

## A COMPARATIVE ANALYSIS ON MATERNITY BENEFITS IN INDIA WITH OTHER COUNTRIES.

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### ABSTRACT

This paper mainly focuses on the maternity benefits available in India and other countries. These days one-third of women are working during their pregnancy time and they are facing some issues to make them overcome from health-related issues. Governments of different countries have implemented maternity benefits schemes all over the world. This is applicable for both public and private sectors with some exceptions. I.e. a woman is eligible only when she is working as an employee in an establishment for a period of minimum 80 days within the past 12 months and the payment during her maternity leave is based on her daily wage and actual absence. But the government provisions of benefits act will be the same for both public and private sectors for women employees on maternity benefits. The maternity benefits schemes are actually helping to protect both the mother and her child's life in a healthy way and helps for her maintenance such as leaves; wages, bonuses. She can work from home and can also be extended if needed. It is a mutual agreement between the employer and the employee. This will help her to take care of her baby during pregnancy and after pregnancy. Hence this study is an attempt to know in detail how the maternity benefit schemes provide facilities for a woman and how it differs from other countries.

**Keywords:** Maternity benefits, working women, maternity schemes.

### Introduction:

Every woman who is working is entitled to claim maternity benefits. Maternity benefits are the benefits that a woman is liable to get at her pregnancy periods such as leave with payment (at the rate of the average daily wages for the period of her actual absence) and bonus. "Maternity benefits schemes in India and abroad" is an important topic to know about employee equality in work and also social responsibility to care for pregnant women and her baby. The aim of this maternity scheme is to give positive outcomes for working women before and after pregnancy and benefits then can get at their maternity time. It is a basic right for women employees to know Indian law and maternity benefits which are established by the government also employers are responsible to inform women through written statements about the benefits available and the eligibility to claim that helps her to use the benefits with struggles.

### Review of Literature:

- Kusuma Naik.M.V, Vedavathy Nayak, Renuka Ramaiah, praneetha (2017) "Pregnancy outcome in Working women with work place stress" deals with pregnancy outcomes and risk factors faced by women at the time of pregnancy due to increase in working women and their continuity towards work during pregnancy period. This paper depicts the result of risk factors for women's health during pregnancy like anemia, postpartum psychosis, reduced plasma volume, diversion of

blood flow away from the placental bed and Hormonal imbalance. It categories physical activity which women should take at pregnancy to reduce the stress level and get away from those risk factors.

- Anita Nath, Shubhashree Venkatesh, Sheeba Balan, Chandra S Metgud, Murali Krishna and Gudlavalleti Venkata Satyanarayana Murthy. (2019)“ The prevalence and determinants of pregnancy-rated anxiety amongst pregnant women at less than 24 week of pregnancy”, a paper deals with the psychological changes and anxiety of pregnant women living in low income counties and high cost of living countries. It explains how common the anxiety and depression during pregnancy.
- ShashiBala (2012),” Implementation of Maternity Benefit Act 1961”, V.V. Giri National Labour Institute, NOIDA. This paper deals with the implementation of maternity benefits and benefits, measures which is made for her in Post-Constitution to protect her and her child because she requires it.
- Dr. Rajeshri Randive Admane.(2020), “A Study on Effectiveness and Impact of Maternity Benefit (Amendment) Act, 2017 on Employment in Unorganized Sector with Reference To Construction Company (West Nagpur, Maharashtra, India)”, this articles aids to understand effectiveness of maternity benefits and also it creates an awareness among working women to know their rights. It helps them to understand social security and protections available for them.

**Objectives of the study:**

- To gain knowledge of Maternity benefit schemes.
- To know how it differs from various countries.

**Research Methodology:**

Research is a study of new facts and contribution of Existing facts. It is a process of Analyzing Available data and modify certain result based on the analysis.

Research methodology is a systematical study of Identifying problem, selecting method of collecting data, Process of the research, Analyze the data and identifying reliable result.

This paper has got Source from Secondary data.

Available secondary data on maternity benefit schemes have been read and observed by the researcher. Sources used for doing this research paper are articles in websites, research papers and journals which give knowledge on Maternity benefit schemes in India and other countries.

**Maternity benefits (Amendment) Act, 2017 in India:**

Maternity benefit act implemented to protect and help female employees at the time of pregnancy by giving them maternity benefits such as being paid in her absence of pregnancy and bonus but it is only applicable for the establishment which has 10 and more employees.

This below-stated establishment comes under the act:

- Factories
- Mines
- Plantations
- Government establishments
- Shops
- Establishments under the relevant applicable legislation

- Establishment notified by the central government

As per the maternity benefit act, a woman who has been working as an employee in the above-mentioned sectors at least 80 days within the past 12 months. They will be paid a salary on their daily wage average base and actual absence. This act became enforced by law since April 1<sup>st</sup>, 2017. Some specified benefits of this act are

#### **Maternity leave for women and child:**

The government has increased the duration of leave availability for pregnant women from 12 weeks to 26 weeks; the leave can be taken as a split basis, 8 weeks before delivery and balance after delivery. The leave taken after delivery is to take care of the child. If the delivery leaves taking for the third baby, there are only 12 weeks of leave is allowed to take, the leave has been split into 6 weeks before delivery and 6 weeks after delivery.

The mother of an adoptive child is also eligible to get 12 weeks of leave if the baby is below 3 months and the woman who is using her egg to create an embryo planted in another woman, being the biological mother, she can get 12 weeks of leave.

#### **Work from Home:**

Women who are unhealthy after pregnancy are given an option to work from home. Depends on the nature of work and comfort, women can be allowed to do their work at home when they could not extend the leave. It actually happens according to the mutual agreement of employers and employees.

#### **Child care-nursery:**

This act is for allowing women to visit the nursery to take of her child during intervals. Women working in an establishment can be allowed to visit her child four times a day including intervals.

#### **Maternity benefits in Singapore:**

In Singapore, a working woman who is claiming maternity benefits from employer and government should fulfill the following eligibility criteria:

- If the child is a citizen of Singapore, the employed mother should have been continually worked at least 3 months before pregnancy or self-employed for the past 3 months of her child's birth.
- She should be a legally married woman to the child's father.
- The employer should have been given notice regarding maternity level before 1 week by the employee.

Under these categories, working women are eligible to get 16 weeks of paid maternity leave. For the first 8 weeks of leave, the salary is paid by the employer. The government will reimburse the payment to the employer for the next 8 weeks of leave after paying it to the employee. If the baby is not a Singapore citizen, only 12 weeks of leave is allowed to take. In this category, for the first 8 weeks of leave, the actual salary will be paid. The second 4 weeks of leave will be given as unpaid leave and it depends on the contract which is signed by the employer and employee. This is applicable for the first and second child, third onwards employer has no contribution to it and the paid salary during the 12 weeks will be reimbursed from the government by the employer.

#### **Some exceptions:**

- If the child is stillborn or shortly dead, the mother is eligible to take the full maternity leave and it does not come under the counting when claiming leave for her next child.
- If the mother has got twins, the benefits will be the same as for the single child.

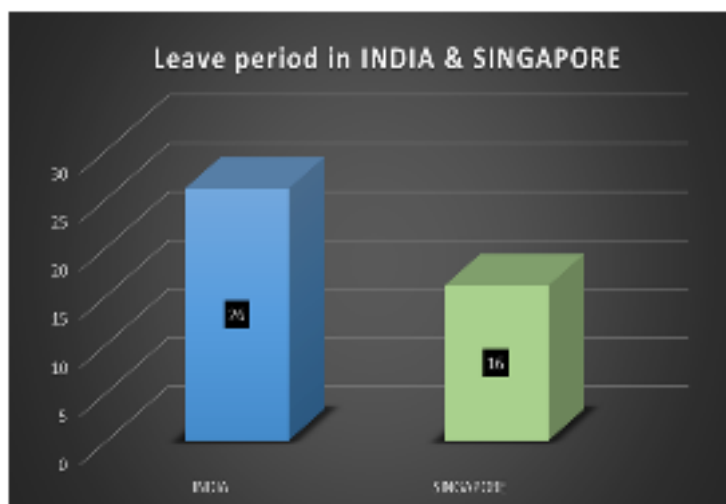
- If the baby gets aborted or loss of the baby after 20 weeks, the working woman can be eligible to take sick leave alone. It does not come under the maternity benefits scheme.

**Comparing the Leave period in India and Singapore using Table and Chart:**

**Table No: 1**

S.NO	Country Name	Leave Period
1	INDIA	12-26 Weeks
2	SINGAPORE	Up to 16 Weeks

**Chart No: 1**



**Interpretation:**

Comparing to Singapore, Indian is offering more leave on maternity time for a woman employee. In India leave period is 12-26 weeks and in Singapore it is up to 16 weeks. While converting it into percentage India is offering 62% out of 100%. Singapore is offering 38% out of 100%. Hence we can understand there is more leave period given in India.

**Maternity benefits in Australia:**

In Australia, leave for pregnancy is up to 18 paid weeks for taking care of her child and herself. Some of the eligibility criteria for getting maternity leave are

- A mother who is carrying a baby and a mother of adoptive child can apply for it.
- According to the last financial year, her individual income should be under \$150000.
- She is not allowed to work during maternity period after applying for the leave.
- She must have Australian citizenship of living in Australia also having permanent special category Visa is must.
- If she is recently vacated to Australia or new resident, she cannot claim the maternity benefits until two years get completed since settled in Australia with some exemptions.
- Even though, she can get maternity benefits if the baby is stillborn or shortly dead.

- She should take a work test within 13 months before the child's birth.
- Also baby's father can get 2 weeks of paid leave, 18 weeks for mother and 2 weeks for father, totally parents can get 20 weeks of leave to take care of the child.
- Job keeper is who works as part time employee or full time employee in an establishment. Job keeper payment can be received by the person if she is eligible with the criteria fulfilled.
- She should have been working in a company at least for 2 years without having permanent employee authority.
- The family who is intend to get maternity benefits should not be intended to receive any other payments at the same time like Australian compensation law, partner pay, dad pay, government paternal leave, etc.,
- One cannot get parental payment and job keeper payment at the same time.
- The mother is eligible to transfer her leave balance to another person who is taking care of her child, at the same time, Dad and partner leave can also be used claimed for the same baby.
- It is possible only when keeping in touch with employer and depends on work place situation.

**Comparing the Leave period in Australia and India using Table and Chart:**

**Table No: 2**

S.NO	Country Name	Leave Period
1	AUSTRALIA	18 Weeks
2	INDIA	12-26 Weeks

**Chart No: 2**



**Interpretation:**

Comparing to India, Australia is offering less leave on maternity time for a woman employee. In Australia only 18 weeks is given for female employee as maternity leave and in India it is 26 weeks. While converting it into percentage Australia is offering 40% out of 100%, India is offering 60% out of 100%. Hence we can understand there is more leave period given in India and less leave in Australia when comparing to India.

**Maternity Benefits in China:**

As per the Labor law of the people’s republic of China Act 1995, established and implemented to safeguard the female who is pregnant is eligible to get 90 days of leave after the birth of her child since she is a Chinese citizen. Actually, there are different schemes in various cities of China for a female employee; this paper concentrates leave and benefits followed in Shanghai. In Shanghai, 98 days of leave is given to the pregnant women, in that; they can take 15 days of leave before delivery. An additional 15 days of leave can be given if any difficulty in delivery occurs. Also an additional 15 days of leave will be given if the woman gives birth to twins.

In case, the woman gets aborted within the first four months naturally, she can get 15 days of leave to take rest. If the pregnancy gets aborted after the first four months, she can get 42 days of leave. Some of the benefits can be given with the mutual agreement between the employer and the employee. In case of difficulty in pregnancy, she can apply the lactation leave with the permission of her employer based on the nature and situation of the work. With the flexibility of work, 6.5 months of leave will be allotted. The additional benefit of post pregnancy is one hour of break during working hours. After delivery, two breaks with duration of 30 minutes can be given to feed the new born baby depends on the distance of parking area and road-trip timing. The father of the new born bay can be allowed to take 15 days of leave. All the national holidays are excluded in the allotted 98 days of leave; the rejoining date will be postponed based on the national holidays in between the pregnancy leave period. Calculating the basic pay of the woman, she is paid by the employer or the insurance agency if she applied for insurance.

**Comparing the Leave period in India and China using Table and Chart:**

**Table No: 3**

S.NO	Country Name	Leave Period
1	INDIA	182 Days(12-26 Weeks)
2	CHINA	90 Days

**Chart No: 3**



**Interpretation:**

In India every women is entitled to get 12-26 weeks of leave which is converted into days (182 days) and in China it is 90 days for maternity period. When

converting it into percentage India is offering 67% out of 100%, China is offering 33% out of 100%. Therefore we can understand there is more leave period given in India While comparing to China.

#### Maternity Benefits in Belgium:

- In Belgium, both unemployed and employed pregnant female can get the maternity benefits. Based on the work and basic pay of the individual, it may vary. The father of the child is allowed to get the paternity leave or birth leave for 10 days. For getting this, the person needs to fulfill the eligibility criteria. Some of the eligibility and benefits are:
- The employee should have worked in the company for past 120 days to get maternity leave and contribution to social security even with a little amount of money is must. But the candidate should have not taken leave more than 30 days before that. Fulfilling the criteria, she can get 15 weeks of maternity leave. It is split into two parts such as prenatal and postnatal leave. Prenatal leave is leave taken before the child birth and postnatal is leave allotted to take after delivery particularly not exceeding 6 months. The minimum days of postnatal leave are 9 weeks. The self-employed person is eligible to take 3 weeks of leave as prenatal leave and 9 weeks as post natal leave. The 9 weeks of postnatal leave of self- employed is optional, they can do part time work if they like.
- The amount they can get during the maternity leave is 75% to 85% based on their salary.
- For unemployed pregnant women, there is special scheme of maternity benefits, especially 484.90 per week of Belgium money for full time self-employed and 242.45 For part time self-employed.
- The father of the child can get 10 days of leave, first three days of paid leave and for the next seven days, Mutual insurance fund payment will pay to the father.

These are some of the benefits given in Belgium for the pregnant women.

#### Comparing the Leave period in Belgium and India using Table and Chart:

Table No: 4

S.NO	Country Name	Leave Period
1	INDIA	12-26 Weeks
2	BELGIUM	15 Weeks

Chart No: 4



**Interpretation:**

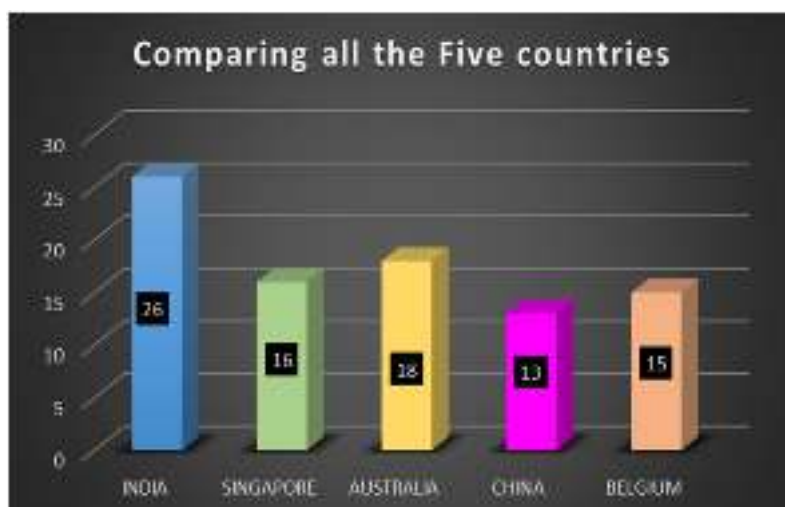
In Belgium women employee who is employed under Belgium contract are eligible to get maternity leave period of 15 weeks, In Indian it is 12-26 weeks. Comparing to India, Belgium maternity leave is less in count but comparing with some other countries the leave period given in Belgium is little high. While converting it into percentage India is offering 63% out of 100%. Belgium is offering 37% out of 100%. Hence we can understand there is more leave period given in India.

**Overall View:**

**Table No: 5**

S.NO	Country Name	Leave Period
1	INDIA	12-26Weeks
2	SINGAPORE	Up to 16 weeks
3	AUSTRALIA	Up to 18 weeks
4	CHINA	90 Days(13 Weeks)
5	BELGIUM	Up to 15 weeks

**Chart No: 5**





### **Interpretation:**

Over all comparison of all five countries are presented as Table and chart in the above diagrams. By observing we can clearly understand that the maternity benefits and leave period offered by government in India is high while comparing with the other four countries given above. If we convert that into percentage then India is offering 30% out of 100%, Singapore is offering 18% out of 100%, Australia is offering 20% out of 100%, China is offering 15% out of 100% and Belgium is offering 17% out of 100%. Therefore INDIA is giving a reasonable and fair level of maternity leave for women employees.

### **Importance of Maternity Benefits:**

These days' women employees are equally working as male employees. Since many joint families have converted to nuclear family, both male and female is in the situation to work and improve the standard of the family. But the physical condition of women is different from men, women has to overcome the physical difficulties particularly pregnancy period. Benefits are needed to recover the health of her and taking care of her newly born child.

### **Findings and Discussion:**

In this research study, the importance of maternity benefits and also the availability of maternity leaves available in India and other few countries have been explained. Comparative explanation using charts and table it has been clearly shown. It helps to gain knowledge about the leave benefits than can be gained by a woman on her pregnancy time also how maternity leave and benefits are varying from country to country can be understood.

This Paper depicts the importance of maternity benefits and schemes applied in different countries Such as India, Singapore, Australia, China, and Belgium. It intends to explore the benefits and allowed leaves particularly. The detailed Act and description have given for the above-mentioned countries in detail.

In some countries they are offering more leave than India for example, In the UK 52 weeks are allotted and Sweden is offering 60 weeks of lave as maternity leave.

In our Country, it is 12-26 weeks which is fair and fine to take care of herself and her newborn baby.

### **Conclusion:**

Every working women should have crossed the question during her pregnancy period is whether she can continue her job or to leave. There, the trouble is to choose either her profession or personal life. So the maternity schemes came into picture to help women and her child during their pregnancy period that reduces the stress and negative thoughts of the mother and get improved health. Allowing father to take leave for few days may get a chance to take good parental care of the baby and gives the mother a proper environment to feed the child. The maternity benefits save the mother from leaving her profession and avoids the child goes on having dark side feeling which means a negative feeling that a child can get if it doesn't get parental care on initial stage. Canada and Norway are the countries which offer more maternity leave with payment that leads them holding the first place. Comparing other countries with India, India is giving 27-47 times higher benefits and leave.

I have taken Singapore, Australia, China, Belgium and India for studying and researching to know the maternity merits and benefits that women get during their pregnancy. The findings are Singapore is about to give 16 weeks of maternity leave and some benefits. In Australia, 18 weeks of maternity leave and some benefits are given to working women. China is giving 98 days of maternity leave. In Belgium, 15 weeks of maternity leave and benefits. India has been giving 26 weeks of maternity leave and payment based on the basic pay and eligibility. In

Canada, 35 to 52 weeks of leave, Norway is of 49 to 59 weeks of leave which may vary based on the nature of work and eligibility criteria. In some cases, Company pays for the pregnant women and in some cases, Government and policies pay them.

Additional benefits are given such as work from home, feeding option during work time, increased pay during the maternity leave time, additional leave in case of twins at delivery time. All these benefits can be received under the mutual agreement between the employer and the employee. There is one chance of complaining against the management if ignores to give maternity leave and benefits.

Finally, benefits and maternity leave are given to reduce the burden of women employee during pregnancy and making them comfortable and feel positive on that concerned period. It is an attempt to support the women employee personally and professionally.

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