

PROFAMILY TAX REGULATIONS IN LAW (SELECTED ISSUES)

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Summary. Taking into account the personal nature of income tax and postulates concerning payment capacity and equity, many constructions of income tax implemented in European Union countries reflect (in various ways and forms) the taxpayer's family status. No legal scheme shaping the issue of taxing family incomes has been developed yet. Particular countries separately determine rules and principles of taxing income generated by families. Among legal solutions that may affect the family situation we can differentiate two groups used in EU countries tax systems: The first contains constructions which are not introduced into income tax for the benefit of a family, but which are essential to it, that is the ones which indirectly reflect this benefit. The second group concerns those which can be introduced to the tax system deliberately in order to protect or promote the family. One of legal solutions significantly influencing legal and tax situation of a family is the minimum income free from tax, which would be difficult to classify as directly of pro-family type. It is treated as subsistence minimum, taking into account the costs of biological or even social existence of a taxpayer.

Key words: deductions, allowances, reliefs, pro-family policy, taxation

INTRODUCTION

Income tax is highly valued in the financial law doctrine. It is seen as a type of taxation which meets all theoretical requirements of science, constitutes an efficient source of public income and does not harm the economy. From a structural viewpoint, two basic types of income tax systems can be distinguished: schedular and global. In a schedular tax system, income tax is levied tax on selected income categories. If a benefit does not fit into any categories, it is not subject to tax. In contrast, in a global tax system, all receipts, irrespective of their source, are subject to tax. In practice, most existing income tax systems lie on the spectrum between global and schedular (mixed systems) [Holmes2001, 3–8].

Taking advantage of broadly understood tax reliefs is, however, increasingly seen as a signal of unequal treatment of taxpayers and of preferring those who make expenditures which are subject to deductions. As a result, taxpayers whose

incomes do not allow them to make such expenditures cannot take advantage of various reliefs and, as a result, have to pay relatively higher taxes on their incomes. The indicated effects of global taxation of personal incomes using the progressive scale combined with the system of various tax preferences provided an impulse to search for and develop a simple system for taxing personal incomes using the proportional tax scale. The implementation of a flat tax rate on income has met a lot of barriers and difficulties. Although it brings great simplification of the tax construction, in reality it deprives a lot of taxpayers of their preferences and it also means that the state resigns from using the tax construction to stimulate the accomplishment of various significant social and economic goals and the whole system of taxing income is subject to complete change. Contemporary personal income tax is based on three basic principles: universality, equity (fairness) and taxation of the so-called net income [Rękas 2015, 8–14].

The national Personal Income Tax system can affect the welfare of people and businesses in a number of distinct ways. In order to study the variety of fiscal arrangements it is important to understand the social and economic characteristics of each country. Legislator's choices not only consist of technical issues aimed to simplify or improve the fiscal system, but more often they lead to vital decisions and policies for a country's development. Fiscal legislation directly influences the individual consumption choices and therefore fiscal normative cannot be presented as neutral. The fiscal framework can stimulate and encourage or discourage people's behaviours. Every single decision affects the marginal prices of the available resources, including the individual free time [Burns and Krever 1998, 13–20; Mares and Queralt 2017, 7–9].

In some countries family status has little or no impact on the amount of tax that an individual pays. In others the income tax system plays a major role in the redistribution of income among families of different types. The question this paper addresses is whether, out of the wide range of practices in Western Europe, there are tax arrangements which are particularly family friendly. Are there existing tax systems which perform well in terms of the welfare of families and, especially, of children and which could be used as blueprints for the design of new systems? Failing that, are there lessons about the advantages and disadvantages of alternative approaches that we can learn through an understanding of the effects of tax instruments in existing systems? [O'Donoghue and Sutherland 1998, 4–6; Piketty and Quian 2009, 3–4].

Tax systems are expected to achieve many things and in practice have to reconcile conflicting aims, most notably in this context the wish to support the traditional family, while ensuring equality of treatment among individuals in different circumstances. In evaluating the success of different approaches in achieving the appropriate level of support to families, we are hampered by the absence of any universally accepted notion of a “neutral” tax system. In addition, there is no consensus about the desirable size of any concession for a child or children or how it should relate to family income. We do not take a view in these areas of ambiguity

about equity. Instead, we focus on the implications of each approach to policy for horizontal and vertical redistribution [Blundell, Graber, and Mogstad 2015, 8–11].

1. METHODOLOGICAL ASSUMPTIONS

Legal sciences use typical methods used in the social sciences and humanities, i.e.: examination of documents (legal acts and administrative court judgments), comparative methods (expert opinions, legal opinions, analyzes resulting from language, grammar and historical interpretation) and case studies. The result of cognitive research is new claims or theories. On the other hand, the results of research for the needs of business practice determine whether and if existing statements and theories regarding tax family policy are useful for solving specific demographic and social problems.

The main purpose of the article is to present the concept of tax pro-family policy and to identify tax technique instruments conducive to the implementation of social tax goals, in accordance with the teaching of the Catholic Church and the formulation of the Church's Social Doctrine.

The additional aim of the article was to assess what aid an average family can count on in specific EU countries in 2016–2019. A simulation was conducted for each country in accordance with the adopted assumptions. Tax reliefs and other allowances for children were taken into account. Assumptions of the analysis embrace: family 2+2, working parents and presumption that each parent earns the national average wage and children aged 4 and 8.

The subject of the article is the presentation of the idea of family policy and tax instruments supporting family.

Induction was used as the main research method. It consists in deriving general conclusions or establishing regularities based on the analysis of empirically confirmed phenomena and processes. It is a type of inference based on the details of the general properties of a phenomenon or object. Using this method requires the assumption that only facts can form the basis of scientific inference. These facts are real (economic and legal) situations. Induction methods include various types of legal acts, analyzes, expert opinions, tax law acts and scientific documents used in social research.

2. PRINCIPLE OF TAXATION EQUITY

All the European Union fiscal frameworks adopt a progressive tax rates scale, but a personal income tax system should also research a vertical and horizontal redistribution. The structure of progressive rates is object of a strong theoretical and technical debate. For example, the fiscal treatment of pendent individuals has found different solutions, and we can distinguish between tax arrangements particularly family friendly and other less favorable [Carvalho and Rezai 2016, 6].

The most important feature of income tax is that it is a tax which can best implement the principle of taxation equity. The tax is constructed in a way which allows to take into account the personal features of a taxpayer as far as subjective ability to pay the tax is concerned, personal features of a taxpayer affecting their ability to pay taxes (payment capacity). Payment capacity is a principle derived from the rule of ability to pay stating that each citizen should pay taxes proportionally to their individual payment possibilities.

We can say, that ability to pay is a progressive taxation principle that maintains that taxes should be levied according to a taxpayer's ability to pay. This progressive taxation approach places an increased tax burden on individuals, partnerships, companies, corporations, trusts, and certain estates with higher incomes. The application of this principle gives rise to the progressive tax system, a system of taxation in which individuals with higher incomes are asked to pay more tax than individuals with lower incomes. The ideology behind this principle is that individuals and business entities that earn higher income can afford to pay more in taxes than lower-income earners. Ability to pay is not the same as straight income brackets. Rather, it extends beyond brackets in determining whether an individual taxpayer can pay his or her entire tax burden or not. For instance, individuals should not be taxed on transactions in which they don't receive any cash. Using stock options as an example, these securities have value for the employee who receives them and are, thus, subject to taxation. However, since the employee does not receive any cash, s/he would not pay tax on the options until s/he cashes them in. Advocates of ability-to-pay taxation argue that it allows those with the most resources the ability to pool together the fund required to provide services needed by many. Critics of this system believe that the practice discourages economic success since it burdens wealthier individuals with a disproportionate amount of taxation. Classical economists like Adam Smith believed any elements of socialism, such as a progressive tax, would destroy the initiative of the population within a free market economy. However, many countries have blended capitalism and socialism with a great degree of success [Holmes 2001, 19–21; James and Nobes 2001, 77–82, Gobetti and Orair 2017, 15–17].

Income tax, as personal tax, can be widely used to accomplish social (welfare) goals of taxation, as it best implements the principle of fairness, combining tax burden with payment capacity of a taxpayer, which allows to adjust tax burden to individual abilities to pay [Wołowiec and Suseł 2009, 346–61; Wołowiec 2008d, 329–52].

Generally, the main aim of income tax should not be its influence on social and economic life but its fiscal aim. This tax is one of the main sources of budget incomes, therefore the more we use it to influence the economy, the lower sums are collected by the budget from it. As a result, taxpayers are more burdened with indirect taxes and this, in turn, does not allow to implement the principles of fairness and equality of taxation, as indirect taxes do not take into account taxpayer's payment capacity to carry the burden of tax payments [Wołowiec 2008a, 35–49;

Idem 2008c, 227–49]. With reference to legal solutions in tax law, the doctrine quite commonly accepts the view that taxes and the whole tax system should be neutral [Gomułowicz and Małecki 2004, 105–108]. This means that taxes should be constructed so as not to hinder the existence and functioning of taxpayers, but also so that they should not contain any preferences for selected groups of taxpayers [Wójtowicz and Smoleń 1998; Wójtowicz 1998; Wójtowicz and Smoleń 1999].

Supporting tax neutrality does not determine negative attitude to influencing, using tax preferences, accomplishment of important non-fiscal objectives by the state. It is assumed that taxation equity is achieved by universality and equality of taxation.¹ The use of various tax preferences may be the consequence of a subjective treatment of tax equity. Such equity requires noticing different material, family or social situation of a taxpayer [Lassotówna 1935]. It is widely believed that tax reliefs and exemptions favor tax equity. The argument of equity allows to gain social acceptance for changes in the system of fiscal burdens [Wołowicz 2003c].

So, income tax systems can affect the welfare of children in a number of distinct ways. First, some children have income of their own; this may be taxed on an individual basis or may be included in the taxation of the incomes of the parents. Second, parents may be allocated tax concessions of one kind or another because they have children. A third, less direct mechanism is through the tax treatment of couples and especially of married women. The role of State and communities in supporting families which are raising the future members of the same communities, and also the future tax payers, represents the central point of this theoretical discussion. In estimating the tax paying capability of a subject the analysis should go beyond the simple amount of resources owned by the individual, giving the proper social consideration to the consequences of different consumption choices. The social value of raising new members of the community has drastically been at the center of attention in the last years, due to the remarkable decline of fecundity in many EU countries [Doerrenberg, Peichl, and Siegloch 2017, 15–17].

3. TAX RELIEFS

Tax reliefs arouse extremely different opinions. Some people believe that they are conducive to correction of fiscal burdens and fair adjustment of the tax amount to the financial situation of a person (family) who pays it. Other claim that reliefs are a form of discrimination against those who do not take advantage of them. The difficulty is that the taxpayer who was granted tax relief does not consider this as a sign of preference but as “justice being done.” It would seem, if we adopted this point of view, that there are no tax privileges, but legal regulations treat some taxation circumstances differently. A person who is unprivileged is so-

¹ Constitutional Tribunal U. 7/87.

mebody who consumes and saves in a way that does not qualify them obtain any privileges. The state which introduces tax reliefs, indirectly admits that fiscal burden is too big. In practice, the introduction of particular tax reliefs may not be conducive to equity, but it may even aggravate injustice. This happens in case of tax reliefs which can be taken advantage of only by people with high or very high incomes. Tax reliefs can then be treated as subsidies for privileged taxpayers. The credibility of tax policy is hurt by that.

The basic reasons for passing tax reliefs are: high tax rates, willingness to support families (taxpayers) in a difficult material situation, performance of pro-family (pro-social) tax policy, technical complexity of taxation principles, separation of law-making and law-enforcement organs in the state, as well as tradition and political system. Lawmakers usually realize that there are many ways to avoid high tax rates, but law enforcement organs do not have enough power to change the *status quo*. A lot of reasons for introducing tax reliefs and exemptions can be attributed to the technique of tax law. They do not significantly affect the size of public income, but they do influence the incomes of individuals and particular social groups. Also tradition plays a vital role in tax reliefs and exemptions. However the historical aspects are preceded by political ones. A member of parliament is often forced to take into account interests of various pressure groups, as these groups determine whether he will be elected again. Another important reason for passing tax privileges is lack of knowledge of terminology among public opinion [Głuchowski, Handor, et al. 2002, 22–24; Wołowiec 2003b, 19–23, Idem 2002, 39–46].

Technical elements contain various forms of tax preferences. One of such constructions is tax exemption. This describes the situation which is not subject to taxation even though there is an actual state which, according to the law-maker, creates tax obligation. The effect of applying this institution is the lack of subject or object of tax obligation. In this way we can exclude the taxpayer's minimal income from taxation, that is the amount of subsistence level [Gajewski 2010, 85–87].

The influence of tax reliefs on performance of non-fiscal goals of taxation brings both positive and negative effects. A system of reliefs consisting in lowering the rate or the amount of tax directly offers a simple construction and, when we take into account the psychological aspect, it is perceived as real relief. The use of preferences as a result of differentiating tax base is much more complicated from the accounting point of view. The existence of numerous increases and decreases of the basis on which tax is calculated makes the method of calculating tax obligation much more complex [Markowski 1990, 10]. That is why we should limit or even negate possibilities created by the tax construction related to stimulation and regulation functions of taxation [Doerrenberg, Peichl, and Sieglöch 2017, 19]. On the other hand, many authors prove that it is necessary to stimulate various economic and social spheres through an appropriately constructed system of preferences. It seems that tax preferences, by performing non-fiscal functions,

do not have to distort market signals [Burzec 2017, 91–93]. They should be constructed so that the stimuli from the market were not weakened or distorted, but, on the contrary, strengthened. These features can be ensured by, for example, reliefs related to introduction of new technologies, innovations, etc. I also believe that there are areas where market signals hardly exist or are very weak. This may refer to investments in environment protection, in science and culture or in regions with high structural unemployment. Obviously, there should not be too many exemptions and reliefs in a tax system. A large number of various preferences make the system complex and brings about negative effects in forms of contradictions in their sectional influence [Sokołowski 1995, 40].

4. THE CONCEPT AND GENERAL FEATURES OF A PRO-FAMILY TAX SYSTEM

All social and economic policies affect families, but the term *family policy* usually refers to social programs, laws, and public directives designed to promote and enhance marriage, reproduction, and raising children. Family policy also ensures child protection and child and spousal support and attempts to resolve conflicts between work and family. The state usually initiates such policies, but employers or voluntary organizations may also establish them. Legislatures and governments that create laws and policy, as well as the agencies mandated and financed to enforce them, such as child welfare agencies, will be referred to as *the state*. This entry focuses on policies and social programs initiated by governments. It investigates how academics have studied these policies and how they have explained variations among nations [Hanock 1999]. In the context of the stimulating function of taxes we should consider whether taxes can and should be used only to cause closely determined economic phenomena – for example to stimulate services through tax preferences, or to cause social phenomena as well – for example by preferential treatment of taxpayers who create jobs in the area with high unemployment. It seems that it is difficult to deny the tax system a broadly understood stimulating function, while tax interference in economy is most often connected with influencing social relationships [Wołowicz 2013].

The “pro-family nature” of the whole tax system, especially its personal income tax element, quite often appears both in politicians’ declarations, social activists’ statements and in hopes of taxpayers, especially those with large families. In practice, legal solutions, especially concerning taxation of personal incomes, should not ignore pro-family social expectations. At the same time we should stress a widespread view that taxes should be neutral, which is prevailing in the doctrine. The belief that taxes should be neutral stems from their fiscal function. We should not – according to some experts – use taxes to achieve various social goals, some of which may go against fiscal requirements of the state. Such goals should be accomplished using other, non-tax instruments (for example by introducing family benefits rather than pro-family tax preferences). With such different posi-

tions of the financial law doctrine – on one hand, and many politicians and a considerable part of the society – on the other hand, is it possible to introduce pro-family solutions into the tax system and do they make sense? What would such “pro-family” solutions consist in? It is difficult to provide a clear-cut answer to such questions. However, it should be noticed that the law – including the tax law – cannot be separated from the influences of broadly understood politics. This means that in reality we implement legal solutions without taking into consideration the position of ‘pure’ doctrine, isolated from politics. Such a situation may also concern legal tax solutions which would support stability of a family and improve its status, also as far as taxation of incomes is concerned.

Definition doubts: The development and implementation of pro-family changes to the Polish tax system is a daunting task. There are numerous reasons for these difficulties. The term ‘pro-family tax’ or ‘pro-family tax system’ raises many doubts. They concern both the legitimacy of the term as well as its content. ‘Pro-family orientation’ may be understood in two ways. Representatives of the doctrine and liberal politicians believe that ‘pro-family’ tax system is the one which stimulates various spheres of the economy, increasing employment, decreasing unemployment, lowering inflation rate or lowering tax rates for all taxpayers. It is hard to reject such a position. Generally – a better condition of the economy may and definitely does affect the improvement of material situation, including social situation, of many families. However, this is not the result of taking into account the family situation of a taxpayer in the tax system [Wołowiec 2008b, 7–10; Damaz and Gorąca–Paczuska 2018, 155–58].

A considerable part of the society, politicians and those representatives of the doctrine who base their opinions on the Catholic Church social science and who support the so-called social market economy claim that the pro-family tax system and especially personal income tax is the one which assumes different tax burden imposed on the same amount of income obtained by various taxpayers depending on their family situation, that is taking into account the number of people the taxpayer provides for. In fact those taxpayers – in spite of formally the same income – are not in the same situation, and taking into account their family situation is consistent with the principle of tax equity and equality understood not only formally.

The doctrine – as we have already mentioned – quite commonly accepts the view that taxes and the whole tax system should be neutral [Wołowiec, Soboń, and Rogozińska–Mitrut 2012; Soboń and Wołowiec 2011, 40–45]. Favoring tax neutrality cannot, however, automatically mean negative attitude to any pro-family solutions in the tax system. Even supporters of tax neutrality allow the existence of ‘pro-family’ tax solutions [Wołowiec and Suseł 2010, 763–64; Wołowiec and Duszyński 2010, 40–44; Wołowiec and Wolak 2009; Wołowiec 2008d, 329–52]. Such solutions may be the consequence of reflecting tax equity understood subjectively. Equity understood subjectively requires noticing different family situation of taxpayers.

Difficulties with constructing the pro-family tax system. Choosing the second concept of 'pro-family' tax does not eliminate many difficulties which appear when attempts at developing a pro-family tax system are made. The most significant difficulties are: 1) variety of taxes collected in Poland – potential 'pro-family' changes in one of them would have to be integrated in the whole tax system; 2) existence of various tax preferences for different groups of taxpayers; 3) financial capacities of the state – taxes collected in the country (such as government or local government taxes) have mostly fiscal objectives, that is to provide the state budget or the local government budget with money for their functioning and accomplishment of fundamental tasks the changes introduced in the tax system may considerably decrease the total sum obtained from taxes without decreasing the scope and size of public expenditure; 4) the condition that the possible changes will not limit the scope of economic activity that is already run nor hamper the process of investing in the economy (mostly in production, trade, agriculture or house-building industry) – such consequences of 'pro-family' changes in the tax system would in fact be 'anti-family', as they could bring about the growth of unemployment, economic recession and generally deterioration of the Polish families' conditions.

The above circumstances do not exclude the possibility of developing directions of changes to the Polish tax system that would support families, facilitated its functioning and improved its material situation. However, all changes require a thorough analysis of not only the current 'immediate' consequences, but also long-term ones (after a few years or a decade). It is necessary to conduct a simultaneous economic simulation of all potential changes. It would also be advisable to initiate more complex and varied research on the situation of Polish families. Such research should concern demographic, psychological, sociological and material issues, state of health and level of education, etc. Only this complex and reliable presentation of the problems of Polish families would allow us to develop an economically appropriate and fiscally coherent concept of changes to the Polish tax system, which would really have pro-family nature and which would strengthen Polish families while limiting negative or pathological phenomena.

5. PROFAMILY TAX SOLUTIONS IN LAW

Tax legal solutions which may influence the situation of the family can be divided into two groups. The first group comprises the formal elements that are not introduced with the benefit of the family in mind, but which are of great significance to it. Here we have: a) the way and scope of calculating costs of obtaining revenue; b) the issue of the minimum income that is not taxable (the so-called 'existence minimum'); c) the possibility of extending tax brackets (thresholds) when using the progressive scale; d) the problem of the level of tax rates.

The second group are legal solutions which may be introduced into the tax system intentionally in order to protect or promote families. An example of such

a solution is obviously the possibility of joint taxation of incomes obtained by family members, taking into account the number of people staying in the household or maintained by the taxpayer.

Legal solutions which may directly influence the family situation may – depending on the accepted concept – lead to increasing the minimum income that is non-taxable, lowering tax base, lowering tax rates or decreasing the calculated tax depending on the taxpayer's financial situation. In order to improve the situation of families in Poland changes in both groups of legal solutions are required. It is also necessary to simplify the construction of the current personal income tax.

5.1. Costs of obtaining revenue

The way and scope of calculating tax deductible expenses is of great significance for the taxpayer. As we know, personal income tax is an income-type of tax, which means that it is the income not the revenue that is taxed. To calculate the size of income gained by the taxpayer we should subtract costs of obtaining revenue from revenue itself. Only this difference – supposing its value is positive – is the taxpayer's income that is subject to taxation. In legal solutions of the Polish tax system only in case of running economic activities the real cost method is applied. It allows us to take into account the real costs incurred by the taxpayer. However, it requires keeping the tax register of revenues and expenses.

Using this method when obtaining other revenues – mostly remuneration from employment relationship or related contracts, as well as contracts of personal services and contracts to perform specified tasks – is practically impossible. We use then the so-called method of lump-sum costs, also known as the 'percentage' method. It means that a certain part – expressed in percentage – of obtained remuneration (which is revenue) is treated as costs of obtaining this revenue no matter whether such costs were incurred or not.

A narrow and very complicated system of calculating costs related to remuneration for work does not reflect the income nature of the tax. It does not reflect the costs related to preparation to perform activities, possible further education and professional development or expenses related to the nature of work, etc. Although a small part of incurred costs may be reflected within the so-called "training" relief, but both its size and the catalogue of exemptions do not cover the actual expenses in this area.

We can also imagine differentiation of costs determined as percentage, depending on the type of performed work, level of professionalism, necessity to cover the costs of further education, etc. This type of solution is much more complicated. It would require developing special tables for jobs and types of work that would qualify for particular percentage brackets.

The size of the costs that are taken into account should always be tied to the amount of obtained remuneration, not to the minimum or average remuneration in the economy (or in the so-called budget sphere). The share of costs of obtaining

revenue from remuneration should never be separated from the size of obtained remuneration for work, as it happens today. The adoption of percentage (lump-sum) form of taking into account costs of obtaining remuneration should not eliminate the possibility of deducting real costs when the taxpayer could prove that they incurred them in the higher amount than the one calculated on the basis of the percentage method.

5.2. Tax-free income

One of legal solutions undoubtedly influencing the legal and tax situation of families, though it would be hard to describe it as directly ‘pro-family’, is to provide taxpayers with a minimum amount of taxation-free income. It can be called the minimum of subsistence (existential minimum) [Marquesn and Neto 2017]. It stems from the necessity to reflect – albeit minimum – expenses related to biological (or even social) existence of a taxpayer. It is a starting condition determining the initiation of any professional activity by the taxpayer. The minimum is also necessary for taxation of the disabled pensioners, retired people and all the other individual taxpayers. The minimum of subsistence (existential minimum) is a determined part of income obtained by the taxpayer. This means that the revenue obtained by the taxpayer should be first decreased by the costs of obtaining revenue (for example revenues from business activity or remuneration) in order to determine the level of income. In some situations (for example disability pensions, retirement pensions) revenue equals income, as the taxpayer does not incur any costs related to obtaining the disability or retirement pension. Then we should take into account the amount of proposed minimum. The necessity to take into account the minimum income that is tax-free stems from the fact that in order to live and to be a taxpayer, an individual must cover the most indispensable living expenses, the so-called subsistence minimum costs. Reflecting such expenses may theoretically be performed in two ways: by exempting some minimum income of the taxpayer obtained in a particular year from taxation or, as a deduction from obtained revenue the minimum costs of taxpayer’s subsistence as costs of obtaining this revenue.

5.3. Tax scale

When using the progressive tax scale for taxation of personal incomes the legal and tax situation of families is greatly affected by the income brackets assigned to particular tax rates.

The current construction of income tax has two such ranges. Theoretically this solution should be considered a correct one. There are low and medium incomes (1st range) and high incomes (2nd range). It is the size of particular ranges that raises some objections. Even with relatively low remunerations – and almost always when a taxpayer takes up additional work – the obtained income (with present regulations almost the same as the remuneration) qualifies the taxpayer to the higher tax threshold. In most developed countries tax rates are quite high, but

next rates appear only when the taxpayer's income exceeds the average level many times. Particular ranges of progression should be significantly "extended." It seems that it would be possible to accept the construction based on multiples of average annual remuneration earned in the budget sector in a previous tax year. In this way, for example incomes up to three times the average annual income would be taxed with the lowest rate, incomes of four to six times such remuneration would be in the second bracket and only those that exceed the average annual remuneration more than six times would be taxed with the highest rate [Wołowiec 2006b, 165–70].

5.4. Direct pro-family construction

All the indicated elements in the construction of personal income tax and possible proposals for their changes undoubtedly, but indirectly influence the situation of Polish families. They affect tax burdens of all taxpayers, regardless of their family situation. However, other solutions are possible in income tax, they would be directly pro-family and they would take into account the number of household members maintained by the taxpayer (or living with them) when taxing the income.

Similar constructions – though in various versions – are used in many countries, also developed countries in Europe and outside [Wołowiec 2002, 75–87; Idem 2004c, 9–12; Idem 2004a, 23; Idem 2003c, 9–12]. Even if we assume the already discussed tax neutrality, such solutions are acceptable and justified as they take into account the equity of taxation understood subjectively. Since one taxpayer has family members to support and another is not burdened with such responsibilities, they are not in an identical tax situation. Therefore they could – and should – be treated differently. This obviously cannot mean introduction of any tax increases for single persons and for couples without children. It may, however, consist in – theoretically varied – possibilities of joint taxation of the taxpayer's income together with the income of the family members who live with them.

This could be joint taxation of the incomes of all family members who make up one household, accepting that the family is the subject of income tax. Another variation is taxation of the 'family head', as his/her incomes are supplemented with incomes obtained by other family members. It is also possible to construct joint taxation of spouses' incomes while preserving their individual character. In all the above solutions various deductions, exemptions, discounts or the so-called reliefs can be used, their size depending on the number of people in the family.

5.5. Joint taxation

A general rule says that the income (revenue) obtained by the taxpayer is subject to individual taxation [Gęsicki and Gęsicki 2004, 193–98]. Several exceptions to this rule cover: joint taxation of spouses, taxation of single people who raise children and taxation of the incomes obtained by minor children. The con-

cept of joint taxation of spouses has as many supporters as opponents. Those in favor emphasize that this is consistent with the nature and structure of marital relationships, as all decisions concerning the division and allocation of income are made jointly. The consequence of this state is joint taxation of taxpayers who are married, which better reflects tax capacity of spouses and manifests pro-family policy of the state [Wójtowicz and Smoleń 1999, 52–62; Wołowiec 2005, 43–46]. The main argument presented by supporters of individual taxation is that joint taxation leads to complications with tax collection. They also point out that this construction, when it does not reflect any form of quotient with the progressive tax scale, negatively influences the motivation to increase income by one spouse. Individual taxation does not create such barriers. It is conducive to income growth, improving the family's material situation [Majewicz 1992, 6–9; Nowak 1995, 325]. Joint taxation of spouses, being a special case of tax accumulation, is not a totally new element in the Polish tax system. Various forms of this accumulation appeared in the previous system, for example in the income tax or in the first version of surtax [Kostecki 1963, 31–43; Wołowiec 2003c, 242–44].

The current construction of personal income tax allows joint taxation of spouses who have been married for the whole year and who have had joint property as long as they submit a joint tax declaration. This is a form of family preference. Joint taxation allows to lower the tax on incomes which are in fact joint for the whole family. This construction, as we know, consists in summing the incomes obtained by both spouses, adding possible incomes of minor children and then dividing the sum into two. The tax is calculated from this half of incomes and then multiplied by two. It is beneficial for spouses to calculate their due tax in this way when one of them does not have any income or when their incomes differ significantly. Joint taxation allows to take into account double tax-free minimum and application of a lower tax rate. In case of joint taxation of spouses we encounter the phenomenon of accumulation of incomes from all sources, thus combining them for tax purposes. There are some exceptions to this principle, as stipulated by the Act, consisting in lump-sum taxation of some types of income. According to the principle of accumulation, the subject of taxation in a given tax year is a sum of incomes obtained from various sources after deducting losses. Spouses taxed separately may be taxed jointly if they express such wish. If they wish to be taxed jointly, they have to submit the joint annual tax declaration signed by both of them [Bick and Fuchs–Schündeln 2018, 5–7].

The application for joint taxation of incomes may be submitted by spouses who meet (jointly) the following requirements: they are subject to unlimited tax obligation in Poland; they have been married for the whole tax year; they have had joint marital property for the whole year; the regulations concerning line tax, lump sum tax or tonnage tax do not apply to them.

If the taxpayer decided to be jointly taxed with their late spouse – they lose the right to settle a given year as a single person bringing up children. If he/she does not make such a decision, in the year when their spouse died they can settle

their taxes as a single person bringing up children as long as they meet all the other requirements. Thus a widowed taxpayer with children has a choice – to be taxed jointly with late spouse or to be taxed as a single parent bringing up children. However, there are some circumstances in which spouses cannot be taxed jointly. This takes place in a situation when at least one of the spouses is referred to in the following regulations: Art. 30c of the Act on Personal Income Tax (allowing settling income tax on incomes obtained from non-agriculture economic activity according to the 19% tax rate, the so-called line tax), the Act on Lump-Sum Income Tax and the Act on Tonnage Tax.

This exemption does not concern individuals who pay lump-sum income tax on their revenues from letting or subletting, usufruct lease or sub-usufruct lease or other similar contracts, if these contracts are concluded within non-agricultural economic activity and if these taxpayers do not have their revenues from non-agricultural activity taxed on the basis of Art. 30c or in the Act on Lump-Sum Income Tax. The construction of joint taxation of spouses is beneficial for them when one of the spouses does not obtain any income or when spouses' incomes differ significantly. Joint taxation allows to apply a lower tax rate. Accumulation then allows to limit tax burden in families in which the incomes obtained by spouses differ a lot or when one spouse does not obtain any income. The intention of joint taxation supporters was to use this solution for social protection of the family. However, in many cases, it is the decline of spouses' joint property is needed to protect the family wealth. It happens, like in legal incapacitation, separate property of spouses may appear independently of the spouses will. In all these cases spouses, protecting their family by cancelling joint property, have to suffer the sanction consisting in losing the right to preference taxation. It should also be noted that in the current legal state, the construction of joint taxation is internally incoherent. The right to joint tax declaration is refused in case of spouses who, in order to protect their family cancelled spouses' joint property, but still remain part of one household, but the right is given to spouses who are actually in separation. This preference is even granted to those spouses for whom separation is a permanent state.

An analogous construction is currently used for taxation of incomes obtained by a single person who raises children. In both cases, joint taxation does not take into account the number of people maintained by the taxpayer. The tax is calculated in the same way for a couple without children and for a family with a few children as well as for a single person raising one or a few children. Single persons have to meet one additional requirement, that is their children cannot obtain incomes which are subject to income tax. This requirement must be considered as contradictory to the principle of tax equity, as in case of joint taxation of spouses, both a husband and a wife can obtain income that is subject to income taxation. A single person raising children is a parent or a legal guardian if this person is single or a widow, a widower, a divorcee or a person for whom the court adjudged separation. This can also be a person whose spouse was deprived of parental

rights or who is serving the imprisonment sentence. In case of a divorced person raising children, the right to this special form of taxation is determined by the legal title, which is a court decision on performing parental powers. The actual upbringing of the child is as important as being a single person. An identical way of taxation is applied to persons who are not residents and who raise children in the tax year on their own, if: a) their place of residence for tax purposes is in a different European Union member country or a country belonging to the European Economic Area or to the Swiss Confederacy and; b) obtained the revenue in the territory of the Republic of Poland which is subject to taxation and which constitutes at least 75% of total revenue obtained in a given tax year; c) and documented their place of residence for tax purposes with a certificate of residence.

The family quotient may be considered the most ‘pro-family’ tax construction. It may have a complicated and developed form (as in France). It could also be simplified, without, for example differentiating children’s ages. However, its introduction should be related to a detailed economic simulation, sociological and demographical studies. The family quotient should reflect both the family interest and prefer its particular model, as well as take into account financial possibilities of the state or budget requirements. The family quotient should be varied. It could, for example, look like this: each spouse would receive one family unit, the first child – 0.25 family units, the second child – 0.5 family units, the third child – one unit, the fourth child 0.5 units, the fifth child 0.25 units. It is also necessary to introduce an upper limit to the quotient – for example up to the fifth child. This does not mean that families with more children would not be able to obtain state support (for example additional allowances for families with many children or in an especially difficult situation, for incomplete families, for families with disabled members, suffering from serious illnesses, unemployment, etc.). In the tax system, however, we should not introduce constructions which would sanction having many children as a way of complete freedom from the burden of paying taxes.² When using the family quotient method, taxable income of all family members, both parents, minor children and adult children who are continuing studying until a certain age, would be summed up and then divided by the quotient indicator. The income calculated in this way would then be the basis for calculating due tax, taking into account the minimum income free from taxation and appropriate tax rate. This tax would then be multiplied by the family quotient indicator.

An alternative to the family quotient could be to take into account the taxpayer’s family situation by using exemption from taxation of precisely determined amounts for each child of the taxpayer, with attention paid to their age or health. Similar exemptions could be used with reference to the spouse who does not work and raises children, as well as to other people maintained by the taxpayer

² PricewaterhouseCoopers [henceforth cited as: PwC], *Family tax reliefs and benefits in the EU countries* 2016; PwC 2017; PwC 2018; PwC 2019.

(for example their siblings who still study). The introduction of such a construction would link the amount of the minimum income free from taxation to the taxpayer's family situation. Such pro-family tax construction would be possible also with the introduction of line tax. It would show some features that could be considered pro-family [Wołowiec 2010, 201–24]. A similar solution is to lower the taxation base by precisely defined amounts related to the fact that a taxpayer has to maintain family members. Such base decreases are in form of tax reliefs. Such reliefs, when used with progressive taxation, may not only lower the amount of calculated tax, but may also qualify the income for the lower range and thus for a lower tax rate. They can have various consequences depending on size of their income.

Similar consequences for all taxpayers could be caused by family discounts which would decrease due tax by the amount determined for each member of family. The deducted amount could be differentiated because of the number of children, their age and health [Wołowiec 2004c, 9–12]. Lowering the tax would mean equal treatment of all taxpayers regardless of the size of their incomes. This circumstance would be essential only when preserving the progressive system of personal income taxation. In case of line tax, tax equity and equality would not be greatly affected by the choice of pro-family solution in form of increased minimum income free from tax due to the taxpayer's health, lower tax base or lower tax itself.

The introduction of 'pro-family' legal and tax solutions, regardless of the final choice of one possible version, should be accompanied by elimination of various tax reliefs existing in the current structure of tax.

6. PRO-FAMILY TAX POLICY IN EU

The expectation is that tax relief associated with families (specific tax deductions and reliefs) should result in lower tax burdens. We focused on two of the most common forms of family tax relief, being a joint tax return and child relief. From the table, it appears that most countries (to include flat tax rate countries) do have some form of family tax support. We should remember that in some countries (for instance in the Netherlands, Portugal, France, Luxembourg) joint tax returns may be filed by couples not officially married but just registered in a court (the forms of registration differ from country to country) or living together at the same place for a specified period of time. Moreover, in France the tax benefits may be claimable by couples of the same sex.³ The average amount of EU state aid in respect to allowances for children and family benefits is approximately EUR 2,383 per year (for Poland the amount is PLN 8,225). When compared with the average salary, this amount translates into the 4th rank among 28 EU states –

³ PwC 2009, 14.

the same status as in the previous year.⁴ Experts stress the fact that a positive and lasting trend is achieved by those states which in addition to financial aid have also implemented systemic solutions. For the purposes of the PwC report⁵ the company has performed a simulation model in order to assess the aid which can be expected in 2017 by an average family consisting of two working parents earning an average salary with two healthy children aged 4 and 8. The data gathered in the report suggest that the average amount of direct aid from EU states for children and family allowances and benefits is currently approximately EUR 2,383 per year. Top states in the ranking are Luxembourg (EUR 7,538) and France (EUR 6,786). In Poland, financial aid for families amounts to approximately EUR 1,926 (PLN 8,225), which places Poland in the middle of the ranking. However, when the amount of support is compared with the average salary in the given country, Poland ranks fourth (after France, Hungary and Austria).⁶

In most EU states, a relationship between family support tax incentives and tax reliefs and a high fertility rate has been observed. One example is France with the highest level of family support in the EU coupled with the highest birth rate. But there are exceptions, such as Germany, where high financial support for families has not so far influenced the birth rate. As a result of the introduction of the 500+ Programme in 2016, Poland has joined the top states providing the highest financial support in relation to the average salary in the state. In Sweden, a consistent family support policy has been in place for many years, enabling the reconciliation of professional career growth along with family life. One key aspect thereof is equality, both in the professional and private sphere. Such an approach contributes to the greater professional activation of women and greater involvement of men in family life. Sweden introduced a bonus for not wasting time – if the next child is born within 30 months from the birth of the previous child, the parental leave may be extended by as much as a year. Latvia, which boasts the highest birth rate growth within the last few years, attained its good results by, among other things, broadening the group of people entitled to receive these benefits and unification of the rules for awarding benefits. Implementation of the national programme for treating infertility has also been played a vital role.

The PwC report suggests⁷ that an important role in the successful implementation of the family support policy is played by employers. According to data gathered in the report, 30% of Polish women give up having children due fear of a facing a potential conflict between home–work responsibilities. Poland is among the last countries to implement flexible employment forms. The number of hours spent by women at the workplace is growing systematically. This is reflected in the time spent by children at early education and care facilities – the Polish result is among the highest in Europe: by 13 hours more than the EU average for chil-

⁴ PwC 2017; PwC 2018.

⁵ PwC 2017.

⁶ PwC 2016; PwC 2017; PwC 2018.

⁷ PwC 2015; PwC 2016.

dren up to 3 years old and by 6 hours more than the EU average for children above 3 years old. As part of family support policy, employers can support their employees taking care of children by offering adjusted programmes in four main areas, i.e. flexible working time (e.g. ability to work part-time, from home, additional paid maternity leave, and work-share options), appropriate infrastructure (e.g. mother and child rooms, rooms where a mother with a child can rest), financial and material aid (e.g. maternity grants, one-time support after childbirth for buying carriages, participation in the costs of pregnancy and childbirth, medical packages) as well as information-training aid (e.g. trainings to facilitate company re-integration after maternity/parental leave).⁸

CONCLUSION

Taking into account the personal nature of income tax and postulates concerning payment capacity and equity, many constructions of income tax implemented in European Union countries reflect (in various ways and forms) the taxpayer's family status. No legal scheme shaping the issue of taxing family incomes has been developed yet. Particular countries separately determine rules and principles of taxing income generated by families [Bolkowiak and Majewicz 1996, 114–26]. Among legal solutions that may affect the family situation we can differentiate two groups used in EU countries tax systems. The first contains constructions which are not introduced into income tax for the benefit of a family, but which are essential to it, that is the ones which indirectly reflect this benefit. These are: tax-free amount; joint settlement of taxes by spouses (marital quotient); the scope of costs of obtaining revenue; possibility of extending tax ranges; the height of tax rates.

The second group concerns those which can be introduced to the tax system deliberately in order to protect or promote the family. These are: joint taxation of the incomes obtained by children and parents; pro-family tax reliefs; the concept of a family quotient.

One of legal solutions significantly influencing legal and tax situation of a family is the minimum income free from tax, which would be difficult to classify as directly of pro-family type. It is treated as subsistence minimum, taking into account the costs of biological or even social existence of a taxpayer. This takes the form of either exempting a certain amount of income from taxation or including it into costs of obtaining revenue. In both forms, an attempt is made to relate the minimum to the indicator of basic consumer goods prices growth and the inflation indicator.

We can observe significant differences among the European Union countries as far as the amount of tax-free income and its relation to the average monthly earnings are concerned. This can be attributed to the fact that the amount of tax-

⁸ PwC 2016.

free income is an outcome of political compromise, reflecting diverse cultural, social and civilization factors as well as independent policies of welfare benefits within the European Union [Kulicki 2005, 66–89]. The concept of accumulating incomes for tax purposes appeared in tax legislature as early as in the 19th century and was related to the model of a large family, typical for that time [Weralski 1959, 61–71; Szpunar 1963, 52–53]. The tax was paid by the whole household community, as it was collected from the so-called household. In time, as a result of disintegration of large families, the place of tax accumulation was being taken over by a system of joint taxation of spouses or incomes of related people. The condition of living together was usually omitted, as priority was given to wealth relationships between family members. Thus the European legislations narrowed down the scope of taxation to a small family and singled out two separate constructions from a household: joint taxation of spouses and joint taxation of parents and children.

A general principle is individual taxation of income (revenue) generated by the taxpayer. There are some exceptions to this rule: joint taxation of spouses, taxation of single persons raising children and taxation of incomes obtained by minor children. The concept of joint taxation of spouses has as many supporters as opponents. The former emphasize that it is consistent with the nature and structure of marital relations, as all decisions concerning division and allocation of income are taken jointly in marriage. The consequence of this situation is joint taxation of spouses, which better reflects tax capacity of spouses and is a manifest of state's pro-family policy [Wołowiec 2004b, 193–201]. The main argument of supporters of individual taxation is that it leads to complications in tax collection. They also point out that this construction, when it does not take into account any form of quotient in case of a progressive tax scale, negatively affects motivation to increase income of one spouse. Individual taxation does not create such barriers. It is conducive to income growth and improves the financial situation of a family.

Key elements of financial support for families with children in tax systems and in respect of family benefits in European Union countries and selected countries outside the EU. Analysis of tax laws acts in EU countries allows to state that most EU countries earmark substantial funds for family support policies, the funds themselves do not guarantee success, what counts is the efficiency of their use and countries with systemic solutions are the most successful. The average amount of direct EU state aid in respect of allowances for children and family benefits is EUR 2,246 (PLN 9,806) per year, but in reality as many as 18 EU states (over 60%) do not achieve this amount.⁹

⁹ PwC 2016.

State support (in EUR) – child allowances and family benefits (average level for 2016–2019)

Countries	Annual state support	Total state support with reference to the average remuneration of spouses/partners (in %)	Fertility rates in the EU
Luxemburg	7300	8,2%	1.6
France	6700	13,3%	2.1
Germany	4900	5,9%	1.43
Austria	4800	8,7%	1.48
Belgium	4300	5,5%	1.7
Denmark	3700	2,6%	1.7
Ireland	3600	5,2%	2.0
Sweden	3000	3,1%	1.9
Finland	2700	2,8%	1.7
United Kingdom	2500	3,1%	1.8
UE – average	2250 euro		1.55
Slovenia	2200	12,5%	1.6
Hungary	2150	9,6%	1.36
Poland	1900	2,4%	1.29
Portugal	1700	6,3%	1.25
Estonia	1680	8,1%	1.5
Italy	1550	2,3%	1.41
Croatia	1500	5,8%	1.43
Latvia	1400	6,7%	1.5
Czech	1100	6,3%	1.42
Slovakia	1050	5,7%	1.34
The Netherlands	1000	1,2%	1.68
Spain	900	2,0%	1.28
Malta	800	2,5%	1.38
Cyprus	700	1,3%	1.32
Romania	500	0,2%	1.41
Lithuania	400	0,9%	1,62
Greece	240	0,5%	1.3
Bulgaria	0	0,1%	1.43

Source: own elaboration based on the PwC and Taxation Trend in EU reports (years 2016–2019)

In most EU countries, the relationship between family support tax incentives and reliefs, and the fertility ratio is noticeable. However, there are exceptions where there is no straightforward relationship. For instance in France the tax incentives and reliefs lead to a high fertility rate, whereas in Germany this rate is

one of the lowest in the EU. In Lithuania, where the amount of direct state aid in respect of benefits and family tax reliefs is one of the lowest, the fertility rate is higher than the average for the EU. Examples of family support tools: allowance for children, allowance for handicapped children, expense deduction, deduction for alimony, family quotient and preferential tax settlements with spouse (child). In case of family allowances and benefits we can replace such instruments like: family benefit, benefit for children who continue education, one-off childbirth benefit and benefit to cover costs of raising children or social benefits [Arnold, Hugh, and Cooper 2020].¹⁰

Benefit for children—deduction from tax and income in selected EU countries

Countries	Deduction from tax (DfT) and dedycton from income (DfI)
Germany	From EUR 7,008 per child to EUR 35,040 per five children (DfI)
Italy	EUR 950 per child (EUR 1,200, if under 3 years) (DfT)
Slovenia	From EUR 2,437 per child to EUR 23,650 per five children (DfI)
Czech	From EUR 494 to EUR 627 Czech per child (DfT)
Spain	From EUR 2,400 per child to EUR 18,100 per five children (DfI)
Portugal	EUR 325 per child (EUR 450, when less than 3) (DfT)
Croatia	From EUR 2,052 per child to EUR 17,264 per five children (DfI)
Poland	From EUR 265 to EUR 643 per child (DfT)
Belgium	From EUR 1,510 per child to EUR 15,570 per five children (DfT)
Netherlands	EUR 1,033 for children (DfI)

Source: own elaboration based on the PwC and Taxation Trend in EU reports (years 2016–2019)

The amount deductible from income does not fully constitute savings for the family, as in case of deduction from tax. Deduction from income only decreases the tax base by the amount of the deduction to which the family is entitled.

¹⁰ Ibid.

Childbirths by sequence of birth in the family in selected EU countries

	First child	Second child	Third child	Fourth and each consecutive
European Union	47.1%	35.5%	11.8%	5.6%
Ireland	37.9%	35.4%	17.6%	9.0%
United Kingdom	39.2%	35.7%	15.7%	9.5%
France	42.3%	35.6%	15.0%	7.0%
Sweden	43.4%	37.4%	13.6%	5.6%
Germany	49.4%	34.4%	11.2%	5.0%
Poland	48.6%	36.4%	10.4%	4.6%

Source: own elaboration based on the PwC and Taxation Trend in EU reports (years 2016–2019)

The incentives and reliefs granted are also related to the percentage of births of children in multi-child families. Families in countries conducting effective family support policy much more frequently decide to have more than one or two children. A wide range of tax instruments is available to account for marriage and the presence of children. These instruments are used in varying combinations and to varying extents across the European Union. We have attempted to generalize the different systems into four groups on the basis of the types of combinations of tax instruments that are used. However, the categorization is quite loose (and could be debated), indicating the lack of clear direction or consensus within groups of similar countries or across EU countries as a whole. The development of national tax systems can be seen as the result of a series of historical accidents and compromises as much as the product of a principled design. This also applies to the division of instruments for family redistribution between those instruments which work through the income tax system and those channelled through the system of cash or in-kind benefits. The availability of a choice of treatment within the tax system – of the transferability of allowances, of opting between independent and joint taxation, or of claiming a concession as a tax credit or as a cash benefit – can be seen as a reflection of uncertainties about the nature of horizontal equity. Leaving the choice to families themselves means that the tax system can be viewed as being less prescriptive about behaviour. At the same time, offering a choice also increases the potential for inequitable treatment within and among families and higher compliance and administrative costs. The wide variation in actual practices, combined with the general ambiguity surrounding the issue of neutrality in the tax system, makes the task of drawing clear lessons from the tax systems of Western Europe difficult for countries in the process of designing new systems. Although there is no set of blueprints for the design of a child- or parent-friendly income tax system, there are a number of guidelines that can be drawn

out from our analysis [O'Donoghue and Sutherland 1998, 4–6; Sattinger 2018, 93–98].

The incomes of families can be enhanced through the income tax system by direct mechanisms (such as tax allowances) or by indirect means (such as tax reliefs for the expenditures common among families with children). It is the combined effects of all instruments that determines the relative tax burdens of families in different circumstances.

The impact of income tax systems should be judged in combination with the other parts of the tax-benefit system, as well as in isolation. Indeed, highly redistributive systems can include “large” income tax systems, with few family concessions, financing an extensive range of family benefits and services. Conversely, “small” income tax systems, with proportionately large concessions to families, may be seen, in isolation, as making a large contribution to horizontal equity, while, when considered in combination with other parts of the system that make minimal family concessions (such as indirect tax or social insurance contributions), they may achieve only a modest amount of redistribution.

Conclusions about the vertical effects of the alternative policies we consider are highly dependent on the underlying conditions of the EU population and the nature of the tax schedule and tax base. The location of children in the all-family distribution, the prevalence of two-earner couples among families with children and the fact that around 20–30 percent of families with children have incomes too low to be taxed, combined with the relatively unprogressive nature of the remainder of the tax schedule, are all important influences on our simulation results.

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PRORODZINNE REGULACJE PODATKOWE W PRAWIE (WYBRANE ZAGADNIENIA)

Streszczenie. Polityka prorodzinna to polityka mająca na celu dobro rodziny i społeczeństwa. Polityka prorodzinna polega na próbie tworzenia przez państwo (samorząd terytorialny itp.) rodzinom odpowiednich warunków ekonomicznych. Obejmuje stosowanie ulg podatkowych, płacowych dodatków i zasiłków dla osób utrzymujących rodziny i dzieci, stosowanie preferencji kredytowych dla młodych małżeństw, zapewnianie mniej zamożnym rodzinom mieszkań w budownictwie publicznym, zapewnienie bezpłatnej opieki zdrowotnej dla matek i dzieci, preferencje w uzyskaniu pracy oraz jej ochronę dla pracujących matek itp.

Słowa kluczowe: ulgi, zwolnienia podatkowe, polityka prorodzinna, opodatkowanie

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