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COMPARATIVE ANALYSIS OF PATERNITY LEAVE POLICIES: LEGAL DESIGN, GENDER EQUALITY, AND LABOUR-MARKET IMPLICATIONS

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I. ABSTRACT

"Imagine a world where a new dads can spend quality time with their newborns without worrying about the work." A comparative method of study of laws is adopted by various nations across the globe to improve and amend laws. One such area that need to be highlighted is paternity leave. The objective of this paper is to provide the clear understanding of the comparative analysis of paternity leave policies worldwide. Paternity leaves policies vary significantly across the globe, reflecting diverse cultural, economic, and legislative approaches to parental responsibilities. The paper examines that several nations have implemented legislation regarding paternal leave, including the United Kingdom, Estonia, Sweden, Japan, and Bangladesh. In contrast, countries like Pakistan and Nigeria don't offer any parental leave for fathers. This study employs a doctrinal research approach to examine the legal framework surrounding paternity leave and its broader legal implications. Using a comparative methodology, it evaluates paternity leave policies through a broad region-based analysis covering Nordic countries, Continental Europe, Anglophone jurisdictions, Asia-Pacific countries, Latin America, and selected developing jurisdictions, while also considering India's position within the wider comparative framework. However, the research shows that the paternity leave is becoming increasingly important in modern cultures around the world. More than half of all economically developed countries have generous, family-friendly policies in place. For instance, all EU members are required to offer a minimum of 10 days of paid paternity leave. This paper argues that how does examining paternity leave policies across different countries influence the development of fair labor regulations, support gender balance, and impact economic and social progress. This paper is relevant for identifying best practices and legal

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implications that could inform different policies made in different countries in regard to paternity leave. The study explores how different policies influence workplace dynamics, gender equality and highlighting the benefits of well-structured leave provisions and the challenges posed by limited or absent policies.

II. KEYWORDS

Paternity Leave; Comparative Labour Law; Gender Equality; Parental Leave Policy; Work-Life Balance.

III. INTRODUCTION

Having a baby is one of the biggest things that happens to a family, but how well the labor market supports this transition is a very different story around the world. Maternity leave, which is grounded in the actual physical needs of the mother after childbirth, has been a part of legislation for over a hundred years. Paternity leave, on the other hand, is a relatively new concept. It is becoming increasingly accepted leave. Countries of family and labor market policies, reflecting a profound shift in societal attitudes about the roles of men and women, caring for children, and fairness in the workplace.

For many years, paternity leave was considered a small addition to maternity protection – a few days tacked on as a gesture of goodwill, but not a serious right at all.

But this is rapidly changing. New research shows that when fathers take time off to care for their newborns, the results are incredibly positive. It leads to healthier babies, improved learning² for children, easier re-entry for mothers into the workforce, stronger marriages, and ultimately, a closing of the wage gap between men and women.

Dads have a big influence on the development of their children when they are very young, and how much support the job market gives dads to take time to raise their children is a big concern in the current debate about social policies, economics, and gender. Although it is a common practice worldwide for mothers to take time off work

² pleck (2010)

after giving birth to their child, with at least fourteen weeks being the minimum standard recognised under the ILO Maternity Protection Convention, 2000, support for fathers remains comparatively limited and, in some jurisdictions, absent altogether.³

Most professionals in the fields of child development, economics, and public health recognise that fathers' involvement during the early years of a child's life has positive developmental effects. Children with involved fathers have better language development, fewer behavioural problems, and stronger educational outcomes.⁴

On the other hand, allowing fathers to take time off work to care for their children can help distribute family and child-rearing responsibilities more equitably between parents. This can be especially beneficial for mothers who are often penalized in their career and income prospects after having children.

Despite the existence of a significant amount of evidence that proves the need for paternity leave, the policies that exist worldwide are still quite different.

In Iceland, each parent is now independently entitled to six months of maternity/paternity leave, forming a total family entitlement of twelve months. Up to six weeks of each parent's entitlement may be transferred to the other parent, making the earlier reference to "ninety days" obsolete.⁵ In the United States, there is no federal law that mandates any paid paternity leave at all.⁶ Between these two extremes, there are many countries that have their own policies that demonstrate how different cultures, budgets, work patterns, and politics can influence family leave policies.

This paper will seek to examine this complex policy landscape in depth.

It will seek to identify patterns, motivations for different policies, and their impact on individuals. Section 2 describes the methods that have been employed. Section 3 examines the history of paternity leave. Section 4 examines the policies that exist in

³ International Labour Organization, *Maternity Protection Convention, 2000* (No. 183).

⁴ Anna Sarkadi et al., "Fathers' Involvement and Children's Developmental Outcomes: A Systematic Review of Longitudinal Studies," *Acta Paediatrica* 97, no. 2 (2008): 153-158.

⁵ Icelandic Parental Leave act no.95/2000(amended 2021)

⁶ Family and Medical leave act (1993)

different regions. Section 5 examines the actual usage of paternity leave and the factors that influence it. Section 6 examines the economic and social impacts. Section 7 examines how policies should be formulated. Section 8 presents recommendations, and Section 9 summarizes all the above.

A. Research Objectives

The objectives of this research paper are:

1. To examine the legal framework governing paternity leave across selected jurisdictions and regions.
2. To compare the design of paternity leave policies in Nordic, Continental European, Anglophone, Asia-Pacific, Latin American, and developing jurisdictions.
3. To identify the key policy variables—such as non-transferability, wage replacement, duration, and employment protection—that influence fathers' uptake of paternity leave.
4. To analyse the relationship between paternity leave, gender equality, maternal labour-force participation, child development, and workplace dynamics.
5. To derive comparative legal and policy recommendations that may assist jurisdictions, including India, in designing more effective paternity leave frameworks.

B. Research Questions

This research paper seeks to answer the following questions:

1. How do paternity leave policies differ across selected regions and jurisdictions?
2. Which policy design features, including non-transferability, wage replacement rate, duration, and employment protection, most strongly influence fathers' uptake of paternity leave?
3. What gender-equity, labour-market, child-development, and family-welfare outcomes are associated with higher paternal leave uptake?

4. What comparative legal and policy lessons can be drawn for jurisdictions, including India, that seek to strengthen paternity leave protection?

C. Research Methodology

This research applies a technique called comparative policy analysis and examines data from a variety of sources. These sources are:

1. The OECD Family Database (2023-2025)⁷, which provides information on how long people are allowed to take leave, how much of their salary they can get back, and how much this will cost as a percentage of the country's economy.
2. The ILO ILOSTAT Database, which contains information on laws in 187 countries.
3. The World Bank Gender Data Portal, which contains information on how many women are in the workforce and how much the pay difference⁸ is between men and women.
4. Reports from the European Commission's Leave Network, which provide detailed information on each country in Europe.
5. Peer-reviewed academic articles from 2005 to 2025 that relate to child development, behavioral economics, and gender studies.
6. National government websites that provide official laws when available.

The countries were divided into four regions: Nordic, Continental European, Anglophone, and Developing World.

Each region was further divided according to how generous the policies are. This was done by using a score that takes into account the following: the length of the leave that is allowed, the amount of the salary that workers get back, the amount of the leave that is for the father, and how protected workers are during their leave.

⁷ OECD family database (2023)

⁸ World Bank Data Portal (2024)

To determine how much people take advantage of the leave benefits, statistical analysis was done where possible in previous studies.

This analysis considered the following: the industry, the level of education, the level of income, and the size of the company. Furthermore, ten countries were examined in depth to examine examples of countries with good policies, countries with average policies, and countries that are changing their policies

IV. HISTORICAL EVOLUTION OF PATERNITY LEAVE

A. Early Emergence: 1970s-1990s

The right to paternity leave as a separate right began in the Nordic countries in the 1970s. Sweden was the first to introduce a balanced system for parents in 1974, which gave both parents the right to take paid time off after having a child. This was the first of its kind in the world⁹. Although the system was designed to be balanced for both parents, most of the leave was still taken by mothers, which showed that the traditional view was still strong.

In 1993, Norway introduced an important change with the 'father's quota'¹⁰ – a portion of the leave that only fathers could take. If they did not take it, they would lose it, and it could not be transferred to the mother. This had a huge impact, and in just ten years, over 70% of fathers began taking leave¹¹, compared to less than 3% before.

B. Expansion and Diffusion: 2000-2015

The paternity leave model adopted by Norwegian fathers diffused to the rest of the Nordic states in the early 2000s.

Iceland, Denmark, Finland, and Sweden initiated or extended their own paternity leave policies. Concurrently, the European Union developed its legal framework on family-related leave in stages. The 1996 Parental Leave Directive and its 2010 successor addressed

⁹ Haas and Hwang (1995); Swedish Parental Leave Act (1974)

¹⁰ Brandth and Kvande (2003)

¹¹ Norwegian Labour and Welfare Administration (NAV) statistics

parental leave, not a separate EU-level right to paternity leave. A distinct EU entitlement to paternity leave was introduced only through Directive (EU) 2019/1158, which repealed Directive 2010/18/EU and required Member States to provide fathers, or equivalent second parents were recognised by national law, with at least 10 working days of paternity leave around the birth of the child. The 2019 Directive also preserved the individual right to four months of parental leave and strengthened it by making two months non-transferable and paid at a level determined by Member States. Outside of Europe, Japan had some of the best paternity leave policies globally, providing up to 52 weeks of leave¹² with 67% of the normal salary.

Yet this generous policy was not very popular. Less than 10% of fathers took advantage of this policy until modifications were made after 2020 to promote greater adoption.

C. Contemporary Developments: 2016-Present

There have been many changes in the recent past, especially in the way countries handle work and family. The COVID-19 pandemic contributed greatly to this, especially in the way it impacted the work-life balance and the importance of the work that goes into the care of children at home. Most non-Nordic countries have made major reforms. For example, Germany extended the famous 'partnership bonus' for a few more months, while Canada improved the sharing of parental leave, Portugal increased paternity leave for fathers, and the UK introduced shared parental leave, although it was later reduced.

In developing countries, paternity leave is now being introduced for the first time. Currently, there are over 100 countries that offer some form of official paternity leave, compared to less than 40 in the year 2000. The extent of the leave varies greatly from one country to another.

¹² Japan Child Care and Family Care Leave Act (1991, amended 2021)

V. COMPARATIVE POLICY ANALYSIS BY REGION

A. The Nordic Model: Global Leaders in Paternal Leave

The five Nordic countries of Sweden, Norway, Iceland, Denmark, and Finland have been leading the world in the implementation of paternity and parental leaves. The Nordic countries have some similarities in the following areas:

1. A high rate of wage replacement, which is usually 70% to 100% of the previous earnings.
2. A long total parental leave period, which is more than one year.
3. A requirement for the father to have a specified amount of leave, which cannot be transferred to another person.
4. A high job security for the parents during the leave period.

Country	Father-Specific Leave	Total Parental Leave	Replacement Rate	2024 Rate	Uptake
Iceland	6 months per parent, subject to limited transferability of up to 6 weeks	12 months	80% subject to statutory ceiling	92%	
Sweden	90 days (quota)	16 months	77.6%	88%	

Norway	15 weeks (quota)	49 weeks	100% / 80%	85%
Denmark	2 weeks + quota	52 weeks	90% (capped)	78%
Finland	92 days (quota)	14 months	70%	81%

It is also worth noting that Iceland is the only country in the world to have a highly advanced form of paternity leave. Iceland originally became well known for its “3-3-3” model, under which three months were reserved for each parent and three months could be shared. However, following later reforms, including the 2021 framework, the entitlement now stands at six months for each parent, with a total parental entitlement of twelve months and limited transferability of up to six weeks between parents. The impact of this is clear: Iceland is ranked number one in the World Economic Forum's Gender Gap Index every year¹³, and fathers' uptake of leave is over 90%.

In Sweden, there is also a highly advanced form of parental leave, but one that is designed to encourage flexibility within a framework of incentives. The "gender equality bonus" has been replaced by expanded provisions for daddy quotas, and parents who share leave equally now get a higher replacement percentage than parents who share unequally. The impact of this is clear: fathers now take 30% of all parental leave days in Sweden¹⁴, the highest proportion anywhere in the world except Iceland.

B. Continental Europe: Progressive but Variable

The paternity leaves in the Continental European countries vary. Germany provides bonus months of paternity leaves, which have been well utilized. In contrast, France

¹³ WEF Global Gender Gap Report (2023,2024)

¹⁴ Swedish Social Insurance Agency (2023)

provides a short period of paternity leaves. In Italy, there have been limited options for paternity leaves.

Country	Father Leave (Weeks)	Replacement Rate	Father-Specific	Uptake Rate
Germany	14 weeks (bonus)	65% (capped)	Partial	40%

Portugal	4 weeks mandatory + 3 optional	100% / 83%	Yes	72%
France	4 weeks	100% (capped)	Yes	68%
Spain	16 weeks	100%	Yes	62%
Netherlands	5 weeks (incl. 4 optional)	70%	Partial	55%
Italy	10 days mandatory	100%	Yes	58%

Austria	Flexible options	80%	Partial	21%
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Germany's Elterngeld system, which was revised in 2007, altered the way parental leave pay is calculated and provided. It shifted from income-based to earnings-based pay for both parents. Another major change was the introduction of two additional months of leave called 'partner months'. These could be taken only if the other parent, usually the father, also takes at least two months of leave. This is like the Nordic father quota and led to an increase in fathers taking leave from less than 5% to 40% in five years¹⁵. Portugal is an unexpected champion in Europe when it comes to granting paternity leave.

Portugal now requires fathers to take four weeks of paid leave and offers an additional three weeks at a reduced pay rate. This is part of the government's plan to divide the burden of parenthood equally between both parents. Portugal's uptake of 72%, the highest for any country apart from the Nordic nations in the EU, indicates that making paternity leave mandatory and paying good wages for it is effective. One major change occurred between 2017 and 2021 in Spain.

They went from just two weeks of paternity leave to sixteen fully paid weeks¹⁶, which cannot be taken over. This is the largest change in paternity leave in Europe, and it now aligns with the most advanced EU policies. The first results indicate that 62% of fathers take the leave, although it is too soon to fully assess the effects.

C. Anglophone Nations: Limited Legal Support

The Anglophone nations, such as the United States, United Kingdom, Canada, Australia, New Zealand, and Ireland, differ from the Nordic and the Central European approaches. Except for Canada and New Zealand, the Anglophone nations do not have federal paid paternity leaves.

¹⁵ Kluve and Thamm (2013)

¹⁶ Spanish Royal Decree-Law

Instead, the decisions lie in the hands of the employer, or the amount of pay is based on the income. Shared parental leaves are also not in place.

Country	Statutory Paternity Leave	Replacement Rate	Paid?	Remarks
United States	0 weeks (federal)	N/A	No*	FMLA: 12 wks unpaid; some states act
United Kingdom	2 weeks	90% of average weekly earnings, capped at £194.32 per week from April 2026	Partial	Shared Parental Leave adds flexibility but uptake remains low
Canada	5 weeks + sharing bonus	55-85%	Yes	35-40 wks shared; bonus if equally split

Australia	2 weeks	100% (at min. wage)	Yes	Dad and Partner Pay scheme
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New Zealand	2 weeks paid + shared	100% (capped)	Yes	Up to 26 wks shared parental leave
Ireland	2 weeks + 9 wks. parent's leave	Full pay (some)	Partial	Parent's leave expanded 2024

The USA stands out as the largest exception among the countries of the Organization for Economic Co-operation and Development, since it is the only high-income democracy that does not require employers to offer paid parental leave by law. The Family and Medical Leave Act of 1993 provides workers with access to unpaid leave for a period of up to twelve weeks if they work for companies with a staff of at least fifty employees. Yet again, this only extends to 56% of the private sector workforce. As a result of this, several states such as California since 2004, New Jersey, New York, Washington, Massachusetts, Connecticut, Oregon, and Colorado have set up their own paid family leave programs, resulting in a mixed bag for the USA.

The Shared Parental Leave (SPL) scheme of the United Kingdom was implemented in 2015 to enable parents to share up to fifty weeks of leave and thirty-seven weeks of pay however they want.

However, the reality is that only between 2% and 8% of the total number of fathers have been able to benefit from it. This is regarded as a major policy failure and is attributed to factors such as limited awareness, low statutory wage replacement, workplace resistance, and the absence of an independent, non-transferable entitlement for fathers. As of April 2026, Statutory Shared Parental Pay is capped at £194.32 per week or 90% of average weekly earnings, whichever is lower, and this statutory rate is ordinarily revised annually.

The most developed system of parental benefits in the English-speaking world outside of New Zealand is the Employment Insurance parental benefits in Canada, which have recently been enhanced to include a ‘parental sharing benefit’ of five more weeks of benefits if both parents take time off.

However, the fact is that not many fathers have been able to benefit from the ‘sharing benefit.’ This is mainly due to the fact that the replacement rate is only 55%, which increases to 85% if they choose the extended leave option.

D. Asia-Pacific: The Utilization Paradox

Several countries in East Asia have introduced paternity leaves that appear to be quite robust. However, in practice, very few fathers end up taking the leaves. This is due to various reasons like workplace culture, lack of employer support for the policy, and the social stigma associated with men taking leaves.

Country	Statutory Entitlement	Replacement Rate		Uptake Rate	Reform Status
Japan	Up to 52 weeks	67% for the initial period, subject to statutory rules	6	40.5% in FY2024	Active reform since 2022, with rapidly

					increasing uptake
South Korea	Up to 52 weeks	80%		28%	Improving; 5% bonus if both take
China	7-30 days (by province)	100%		~40%	Provincial variation; no national data
Australia	2 weeks (Dad/Partner)	Min. wage		50%	Reform ongoing
New Zealand	2 wks + shared leave	Capped		~45%	SPL reform 2020

Japan has one of the biggest gaps between what the law provides and what happens when it comes to paternal leave. The law provides a possibility of taking 52 weeks of leave at 67% of regular pay¹⁷ for the first six months of leave and then a reduced amount for the rest of the leave period. Until 2021, however, few fathers took the leave – less than 10%. In 2022, Japan strengthened employer obligations to inform eligible workers about childcare leave options, contributing to a marked increase in male uptake.

Official data from Japan's Ministry of Health, Labour and Welfare shows that the male childcare leave uptake rate rose from approximately 17.1% in FY2022 to 30.1% in FY2023, and further to 40.5% in FY2024. Although this remains below the level suggested by

¹⁷ Japan Child Care and Family Care Leave Act, article 9

Japan's generous formal entitlement, the trend demonstrates a much faster and more substantial increase than earlier projections indicated. South Korea has a similar story.

In Korea, the law provides for a three-month leave for fathers at full pay, and it has been enhanced over the years. Until 2010, however, few fathers took the leave – less than 5%. In 2024, it has risen to 28%.

E. Latin America: Expansion of Paternity Leave

Laws with Implementation Issues Latin America has experienced tremendous expansion in the implementation of paternity leave laws since 2000, with most of the countries in the region mandating a minimum of one to two weeks of paid paternity leave. However, the effectiveness of the policy is limited by the high prevalence of informal employment and the lingering attitudes and biases against men who assume such roles.

Chile extended its paternity leave to five days in 2011¹⁸ and then went a step further by introducing the 'shared postnatal parental leave policy,' which enables the father to take up to six weeks of the mother's postnatal leave. Colombia enacted Law 2114 of 2021¹⁹, which extended the duration of paternity leave from eight to fourteen working days. Brazil's 'Programa Empresa Cidadã' enables companies to extend the duration of paternity leave to twenty days by going beyond the initial five days in exchange for tax incentives²⁰, and currently, there are twenty thousand such companies.

In many countries of sub-Saharan Africa and South Asia, some form of paternity leave has been made mandatory. It varies from three days to ten days. In South Africa, ten days of paternity leave are mandated, while Kenya offers two weeks of paternity leave. In Tanzania, fathers are entitled to three days of paternity leave. In India, the legal position remains fragmented. Male Central Government employees are entitled to fifteen days of paternity leave under the Central Civil Services (Leave) Rules, 1972, but there is still no comprehensive central statute mandating paid paternity leave for private-sector

¹⁸ Chilean Law No. 20.047(2005);20.891(2015)

¹⁹ Columbia Law 2114 (2021)

²⁰ Brazilian Law No.11.770(2008)

employees. The Code on Social Security, 2020, which formed part of India's consolidated labour-code framework brought into effect from 21 November 2025, primarily retains maternity-benefit protections, including twenty-six weeks of maternity benefit and related safeguards; it does not, by itself, create a general binding private-sector paternity leave entitlement. Official PIB material on the new Labour Codes discusses maternity benefits under the Code on Social Security, including the eighty-day eligibility requirement and twenty-six-week maternity benefit, but does not identify a corresponding statutory paternity leave mandate.

At the same time, the Indian legal debate has moved beyond the earlier service-rule position. The Paternity and Parental Benefits Bill, 2025, introduced in the Lok Sabha as a private member's bill, proposes a statutory framework for paternity and parental benefits. The Bill proposes paid paternity benefit for up to eight weeks, subject to eligibility conditions, and a combined parental benefit of eight weeks to be divided between legally married parents. However, as an introduced Bill, it has not yet created enforceable rights unless and until enacted and notified ²¹

85 to 93% of sub-Saharan Africa has informal employment.

This means that paternity leave laws are not applicable to most of the working fathers. There is a lack of support to ensure that paternity leave laws are being enforced. There is a positive shift in the laws of many countries. Many countries are considering providing more paternity leave options.

VI. UPTAKE RATES AND DETERMINING FACTORS

A. Global Uptake Patterns

The take-up of paternity leave i.e., the percentage of fathers who take leave when eligible varies from under 2% in countries with poor policies to over 90% in Iceland. Four key factors explain the variations in take-up rates across countries: Wage Replacement Adequacy Countries where fathers receive wage replacement of 67% or more of previous

²¹ Central Civil Services (leave) Rules, 1972

earnings see higher take-up rates of paternity leave than those where fathers receive low flat-rate payments or no payment at all.

Non-Transferability Countries where paternity leave is specific to fathers and cannot be transferred to the mother see the highest take-up rates of paternity leave. Maximum Length of Leave Countries see a leveling off take-up rates of leave specific to fathers after four to six weeks of leave. Countries providing fathers with more leave than this do not see higher take-up rates.

B. The Income Effect

Research has proven that the higher the income level, the lower the probability of fathers taking paternity leave in countries where the father does not get compensated for the lost income. In the UK, the higher the income level, the lower the probability of fathers taking Shared Parental Leave²². This is because the income level for this leave is only up to £182.92, making it too expensive for the higher-income earners. In the Nordic countries, the amount received for paternity leave is directly proportional to the income level, thus the equal distribution of paternity leave among people of different income levels.

In the US, paid paternity leave policies tend to be offered only to high-paying industries, especially in the tech industry. A 2019 study done by the Society for Human Resource Management found that only 30% of employers offered some form of paid paternity leave²³, mostly big, high-tech companies. The rest of the workforce, especially in low-paying jobs such as blue-collar jobs, tend to receive no paid paternity leave.

C. Employer and Workplace Culture

While there is a lot of time off provided in law, the culture of the workplace can also be important in determining how much time off people end up taking. In a major study of fathers in Norway (Duvander et al., 2020), it was found that "men in male-dominant occupations, in high-level management positions, or in workplaces emphasizing always

²² Equality and Human Rights Commission, UK (2018)

²³ SHRM Survey 2019

being present at work tend to use much less leave than formally allowed²⁴, even when their earnings are similar." The main reasons for not taking time off given by these fathers were worries about their career prospects, losing customers, or getting bad performance reviews as the reasons for not taking time off. Japan is the extreme example of how workplace culture can trump legal provisions for time off.

VII. ECONOMIC AND SOCIAL OUTCOMES OF PATERNITY LEAVE

A. Effects on Gender Pay Equity

The most compelling data suggests that generous paternity leaves have a major impact in reducing the pay gap between the genders. It does this in several ways, such as sharing the load between the parents, enabling mothers to return to work faster and more often, and making it more acceptable for men to take the role of caregivers. This, in turn, helps reduce the prejudice some employers have against women of childbearing age.

One such example is Iceland. Prior to the major paternity leave reforms implemented in 2000, Iceland's pay gap between the genders was at 40%. In 2023, this gap was reduced to 9.7%.²⁵ While this may seem like a dramatic change, researchers have noted that many other reforms were implemented during this time, such as the availability of childcare services and the promotion of equal pay. Studies controlling these variables indicate that the reforms implemented in paternity leaves contributed to a 15-25% reduction in the pay gap between the genders in the Nordic countries. (Duvander & Lammi-Taskula, 2011).

In Germany, for instance, a change was made to the parental leave policy in 2007. Kluve and Tamm (2013) used government data to show that the policy change made it much more likely for fathers to take any kind of parental leave. This was related to a significant 4 to 7 percent decline in the gender pay gap ²⁶for companies where multiple fathers took

²⁴ Duvander et al. (2020)

²⁵ Statistics Iceland (2023)

²⁶ Kluve and Tamm (2013), *Journal of Population Economics*

leave. This implies that when more fathers can take leave, it has a spill-over effect on the workplace that reduces the pay gap for women compared to men.

B. Effects on Maternal Labor Force Participation

The impact of paternity leave on the ability of mothers to work is also important.

Paternity leave for fathers helps mothers get back to work since they don't have to take as much leave to care for their children. When analyzing the data from the OECD, it is possible to link the amount of leave taken by fathers to the number of women who can work, especially in full-time positions.

However, this is not the case at all levels of leave. The greatest benefit to mothers is when paternity leave is longer than the first two weeks, particularly when childcare is not yet available. This means that short leave policies, such as in many countries in the English-speaking world, may not be sufficient to help women's careers.

C. Child Development Outcomes

Developmental psychology research indicates that if fathers are involved early in the child's life, it results in positive outcomes in thinking, feelings, and getting along with others. When research is conducted to look at a large number of studies done by other researchers like Sarkadi et al. (2008) and Pleck (2010), it indicates that children whose fathers are very involved in their lives in the first year of life have better language development, perform well in thinking tests at the age of three to five, have fewer behavior problems, and have good social skills.

It's difficult to say for certain whether being involved has a direct impact on these positive outcomes because some fathers who are more involved may already possess other characteristics that make them better parents.

When a study was done on a change in Norway's paternity leave policies in 1993, it was found that taking paternity leave was associated with better education outcomes for children, particularly for those fathers who did not have a lot of education. In other

words, paternity leave policies can help people “move up the social ladder,” a factor that is not often considered when making policies.

D. Paternal Health and Wellbeing

Paternity leave also has an impact on the mental health of the father. In the United Kingdom, the United States, and Sweden, studies have been conducted to determine the impact of paternity leave on the mental health of the father. The studies showed that the mental health of the father improves if he takes paternity leave because he will not be depressed or anxious, even if he was depressed or anxious before the birth of the baby (Feldman et al., 2003; Goodman, 2004). This happens because the father will be able to bond with the baby, thus taking time off will reduce the stress he will be subjected to because he becomes a father.

The relationship also improves if the father takes paternity leave. The study done by Rehel (2014) showed that the relationship improves if the father takes paternity leave because the relationship satisfaction will be higher, and the division of household chores will be equal up to two years after the paternity leave²⁷.

E. Fiscal Costs and Benefits

The cost of implementing paternity leave is a concern for governments considering such policies.

However, when we consider the costs and benefits over a longer period, we find that the fiscal benefits are generally positive. The main reasons for this are:

1. More women in the workforce mean more income tax revenues and fewer welfare costs.
2. Improved child development outcomes mean fewer costs for special education and social services for adults.

²⁷ Rehel (2014)

3. A smaller gender pays gap means more people contribute to tax revenues and fewer people rely on pensions, since women tend to save less for retirement when they take time off work.

While there are some costs associated with a father's temporary absence from work, this is at least partially offset by the benefits of lower employee turnover and higher employee retention rates for mothers.

According to the OECD (2016), "in countries where fathers take paternity leave rarely, the economic cost of gender inequality in the labor market – such as the cost of GDP from underemployment of women and the wage gap – can amount to 15% of GDP over 25 years.

This cost of providing comprehensive paternity leave policies, which amounts to 0.1-0.3% of GDP annually, is a highly cost-effective investment.

VIII. POLICY DESIGN CONSIDERATIONS

A. The Critical Role of Non-Transferability

The most important thing when it comes to the design of a paternity leave policy is whether the leave is individually non-transferable or not; in other words, whether it is only for use by the father or whether it is possible for it to be shared with the mother or for it to go unused if the father does not use it. The evidence from the Nordic countries makes it clear that non-transferable father quotas are much more effective at getting fathers to take leave than transferable ones.

The reason for this is simple: when the leave is transferable, couples tend to default to the mother taking all of it because of factors such as employer pressure or income differences, since the mother often makes less than the father. Non-transferable leave gives the father a strong incentive to use his own leave; in effect, it flips the default from "mother takes all" to "father uses his own leave by default."

The UK's Shared Parental Leave system also supports this idea but in a different way. This fully flexible and transferable system has seen a disappointing take-up of paternal

leave of only 2-8% over nine years and is considered a failure because it removed the non-transferability principle to encourage fathers to take up leave.

B. Wage Replacement Rate Adequacy

The replacement rate of wages also has to be sufficiently high to make it worthwhile for people to take leave. Research has shown that when the replacement rate falls below 67%, fewer people take leave, especially those from higher-income backgrounds. In countries such as the UK, where a cash benefit is provided for Shared Parental Leave, higher-earning fathers are often excluded from a financially viable option for leave. From a fairness perspective, it is recommended that the replacement rate of wages be related to earnings but also includes a ceiling.

This balances the need for higher earners to receive a good proportion of their earnings back while also keeping costs within reasonable bounds for the public purse. In the Nordic countries, the ceiling for the replacement rate of wages is set at 6 to 8 times the median wage, which captures most working fathers without going overboard for the highest earners.

C. Duration and Timing

The information on the duration of leave does not lend itself easily to clear conclusions. When leave is taken for less than two weeks, not much is changed in terms of how household work is shared or how much work mothers do. Most of the positive effects on child development seem to occur when leave takes place between four and eight weeks. When fathers have left within this range of four to twelve weeks, this has the most significant effect on how household work is shared. When leave exceeds twelve weeks, adding time does not increase fairness within the home, but child development benefits continue.

Having the flexibility of time being able to take leave in smaller parts rather than all at once increases the likelihood of taking leave because, for people in professional or managerial jobs, taking time off for a long period is not easy.

Countries such as Portugal, Sweden, and Germany allow people to take their leave in separate parts or part-time; this is why these countries have a higher uptake of leave.

D. Employment Protection and Anti-Discrimination Provisions

Statutory provisions for paternity leave should be accompanied by provisions for employment protection to ensure fathers are not victimized at their workplaces for taking the leave and to guarantee their return to similar employment or the same employment. In countries where such provisions are not effectively implemented or enforced, such as in developing countries without effective labor inspection systems, fathers are unlikely to take up the leave as they may not be assured of protection and respect for their rights.

Enforcement of provisions for anti-discrimination is also essential. This includes ensuring fathers have access to labor courts or other official avenues to seek justice for unfair dismissal or other career setbacks at their workplaces for taking the leave. The EU's Work-Life Balance Directive of 2019 clarified provisions for the enforcement of these provisions and protection for fathers to claim compensation for unfair dismissal for taking parental leave.

IX. POLICY RECOMMENDATIONS

When it comes to paternity leave policies governments need to think about what they can do to make things better. For countries like the USA, UK and Australia where fathers do not get a lot of time off there are a thing that need to be done.

A. For High-Income Countries with Limited Paternity Leave (USA, UK, Australia)

1. First, the government should make a rule that says all fathers get at least four weeks of paid time off when they have a baby. This time off should be for the father. He should get at least 67% of his usual pay. The paternity leave should be for the father. It should not be something that can be given to someone else.
2. Second, the idea of shared leave should be stopped. Instead, fathers should get an amount of time off; that is just for them. If they do not use this time off, then they should have to do something as a result.

3. Third the amount of money that fathers get when they are on paternity leave should depend on how much they earn. There should be a limit to how much money they can get. This way the system is fair for people who earn amounts of money.
4. Fourth companies should have to tell the government how many fathers are taking time off. This is something that Japan already does. It helps to make sure that companies are doing what they are supposed to do.
5. Finally, the government should start campaigns to teach companies and managers about paternity leave. This can help to change the way people think about fathers taking time off. It can make it easier for them to do so.

The government should run these campaigns to help people understand why paternity leave is important, for fathers and to encourage them to take the time off that they need.

For countries with incomes that want to make paternity leave better it is key to pay workers their full salary for at least two to three weeks when they take leave.

B. For Middle-Income Countries Expanding Provision

This period really affects how employees behave. There also needs to be a focus on making sure new laws are enforced properly. This means labor inspections and complaint systems must work well. To get more people to take paternity leave in jobs where one person is crucial offering leave in parts could help. It could be given in several periods. Another idea is to give tax benefits to employers who offer more paternity leave. Countries, like France and Brazil do this. It seems to work well.

C. For Countries with High Entitlements but Low Uptake (Japan, South Korea)

Employers should have to report on how men take paternity leave. If the numbers are really low, employers should get in trouble. They need to make sure men take least a little time off when they have a baby. It should be like two weeks or something. They cannot say no to it. Some countries in the north of Europe already do this.

We should get the bosses on board with this idea. The CEOs should say publicly that they think paternity leave is important. They should make agreements with companies in their industry to support this. We should also give awards to companies that make sure men can take time off when they have a baby. Paternity leave should be flexible so men can take a day off here and there. In some countries, like Japan and Korea it is hard for men to take a break all at once so we should make it easier for them to take time off in smaller parts.

D. For Low-Income and Developing Countries

We need to think about people who work in these countries. First, we should make sure they have some protection for their jobs. This includes time off when they have a baby. It is better to have a time off that everyone follows than a long time off that nobody follows.

We can use money from organizations like the ILO and World Bank to help people who check if companies are following the rules. This will help make sure that the rules are actually working.

We should talk to the people who own companies and the people who represent the workers. Sometimes the rules do not apply to everyone, so talking to these groups can help. Let us try out programs in small areas first. This way we can see what problems might come up before we try to do it in the country. We can learn from Low-Income and Developing Countries. Make things better for the people who live there.

X. CONCLUSION

The way paternity leave is handled around the world in 2026 shows us that there are steps forward and still some unfair things that exist. Countries in the region have tried different policies for over fifty years and have shown that giving fathers generous paternity leave can really change how caregiving is shared right away and help reduce the inequality between men and women in the workplace over time. Paternity leave is important because it helps reduce the difference in pay between men and women makes it easier for mothers to keep working improves how children develop and helps fathers

feel better about their role as caregivers. This is still not common. Most fathers around the world do not have paid paternity leave.

Have very limited rights that do not make a big difference in how they behave as caregivers. The United States is the major democratic country with a high income that does not offer any federal paid paternity leave.²⁸ Some countries in East Asia have laws about paternity leave but the culture at work often makes these laws ineffective. What we can learn from looking at these policies is that paternity leave should be for fathers the pay should be enough to make it worth taking there should be strong rules to make sure the policy is followed and we need to change the culture at work. This takes time, but we can do it by making information public requiring companies to disclose their policies and working directly with employers. This is really important for our society and the economy. As people get older and have children in both rich and middle-income countries, making it easier for families to share caregiving responsibilities is not just about being fair. It is necessary for our economy.

Countries that do not support fathers in taking care of children will keep putting women at a disadvantage in the workplace stop more women from working and miss out on the full potential of children development. The arguments in this paper show that investing in paternity leave is one of the social policies that governments can use in the twenty-first century and it is also very cost-efficient²⁹. Paternity leave is essential for our society, and we need to make sure that fathers have access to paternity leave so we can create a workplace, for everyone and paternity leave is a crucial part of this.

XI. REFERENCE

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²⁸ FMLA 1993; OECD (2023)

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