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**Different paths towards familialism?
Young people and social citizenship in France and the UK
from WW2 to the 1990s.**

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ABSTRACT

In the past years, some typologies have been proposed to distinguish different “youth transitions”, relying on welfare regimes typology. Yet, the links between youth and social citizenship are still to be further analysed. As far as social assistance is concerned, an age limitation at 25 years old has been implemented in many countries, regardless of the differences between “youth transition regimes”. For instance, this kind of limitation can be found both in France and the UK. First, in order to address this puzzling commonality, we proceed to a process tracing of the two reforms leading to such limitation: the adoption of the basic income RMI in France in 1988, and the 1986 and 1988 Social Security Acts in the UK. We argue that this commonality finds its origin in the negative image of young people that is present in these countries: they are not considered as proper adults who could benefit from social citizenship. Second, we show how the different institutional welfare arrangements adopted after WW2 have shaped two different types of negative image: in France, young people are considered as “social children” because of the prevalence of the family policy, whereas in the UK, they are deemed to be keen to state dependency and idleness because of the growing importance of social assistance.

1. Introduction: young people and social citizenship.

1.1. Puzzle and research question.

Many criteria can be found to determine the access to social citizenship and entitle to social benefits. The comparative literature on social policy has, for instance, focused on contribution and work, residence and nationality, even gender. Still, there is one criterion that has not been systematically looked at: age¹. It has been taken into account as far as pensions and retirement were concerned. Therefore, the “old age” has been analysed by social policy scholars (Guillemard, 1986). But, what about the minimum age for access to other types of social policy? What is the age entry of social citizenship?

If one looks at the minimum age of entitlement for social assistance for example, there is a great deal of diversity. In many countries, there is no age limitation to such benefit: this is the case in Belgium, Germany, Ireland, Korea or Sweden (OECD, 2008, p. 27 and following). In some others, there is: 25 years old is often the age to full access to social assistance, for instance in Denmark, Luxembourg, France, Spain and the UK.

How can we understand this difference, which does not fit into the usual typologies of youth transition (Walther, 2006) and welfare regimes (Esping-Andersen, 1990 ; Ferrera, 1996)? Such age limitation can be read as an increased familialization of young people who have to rely more on their families. Is this age limitation an illustration of a revival of familialism, even in countries that are not part of the Continental regime?

1.2. Theoretical framework.

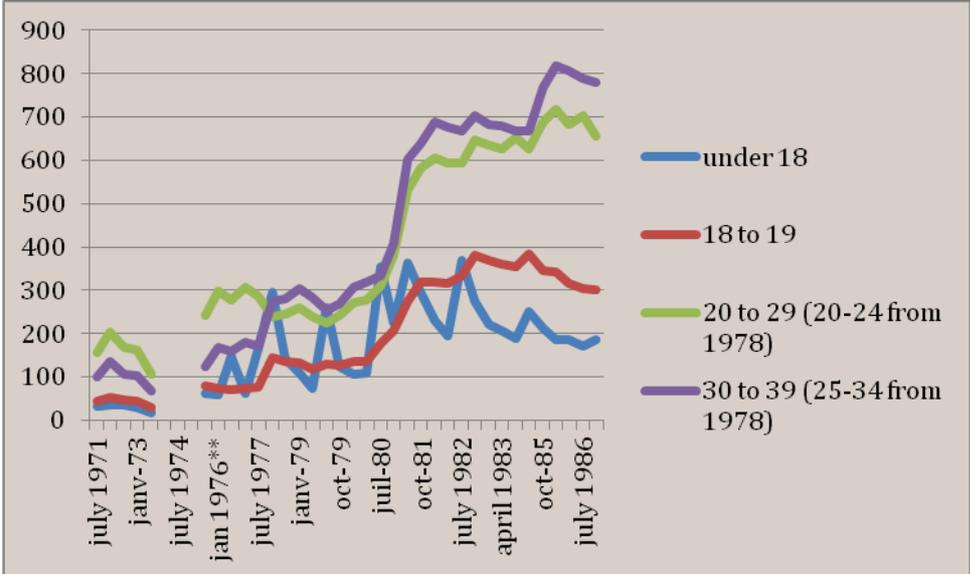
The aim of this paper is to understand the place of young people in the welfare state, and their access to social citizenship. We decided to enter this issue through the lens of the age entry for social assistance.

First of all, we could assume that young people are not a part of the population well represented and integrated in the policymaking since their vote is less important in an ageing society: it is the hypothesis of the “gray power”, which would encourage decisions makers to favour the elderly (Wilensky, 1975 ; Pampel et Williamson, 1989). However, in the case of France, the age limitation is adopted by a left-wing party, voted by a large part of young people compared to the elderly: 60% of the 18-24 voted for the left-wing candidate François Mitterrand, against 51% for the 50-64 and 47% for the over 65 (SOFRES, 1988; see also Muxel, 2010).

¹ One of the few works on age is *Age in the welfare state* (Lynch, 2006), but it does not look at age limitation of social benefits.

Another argument would be that the new general context of retrenchment of the welfare state (Pierson, 1996) has led governments to cut social expenditure, independently from their political belonging. According to the path dependency argument (Pierson, 2000), the structuration of strong interest groups is one way to oppose such cuts in the welfare state. Yet, young people represent a weak category of the population and an easy target for such political purpose. They are not well organized in order to defend their interests, like other “new social risks” groups (Bonoli, 2005). In order to make some saving in social expenditure, introducing an age limitation and cutting some benefits targeted at young people would be therefore relatively easy. As a result, the relative weakness of youth organizations in both countries (Verschelden, 2009) could be part of the reason. In fact, in Québec, these types of organization are much stronger and have institutional resources. As a result, they have succeeded in removing the “age discrimination” that constituted the same kind of age limitation to social assistance (Lima, 2005). This weakness must have eased the action of Governments.

Figure 1: youth unemployment by age in the UK (thousands)

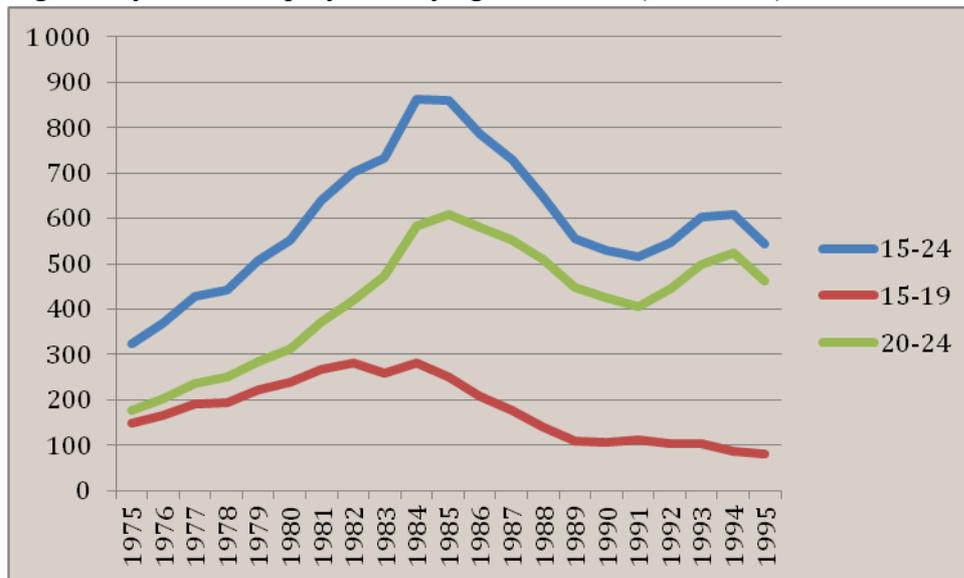


Source: Employment gazette 1978, 1984, 1987 (own calculation)

** starting from 1976, adult students are excluded.

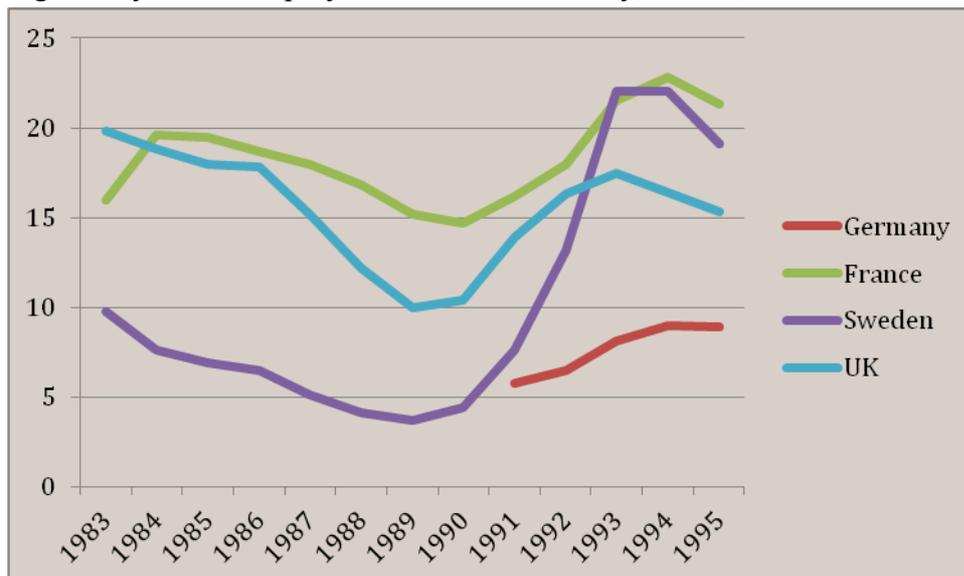
Moreover, together with the context of retrenchment of the welfare state, unemployment started to rise in the 1970s, especially for young people (see figures 1 and 2): youth unemployment rates stay very high in the 1980s in France and the UK, contrary to other countries where there was no adoption of an age limitation like in Sweden and Germany (figure 3). As a result, the cost of young people relying on welfare benefits was increasing, which could have been seen as a problem in a context of retrenchment.

Figure 2: youth unemployment by age in France (thousands)



Source: INSEE, Enquêtes Emploi

Figure 3: youth unemployment rates in Germany, France, Sweden and the UK.



Source: Eurostat, 2012.

On the other hand, a will to proceed to some saving in public expenditure cannot explain such limitation by itself. Indeed, the context was very different in the two countries regarding this particular issue. In the UK, cuts in social expenditure were one of the objectives of social security reforms under the Conservative governments. In France, the adoption of the *revenu minimum d'insertion* (RMI) was not conceived as a retrenchment of the welfare state, but on the contrary, as a way to expand social rights. Therefore, the hypothesis of targeting cuts in social security towards a weak political group is part of the explanation: it is a necessary condition, but not a sufficient one.

Lastly, we can argue that young people have a negative image in public opinion (Larsen, 2008), and that would be why political parties decided to limit their social security entitlements. In fact, youth is a symbolic category of the population (Loncle, 2003) that allows politicians to deliver a general discourse about Nation and citizenship. As a result, symbolic and ideological representation about the place of youth in society would explain the age limitation.

In youth transition and youth policy typologies, two different images can be found in different countries: the image of “youth as a problem”, and the image of “youth as a resource” (IARD, 2001). A third image can also be found in continental countries, which is “vulnerable youth” (Wallace et Bendit, 2009, p. 445). The image of “youth as a problem” is present in the UK, whereas in France, the three images are supposed to be present (Wallace et Bendit, 2009). Such a negative image of young people would therefore lead to the refusal of a full social citizenship through an age limitation. In our lecture of parliamentary debates, two different images of youth have been found, present at the same time in the two countries. These are negative images, considering youth not as a problem but as incomplete adulthood.

On the one hand, there is an image of youth as childhood: young people are not adults like other adult citizens, as they are still in education. Accordingly, in Walther’s typology, the “concept of youth” was “adaptation to social positions” (Walther, 2006, p. 126). Even if they are not always considered properly as “children”, they are deemed to be in-between. As a result, they cannot really claim for the same social benefits as adults over 25: their family have to take care of them. This is the “familialist” image.

On the other hand, they are seen to be keen to idleness and state dependency, rather than work, education and self-reliance, if they are not under constrain. Giving them social assistance can potentially lead to an “inactivity trap”, as well as create incentives towards a “culture of dependency”. In this perspective, young people are above all considered as economic actors, accordingly to the British concept of youth “early economic independence” (Walther, 2006, p. 126). This is the “work ethic” image.

The commonality of these two images is that young people are considered negatively: as non-adults. And this is why they should not get the same benefits as other adults: this commonality allows for a large consensus in this direction. The two images are present both in France and the UK. Yet, in France the “familialist” image is more important, whereas in the UK, the “work ethic” image is predominant.

This hypothesis allows us to understand the commonality of such age limitation in social assistance. However, it also underlines the differences of this age limitation and the images of youth in both countries. We will argue in section 3 that this difference can be explained by the institutional structuration of social security towards young people after WW2. In France, on the one hand, the family policy has been used to deal with youngsters, considered as “dependent”, which has led to the image of “children”, i.e. *mineurs sociaux* or *grands enfants*. On the other hand, their British counterparts had been entitled to social assistance on their

own rather early, provided some requirements. This is why they are not considered as children or dependent, but rather seem to be keen to idleness and state dependency, according to the stigma attached to the recipients of social assistance since the very first Poor Laws (Lees, 1998).

1.3. Methodology and case studies.

Our initial puzzle concerns the misfit between empirical data (age in social assistance) and theory (typology of youth transitions and welfare regimes). In order to address this problem, we decide to use the “method of agreement” elaborated by John Stuart Mill, in a “most different system design” (Przeworski et Teune, 1970). In such type of research design, one has to look at the similarity that can explain the puzzling commonality, after having underlined and rejected all the differences (see above). Such method is more relevant when we look at two very different cases, since it is easier to seize the similarities, which are deemed to be rare. That is why we picked France and the UK as case studies. They both present an age limitation at 25 in social assistance, adopted nearly at the same time in the 1980s, although they belong to different welfare and youth transition regimes.

In order to see the relevant commonality, we proceed to a process tracing of the adoption of such age limitation in section 2. We look at the arguments and positions of the relevant actors when the RMI was adopted in France in 1988, and when the 1986 and 1988 Social Security Acts were adopted in the UK. We rely on official documents and reports, parliamentary debates, and secondary literature on the subject.

This process tracing, although focusing on commonality, will lead to the underlying of differences between the two countries. In fact, although there is an age limitation in both countries, this limitation is actually very different and does not have the same meaning. In order to understand this difference, and the place of young age in social citizenship, we will look in section 3 at the evolution of social policies in both countries from WW2 until the end of the 1980s and the beginning of the 1990s (just after the introduction of the age limitation and before the adoption of other reforms concerning social benefits for young people).

2. The introduction of the age limitation in social assistance.

In this section, we will trace the adoption of the reform that led to the introduction of an age limitation at 25 in social assistance. We argue that a negative image of young people is at the origin of that limitation. However, the comparison between the two reforms will show that actually the negative images are quite different in the two countries, as well as the kind of age limitation.

2.1. France: the adoption of the RMI in 1988.

The symbol of the familialization of young people is the age limitation adopted by the basic income *revenu minimum d'insertion* (RMI). In fact, when this means-tested benefit is adopted in 1988, a “social majority” (i.e. access to social citizenship) is acted at 25 years old: it does not allow young people under 25 years old to claim for this brand new national social assistance scheme.

According to the familialist principle, the family has to take care of their children in the first place. It follows the “principle of subsidiarity” present in many continental “Christian-Democratic welfare state” (Van Kersbergen, 1995). Letting young people to get access to this kind of welfare support would run against familial solidarities: it would foster a premature *décohabitation*, i.e. leaving the parental home, which could bring some risk of isolation for young people (Lima, 2004). It did not mean that support was refused to young people in full-time education in general, since tax reliefs for parents’ students were available. In this fiscal legislation, the age of independence is precisely 25: this is the age that represents the end of the status of child (*enfant à charge*).

However, we need not to overestimate the importance of the familialist ideology. The refusal to entitle young people under 25 is also justified because there are some schemes within the so-called *politique d'insertion professionnelle des jeunes*. The progressive institutionalization of this policy, since the late 1970s and the early 1980s (Lefresne, 2012), have developed many different schemes of support for young people under 25 (Lima, 2008). Since the RMI had to respect the principle of subsidiarity, it did not seem relevant to entitle young people, since they could rely (in theory) on other types of support (Rapport sur le projet de loi relatif au revenu minimum d'insertion, 1988) such as the *allocation d'insertion*. This unemployment assistance benefit had been created in 1972 in order to foster young workers’ mobility. It is further extended in 1984 to sustain those who had not worked enough to be entitled to unemployment insurance benefits, especially the young unemployed from 16 to 25.

However, there could be problems when young people have no relationships with their family, or when they simply do not have a family anymore. That is why, while the RMI was refused to young people, another specific assistance scheme was adopted to compensate: the *Fonds d'aide aux jeunes* (FAJ). It did not represent a proper social right for young people though. It is an “ultra-residual” assistance scheme, in which social worker estimates if the

young really deserves it, by looking at his economic situation, his project and his good will (Lima, 2008). Thus, it is only supposed to provide a provisory hardship relief, nothing more. Moreover, even for young people over the age of 25 years old, social assistance was still considered subsidiary. The family was always the social institution that had to take care of youth in the first place. Hence, the amount of the RMI was inversely proportional to family transfers declared: the delivery of the RMI depended on the fact that young people would have asked their parents to fulfil their legal duties towards them (Van de Velde, 2007), according to the legal obligations of parents to support their children until they find a stable employment (according to the articles 203 and 295 of the Civil code).

In 1992, the RMI underwent some changes. The *commission nationale d'évaluation du RMI* acknowledged that a growing part of young people experienced severe hardship, so that the RMI scheme had to be amended. For instance, it was argued that a provisory and derogatory access to the RMI should be allowed for young people under 25. The FAJ was then extended and implemented in every local authorities (*départements*) in order to help young people under 25 who were in difficulty. Moreover their access to healthcare was provided by the state when they had revenue below the level of the RMI. However, the age limitation was maintained at 25 years old, although, at the same time, the *allocation d'insertion* was removed from them. This withdrawal had the consequence to force young people to rely even more on their families when they were not employed yet, and then their familialization. Along with this “familialist image” of youth, the “work ethic image” was also present though in a less extent. According to the neo-classic approach of the individual who maximizes his own utility, such benefit was feared to discourage young people to study or work (i.e. *désincitation au travail*). As a result, in order to avoid “assistance” of young people (Lima, 2012), or pejorative translation *assistanat*, the RMI was refused to them. It represents the fear of an “inactivity trap”.

2.2. UK: the 1986 and 1988 Social Security Acts.

The election of the Conservative Margaret Thatcher in 1979 changed the general landscape of social security, and led to major reforms so far as young people were concerned. Three elements were of great importance in her New Right's programme: the consideration that public expenditure in general, and social security in particular, was a problem and had to be diminished; the will to simplify the system in order to make it more efficient; and lastly, the work ethic, which aimed at self-reliance rather than a “culture of dependency” for social security recipients (Millar, 2009, p. 14), according to the “workfare” philosophy. As far as age is concerned, two different issues were at stake in the UK: the age entry (like in France), but also the access to the adult rate.

In 1983, the Conservative government announced great revisions of Social Security, and launched four distinct reviews, the so-called “Fowler reviews”, on pensions, housing benefit (HB), supplementary benefit (SB) and benefits for children and young people. The fact that a review was focused on the problem of children and young people shows how relevant this

issue had become at the time. Yet, these reviews, except the one on HB, were not published separately. Instead, a general Green Paper was published on June 3rd 1985 in three volumes. This Green Paper criticized SB because it was too complex, and because it could not “target resources to those who need help most as effectively as it could” (Green Paper, 1985: 31). As a result, a new scheme was proposed, the “income support” (IS), in which “benefit will be determined essentially by age and family responsibilities (...). Thus there will be a lower rate for those under 25 and a higher rate for pensioners” (Green Paper, vol.1, 1985: 32). This new age limitation was supposed to replace the former householder/non-householder division considered to complex to administer, and a pragmatic consideration explained the age 25 chosen: “there is no one age dividing line relevant to all claimants. But it is clear that at the age of 18 the majority of claimants are not fully independent and that the great majority of claimants above age 25 are” (Green Paper, vol.2, 1985: 23). The introduction of this age limitation reflects here a simpler administrative means, that is supposed to be more democratic and more fair (Percheron, 1991).

On December 16th 1985, the Government published its White Paper “Reform of Social Security: Programme for Action”, and the Social Security Bill was presented to the House on 17 January 1986. However, the measures presented in 1986 were only implemented later in 1988. The category “young people” appeared in social legislation at that moment with the introduction of the age limitation at 25 in the new IS scheme.

The “familialist image” is part of this limitation in the sense that young people at that age are supposed to live with their parents. However, the fact that IS still exists for young people under 25 shows that this image is much less important than in France. In fact, they can claim for it at lower rate, which underlines the presence of the “work ethic image”: the aim of these different rates is to not give incentives to young people to stay unemployed. Few political conflicts over this implementation took place during the reform, contrarily to change concerning student’s entitlements and 16-17 year olds.

In 1986, the Government assessed that it would not raise the age entry of IS, which would remain 16, although it was argued that the “Government’s objective is that young people should have opportunities for training and employment or education which make it unnecessary for them to be unemployed” (SSC, 1985: 40). In spite of that, after the re-election of Margaret Thatcher in 1987, a new Bill was presented, much more controversial with regards to young people. In fact, contrarily to previous assessments, it was decided to raise the age entry from 16 to 18. Whereas the parliamentary debate in 1986 barely concerned young people and the age limitation of 25, young people and the upraising of the age entry are at the centre of the conflict between the Conservative majority and the Labour opposition during the parliamentary debate of November 1987.

The Tory argument for upraising the age entry of IS was that, at the same time, a guarantee to get a place in the Youth Training Scheme (YTS)² would be offered to all school leavers above

² The YTS replaced the Youth Opportunities Programme (YOP) in 1983.

16. Furthermore, the training allowance had been fixed at a higher rate than IS for young people, so that there would not be any financial incentive to refuse such place. In this perspective, every young people between 16 and 18 years old should be in training or education, and not in unemployment, accordingly to the Conservative manifesto. Yet, it is still up to young people to decide: the scheme is not compulsory, and the compulsory school leaving age would remain 16. If young people decide not to go in education or training, without having a job, then the Government argued that it was not the State's responsibility to provide any support.

This argument reflects the “work ethic image” of youth. When they have the choice, young people must choose work or education over dependency on social assistance. The Tories underlined the fact that this measure was directed at those young people who deliberately do not go into education or training because they would rather stay in a state of dependency³. The Labour opposition underlined the fact that this constraint was already possible in previous legislation: “Claimants must be available for work and be willing to take up any reasonable offer of work or approved training, including youth training schemes, or be penalised under section 20 of the Social Security Act 1975”⁴. So the complete removal of entitlements for young people aged 16-17 was seen as a mere retrenchment in social rights for young people, which was motivated by a negative image of young people, who are seen to be idle.

2.3. Comparison: two different images of youth for two different types of age limitation.

After having described the adoption of those reforms, we can say that if 25 is the age of full social citizenship in both countries, it does not have the same meaning regarding access to social benefits. In France, there was no national assistance scheme before the introduction of the RMI. The latter represents the adoption of a national universal means-tested benefit, which logic is very different from the contributory principle present in social insurances of the *Sécurité Sociale* (Palier, 2005). Since every citizen can claim for such assistance benefit, provided a means test, age is a crucial criterion regarding entitlement. Before this scheme, age was less important, since work and contribution were the most important criteria to be entitled to insurance benefits. As a result, there was no explicit age for full social citizenship. That is the reason why age has emerged as a social security issue with the 1988 debate.

Therefore, the age limitation of 25 in France has separated childhood (i.e. no social citizenship) and adulthood (i.e. social citizenship). Under 25, young people are not considered as “independent” by social security, and cannot claim for benefits on their own. The general rule is that they can only claim for the RMI as “dependent”, i.e. as *enfant à charge* of their parents.

³ Therefore they also created a “bridging allowance” for those who want to get a place in the YTS, but have not been offered one yet.

⁴ Hansard, H.C. Debs, vol.121, cc.718, *per* Mr. J. Battle, 2 november 1987.

In the UK, being under 25 does not necessarily mean being a child for social legislation. Whereas 25 years old is the age entry of social assistance in France, it is not the case in the UK. The age entry is 18 years old since 1988, and was 16 before that. That means that young people over 18 are considered as adults, though not entirely: the age limit of 25 does not mean social citizenship (like in France) but *full* social citizenship, when young people are supposed to get their complete independence from their parents. Actually, young people under 25 are entitled to IS but at a lower rate.

That is why the debate was fiercer concerning the upraising of the age entry from 16 to 18 in 1988 than in 1986 concerning the age limitation at 25. We can go as far as to say that, even though there is a commonality regarding the age limit of 25, the French debate fixing social citizenship at 25 is much closer to the debate fixing social citizenship at 18 in the UK. As a matter of fact, while the expression “*jeunes adultes*” in France is globally directed at people under 25, the expression “young people” in the UK often concerns the 16-17 year olds only. Between 18 and 25, British young people are neither children nor adults: they are in-between for social security. That is why “young people” have a juridical meaning in the UK: social security has acknowledged in a certain way the new period of life that is youth. In the French social legislation, youth is a synonym of childhood. And this difference relies on the different images of youth in both countries: even though there is a “negative image” of young people in both countries, in France they are considered as “social children” (*mineurs sociaux*, or *grands enfants*), whereas in the UK they are deemed to be keen to state dependency and idleness. We can go as far as saying that this has to do with the distinction in the literature between the image of “vulnerable youth” in continental countries and “youth as a problem” in the UK.

In the next section, we will argue that the reason of this difference has to be found in different institutional settings: in France, which welfare state is often labelled “conservative-corporatist” (Esping-Andersen, 1990), the family policy has been the part of the social security that has dealt with young people after WW2, whereas in the UK, which welfare state is often characterized as “liberal”, it is social assistance that had to fulfil this task.

3. The structuration of social security towards young people after WW2.

The origin of the common age limitation of social citizenship has to be found in the negative image of young people that is present in both countries. Still, this image is rather different: young people are “social children” in France, whereas they are economic actors with a bias towards state dependency and idleness in the UK. In this section, we will argue that this difference relies on the institutional welfare arrangements: after WW2, the family policy had to deal with French youngsters, whereas social assistance for the most, alongside a generous grant system, had become a more and more important source of support for their British counterparts.

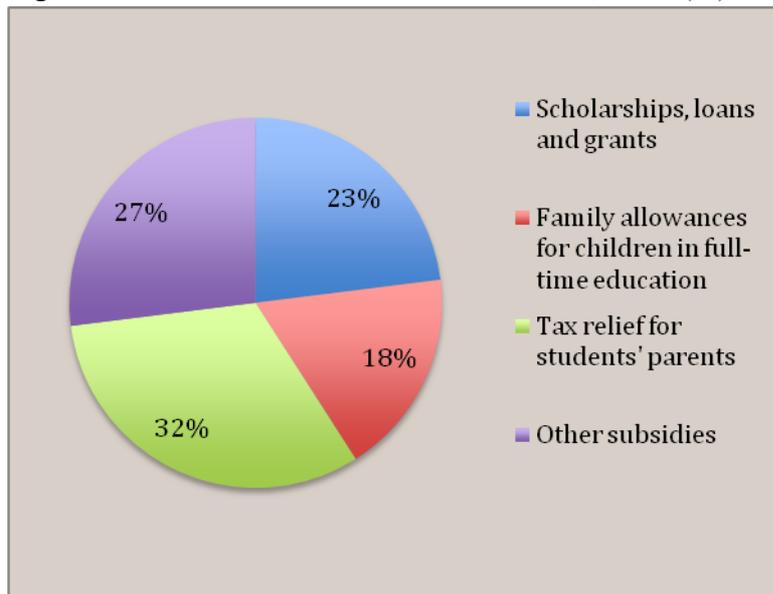
3.1. France: the familialization of young people.

The introduction of the age limitation in 1988 was prolonging a long-term process of familialization of youth in France. Its principle can be found in the article 203 of the civil code: the father has to take care of his child until he or she finishes his or her studies. As a result, grants for instance are not supposed to help directly students to get their independence, they are only meant to help the family to support a child in HE (Orivel, 1975, p. 16). Therefore, they are means-tested and depend on parental income (it is the so-called “*principe de l'aide aux familles*”).

The core of this familialization is the family policy, through tax relief and family allowances. The familialization of youth benefits means that young people are considered as “dependents” in social security, and therefore cannot claim on their own for social benefits. That is why the family policy is crucial, and is predominant in France: social benefits target families who have a child either under a certain age, or in education. After that the school leaving age had been raised from 13 to 14 in 1936, the upper age limit to benefit from family allowances had also been raised from 16 to 17 years old for young people in full-time education or apprenticeship (Ceccaldi, 2005, p. 67). This age has regularly risen after WW2 to go along with the extension of education, especially concerning students in HE.

As far as taxation is concerned, income tax reliefs are very important. In 1945, the system of the *quotient familial* is adopted. It lowers the income tax with regards to the number of *parts* that constitutes each member of the family. As a result, the more children there are in the family, the less this family pays income tax. Since in France, young people are keen to be considered as children as long as they are in education, they can often constitute *parts* (or *demie-parts*) that will reduce their parents' tax. The objective is that this revenue that parents do not pay in tax would go towards the maintenance of their children in education. From a public spending point of view, this way of dealing with young people in education is far more important compared to the other ones, as figure 4 shows it: tax relief for students' parents in 1974 represents one third of all public spending towards students. The family policy (tax relief + family allowances) constitutes half of it, which is a peculiarity of the French case (Blaug et Woodhall, 1978).

Figure 4: distribution of student aid in France, 1974 (%).



Source: Orivel (1975).

The French family policy aims not only to sustain the birth-rate, but also to encourage to continue education beyond compulsory school: “the payment of family benefits is conditioned by educational attending, and their payment beyond compulsory school is conditioned by attending higher education”⁵ (De Foucauld et Roth, 2002, p. 114). And after WW2, participation in education exploded (Meyer, Ramirez, Rubinson et Boli-Bennett, 1977), which led to a growing role of the family policy to sustain this trend.

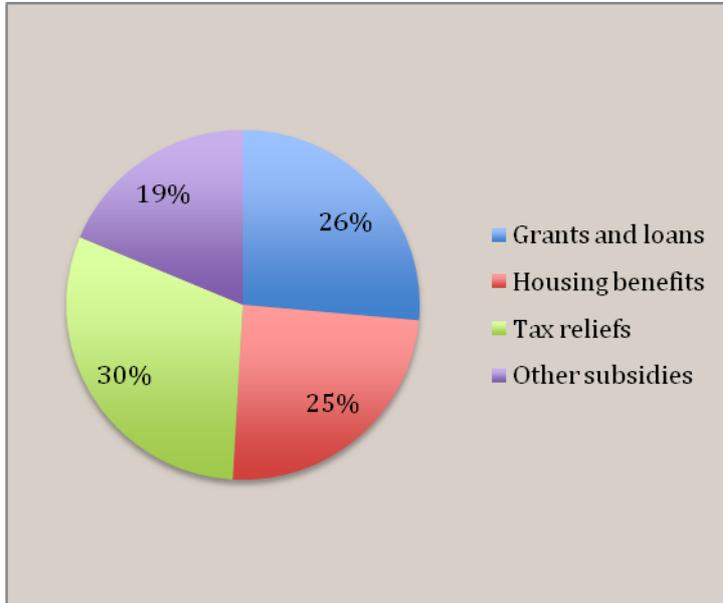
This increased tendency to use family policy in order to deal with the youth issue is also related to the “social turn” of the family policy during the 1970s. At the beginning, family benefits are thought to proceed to horizontal redistribution between families with and without children. In the 1970s, new social problems are however progressively taken into account by the family policy, leading to a more vertical redistribution between different categories of revenue, through universal or means-tested benefits (Damon, 2006, p. 24). When the autonomy of young people is put on the Government’s agenda during the 1990s (Vallat, 2002), this problem is incorporated into the perimeter of the family policy, illustrating an increasing “familialization” of the youth issue.

Consequently, the payment of family allowances has been extended to children up to 19 in 1998 and to 20 in 1999, regardless of any educational requirement. Young adults up to 25 years old who are in HE may also be attached to the fiscal household of their parents, and therefore provide a *demie-part supplémentaire au quotient familial* (21 years old for young people not in HE). Lastly, the 1993 finance Bill established a tax relief for school fees (*réduction d’impôt forfaitaire pour frais de scolarisation*), which was of 153€ for a high school student, and of 183€ for a HE student in 2002. In 2011, it represented a public

⁵ Author’s translation.

spending of 195 millions € (Ministère de l'Education Nationale et Ministère de l'Enseignement supérieur et de la recherche, 2012). Figure 5⁶ shows that tax relief was still very important in 1995.

Figure 5: distribution of student aid in France, 1995 (%).



Source : MEN (2012).

In 2010, the coverage of young people by family policy (i.e. the ratio of young people receiving benefits from the *caisses d'allocation familiales* in relation to all young people) rises to 52, 2% not only through family allowances (*prestations familiales*: 64% of young people benefit from them), but also thanks to some means-tested benefits such as the *complément familial* (until 21 years old) (Nicolas, 2010, p. 114). 30% of social spending in family policy is directed to young people (16-24 years old). Lastly, although young people under 25 years old are not entitled to social assistance, they can still benefit from the RSA, since 8% of young people are covered by it, against 6,8% for the whole population: 66,4% of them is covered as “dependents” (*enfant à charge*), and the rest is covered by the new 2009 *RSA jeune* (young people can claim for social assistance as long as they have worked two full years over the previous three years) (Labadie, 2012).

3.2. UK: the ambiguous role of social assistance.

In the British grant system, there was also a “parental contribution”, which represented the “family responsibility principle” (Harris, 1989), since families were supposed to participate to the support of students. In fact, some tax reliefs also targeted parents having a child in full-time education (without any upper age limit). Since 1956, family allowances were also available for parents who had a child in full-time education or apprenticeship until the age 18, and 19 since 1964 (Harris, 1989). In 1975, the Child Benefit Act merged child tax allowances

⁶ Family allowances have been replaced by housing benefits because they no longer depend on the participation of young people under 20 in education, whereas housing benefits have been opened up to students in 1993.

and family allowances into one “child benefit”, payable from the very first child, with the absolute upper age limit of 16 (19 when in full-time education).

However, this trend remained very limited in the UK compared to France. On the one hand, the place of tax relief is much more important in the general economy of student support in France than in the UK. In the 1970s, whereas in France, tax relief represents more than a third of total expenditure for student support, and exceeds grant expenditure (see table 1), in the UK, an undergraduate receive only 70£ of tax relief for his parents, but 265£ of maintenance award, less elements for books and parental contribution (Blaug et Woodhall, 1978, p. 347). In France, tax relief represents 180% of the direct aids to students, whereas in the UK it only represents 25%. On the other hand, grants do not allow independence of students in France: not only is their average amount too low, but also, only 15% of French students is eligible for them, against 92% of British students in 1974-1975 (Blaug et Woodhall, 1978, p. 348).

Therefore, the difference between the two grant systems is striking, since they represent the general image of young people. In France, we have young people who have to rely a lot on their families, whereas in the UK, they are supposed to get their independence from their parents rather early (Van de Velde, 2008). These different conceptions of youth then translate into the type of social policy young people can benefit from: the family policy in France and social assistance in the UK.

As far as social security is concerned, unemployment insurance has first been available for young people over 16 since its adoption in 1911. Provided they had worked and contributed enough, they could be entitled to unemployment benefit (UB). As a result, young people over 16 have been considered as independent by social security legislation rather early. Nevertheless, unemployment assistance took into account young people over 16 as dependent. The 1948 National Assistance Act, instituting a national social assistance scheme in the UK, changed that accordingly to UB.

Social assistance is a very important part of the British welfare state. It is typical of the English-speaking countries, in which there is a “welfare state with integrated safety nets” (Gough, Bradshaw, Ditch, Eardley, et al., 1997). The level of benefits is quite high, as well as the percentage of the population that receive such benefit (15,3% in 1992, against 2,3% in France) and the level of expenditure (6,4% of GDP in 1992, against 1,8% in France) (Gough, Bradshaw, Ditch, Eardley et Whiteford, 1997, p. 24).

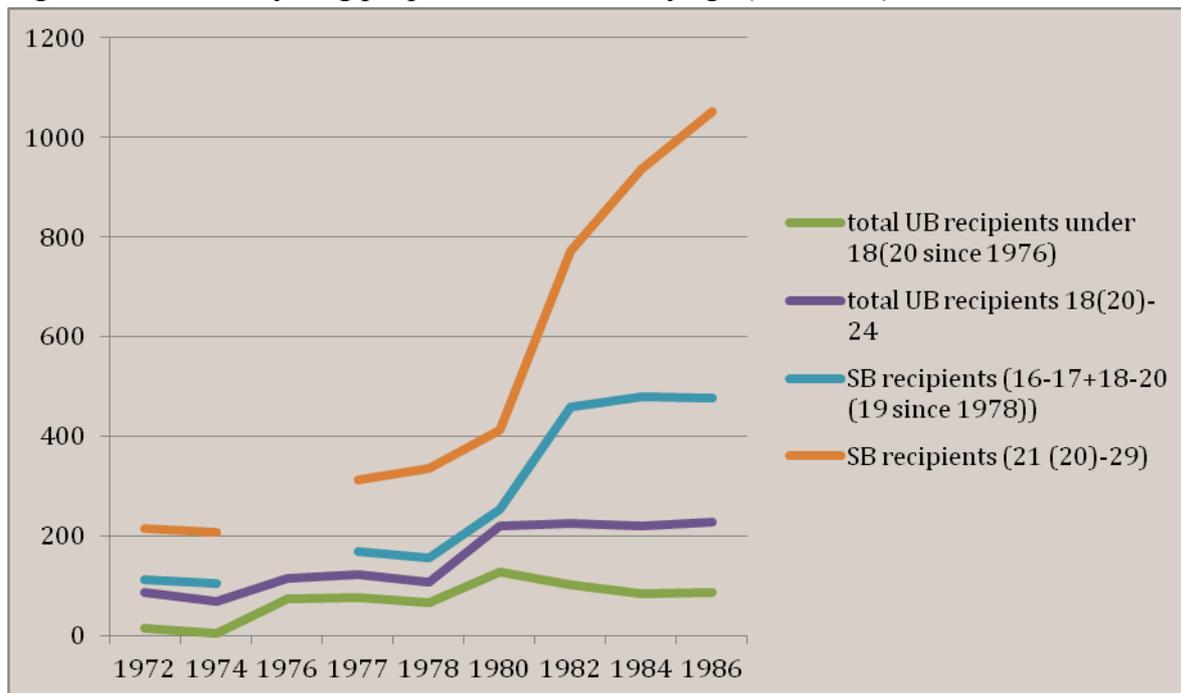
The age entry of national assistance was 16: before this age, children were considered as “dependent” and could not claim for benefit on their own. It has been fixed at 16 because the school leaving age was supposed to be raised to 16 as well (which was effectively the case from 1972-73 onwards), and because UB was already available at that age. This scheme supposed that there were two main requirements to meet: rent and other than rent. Thus, it established the distinction between the “householder”, who had his net rent paid in full, and the “non-householder”, who got a reasonable share of the rent paid, except when under 18. The householder is supposed to live on his own, whereas the non-householder still lives with

his parents. Therefore, the different rates of social assistance were fixed by the situation of young people, and not simply their age.

In 1966, the introduction of SB, replacing national assistance, changed the general economy of social security for young people. Although the age entry was still 16, young people in advanced or non-advanced education were not entitled to this benefit since their parents could claim for child benefit. On the other hand, students were entitled to such benefit during vacations, since they could be considered as “available for work” in that particular period of the year in which they were not supposed to attend class.

Even though SB was not originally thought to support students, the Supplementary Benefits Commission considered in 1976 that “there was no justification for excluding them from a right that is available to others” (Harris, 2000, p. 328). As a result, there had been a steep increase of students claiming for this benefit: 48 000 in 1973, they were 174 000 during 1976 Easter vacations. Changes in student grants in 1976 (student grants taken into account as “resource”) diminished this number for short-vacations, but not for summer vacations: half of students were receiving SB in the 1985 summer (Harris, 2000). “The period 1966-1980 saw the role of SB as a source of support become increasingly important” (Harris, 1989, p. 65).

Figure 6: number of young people on UB and SB by age (thousands).

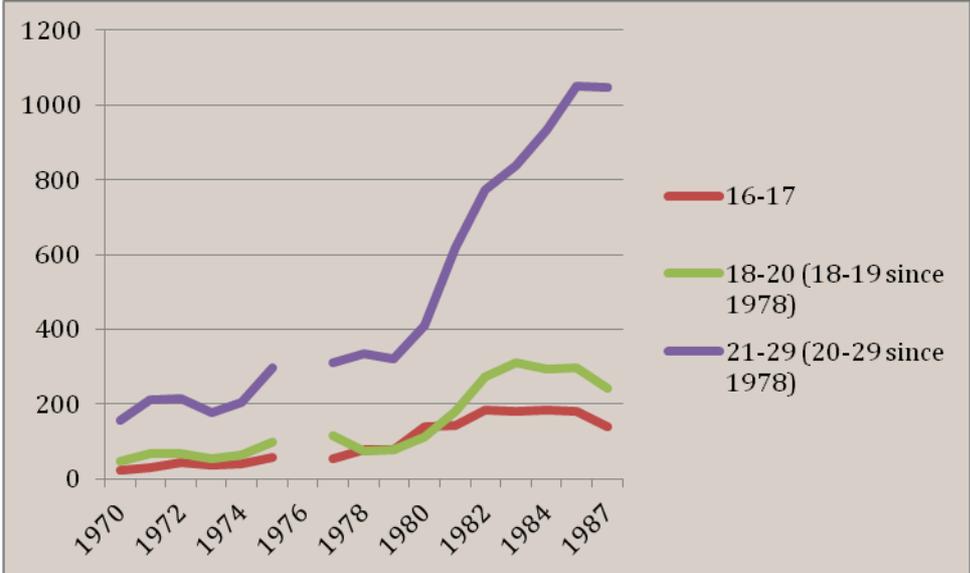


Source: Social security statistics 1972, 1974, 1976, 1977, 1978, 1981, 1983, 1985, 1987, 1988 (own calculation)

Moreover, the increase of youth unemployment since the 1970s (19,8% in 1983, Eurostat) had been pushing many young people in unemployment and hardship, hence towards social assistance, much more than on UB (see figure 6). Since it was necessary to have worked for at least a year to claim for UB, SB had become the principal social benefit for the young

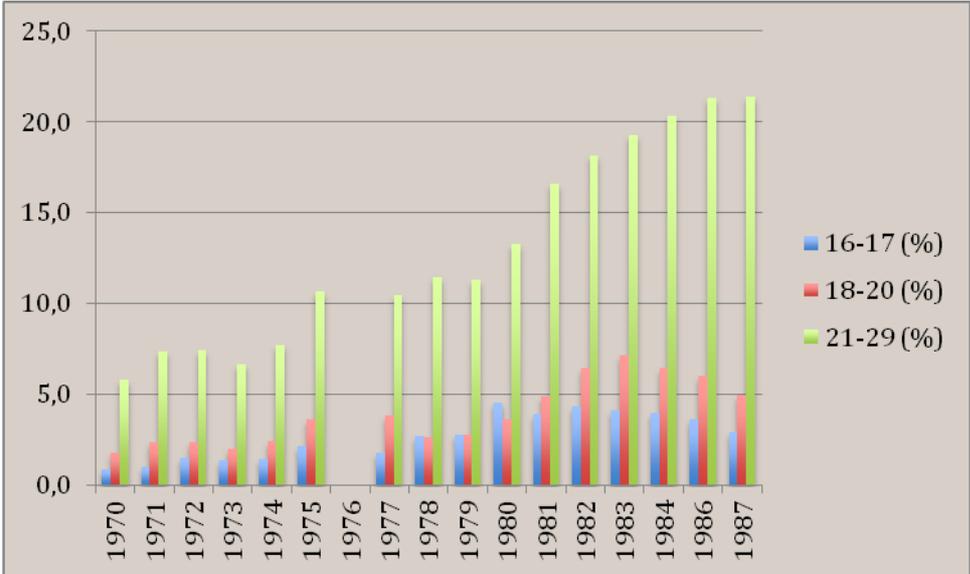
unemployed (Brown, 1990). This increased importance of SB for young people in general (see figure 7), both unemployed and in HE, as well as the place of young people among all recipients of SB (figure 8) fostered an image of young people mainly relying on state subsidies, developing a “culture of dependency”, which was at the origin of welfare reforms in 1986 and 1988.

Figure 7: young people receiving regular payments in a week (SB) by age (thousands).



Source: Social security statistics 1989 (own calculation)

Figure 8: young people receiving regular payments in a week (SB) by age (% of total recipients).



Source: Social security statistics 1989 (own calculation)

4. Conclusion.

Section 2 has showed how a negative image of young people, who are not considered as full adult citizen, led to an age limitation both in France and the UK. However, a closer look at such age limitation, as well as at this negative image, underlined the fact that this commonality was not so puzzling after all, inasmuch as we showed how different the two age limitations actually were. Indeed, section 3 has demonstrated that different kind of welfare arrangements and institutional features were actually the cause of two different images of young people. In France, the extended use of the family policy has fostered an importance familialization of youth. As a result, young people have been increasingly seen as children, especially in social security. On the other hand, in the UK, social assistance was the main welfare support for young people. This is why they have been deemed to be keen to idleness and state dependency, and not self-reliance.

This paper provides two contributions to the comparative literature on the welfare state. First, from an empirical point of view, social policies towards young people, including student support, are not well documented. It is an area of the welfare state under-developed. Second, from a theoretical perspective, this paper underlines the fact that social images, i.e. ideas, can actually have an explanatory power as long as they have been institutionalized beforehand (Berman, 2013).

Further research is needed on this topic, i.e. on the place of young people in social protection in Europe. Two main issues have to be addressed: on the one hand, more countries have to be integrated to the analysis, and especially countries in which youth has a positive image since young people are seen as a “resource”, like in the Nordic countries. On the other hand, the links between the educational realm and social policies have to be further explored. In fact, whereas in France and the UK social policies are crucial concerning the support to the transition to adulthood, in Germany, for instance, it is the education system, and more precisely the dual system of apprenticeship, which is supposed to deal with this issue (Heinz, 2000).

List of references:

- BERMAN, Sheri. Ideational theorizing in the social sciences since 'Policy paradigms, social learning, and the State'. *Governance : An international journal of policy, administration and institutions*. 2013, vol. 26, n° 2, p. 217–237
- BLAUG, Mark, WOODHALL, Maureen. Patterns of subsidies to higher education in Europe. *Higher Education*. 1978, vol. 7, n° 3, p. 331–361.
- BONOLI, Giuliano. The politics of the new social policies: providing coverage against new social risks in mature welfare states. *Policy & politics*. 2005, vol. 33, n° 3, p. 431–449.
- BROWN, J.C. The young unemployed. In *Victims or villains? Social security benefits in unemployment*. Policy Studies Institute, 1990.
- CECCALDI, Dominique. *Histoire des prestations familiales en France*. Comité d'histoire de la Sécurité sociale, 2005.
- CHEVALIER, Tom. *L'Etat-providence et les jeunes*. Paris : L'Harmattan, 2012.
- DAMON, Julien. *Les politiques familiales*. Paris : PUF, 2006.
- ESPING-ANDERSEN, Gosta. *The Three Worlds of Welfare Capitalism*. Princeton : Princeton University Press, 1990.
- FERRERA, Maurizio. The « Southern Model » of Welfare in Social Europe. *Journal of European Social Policy*. 1996, vol. 6, n° 1, p. 17-37.
- DE FOUCAULD, Jean-Baptiste, ROTH, Nicole. *Pour une autonomie responsable et solidaire*. Paris : Commissariat général au Plan, 2002. Rapport au Premier Ministre.
- GOUGH, Ian, BRADSHAW, Jonathan, DITCH, John, EARDLEY, Tony, WHITEFORD, Peter. Social Assistance in Oecd Countries. *Journal of European Social Policy*. 1997, vol. 7, n° 1, p. 17-43.
- GUILLEMARD, Anne-Marie. *Le Déclin du social : Formation et Crise des politiques de la vieillesse*. Paris : PUF, 1986.
- HARRIS, Neville S. Social security and education. In *Social security law in context*. Oxford : Oxford University Press, 2000, p. 327-361.
- . *Social Security for Young People*. Hants : Avebury, 1989.
- HEINZ, Walter R. Youth transitions and employment in Germany. *International Social Science Journal*. 2000, vol. 52, n° 164, p. 161–170.
- IARD. Study on the state of young people and youth policy in Europe. 2001.
- VAN KERSBERGEN, Kees. *Social Capitalism: A Study of Christian Democracy and the Welfare State*. Routledge, 1995.
- LABADIE, Francine dir. *Inégalités entre jeunes sur fond de crise. Rapport de l'Observatoire de la jeunesse 2012*. Paris : La Documentation française, 2012.
- LARSEN, Christian Albrekt. The political logic of labour market reforms and popular images of target groups. *Journal of European Social Policy*. 2008, vol. 18, n° 1, p. 50–63.
- LEES, Lynn Hollen. *The Solidarities of Strangers: The English Poor Laws and the People, 1700-1948*. Cambridge : Cambridge University Press, 1998.
- LEFRESNE, Florence. Trente-cinq ans de politique d'insertion professionnelle des jeunes: un bilan en demie-teinte. In Valérie Becquet, Patricia Loncle, Cécile Van de Velde. *Politiques de*

- jeunesse: le grand malentendu*. Nîmes : Champ social, 2012, p. 106-125.
- LIMA, Léa. De la construction d'une génération sacrifiée à la formation d'une 'classe d'âge'. La requalification du problème social de la jeunesse au Québec entre 1983 et 2000. *Sociologie et sociétés*. 2005, vol. 37, n° 2, p. 235-263.
- . L'âge de l'État social: une comparaison France-Québec des systèmes d'assistance-jeunesse. *MATISSE L'accès inégal à l'emploi et à la protection sociale*, Paris, 16 septembre 2004.
- . Le temps de la prime insertion professionnelle : un nouvel âge de la vie. In GUILLEMARD, Anne-Marie dir. *Où va la protection sociale?* Paris : PUF, 2008.
- . Les jeunes vulnérables: laboratoire de l'Etat social actif? In *Inégalités des jeunes sur fond de crise. Rapport de l'observatoire de la jeunesse*. Paris : La Documentation française, 2012.
- LONCLE, Patricia. *L'action publique malgré les jeunes. Les politiques de jeunesse en France de 1870 à 2000*. Paris : L'Harmattan, 2003.
- LYNCH, Julia. *Age in the Welfare State: The Origins of Social Spending on Pensioners, Workers, and Children*. Cambridge : Cambridge University Press, 2006.
- MAYER, Karl Ulrich, SCHOEPFLIN, Urs. The state and the life course. *Annual review of sociology*. 1989, vol. 15, p. 187-209.
- MEYER, John W., RAMIREZ, Francisco O., RUBINSON, Richard, BOLI-BENNETT, John. The world educational revolution. 1950-1970. *Sociology of education*. 1977, vol. 50, n° 4, p. 242-258.
- MILLAR, Jane. *Understanding Social Security: Issues for Policy and Practice*. Bristol : The Policy Press, 2009.
- MINISTERE DE L'EDUCATION NATIONALE, MINISTERE DE L'ENSEIGNEMENT SUPERIEUR ET DE LA RECHERCHE. Repères et références statistiques sur les enseignements, la formation et la recherche. 2012.
- MINONZIO, J., VALLAT, J.P. L'union nationale des associations familiales (UNAF) et les politiques familiales. *Revue française de science politique*. 2006, vol. 56, n° 2, p. 205-226.
- MUXEL, Anne. *Avoir 20 ans en politique : Les enfants du désenchantement*. Paris : Seuil, 2010.
- NICOLAS, Muriel. La politique familiale destinée aux jeunes. *Politiques sociales et familiales*. 2010, n° 102, p. 113-119.
- OECD. Elements of tax-benefit systems. In *Benefits and wages 2007: OECD indicators*. Paris : OECD Publishing, 2008.
- ORIVEL, François. *L'aide aux étudiants en France: faits et critiques*. Dijon : IREDU, 1975.
- PALIER, Bruno. *Gouverner la sécurité sociale : Les réformes du système français de protection sociale depuis 1945*. Paris : PUF, 2005.
- PAMPEL, Fred, WILLIAMSON, John. *Age, Class, Politics, and the Welfare State*. Cambridge : Cambridge University Press, 1989.
- PERCHERON, Annick. Police et gestion des âges. In PERCHERON, Annick, REMOND, René dirs. *Age et politique*. Economica, 1991.
- PIERSON, Paul. Increasing returns, path dependence, and the study of politics. *American political science review*. 2000, vol. 94, n° 2, p. 251-267.
- . The New Politics of the Welfare State. PIERSON, Paul. *World Politics*. 1996, vol. 48,

n° 02, p. 143-179.

PRZEWORSKI, Adam, TEUNE, Henry. *The logic of comparative social inquiry*. Wiley-Interscience, 1970.

Rapport sur le projet de loi relatif au revenu minimum d'insertion. Commission des affaires culturelles, familiales et sociales de l'Assemblée Nationale, 1988.

VALLAT, Jean-Philippe. *La politique familiale en France (1945-2001) : construction des intérêts sociaux et transformations de l'Etat-providence*. Paris : Institut d'études politiques, 2002.

---. La représentation des intérêts familiaux en Europe. *Recherches familiales*. 2008, n° 1, p. 15-32.

VAN DE VELDE, Cécile. *Devenir Adulte : Sociologie comparée de la jeunesse en Europe*. Paris : PUF, 2008.

---. La dépendance familiale des jeunes adultes en France. Traitement politique et enjeux normatifs. In PAUGAM, Serge dir. *Repenser la solidarité. L'apport des sciences sociales*. Paris : PUF, 2007.

VERSCHELDEN, Griet. *The history of youth work in Europe: relevance for youth policy today*. Strasbourg : Council of Europe Pub., 2009.

WALLACE, Claire, BENDIT, Rene. Youth Policies in Europe: Towards a Classification of Different Tendencies in Youth Policies in the European Union. *Perspectives on European Politics and Society*. septembre 2009, vol. 10, n° 3, p. 441-458.

WALTHER, Andreas. Regimes of youth transitions: Choice, flexibility and security in young people's experiences across different European contexts. *Young*. 2006, vol. 14, n° 2, p. 119-139.

WILENSKY, Harold L. *The Welfare State and Equality: Structural and Ideological Roots of Public Expenditures*. Berkeley : University of California Press, 1975.