

A Global View of Maternity Support

Shared Responsibility: International Lessons in Supporting Mothers



EXECUTIVE SUMMARY

This report provides a comparative analysis of maternity benefit financing models across 82 countries, based on publicly available, verifiable data. It examines how different nations fund paid maternity leave through government budgets, employer contributions, employee premiums, or a combination of these, offering insights into the global distribution of responsibility for maternity support.

India's maternity benefit framework is assessed in relation to international practices, with a targeted review of policies from five countries that demonstrate innovative approaches to supporting women's continued workforce participation after childbirth.

The analysis highlights key trends in maternity benefit funding and the availability of paternity and parental leave, offering actionable insights for strengthening support systems for working parents.

Key Observations



Social Security

44% of countries (36 out of 82) fund paid maternity leave through social contributions shared by employers and employees



Public Support

16% of countries (13 countries) provide government-funded maternity benefits, signaling a shift toward universal access and reduced employer liability



Employer Funded

15% of countries (12 countries), including India, still require employers to fully finance maternity benefits—a model increasingly seen as unsustainable

Mixed Funding

Mixed funding models employer-government/ employer-employeegovernment, and employee-government are also prevalent; a shift towards shared duty



Paternity Leave

72% of the countries (59 countries) provide at least one-day-paid paternity leave; a shift towards more inclusive leave policies that recognize the role of fathers in early childcare



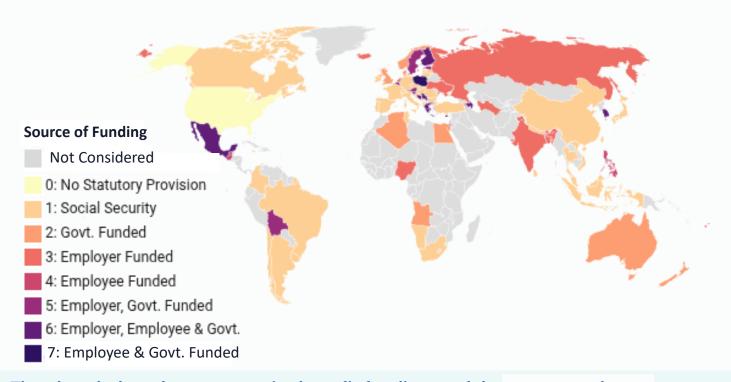
Parental Leave

33% of the countries (27 countries) provide paid parental leaves enabling greater flexibility for families and supporting longer-term engagement of both parents in caregiving

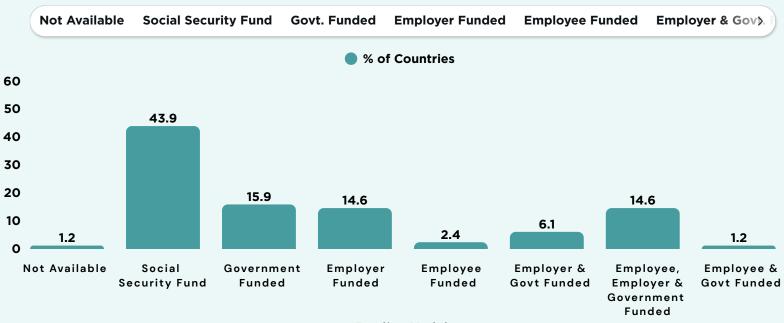
WORLD OVERVIEW

FUNDING MECHANISM

Benefits and Leaves across 82 countries



The chart below shows maternity benefit funding models represented as a percentage of the 82 countries



Funding Models

The next section reviews five countries chosen for their geographic diversity and exemplary practices. It examines their maternity benefit structures, funding mechanisms, additional support during the maternity period, and provisions for parental and paternity leave.



BRAZIL



Policy Evolution

Labor Code

Federal Constitution guarantees 120 days of paid maternity leave and job protection from conception to five months post-birth

2012 •

Supreme Court mandates maternity leave for mothers of preterm or ill newborns to start aft hospital discharge, ensuring extended care and bonding

Compony Citizen Programme enabling private employers to 180 days and paternity leave to 20 days with tax incentives

extend maternity leave to

2022

~1998

Maternity Related Benefits

Comprehensive **Maternity** Leave **Benefits:**

- Maternity leave: Covers 100% of earnings. Private sector offers months (extendable to 6-8 months under Company-Citizen Programme).
- Public sector: 6 months federally; extensions state/municipal vary by approval.

Universal Coverage:

• Available to all women: formal, temporary, or self-employed, regardless of work card status.

Support and Flexibility:

 Labour Law grants two 30-minute breastfeeding breaks daily until the child is 6 months old.

Additional Benefits

• Paternity leave: 5 days in private sector (extendable to 20 under CCP), 20 days for federal employees; fully employer-funded, covering 100% of earnings, taxes, and social contributions. No statutory parental leave entitlement (Refer Annexure 1 for definitions)

Funding Mechanism

- Employers pay the benefit upfront and deduct it from their social security (INSS) contributions, which are funded by both employers and employees
- The government pays any deficit, if any

Compulsory social insurance contribution



Employers contribute 20% of the salary bill (8% for domestic employees)



Employees contribute on a sliding scale based on their salary

Voluntary social insurance contribution



For self-employed workers and business owners, leave is funded entirely by their own contributions.



ESTONIA



Policy Evolution

Labor Code Provided 140 days of maternity benefits linked to ∘Pre- 2004 employment status, with limited parental 18 months of paid support and no parental leave flexibility (capped at 3x national average 2004 • wage) and 10 days of paternity leave Extended paternal leave to 30 days and introduced 2020 provisions for multiple births and Benefits reduced triplets from 140 to 100 days, 2023 provisions for shared leave were set with flexible use by both

Maternity Related Benefits

Comprehensive Maternity Leave & Benefits:

- 100 days fully paid at 100% of average earnings
- Up to 70 days of leave can be taken before childbirth, with the remaining 30 days after

Universal Coverage:

 Applies to all employed mothers, including temporary contracts over 1 month, regardless of service length or citizenship

Work Restrictions for Pregnant & Nursing Women:

- No night shifts in final 8 weeks of pregnancy
- Mothers of children under 1.5 years get 30-min paid breastfeeding breaks every 3 hours

Additional Benefits

- Paternity Leave: 30 days, usable from 30 days pre-birth until child turns 3; promotes shared parenting and flexibility.
- Post-Maternity Family Entitlement: 475 days paid leave at 100% of earnings. Monthly Support of €725 for non-working parents and €820 for working parents

Funding Mechanism

- Maternity, paternity, and parental benefits funded through the Social Insurance Fund (replacing Health Insurance Fund), with contributions from employers, employees, and the state.
- Self-employed receive benefits based on their tax contributions; unemployed are funded by the state

Compulsory social insurance contribution



parents

Employers contribute 33% of gross salary: 20% to pension (INSS), 13% to health and social benefits.



Employees don't pay directly; Pillar II pension members contribute 2%; 4% added by the state from the social tax



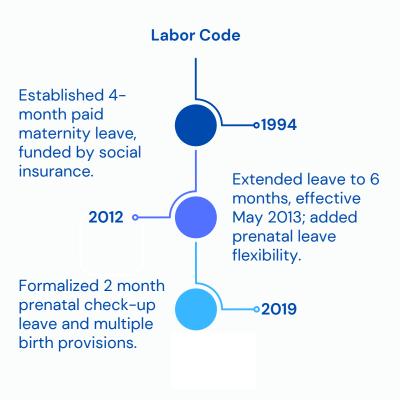
State-funded through employer social tax and general budget; since April 2022, universal maternity, paternity, and parental benefits replaced earlier schemes and are fully governmentfinanced



VIETNAM



Policy Evolution



Maternity Related Benefits

Comprehensive Maternity Leave & Benefits:

- 6 months fully paid leave at 100% salary; extended for multiple births
- Paid recovery leave (5–10 days); no social insurance contribution during leave

Strong Employment Protection:

- Guaranteed reinstatement to same/equivalent role post-maternity
- Legal protection from dismissal due to maternity/pregnancy
- Contract renewal priority for pregnant/nursing women

Work Restrictions for Pregnant & Nursing Women:

- No night shifts or strenuous jobs during pregnancy/nursing
- 60 mins/day childcare break; 30 mins/day menstrual leave (both paid)

Additional Benefits

- Health insurance coverage during maternity
- Paternity Benefits: 5-14 days leave + \$128 per child
- Mothers: Lump-sum childbirth/adoption allowance = 2 months of minimum salary

Funding Mechanism

- Maternity and paternity leaves are funded through compulsory social insurance, with contributions from both employers and employees.
- Self-employed individuals can access similar coverage through voluntary social insurance.

Compulsory social insurance contribution



Employers contribute 17.5% of the employee's salary towards insurance, including maternity and parental benefits.



Employee's contribution is 8%

Voluntary social insurance contribution



Self-employed individuals can opt for voluntary social insurance by contributing 22% of their income to access the same benefits.



SINGAPORE



Policy Evolution

Labor Code

Employment Act entailing 8 weeks of paid maternity leave for employees with 180+ days of service, fully funded by employers

Child Development Co-Savings Act introduced 16 weeks of Government-Paid Maternity Leave, including for mothers on short-term contracts

2013

~1968

Shared Parental Leave allowing mothers to share 4 weeks of GPML with legally married fathers

Shared Parental
Leave extended to 6
weeks (10 weeks from 2026), including gig and short-term contract workers

Maternity Related Benefits

Comprehensive Maternity Leave & Benefits:

- 16 weeks of leave: 8 weeks pre-birth, 8 weeks post- birth of the child.
- The leave has to be availed in a continuous block within the 12 months from the date of child birth

Strong Employment Protection:

- Parent must be employed or selfemployed for at least 3 continuous months before birth; child must be a Singapore citizen at birth or within 12 months
- Employees with 3+ months of service are protected from retrenchment or dismissal without valid cause during pregnancy.

Work Restrictions for Pregnant & Nursing Women:

 Female employees may work at night only with their and medical consent.

Additional Benefits

- Four weeks of paid paternal leave, up to \$2,500/week or \$10,000 total, must be taken continuously within 12 months of birth
- From April 1, 2025, parents can share 6 weeks of leave, increasing to 10 weeks from April 1, 2026. Employers pay upfront and claim reimbursement, capped at \$2,500/week per parent.

Funding Mechanism

- Maternity leave is co-funded by the employer and government for the first two children, and fully funded by the government from the third child onwards
- Self-employed women must be actively engaged for at least 3 continuous months before the child's birth to receive maternity benefits

Contributions for Maternity Benefits



Employers contribute to the maternity benefit for the first 8 weeks paid at full gross rate pay in vase of first and second child



For the first and second child, the government funds the last 8 weeks of maternity leave, capped at \$20,000 per child. For the third and subsequent children, it fully funds all 16 weeks, capped at \$40,000 per child

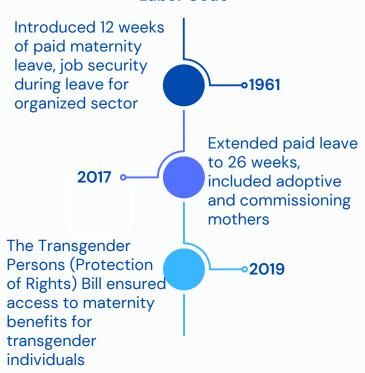


COUNTRY REVIEW INDIA



Policy Evolution

Labor Code



Maternity Related Benefits

Comprehensive Maternity Leave & Benefits:

- 100% of average daily wages for up to 26 weeks (for up to 2 children)
- 8 weeks could be availed pre-birth, 18 weeks post-birth
- For more than 2 children, benefits are provided for 12 weeks leave

Strong Employment Protection:

 No dismissal due to pregnancy and guaranteed reinstatement to original or equivalent role with same pay, benefits, and seniority

Support and Flexibility:

- Creche facilities (for establishments with 50+ employees)
- Two 15-minute nursing breaks daily until the child is 15 months old
- Work-from-home available by mutual agreement (not mandated)

Additional Benefits

- Government employees get 15 days paid paternity leave, to be used within 6 months.
- No paternity leave provision in the private sector.
- No shared parental leave available.

Various Funding Mechanisms

Maternity Benefit Act

- Employers pay full wages during maternity leave, based on average daily wage from the prior 3 months. Applies to formal sector female employees.
- Employers also cover benefits like medical bonuses

FCU

ESIC

- Applies to women in establishments with 10+ employees earning ≤ ₹21,000/month.
- Funded by employee

 (0.75%) and employer
 (3.25%) contributions, plus government subsidies.

Pradhan Mantri Matru Vandana Yojana

- Eligible for women over 19 from BPL families, excluding regular government employees.
- ₹5,000 in 3 installments for first child; fully funded by Ministry of Women & Child Development.



ANNEXURE 1

DEFINITIONS

Maternity Leave

Employment-protected leave of absence for employed women directly around the time of childbirth (or, in some countries, adoption). The ILO convention on maternity leave stipulates the period of leave should be at least 14 weeks.

Paternity Leave

Employment-protected leave of absence for employed fathers at or in the first few months after childbirth. Paternity leave is not stipulated by international convention. In general, periods of paternity leave are much shorter than periods of maternity leave.

Parental Leave

Employment-protected leave of absence for employed parents, which is often supplementary to specific maternity and paternity leave period and usually follows the period of maternity leave.



ANNEXURE 2

LIST OF COUNTRIES

- Albania
- Algeria
- Andorra
- Angola
- Antigua and Barbuda
- Arab Republic of Egypt
- Argentina
- Armenia
- Australia
- Austria
- Azerbaijan
- Bahrain
- Bangladesh
- Barbados
- Belgium
- Bhutan
- Bolivia
- Bosnia and Herzegovina
- Brazil
- Bulgaria
- Cañada
- Chile
- China
- Colombia
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Fiji
- Finland
- France
- Germany
- Greece
- Grenada
- Guatemala
- Hungary
- Iceland
- India
- Indonesia
- Ireland

- Israel
- Italy
- Jamaica
- Japan
- Latvia
- Lithuania
- Luxembourg
- Malaysia
- Malta
- Mexico
- Namibia
- Nepal
- Netherlands
- New Zealand
- Nigeria
- Norway
- Philippines
- Poland
- PortugalRepublic of Korea
- Romania
- Russian Federation
- Serbia
- SingaporeSlovak Republic
- Slovenia
- South Africa
- Spain
- Sri Lanka
- Sweden
- Switzerland
- Taiwan
- Thailand
- Tunisia
- Turkey
- Turkmenistan
- Ukraine
- United Kingdom
- United States of America
- Uruguay
- Vietnam



REFERENCES

- 1. Country Reports, International Network on Leaves and Policies Research
- 2. Country Profiles, The International Social Security Association (ISSA)
- 3. The Laws of Fiji
- 4. The Bangladesh Labour Act, 2006
- 5. Social Security
- 6. Namibia, Social Protection Spotlight, International Labour Organization
- 7. Employee Benefits, Remote People
- 8. Countries, Rivermate
- 9. Payroll & HR Services
- 10. Tax Summaries, PWC
 - 11. Maternity and Paternity at Work, International Labour Organization
- 12. Length of Paid Leaves, Gender Data Portal, World Bank
- 13. Services Australia
- 14. Leave Entitlements, Australia
- 15. Maternity Leave by Country, World Population Review
- 16. <u>Maternity at work: A review of national legislation. Second edition, 2010, International Labour Organization</u>
- 17. <u>Parental Leave Systems, OECD Database</u>



