: 10). They were 'pre-modern' in the sense of prefiguring the rational objective administration that marks the modern welfare state (Habermas, 1983, cited in Harvey, 1989: 12) in the older forms of charitable and mutual aid.

This interpretation defines the basic threshold of social rights of citizenship. What marks the emergence of social citizenship, however primitive its form, is the congruence of eligibility for assistance with membership in the community of the nation. The emergence of these early forms of provision saw a shift from the situation in which a person's claim to assistance negated the claim to civil and political status to one in

which the claim to assistance was consistent with, and indeed confirmed, social status as a member of the community. This is the bedrock of equality: these were new forms of social provision, and they represented some degree of economic security and social legitimacy for age groups who had lacked both. The parallel with liberal democracy is more general than specific, but it is relevant that the establishment of new forms of social provision typically entailed a shift of responsibility away from the local and toward the national state.

Social citizenship is more usually identified with Marshall's own historical moment in the establishment of the postwar welfare state. The pre-modern forms of social citizenship manifested in means-tested social assistance and early versions of social insurance were rarely considered to represent full subsistence, but rather presumed access to other resources through employment, kin relations or community. For Marshall, social citizenship entailed the guarantee, as of right, of a minimum standard of well-being necessary to support full membership of a community (Barbalet, 1988: 5). The importance of this minimum is two-fold, for it represents not only the insulation of the individual against the worst adversities of the market and capitalist economy but also an affirmation, in material form, of the value of the individual as a participant in society. Citizenship is a status of equality in honour and dignity with other members of the community. This status is bestowed by the welfare state only when it gives access to a material minimum, and does so by right of community membership. It is this status of honour and dignity as a human being, expressed in the right to a minimum quantum of economic resources, which provides the foundation for full participation in civil society and political process.

This identification of citizenship with the postwar development of the welfare state reflects an anglocentric bias in the interpretation of welfare history. Most advanced industrial nations, including the UK, introduced old age pensions before the war, However modern and pre-modern social provision differ in critical respects, though these differences are less marked in Germany than elsewhere. These differences lie in the fuller development of social provision with respect to both state responsibility for ensuring a minimum material standard and its availability on a basis of right. With bureaucratic and professional development, moralistic and discretionary modes of access were replaced by codified rules of

eligibility and entitlement. The community was more fully defined by social security systems encompassing a large share of the population in the circulation of benefits and revenues. Citizenship in this sense has almost always been national in scope, and benefits based on individual entitlements.

Still other interpretations have sought to extend the idea of citizenship beyond Marshall's social minimum, stretching its horizons to allow broader aspirations toward social and economic equality. A gesture of this kind is implicit in Titmuss' (1974) famous 'models of social policy', characterising the underlying value bases of social policy as residual, industrial/achievement, and institutional/redistributive in nature. The residual model drew its essence from pre-modern social assistance, and the industrial/achievement one from the wage-related social insurance of the postwar period. The institutional/redistributive model attempted to spell out an ideal vision in which a broad range of institutions enabled the members of its community to share in both giving and receiving. Always difficult to pin down, the model seems to evoke the image of an idealised Scandinavia. It puts very great weight on the importance of dignity in the meeting of human need, which Titmuss saw as most fully ensured when the use of the social services was a general condition of society. The place of a guaranteed minimum standard of well-being is here taken by the more abstract, but potentially more far-reaching, notion of the redistributive welfare state. In its redistributive role the welfare state not only ensures that all citizens have access to the resources to meet their needs but also provides the institutional framework within which all are givers as well as receivers. Mishra (1981: 14) has signalled its broader implications in his observation that the residual and institutional models become much clearer - though Titmuss himself might not have agreed - if one imagines a third possibility in 'structuralist' social policy, which would recognise the limitations on social policy inherent in capitalist society.

Myles' (1989: 28-9) interpretation of the 'citizens' wage' is analytic, designed to capture the ambiguous, hybrid character of public old age pensions in capitalist society. He portrays old age pensions as compounding contradictory elements of the liberal ideology of wage justice, in which the pension is understood as deferred income from employment and therefore properly unequal in value, and democratic

values of social equality, in which the pension incorporates a share of the social product over and above the wage and is appropriately downwardly redistributive. Myles' interpretation is founded on Marshall's, but gives the notion of citizenship an inflection of extractive social justice. The material element is more important than the symbolic in Myles' analysis, though ideas about equality and the social meaning of entitlement figure in the political economy of pension development.

Finally, Esping-Andersen and the power resources school more generally identify citizenship with the (limited) emancipatory potential of the welfare state to 'decommodify' human life. Esping-Andersen (1990: 21-6) further elaborates the concept of citizenship as Marshall presented it, developing it in two dimensions. The first concerns the quality of social rights and the rules and conditions governing them: social rights must be secure, adequate in material substance, and must be granted on terms which dissociate them from market performance. But, Esping-Andersen notes, social rights carry with them economic and social statuses, and so also serve to place their bearer in a given social stratification modifying, or perhaps supplanting, class position. The social rights constructed by the welfare state thus entail an active ordering of social relations. Esping-Andersen reserves the badge of citizenship for frameworks of social rights which establish a degree of insulation of the wage worker from abject dependence on the labour market. This is because together the two dimensions of citizenship shape the capacity of the working class to pursue its political interests through wider alliances with adjacent groups. Baldwin (1990) develops much the same argument in the more generalised terms of social insurance and the common interests of the 'risk groups' it defines. He points also to the reciprocal relation between state and citizenship, that the shape of social rights comes to reflect the alliances of the 'risk groups', including the interests of the middle class groups occupying pivotal positions in the politics of alliance.

These extended interpretations of citizenship at once limit and generalise the notion. The positive complementarity between need and claimancy on one side and rights bearing community membership on the other is taken for granted. For writers such as Myles and Esping-Andersen, as for Marshall, the tensions underlying complementarity of civil, political and social rights are the motor of welfare state development. These tensions are reflected in the status of the claimant, a moral status for Titmuss and a

political one for Myles and Esping-Andersen. In its material element, citizenship stands less for a guaranteed minimum standard of living than for some share in more abstract exchanges of social justice. Though the actual money amount may be minimal, it is to be judged by the relative standard of the community at large. The dignity, honour and legitimacy of the citizen recipient take on broader meanings, including those of embourgeoisement and political co-optation. These meanings are spoken in the language of inclusion, for citizenship is an expression of community. Whether this community is viewed in the congenial frame of Titmuss' (1970) institutionalised altruism, or as a stabilising institution of a class divided polity, its social boundaries are assumed to coincide with the legal and territorial identities of the nation-state. Marshall himself took this latter view, but very clearly considered this relation to rest on accidents of history in the UK case.

3 Citizenship and Universality

Citizenship has often been directly and literally equated with universality in the provision of benefits. This has been most marked in the case of income support, where it has been most commonly argued with respect to child benefits and old age pensions. This equation of citizenship with universality rests largely on interpretations of what constitutes a meaningful basis of right in access to the social entitlements of the welfare state. As we shall see, however, this is not so straightforward as it at first appears.

Ware and Goodin (1990: 5-9) have slightly reformulated Titmuss' three models of social policy referred to above, clarifying the principle of eligibility which underlies each. These correspond reasonably closely to the three basic principles underlying social security systems, or parts of systems, in modern welfare states. Their residualist (or needs-based) model operates on the principle that everyone is potentially eligible for the assistance necessary to reach a minimum standard, but that such assistance is actually provided only to those who experience actual need, and who satisfy a test that such need is genuine. In the case of financial assistance this normally entails a means test of some kind. The insurance (or contributions-based) model parallels Titmuss' industrial-achievement model and is organised on the principle that eligibility for assistance should depend on a history of past 'contributions' building interests in a

fund, and that the level of benefits be linked to that of contributions. The social citizenship (or rights-based) model has parallels with Titmuss' institutional-redistributive model of social policy, but in Ware and Goodin's schema is unambiguously identified with membership in society through residence or legal status, and with equal eligibility, unqualified by either a test of means or the requirement of past contributions.

Each of these models can be thought of as representing universality in some form or other. In principle the protection given by needs-based assistance is available to all, though the actual receipt of assistance is limited to those who fall below the minimum standard. Contributions-based assistance is universal in the sense that it encompasses the full population of workers and their dependants in a single framework of provision. This has been called the 'citizen-worker' model of welfare provision (Hernes, 1987).

But it is the third model of rights-based provision which is most widely identified with universality. Palme (1990: 106) refers to it as the most unambiguous condition for acquiring a right to a pension. Given its direct and unmediated identification of eligibility with community membership as resident or legal citizen, universality represents the apparently natural expression in social policy of the equality of liberal democracy.

In his reading of Marshall, Barbalet understands citizenship as necessarily requiring universality. This is because citizenship is inherently and essentially two dimensional, requiring not only that all members of society share in access to economic subsistence but also that they share in the common experience of government administration.

While earlier forms of class abatement alleviated the condition of poverty they tended to reinforce the class divisions between those to whom the services were provided and those who did not require them. The universalization of social services as a right of citizenship, on the other hand, has meant that the vast majority of citizens are subject to the same process through which the services are provided and receive essentially the same benefit. This common experience reduces the social distance between citizens. (Barbalet, 1988: 50-1)

Thus, citizenship is manifested in both the coverage of income security provision and the structure of its payments.

However, this equation of citizenship with universality can be questioned. Two particularly important objections have been raised. The first is that there is a fundamental contradiction in the notion of citizenship between its nature as a universal status and its identification as a bundle of universal social rights. The second is that universality itself is immaterial to the goals of citizenship, if these are taken to be substantive equality as an outcome of welfare state provision, either as the achievement of a minimum standard of well-being or as the enhancement of equality through more all-embracing patterns of redistribution.

Barbalet (1988: 67-72) finds a contradiction between the universality of citizenship and the particularity of the needs and circumstances of individual citizens. In parallel with civil and political rights, the social dimension of citizenship is a condition of participation in a common national community. The universality of citizenship is thus abstract, by its very nature formally equal for all members of the nation community. In contrast, social rights are substantive, consisting of material provisions subject to specified qualifying conditions and meeting individually different needs. In this sense social rights cannot be said to be the same, hence universal, for all citizens. Barbalet overstates this contrast, for like social rights, civil and political rights are also institutionalised in universal forms, yet in practice, of unequal value to different individuals and the members of different social groups. Nevertheless a contradiction remains between the status content of citizenship and the substantive content of social rights.

This contradiction is played out in the politics of old age pensions in various welfare states. Arguments about the merits of their various forms, as in the models proposed by Titmuss and by Ware and Goodin above, turn on the relationships between substantive forms of income support and appropriate standards of equality among citizens. The redistributive virtues of means-tested social assistance are said to be secured at the cost of claimants' dignity, and hence inconsistent with the equality of status inherent in citizenship. Social insurance, while encompassing workers of all classes, transforms the inequalities of the capitalist labour market into substantive inequalities in social provision. Universal, flat-rate provision

treats all citizens equally,¹ but by virtue of that fact does little to redress wider inequalities. Thus all three frameworks entail a contradiction in some form between the basis of right and the adequacy of support.

In actuality, the various types of income support have been differently developed from country to country, and moreover the income support systems of most countries combine elements of several kinds. Some people now argue that outcomes are relatively independent of instruments, and that it is only outcomes that matter. Welfare states, they argue, should be compared in terms of their performances, measured in the achievement of low levels of poverty and moderation of income inequality.

Ringen (1987: 7-14), for example, considers that the goal of equality can be given a weak or a strong interpretation in the politics of welfare state development. A weak interpretation aims at a guaranteed minimum standard for all members of society, while a strong formulation refers further to the entire structure of inequality.

In the first case, the ambition is to eliminate destitution and individual misery, in the second case to eliminate, in addition, societal cleavages which might cause conflict and tension in society. (Ringen, 1987: 7)

He identifies this latter goal with citizenship, and argues that the size of the welfare state is a more meaningful indicator than is the use of universality or selectivity in its programs.

Mitchell (1991) examined the tax and transfer systems of ten welfare states with respect to their efficiency and effectiveness in reducing income poverty and inequality. Her data, drawn from the 'first wave' of LIS, relate to the period around 1980. She concludes that the conventional wisdom about the relative merits of universality and selectivity in benefit administration is unfounded. On the basis of her research there is no clear and necessary association between the

1 Le Grand (1982) argues that such benefits favour the middle classes, who are able to make more advantageous use of them. This is likely to be a less significant factor in the case of income support than of access to professional services such as health care and education.

universality or selectivity of benefits and either effectiveness or efficiency.

It may indeed be true that minimum material standards can be assured, and significant redistribution of income achieved, through a wide variety of transfer and taxation instruments. It is nevertheless difficult to believe that the institutional contours of the welfare state are irrelevant, for they give the provision of welfare income its particular and variable social meaning. These contours are, in fact, the stuff of welfare politics, for they have embodied in them ideas about individual behaviour, social justice, and the collective interests of social groups. They also affect the social experience of individual recipients, including that of stigma, status honour and social justice.

4 Citizenship Compared

It may nevertheless be instructive to look afresh at how public provision of income in old age in various countries meets some of the criteria of social citizenship. The point of such an exercise is to reconsider the meaning of citizenship with presumptions about its embodiment in or incompatibility with particular instruments of income support set aside. Instead, it is proposed to reflect on citizenship from the perspective of the outcomes of the actual tax and transfer systems of a number of countries.

The arguments above suggest that the essence of citizenship lies in the duality between equality of status as a member of society and the assurance of a minimum standard of material well-being. There are, however, inherent tensions and potential contradictions between the two sides of this duality. These tensions are mediated by the particular notion of social right around which eligibility for income support in old age is organised in each country. Thus it is necessary to look at all three of these dimensions of income support systems in the social construction of citizenship, and in particular at the way in which they fit together.

One indication of the equality of status or honour with which the welfare state invests its citizens can be found in the inclusiveness of its programs, i.e. in their coverage. I refer here to the literal notion of the proportion of the members of the nation community who receive a benefit of any amount. As Barbalet (1988) has remarked, the importance of coverage is

two-fold, for it refers both to the breadth of access to material resources and to the common experience of claimancy and social administration. The coverage of welfare state programs may thus serve as a representation of equality, whether or not the benefits citizens receive are of equal monetary value.

Citizenship nevertheless entails more than mere symbols of equality. Its other side is material equality, at the very least in the achievement of a minimum standard of material well-being and perhaps more broadly in the development of redistributive institutions linking the members of the nation in a wider pattern of equalisation of resources and opportunity. While measures of poverty and redistribution have become very sophisticated, it is important to remember that income is a narrow measure of what we really mean by citizenship when the ultimate interest is in social participation in civil and political society. It is also important to bear in mind that these sophisticated technologies of measurement introduce at least as many questions about appropriate comparison as they resolve.

The critical linkage between equality of status and equality in more material terms is the establishment of claims upon the programs of the welfare state on a basis of right. This basis of right is the foundation of citizenship, in the sense that the social right to assistance enhances rather than detracts from the civil and political rights of citizenship. It has, however, been difficult to formulate across boundaries of culture, politics and academic discipline, and much of the argument about what constitutes social citizenship through the welfare state has reflected these biases. There is a sense in which citizenship has been understood negatively, as a basis of right which is not imbued with the violence of the means test or the property value of insurance contributions. The basis of right in residence has gone little questioned in consequence, though it too can have its unpleasant side in the exclusionary practices of, for example, immigration and labour regulation. Discussions of the basis of right have tended to slide between the importance of modern as opposed to pre-modern modes of benefit entitlement, mainly the use and form of means testing, and the independence of access to subsistence from the market, and in particular from the labour market. With the concept of de-commodification Esping-Andersen and Korpi (1987) attempt to bring these together, though not entirely adequately.

The discussion to follow reviews these various aspects of social citizenship as they are reflected in the outcomes of welfare state arrangements, in the present case the provision of income support in old age. In part the case for an approach made on the basis of outcomes rather than inputs has already been made. It rests on the great flexibility of tax and transfer instruments with respect to the incidence of costs and benefits, making unsafe abstracted assumptions about the merits of particular types of provision. But it also represents an attempt to put both sides of the citizenship duality on the same footing. The identification of citizenship with the guarantee of a minimum material standard refers, in fact, to outcomes, while much of the argument about the basis of right and equality of status has been conducted in terms of institutional inputs. The discussion presented below reflects on the two terms of citizenship from a consistent standpoint, that of their effects in the outcomes of income support provision.

The outcomes of public provision of income support in old age have been considered for two types of family unit, couples and single women living alone. These were chosen as representing archetypical cases against which policies are commonly evaluated. More interestingly for the present purpose, they typically (though not in all cases) provide an indication of the groups most and least well supported in old age pension arrangements. These variations are of particular interest in the consideration of pensions based on or incorporating social insurance principles, where entitlement conditions typically reflect male employment patterns over the life course (Hernes, 1987). On one side, the gendered basis of qualifying conditions for old age pensions tends to disadvantage women, being reflected in lower benefits paid to women on their own account. On the other, these arrangements also typically recognise women as dependants, providing secondary coverage to them as the wives and survivors of male contributors. Outcome data do not distinguish between benefits received on account of a person's own contributions or those of a partner, but the divergent standards of provision to couples and single women provide some indication of the relative treatment of women under different income support arrangements.

The data are drawn from the LIS database, and relate to microdata from national income and expenditure surveys for the 'second wave' of LIS,

covering years in the mid-1980s. The usages made of LIS data are reasonably standard ones, computed wherever possible on the basis of standard LIS variables concerning income, taxes and transfers. Income calculations include benefits received in both cash and near-cash forms. In most cases data are presented for two ‘family types’, couples in which the head is aged 65 or more and ‘families’ of a single woman aged 65 or more. In both cases samples included only families in which there were no persons present in the household other than the couple or the single woman.

The countries chosen for discussion range across the three categories of the OECD (1988) classification of public pensions into, ‘basic’, ‘insurance’, and ‘mixed’ categories. Australian income support is of the basic variety, having grown directly from pre-modern social assistance. Pensions in Germany and the US operate on an insurance model in which benefits and contributions are related to employment. The UK, Norway, and Sweden have mixed pension systems combining two or more elements of social assistance, social insurance and universal coverage on a residential basis. The descriptions below apply to income support arrangements as they operated in the mid-1980s.

The income support system of **Australia** is a direct descendant of the pre-modern social assistance schemes introduced in a number of countries at the turn of the century, and is unambiguously (and unapologetically) selective. Pensions are potentially available to all legal residents, subject to a residential qualifying period, but actual entitlement is subject to tests of income and assets. While virtually every welfare state includes some form of means-tested provision, the Australian pension system is unusual in the relative generosity of the level of means permitted to eligible claimants. The age pension is designed to provide a minimum income standard. Benefits are flat-rate for those fully eligible, but may be reduced by the effect of means tests. The age of eligibility for benefits is 65 for males and 60 for females.² Australian pensions are funded from general revenue, and there is no contributory element.

During the period of welfare state expansion Australian age pensions were briefly available on a universal basis, with some degree of

2 The age at which women become eligible for the age pension is to be increased to 65 over a twenty-year period beginning in 1994.

universality applying during the decade 1973-1983. Ironically, this has caused this pension to be treated as an instance of 'citizenship' in some recent comparative studies (see Palme, 1990).

(West) Germany, in contrast, is the exemplar of income support in old age through compulsory social insurance. Coverage of employed persons and their dependants is comprehensive, but fragmented among a series of parallel occupational funds. Uncovered persons such as non-working housewives and aliens with long-term residence can join a fund on a voluntary basis. Benefits are earnings related, and are designed to maintain a relative standard of living in retirement. Males are eligible to claim benefits at age 63 after 35 years' contributions, and at age 65 after 5 years. Women are eligible at age 60 with 10 years' contributions in the previous 20 years. Provisions are funded by flat proportional contributions by employees and employers, with further subsidy from government.

German social insurance is underpinned by means-tested social assistance funded by local and state government and administered by local authorities.

In the **United States**, income support in old age is also provided through universal compulsory social insurance. American 'social security' provides coverage to those in the labour market, their spouses and survivors. A series of historical exclusions, among them federal civil servants and workers in non-profit organisations, were reduced in 1983 amendments, but casual agricultural and domestic workers remain uncovered. Eligibility is based on past employment and contributions, with benefits payable from age 65 (62 subject to an earnings test, a milder form of which also applies below age 70) for both men and women. Benefits are earnings-related, but redistributive adjustments are built into payments so that low income groups receive a higher proportion of their pre-retirement income than do middle and high income groups. Provision is funded by flat proportional contributions by employer and employee, supplemented by government contribution.

Social insurance is underpinned by means-tested social assistance pensions paid by the Federal Government. These are means tested on income and assets. Further social assistance is available, subject to further tests of income and assets, in the form of food stamps.

The foundations of income support in old age in the **United Kingdom** were laid in the Beveridge model of National Insurance, in which social insurance provided universal coverage to employees and their dependants. These pensions provide flat-rate benefits at age 65 (men) or 60 (women). An earnings-related tier has been added, and since 1988 provisions of both kinds have carried the option of ‘contracting out’ for equivalent or superior protection through a regulated private fund. Benefits are financed from contributions at graduated rates from employees and employers, supplemented by government. A non-contributory pension, funded from general revenue, is available at the age of 80 years to those ineligible for a national insurance pension or receiving pension at a low rate.

National Insurance is underpinned by a third tier of social assistance, providing income support and housing benefits, subject to means tests on income and assets.

Norway and Sweden serve here as the exemplars of citizenship on the ‘Scandinavian model’ (Esping-Andersen and Korpi, 1987). Both have two-tier arrangements for income support in old age, consisting of universal flat-rate pensions with earnings-related supplements.

In **Norway** a National Insurance Scheme (NIS) incorporates a universal flat-rate pension. A minimum pension is available to all residents after three years’ residence in Norway, while entitlement to a full pension requires 40 years. All employees and self-employed workers earning over a basic amount are also covered in a supplementary insurance scheme providing earnings-related benefits. Those not receiving the earnings-related supplement or receiving only a small such payment are eligible for a special supplement. Housing benefits are means tested. Benefits are funded from small contributions by employees and much larger contributions by employers, and by an income tax. Income ceilings in the contribution structure result in higher replacement rates for low-income than for high-income earners. Eligibility for benefits commences at age 67 for men and women.

National Insurance provision is underpinned by means-tested social assistance through municipal government. Levels of support vary, but are below minimum benefit levels of NIS.

Sweden has a basic pension system providing universal, flat-rate coverage to all persons. A minimum pension requires residence in Sweden for three years or more, and full pension, residence of 40 years. This is funded by government. In addition, all employees and self-employed persons earning over a base amount have mandatory coverage in earnings-related insurance scheme for National Supplementary Pension (ATP), wholly funded by employer contributions. Eligibility for benefits begins at age 65 for men and women, with provision for early retirement on partial pension.

Universal and earnings-related provisions are supplemented by several means-tested elements. Social assistance provides for people not otherwise covered or where benefits are insufficient. Pensioners eligible only for the basic pension are also eligible for means-tested benefits in the form of a supplement for a dependent wife and municipal housing allowance.

4.1 Equality of Status: The Universality of Coverage

One of the basic foundations of social citizenship is the enjoyment of benefits by a large part of the population. Inclusiveness in the circle of benefits and taxation is an important representation of equality in the community symbolised by the welfare state. Moreover, it means that citizens share the common experience of claimancy, referring not only to the pleasures of reciprocity but also to the politics of administration. The coverage of old age pension provision can stand, then, as one indication of the equality of status conferred through the pension programs of the welfare state.

Table 1 below compares the coverage of public income support in the six countries. The table presents the proportions of aged couples and single females living alone who had received income of any amount from social transfers in the survey period. The first row of the table refers to the receipt of income from a social transfer payment of any kind, and with the exception of Australia indicates that the receipt of transfer income in old

Table 1: Coverage of Income Support: Percentage of Aged Couples and Single Females Receiving Income from Social Transfers and Means-tested Transfers in Six Countries, Couple and Single Female Families ^(a)

	Australia ^(b) (1985-6)		(West) Germany (1984)		United States (1986)		United Kingdom (1986)		Norway (1986)		Sweden (1987)	
	C	SF	C	SF	C	SF	C	SF	C	SF	C	SF
Receives social transfer income ^(d)	75	91	97	99	95	97	99	100	94	98	100	100
Receives means-tested transfer income ^(e)	75	91	3	12	5	18	43	74	18	26	13	49

- Notes:
- a) Income units with heads aged 65 or more and living in households with no other persons. Income figures are weighted and are based on weekly data for the UK and annual data for all other countries. Cases with negative or zero gross income have been excluded.
 - b) Australian age pension recoded as a means-tested provision.
 - c) C = couples, SF = single females
 - d) LIS variable SOCTRANS.
 - e) LIS variable MEANSI, includes means-tested near-cash benefits.

Source: Luxembourg Income Study database.

age approaches universality in all six countries. This is, of course, a straightforward reflection of the nature of Australian exceptionalism, with income support provided on an overtly selective basis. Only three couples in four had income from a pension or benefit, compared to well over 90 per cent of couples in all other countries. The comparatively low figure of 94 per cent among Norwegian couples may be a result of the later age of eligibility for National Insurance in that country. It is notable that there was very little difference between the proportions of couples receiving income from public transfers in the social insurance countries, Germany and the US, and in those countries in which social insurance comes on top of a universal payment, the UK, Norway and Sweden. The contracting

out provisions introduced into the UK retirement income system since 1988 are not, of course, reflected in these earlier figures.

In all countries, the receipt of transfer income in old age was an even more universal experience among single females than couples. This group includes both women receiving retirement income in their own right and widows having entitlements as the survivors of their husbands. The greater universality of receipt says nothing about the level of such benefits, but only that the experience of claiming and receiving benefits is very widely shared.

4.2 The Institutional Forms of Social Rights

Of the various forms taken by social entitlements, it is residence-based universality and means-tested selectivity which are most directly identified with citizenship or its absence as the basis of aged income support. The equation of citizenship with equality of benefit entitlement on the basis of residence or legal status is particularly clearly stated in Ware and Goodin's (1990: 5-9) typology of welfare state models. As Table 1 has shown, however, there is very little difference among the countries considered here between those having a 'citizenship' component in their income support system (the UK, Norway and Sweden) and those relying entirely on social insurance (Germany and the US). Only Australia stands out, on account of its use of means-tested pensions.

Of all forms of income support, means-tested social assistance is widely viewed as least compatible with citizenship. The most fundamental objection to means-testing views it as a violation of human dignity. A relic of charity and pre-modern forms of public provision, it is seen as intended to humiliate the recipient of assistance and deter future claims. Titmuss (1976) captured this in his suggestion that residualism required the claimant to state that 'I am an unequal person'. In this sense the administration of selectivity based on means testing is out of keeping with the modern basis of right, not because it is necessarily inconsistent with bureaucratic procedural justice, but because it is inconsistent with the fundamental equality of citizens as human beings.

As the descriptions of income support have already indicated, all the countries discussed here operate some form of means-tested provision, in most cases as a final safety net under arrangements based on insurance

principles. The second row of Table 1 gives an indication of how widespread the experience of claiming these benefits is among the aged population of each country. As with the other entries in this table, the figures show the proportions of aged couples and single females who received income in any amount from a means-tested cash or near cash benefit during the survey period. The amount of such income received is not taken into account in this table.

As might be expected, the high figures shown for Australia stand out immediately, for in that country the claim to a benefit is synonymous with submission to a test of need. The Australian case raises a number of challenges to the conventional view of means testing. It is often suggested that the character of Australian needs testing differs from that in other countries, serving not to restrict assistance to those with the fewest resources but to withhold scarce public funds from the relatively small group having the greatest. It is claimed that this difference, in conjunction with peculiarly Australian historical experience and political culture (Shaver, 1991), have rendered insubstantial any stigma or humiliation attached to the use of means testing. More broadly, widespread experience itself may serve to render the experience normal, merely one bureaucratic dealing among many. Ringen (1987: 12) points out similarities between needs testing and progressive income taxation, referring to their similar potential to cause social division and conflict. It is not often recognised that income taxation is as suitable a basis as the receipt of benefits for the common experience of administration which Barbalet identifies with the universality of social citizenship.

The experience of means testing was also widespread in several of the other countries shown in Table 1. The experience of means testing was least common in the social insurance countries, Germany and the US. After Australia, it was most widespread in the UK, where more than two in five couples and three in four single women in old age received a means-tested provision of some kind. This experience was surprisingly common in Norway and Sweden, the countries often regarded as exemplars of universality and citizenship.

In all these countries more women than men have received means-tested benefits, and in almost every country this difference is substantial. It seems likely that these differences are linked with women's receipt of lower benefits in systems based on social insurance. With the exception

of Sweden, the differences in the proportions of couples and single women receiving means tested benefits reflected the relative importance of social insurance in the income support system as a whole. In (West) Germany and the US, the receipt of means-tested income was between three and four times more common for single women than for couples. In the UK and Norway, where this was much more common for both groups, the receipt of means-tested income was less than twice as common among single women as among couples. The high figures in both the UK and Sweden reflect claims to housing benefits and the greater housing need of single women in old age.

While issues of principle are important, the significance for citizenship of residence-based universality and the use of means testing may practically depend on the share of means-tested benefits in income as a whole. As a symbol of equality the importance of universal allowances may depend on their proportion in total income. More evidently, the larger a part of income that is subject to the processes of means testing, the more salient is the social meaning of the status attributes and administrative processes associated with it. Table 2 presents the composition of family income in the six countries, showing the mean share in gross income of each income component. The table breaks income from social transfers down into social insurance and means-tested transfers. Figures for social insurance transfers include both minimum, flat-rate and wage-related components, hence it is not possible to compare the relative importance of 'citizenship' and social insurance benefits in the incomes of transfer recipients.

The relative importance of means-tested income is clearly shown. Though means testing is used in the income support systems of all six countries, it played a large part in the incomes of aged people at average income levels in only two countries. The central role of means testing in Australian income security has already had considerable discussion. In no other country do means-tested provisions play a comparable role. Australia aside, the UK stands out from all others in the importance of means-tested benefits to the average claimant. This importance was more than three times greater for single aged women than for couples. There was also a notable dependence on means tested benefits to be found among single women in Sweden. In both of these countries means-tested housing

Table 2: Composition of Family Income in 6 Countries: Percentage of Each Income Component as a Mean Share of Gross Income, Couple and Single Female Families ^(a)

Families ^(b)	Australia (1985-6)		(West) Germany (1984)		United States (1986)		United Kingdom (1986)		Norway (1986)		Sweden (1987)	
	C	SF	C	SF	C	SF	C	SF	C	SF	C	SF
Wages and salaries	4	1	3	1	12	4	3	1	14	4	7	1
Self-employment income	3	1	3	1	2	-1	1	0	3	1	0	1
Cash property income	20	15	6	4	19	18	10	7	8	6	7	11
Factor Income	26	16	13	5	33	20	14	8	26	11	15	12
Employment related pensions	22	5	na	na	15	9	19	10	7	6	na	na
Market Income	48	22	13	5	47	29	33	18	32	17	15	12
Social insurance transfers	na	na	86	91	51	65	62	63	65	80	85	80
Means-tested transfers	50	77	1	3	1	5	5	18	1	2	1	8
Private transfers	0	0	0	1	0	0	0	0	0	0	0	0
Other income	2	1	0	0	0	0	0	0	2	0	0	0
Gross Income	100	100	100	100	100	100	100	100	100	100	100	100
Payroll taxes	na	na	1	0	1	0	0	0	3	1	na	na
Direct taxes	4	2	1	1	5	3	7	3	12	6	29	21
Disposable (Net) Income	96	98	98	99	94	97	93	97	84	93	71	79

Table 2: Composition of Family Income in 6 Countries: Percentage of Each Income Component as a Mean Share of Gross Income, Couple and Single Female Families (a)

- Notes:
- a) Income units with heads aged 65 or more and living in households with no other persons. Income figures are weighted and are based on weekly data for the UK and annual data for all other countries. Cases with negative or zero gross income have been excluded. Composition of income calculated using average share method.
 - b) C = couples, SF = single females
- AS85 non-existing variables assigned zero value: v4, v7, v13, v22, v25, v26, v27, PAYROLL; SOCI and MEANSI inverted.
 GE84 non-existing variables assigned zero value: v16, v17, v23, v24, v27, v32, v33, v35, PENSIOI.
 US86 non-existing variables assigned zero value: v16, v22, v24.
 UK86 non-existing variables assigned zero value: v33.
 NW86 non-existing variables assigned zero value: v16, v19, v22, v23, v27, v33, v35.
 SW87 non-existing variables assigned zero value: v4, v13, v17, v23, v26, v27, v32, v33, v35, PAYROLL, PENSIOI.

Source: Luxembourg Income Study database.

allowances are important parts of the income of low income aged persons. The five per cent of means-tested income received by aged American women reflected substantial dependence on food stamps, which mark their bearers as recipients of 'welfare' in the spending as well as the receipt of income.

This picture presents an average, and given the low income required to qualify for means-tested benefits in most countries is a most artificial one. Except in Australia and the UK to a lesser degree, most income from means-tested benefits went almost wholly to a small group of recipients. It is this pattern of concentration, as much perhaps as the means-testing procedures themselves, that associates selectivity with social division and makes it inconsistent with social citizenship.

For this reason it is interesting to compare the way in which income from means-tested payments is distributed in the six countries. Means-tested benefits play a subsidiary role in most income support systems, providing fall-back coverage to people who do not qualify for benefits under the usual rules of eligibility and/or supplementing the benefits of those whose entitlements are very low. It is usual for most of the income from these payments to go to a small group of claimants, and the inequality with which they are distributed provides some indication of the stigma and social division potentially associated with them. The Gini coefficient can be calculated to measure inequality in the distribution of income from means-tested benefits. The closer the coefficient is to 1, the more unequally this form of income is distributed, hence a high coefficient indicates that a large share of all means-tested income is received by a small part of the population.³

Table 3 shows Gini coefficients measuring inequality in the distribution of means-tested benefits among couples and single women in each country. The distribution of means-tested income among couples was highly concentrated in Germany, the US, Sweden and Norway, and among single females in Germany, the US and Norway. These benefits were only slightly more widely shared among UK and Swedish women and UK couples. In comparison, means-tested benefits were relatively

3 It should be noted that this usage inverts the usual reading of the Gini coefficient, in which a low coefficient suggests a relatively equal distribution of gross or disposable income.

evenly distributed in Australia, and markedly more so among single females than couples.

As Table 1 showed, with the exception of couples in Australia the receipt of social transfers was near universal in all six countries, while the receipt of means-tested benefits was in most cases concentrated within a small group. However most interpretations of citizenship demand more than this. Citizenship has been identified with the assurance of a minimum standard of living, with a degree of independence of the labour market, and with redistribution reducing the inequalities of market society. In all these respects the significance of social transfers for citizenship depends not only on their universality but also on their importance in the total incomes of individuals and couples. As Table 2 showed, there are clear differences in the relationship between social transfers and various forms of factor and market income.

What stands out immediately in Table 2 is the larger role of factor income in the countries whose welfare states Esping-Andersen (1990) has typified as 'liberal'. Factor income played a much larger role in total (gross) income in the US and Australia than in others of these six countries, in Australia through cash property income⁴ and in the US through income from both earned and unearned sources. The aged in these countries also depended more than their counterparts in other countries on private employment related pensions, and this pattern was reflected also in incomes of the aged in the third 'liberal' welfare state, the United Kingdom. The receipt of employment related pensions was particularly high in Australia, though the spread of occupational superannuation is a comparatively recent development in that country.

The comparatively large share of factor income of Norwegian men reflected the later age of eligibility for transfer payments in that country.

4 It is difficult to separate income from property from private pension income in the incomes of the aged in Australia because assets generating cash property income have often been acquired through the payment of private pension entitlements as lump sums.

Table 3: Inequality of Distribution (Gini Co-efficients) of Means-tested Transfers in Six Countries, Couple and Single Female Families (a)

Families ^(c)	Australia ^(b) (1985-6)		(West) Germany (1984)		United States (1986)		United Kingdom (1986)		Norway (1986)		Sweden (1987)	
	C	SF	C	SF	C	SF	C	SF	C	SF	C	SF
Distribution of Means-tested Benefits ^(d)	.411	.207	.984	.943	.979	.925	.775	.572	.884	.845	.918	.638

- Notes:
- a) Income units with heads aged 65 or more and living in households with no other persons. Income figures are weighted and are based on weekly data for the UK and annual data for all other countries. Cases with negative or zero gross income have been excluded.
 - b) Australian age pension recoded as a means-tested provision.
 - c) C = couples, SF = single females.
 - d) LIS variable MEANSI, includes means-tested near-cash benefits.

Source: Luxembourg Income Study database.

At the same time, Norwegian men and women also received private occupational pensions, though at relatively low average levels. The LIS database does not provide these data for Germany or Sweden.

Taking social insurance and means-tested payments together, transfers accounted for between about half (Australian couples) and virtually the whole (German single females) of total income. In the incomes of couple families, the 'liberal' welfare states stood out from all others, with public provisions representing only about half of average income. In contrast, reliance on public pensions was very high in Germany, but was almost as high in Sweden and Norway.

It is no surprise that in all these countries transfers composed a much higher proportion of the incomes of single women than they did of couples. The difference is a reflection of women's weaker position in the labour market during the earlier lives of the present day aged. It was greatest in the three countries having 'liberal' welfare states, and most

pronounced of all in Australia. In these countries there were very large differences in the part that employment-related pensions income played in the incomes of couples and single women, and couples typically also had larger shares than single women of income from both employment and property. Single women in Germany, Norway and Sweden were also more wholly reliant than couples on income from public transfers. These data do not show social insurance components of income security systems as disadvantaging women (see Hernes, 1987; Lewis, 1993), perhaps because outcomes data show the combined effects of women's disadvantage in contributory systems based on the male model of continuous, life-long employment and cross-subsidisation in income support associated with women's economic dependency.

The composition of income and differences in the relative importance of market and transfer income is a key aspect of citizenship as Esping-Andersen (1990) identifies it, the capacity of welfare state benefits to confer a degree of independence of the labour market and its disciplinary forces. This is one of the principles underlying his index of de-commodification. The reference of that index is however only secondarily to income in old age, its more immediate concern being with the contribution which income protection in old age makes to independence of the market in working life and class politics.⁵ Market independence in the composition of incomes of those who are now the citizen's relation to the state as the claimant of a social right, and the relative strengths and vulnerabilities of those who depend on transfers in welfare states of different kinds. Here the 'liberal' welfare states stand out from those of Germany and Scandinavia, though a later retirement age means that some Norwegian workers remain dependent on the labour market well after the age of 65.

There are no apparent differences between social insurance and mixed income support systems in the mean composition of income from public and private sources shown in Table 2. Thus transfers make up similar proportions of total (gross) income in Germany, which relies wholly on

5 Among the six countries considered here, the index of de-commodification (Esping-Andersen, 1990: 50) serves primarily to distinguish the welfare states of the 'Scandinavian model' from others. Interestingly, the index is indifferent between (West) Germany and the UK despite much higher replacement rates in the German case. Working from the same data, Palme (1990) distinguishes Germany from the UK and the US.

social insurance, and Sweden, which combines universal and social insurance components. A parallel but less close similarity is found between the US, with social insurance only, and the mixed system of the UK. Single women are more dependent on transfers than couples in all six countries; the gap is widest in Australia and most narrow in Sweden.

Myles identifies citizenship with redistributive social justice, reducing the inequalities of the capitalist market. To assess the capacity of income support to achieve a degree of redistribution it is necessary to take account not only of the receipt of benefits but also of the effects on income of taxes and insurance contributions (Mitchell, 1991). The appropriate comparison is thus between market income and disposable (net) income, allowing for both the receipt of transfer payments and the payment of taxes and social security contributions. Table 4 presents such a comparison, showing inequality in the distributions of market and disposable (net) income as measured by Gini coefficients and the percentage reduction in inequality achieved by benefits and taxes in each country.

Perhaps of greatest interest in these figures is the substantial degree of redistribution achieved through income support of the aged in all six countries. In this sense redistribution does little to differentiate degrees of citizenship in these six countries. With the exception of couples in the US, inequality of income is at least halved in all countries and is reduced by a larger factor in several. Redistribution is greatest in those countries in which transfer payments make up the largest part of gross income, i.e. Sweden, Germany and Norway. It is smallest in the US, where disposable income remains more unequally distributed than in any other of the countries. Redistribution is also generally lower also in the 'liberal' welfare states of UK and Australia. The same pattern was observed by Mitchell (1991: 128-9) for years around 1980.⁶ As might be expected

6 Mitchell found that social security and taxation systems reduced the level of income inequality in all the ten countries in her sample, with the transfer payments side generally carrying the greater burden of redistribution. Total redistribution was greatest in Sweden, followed at some distance by Norway and Germany. The transfer and tax systems of the UK, Australia and the US achieved successively less redistribution, with the US accomplishing only half that of Sweden.

Table 4: Inequality of Distribution (Gini Coefficients) of Market and Disposable Income and Measure of Reduction in Inequality in Six Countries, Couple and Single Female Families^(a)

	Australia (1985-6)		(West) Germany (1984)		United States (1986)		United Kingdom (1986)		Norway (1986)		Sweden (1987)	
	C	SF	C	SF	C	SF	C	SF	C	SF	C	SF
Families ^(b)												
Market income	.644	.804	.864	.893	.615	.730	.647	.757	.613	.773	.705	.695
Disposable (net) income	.245	.199	.256	.260	.339	.363	.250	.177	.223	.194	.174	.195
Percentage reduction in inequality	62	75	70	71	45	50	61	77	64	75	75	72

- Notes:
- Income units with heads aged 65 or more and living in households with no other persons. Income figures are weighted and are based on weekly data for the UK and annual data for all other countries. Cases with negative or zero gross income have been excluded.
 - C = couples, SF = single females.

Source: Luxembourg Income Study database.

given their greater dependence on income from transfers, redistribution is generally greater among single women than couples. The difference is greatest in the UK and Australia. Norway is an exception to this pattern. Perhaps of greatest interest in these figures is the substantial degree of redistribution achieved through income support of the aged in all six countries. In this sense redistribution does little to differentiate degrees of citizenship in these six countries. With the exception of couples in the US, inequality of income is at least halved in all countries and is reduced by a larger factor in several. Redistribution is greatest in those countries in which transfer payments make up the largest part of gross income, i.e. Sweden, Germany and Norway. It is smallest in the US, where disposable income remains more unequally distributed than in any other of the countries. Redistribution is also generally lower also in the 'liberal' welfare states of the UK and Australia. The same pattern was observed

by Mitchell (1991: 128-9) for years around 1980.⁷ As might be expected given their greater dependence on income from transfers, redistribution is generally greater among single women than couples. The difference is greatest in the UK and Australia. Norway is an exception to this pattern.

Finally, it should be noted that there is little relation between the type of income support arrangements used in a country and the extent to which inequalities of income are reduced. Australia, which relies wholly on means-tested payments, achieves much the same level of reduction as the UK and Norway, where there are substantial degrees of universality. German social insurance is at least as redistributive as are the mixed systems of Scandinavia. As Mitchell (1991) and Ringen (1987) have already observed, social policy instruments are very flexible. Moreover, the income support arrangements prevailing in a country and their redistributive effects feed back into the shaping of pre-transfer incomes, influencing incentives to accumulate property and join private pension plans. Comparisons of redistributive effectiveness of the kind presented here take no account of these interactions.

Citizenship thus cannot be reduced to the form given to social rights by the particular instruments used in income support arrangements. Its significance is social as much as economic, and lies in the variable ways in which social assistance, social insurance and universal flat-rate benefit systems mediate the duality between equality of status among members of the nation community and equality in entitlement to a minimum level of material well-being.

7 Mitchell found that social security and taxation systems reduced the level of income inequality in all the ten countries in her sample, with the transfer payments side generally carrying the greater burden of redistribution. Total redistribution was greatest in Sweden, followed at some distance by Norway and Germany. The transfer and tax systems of the UK, Australia and the US achieved successively less redistribution, with the US accomplishing only half that of Sweden.

4.3 Citizenship and Minimum Income

All but the least demanding interpretations of citizenship identify it with the guarantee of a minimum standard of material well-being through the institutions of the welfare state. Following Marshall, this minimum is customarily understood as a relative standard having a social content, one permitting the citizen 'to live the life of a civilized being according to the standards prevailing in the society' (cited in Barbalet, 1988: 67-8). While this minimum is not necessarily reducible to poverty, the development of comparative measurements of poverty does at least have an appropriately relative basis for considering this aspect of citizenship across national boundaries.

Table 5 compares the incidence of poverty among aged couples and single women in the six countries. These estimates are based on head counts of the numbers of aged couples and single women having a disposable (net) income which is low relative to the median incomes of the national populations of their country as a whole. An equivalence scale has been applied to take account of the different needs of income units of different size and composition, the OECD scale, which weights the first adult in an income unit more heavily than other adults and adults more heavily than children. While the particular measures and equivalence scales chosen do make some difference to the results obtained, the effects of such methodological choices are of less significance in the comparison of aged couples and single persons than in broader comparisons (Smeeding et al., 1993: n. 2). The table shows the percentage of aged couples and single women having incomes below three 'poverty lines', drawn at 40, 50 and 60 per cent of median equivalent income in the country concerned.

While the choice of a poverty line of this kind is necessarily arbitrary, these are close to the income standards used to define poverty in some of the countries concerned. The first, at 40 per cent of median disposable income, is close to the line used in US policy discussion, while the second at half of median income is common in European countries and the third, at 60 per cent of median income, approximates the Swedish existence minimum (Förster, 1993:11).

As the table shows, the income support systems of most of these countries set an effective minimum income standard at or above the level of 40 per

Table 5: Percentage of Couple and Single Female Units Below Poverty Lines of 40, 50 and 60 Per Cent of Median Equivalent Disposable Income^(a)

	Australia (1985-6)		(West) Germany (1984)		United States (1986)		United Kingdom (1986)		Norway (1986)		Sweden (1987)	
	C	SF	C	SF	C	SF	C	SF	C	SF	C	SF
Families ^(b)												
40 % of median	2.6	1.3	3.1	1.9	6.6	13.2	0.9	0.4	0.2	1.6	0.2	1.6
50 % of median	4.0	3.5	6.9	5.9	11.2	27.4	2.0	0.9	1.3	4.4	0.7	2.7
60% of median	30.4	43.5	14.4	13.6	17.9	43.5	11.1	7.0	14.8	32.9	4.0	11.9

Notes: a) Income units with heads aged 65 or more and living in households with no other persons. Income figures are weighted and are based on weekly data for the United Kingdom and annual data for all other countries. Cases with negative or zero gross income have been excluded. OECD equivalence scale.

b) C = couples, SF = single females.

Source: Luxembourg Income Study database.

cent of median equivalent income, having five per cent or less of aged couples and single women with incomes below this line. Even at this level the US stands out from all others in its high incidence of poverty, and especially in the incidence of poverty among single women. Smeeding et al. (1993) have made similar estimates, as has Mitchell (1991: 73), working with 'first wave' LIS data from around 1980. Smeeding et al. associate higher guarantees with both the insurance and mixed systems of European countries, which provide a relatively high minimum benefit and a small earnings or contribution related second tier, and with the heavy reliance of Australia and the UK on means-tested benefits.

The minimum income standards achieved in the three countries having mixed systems of income support - UK, Norway and Sweden - keep all but a small minority of aged couples and single women at or above the higher level of half of median income. Australia's means-tested income support system allows slightly higher proportions of aged couples and

single women to fall below this standard, as does German social insurance. The level of poverty among the US aged is far higher.

A minimum income standard of 60 per cent of median equivalent income is achieved only in Sweden, and there only in the case of couples. Single aged women Sweden and the UK have rates of poverty which, while higher than rates among couples, are markedly below those elsewhere. Australia's means-tested income support system is no more, and perhaps less effective than US social insurance arrangements. At this level the mixed Norwegian system is no more effective than German social insurance in the case of couples, and markedly less so in the case of single aged women.

Across the comparisons, there are greater tensions in some countries than others in the citizenship duality between equality of status and the assurance of a minimally adequate income. Though these tensions have some connections to the nature of income support arrangements, they are not defined by them. The strongest internal contradictions are found in Australia and Germany and are of different kinds. Australian income support subjects all claimants to a test of means, but the income distributed through the test is very widely shared. Although substantial redistribution is achieved, levels of poverty remain high. Germany, in contrast, operates a broadly inclusive form of social insurance making little use of means tested benefits, yet also has substantial poverty. The experience of means testing is widespread in the Scandinavian exemplars of universal citizenship, Norway and Sweden, most especially among single elderly women in Sweden, yet substantial degrees of redistribution are also achieved in these countries and the level of poverty among the elderly in Sweden is low. In the UK low levels of poverty are associated with substantial use of means-testing. The US is in a class by itself, making little use of means tested benefits but having the lowest levels of redistribution and far higher levels of poverty than in any of the other countries.

5 Conclusion

The results of this review of social citizenship as it is manifested in income support arrangements are not all that surprising. Broadly, the review suggests that if one is to identify social citizenship by the

outcomes of a nation's old age pension system, then citizenship is an attribute of the welfare states of Norway and Sweden, but also arguably of Germany and the UK. Of the six countries considered, the income support systems of these welfare states satisfy best the dual standards of ensuring both equality of status as a member of the nation community and a minimum standard of material well-being for all. They are most inclusive in their incorporation of citizens in the community of recipients, while also supporting their citizens at comparatively high levels of economic well-being. In the inclusiveness of their coverage and levels of income support, Sweden, Norway and Germany sustain both aged couples and single women, though not necessarily at the same levels of income.

The two unambiguously 'liberal' welfare states clearly stand apart, the US because it gives so little shelter from the market and itself provides so poorly, and Australia because it does only a bit better in both regards. The old age pension systems in these countries also leave single women markedly more vulnerable to the market than aged couples. The UK shares some of these liberal attributes, with market exposure through dependence on private occupational pensions already substantial and likely to increase with the development of privatised 'contracting out'.

The old age pension systems of (West) Germany and Australia have often been viewed as inherently unable to confer social citizenship upon their recipients, though on different grounds. The archetypical example of the 'corporatist' welfare state (Esping-Andersen, 1990), German social provision works both to maintain differences of status in old age and to reinforce the discipline of the market. But this argument holds in its strongest form only when the view is limited to public provision. The contrast is moderated when the composition of total (gross) income is taken into account, in which case it is seen that the market share of income in Germany is less than in Sweden and markedly less than in Norway, where receipts from (private) employment-related pensions account for eight per cent of the income of the average couple in old age. Retirement income policies of the present period commonly extend beyond the structuring of public provision, using taxation and other incentives to shape the articulation of income streams from public and private sources. The identification of regime types from public provision alone is hence increasingly problematic.

Equally, Australian social provision is often contrasted with provision as citizenship because of its central reliance on means testing in the allocation of benefits, yet this practice is a subordinate feature of provision in all countries. It is widely experienced by claimants, particularly single elderly women, in both Norway and Sweden. Australian provision does share the most basic element of citizenship in that the claim to assistance is fully congruent with the civil and political rights of citizenship. It is not often remarked that until 1945 a person receiving poor relief in Sweden lost the right to vote (Olsson, 1985). Australian means-testing practices are rightful in the sense that the rules and procedures are non-discretionary, matters of public knowledge, and their application open to appeal. As Ringen (1987) has noted, there are parallels with the progressive income taxation characteristic of most welfare states including those regarded as based on citizenship. The question of means testing should also not be considered in isolation, but in the wider context of administrative relations between citizen and state.

In actuality, the old age pension systems of most welfare states provide a near-universal minimum which is citizenship-like in some respects, whatever its basis. The OECD (1988: 65-6) foresees this minimum as likely to play a more important role in the future development of income security for the aged. It is suggested that governments will increasingly come to see a basic and essentially universal minimum as useful to cope with changes in household and family structure, especially those in which women seek entitlements to pensions in their own right. Ad hoc responses to high and continuing rates of unemployment are also expected to strengthen trends toward the provision of a universal minimum, as are policy responses seeking to offset the trend toward greater private sector provision favouring workers with higher wages and longer working lives. The report notes that the move to introduce basic flat-rate provisions into systems of social insurance is also favoured by those who would like there to be a clearer distinction between transfer and insurance annuity elements in social insurance systems, separating the instruments associated with equity and efficiency goals.

This OECD forecast is not without irony, for it portrays the resurgence of universality and citizenship in social policy less as the result of mobilisation through the civil and political rights of citizenship than as a technocratic response to pragmatic problems in the management of social

and economic change. The questions this raises for arguments about the social and political construction of the welfare state have not been pursued here. But it also raises others more relevant to the present theme concerning the utility of the notion of citizenship at all when it represents no more than the basic minimum towards which many modern welfare states are tending.

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