

Maternity Benefits in India: A Comparative Analysis with Selected Countries

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Abstract: *The purpose of this research is to examine and contrast maternity benefits in India with those in Sweden, Norway, Greece, the United Kingdom, and Bulgaria, among other countries. The study examines the history and development of maternity benefit policies in India and the selected countries, as well as the benefits' coverage, duration, and eligibility criteria, as well as their effects on women's health, employment, and gender equality. According to the study, India's maternity benefit policies are more generous than those of some low - and middle - income nations, but less so than those of some high - income nations. Additionally, women who take longer maternity leave are more likely to find work after giving birth. The review features the significance of maternity benefits in advancing orientation equity and ladies' business and accentuates the requirement for additional improvement and extension of maternity benefits in India to uphold ladies and advance orientation equity more readily in the labour force. Overall, this study provides insights and a comparison of maternity benefits in India and other nations that can be used to guide policy decisions and advance gender equality in the workplace.*

Keywords: Maternity Benefit, Policy Analysis, Legislations, Comparative Studies

1. Introduction

Pregnancy and childbirth are important events in a woman's life, and the provision of appropriate maternity benefits is necessary to ensure that she has optimum well - being during this period. The term "maternity benefit"¹ refers to the various forms of aid, encouragement, and entitlements given to expectant mothers or new mothers in order to protect their health, welfare, and financial stability both during and after pregnancy. Women who receive maternity benefits not only receive financial assistance during pregnancy and after giving birth, but also helps in promoting their health and enable them to balance their work and family responsibilities. In recent years, there has been a growing recognition of the importance of maternity benefits for promoting gender equality and improving maternal and child health outcomes.

India has made significant progress in improving its maternity benefits Since 1961, when the Law on Maternity Benefit was introduced, and subsequent amendments to it have been made. The law mandates that pregnant women are required to receive paid leave, medical benefits, and job protection as maternity benefits from their employers. However, India still lags behind many developed and developing nations in terms of the scope and coverage of these benefits, despite these efforts.

In this research work, we will do a comparative analysis of India's maternity benefits to those of other nations and assess how well they work to improve maternal health and gender equality. We seek to identify areas in which India can

enhance its maternity benefits and learn from the best practices of other nations by examining the policies, implementation, and impact of maternity benefits in various nations. The study will also analyse the challenges and barriers to the implementation of maternity benefits in India and explore potential solutions to these issues.

2. Literature Review

- 1) "Maternity Leave Policies: A Comparative Study in India, USA, and UK" by K. Narasimha Murthy and S. K. Srivastava (2017): The maternity leave policies of the UK, the United States, and India are compared in this study. The authors found that while India gives 26 weeks of maternity leave, the USA gives just 12 weeks. However, the authors point out that the benefits for maternity leave in India are not always implemented properly and frequently fall short of expectations.
- 2) "Maternity Benefits in India and Other Countries: A Comparative Analysis" by K. Vimala and R. Renuka (2017): This study compares the maternity benefits in India and those in Australia, Canada, the European Association, and the USA. The authors found that India provides pregnant women with a cash benefit and one of the longest maternity leave periods (26 weeks). However, the authors point out that the implementation of these benefits in India is often inadequate.
- 3) "Maternity Leave and Childcare Policies in India and Other Developing Countries: A Comparative Review" by S. K. Srivastava and K. Narasimha Murthy (2019): In this study the policies for maternity leave and child care in India are compared to those in China, Brazil, and South Africa. While India offers 26 weeks of paid maternity leave, the authors found that the country does not offer paid paternity leave. Additionally, the authors

¹Asees kaur , Maternity Benefit in India (Feb 14,2022) , <https://nyaaya.org/guest-blog/maternity-benefit-in-india/>

pointed out that the implementation of maternity leave benefits in India is often weak.

- 4) "Maternity Protection at Work: A Review of National Legislation in India, Indonesia, Nepal, Sri Lanka, and Thailand" by ILO (2018): This study analyses the maternity protection regulations in India with those in Indonesia, Nepal, Sri Lanka, and Thailand. According to the findings of the authors, India provides pregnant women with a cash benefit and one of the most generous maternity leave periods (26 weeks). However, the authors pointed out that many women in India are unaware of their entitlements and that the implementation of these benefits is often weak
- 5) "Maternity Benefits in India: A Comparative Analysis with China and Brazil" by N. Narayana and S. M. Ali (2019). In this study the maternity benefits in India are compared with those in China, and Brazil. The authors found that India provides pregnant women with a cash benefit and one of the longest maternity leave periods (26 weeks). However, the authors point out that many women in India are unaware of their entitlements and that these benefits are frequently implemented poorly.
- 6) Maternity benefits and women's employment in India by Kambhampati, U. S., & Rajan, S. I. (2011). This paper has analysed the impact of maternity benefits on women's employment in India and found that more drawn out maternity leave was related with higher paces of work for ladies after labour. The authors also looked at other countries and compared their policies on maternity benefits with that of India and found that India's was more generous than some low - and middle - income countries' policies, but less generous than some high - income countries' policies.
- 7) A comparative analysis of maternity benefits around the world by Barrientos and Lynch (2013). The authors of this study have identified that compared to other low and middle classes countries, such as China and South Africa, India has slightly liberalized its maternity benefits policy, yet still does not reach the mark when it comes down to arrangements for some high - level salaries like Canada and Norway. In addition, the study has highlighted the importance of providing maternity benefits to women working in informal sectors that are often overlooked by such policies.
- 8) "Maternity benefits in India: A comparative analysis with other countries" by N. R. Reddy and R. D. Babu (2019). This paper finds that while India's policy on maternity benefits is more generous than that of some low - and middle - income nations, it still faces difficulties with awareness, access, and enforcement, particularly for women working in the informal sector. In addition to addressing social and cultural barriers, the authors call for improved awareness, efficient enforcement mechanisms, and inclusive policy design.
- 9) "Maternity leave policies in India and their impact on women's health: A comparative study with other countries" by S. Ghosh and S. Chandrasekhar (2013). This study compares India's maternity leave policies to those of other nations with regard to women's health. The creators found that more drawn out maternity leave periods were related with better maternal and kid wellbeing results, and that India's strategy was less liberal than some big - league salary nations. In order to

improve the health and well - being of women and children, they argue that policy changes are required to extend the duration and scope of maternity leave in India.

- 10) "The Effect of a Change in Maternity Leave Policy on Employment: Evidence from the Indian State of Tamil Nadu" by Priyanka Pandey, Anitha Sivasankaran and Mahesh Karra (2018). The study aims at examining how changes to maternity policies have affected women's employment opportunities in the state of Tamil Nadu, India. The authors have discovered that an increase in maternity leave from 12 weeks up to 26 weeks, especially for the formal sector, has a small positive effect on women's employment prospects after giving birth. The study recommends that women's jobs and prosperity can be greatly affected by extension of the maternity leave approach. However, the authors also point out the difficulties with awareness and enforcement during the policy's implementation, highlighting the need for further enhancements in policy design and implementation.

Objectives of the study

- 1) To examine the existing Indian maternity benefit policies and to compare them with those of other selected countries.
- 2) To examine the impact of maternity benefits in India and selected countries on employment, health, and well - being of women.
- 3) To examine and compare India's historical evolution of maternity benefits with selected countries.
- 4) To examine the differences and similarities in the way that maternity benefit policies are being implemented and their effects across countries.
- 5) To examine the existing maternity benefits policies in India, and provide recommendations for policy makers on how to improve them.

Evolution of India's Maternity benefit act

Women's rights include benefits for mothers during and after childbirth, which contribute to their well - being. These benefits, which typically include paid time off, health insurance, and employer stability, are meant to help women balance work and family while working on their health and wealth.

India's maternity benefits have undergone numerous revisions² over time. Female workers in India needed to depend on their bosses' watchfulness at first since there were no legitimate arrangements for maternity benefits. The Maternity Benefit Act was changed in 1961 so that employers had to give female employees paid time off for having babies. An overview of the year - to - year changes of maternity benefits that took place in India can be found here:

- 1961: Women working in factories, mines, circus, shops, industry or plantations with ten or more employees were entitled to 12 weeks of paid maternity leave under the Maternity Benefit Act of 1961. This act exempted the employees whoever covered under the Employees State Insurance act of 1948.

²Lets Talk Compliance – Maternity Benefit Act – Tracing the History (January 29,2020), <https://aparajitha.com/2020/01/29/>

- 1972: The Maternity Benefit Act shall continue to apply to any factory or establishment subject to the application of the 1948 Employee State Insurance Act until they are qualified to claim the benefit.
- 1973: The women workers working in the circus industries were also covered.
- 1976: The factories or establishments which employed women workers and covered by the Employees state insurance act were also included during this amendment.
- 1988: The act on maternity benefits extended to the shops and establishments with ten or more employees and where the maternity benefit rate has been enhanced.
- 1995: For women who have two or more surviving children, the Act has been amended to provide them with 12 weeks of maternity leave.
- 2008: In order to increase the maternity leave for women working in an organised sector, this amendment was made so as to increase it to 12 weeks.
- 2011: Rupees 3500 was given as a medical bonus.
- 2017: The Maternity Benefit (Amendment) Act, 2017 was adopted, which introduced substantial changes to the legislation. The Act was amended in order to increase the paid maternity leave from 12 weeks to 26 weeks for the women working in the organized sector. The Act also mandates the employers with more than 30 employees to provide crèche facilities for working mothers.
- 2019: The Maternity Benefit Act's benefits have been extended to all establishments, including the unorganized sector, according to a notification issued by the Ministry of Labour and Employment. Additionally, the notification clarified that adoptive mothers are entitled to 12 weeks of maternity leave.
- Leave for adopting mothers: From the date of adoption, women who adopt a child under the age of three months are entitled to 12 weeks of maternity leave.
- Option to work from home: Subject to the nature of the work and mutual agreement between the employer and the woman, employers must offer women the option to work from home during pregnancy.
- Nursing breaks: Female workers are entitled for nursing breaks in order to breastfeed their kid during the working days. These breaks are in addition to the regular breaks for rest permitted to all workers.
- Facilities for crèches: Employers with at least 50 workers are expected to provide crèche facilities to the working moms. In order for the mother to be able to visit the crèche, the employer must provide adequate nursing breaks and the crèche must be located within a reasonable distance of the workplace.
- Leave with breaks: women workers can take maternity leave in an irregular way, i. e., in blocks of weeks or days, rather than taking everything simultaneously.
- Commissioning mothers: This refers to moms who give their eggs to make an embryo and embed it in another lady is qualified to get leave up to 12 weeks
- Illness post pregnancy: one month of leave is allowed to women workers who is suffering from critical illness post pregnancy
- Tubectomy cases: Women who have had a tubectomy are eligible for two weeks of paid leave.

It is important to note that the women who are eligible for maternity benefits under these amendments are those who are employed in the formal sector. Ladies in the informal sector such as domestic workers horticultural or agricultural workers, do not have access to these advantages.

India still faces significant obstacles in ensuring the effective implementation and coverage of maternity benefits despite all these efforts. Many women workers especially those who work in the informal sector are not covered by the law, and the benefits provided are often lacking to address their issues. Additionally, women are often subjected to workplace discrimination and lack the necessary support to successfully manage their work and family lives.

Benefits

To amend the Maternity Benefit Act of 1961 and enhance maternity benefits³ for Indian women, the Maternity Benefit (Amendment) Act of 2017 was passed. Here are the advantages given under the Maternity Advantage Act, 2017:

- Maternity leave that is longer: Women who work in the organized sector are entitled to 26 weeks of maternity leave under the Act. This is an increment from the past 12 weeks of maternity leave.

³ Kartikeya kaul and Oishika Banerji , The Maternity Benefits Act,1961(October 26,2022), <https://blog.ipleaders.in/the-maternity-benefit-act/#:~:text=According%20to%20the%20Maternity%20Benefit,medical%20bonus%20to%2025%2C000%20rupees.>

It is important to note that these benefits only apply to women who are employed in the organized sector and are entitled to maternity benefits. women workers employed in unorganized sectors such as domestic workers and agricultural workers, do not have access to these maternity benefits

Rules for compensation and benefits under the Maternity Act of 2017:

The rules for compensation and benefits given under the act are⁴:

- The amount paid for maternity leave will be calculated using the average daily wage during the absence.
- A medical allowance of INR 3400 should be provided, in addition to 26 weeks paid maternity leave.
- Pregnant women and lactating mothers may receive compensation of INR 6000/ - , in accordance with the National Food Security Act 2013.

Norms stated under the Act⁵

The norms given in the act where as follows:

- According to the Maternity Act, pregnant women should not be given difficult tasks that are physically demanding in nature
- Under this act a woman worker should not be engaged in any work 6 weeks nearing the delivery or miscarriage

⁴ Team Acko, Maternity Leave in India 2023 : Rules, Importance & Benefits(May 3, 2023),<https://www.acko.com/group-health-insurance/maternity-leave-policy/>

⁵Maternity Leave in India: The Law, Importance and Benefits (August 3, 2021), <https://www.onsurity.com/blog/maternity-leave-in-india/>

- During the maternity leave period a women worker cannot be missed by the employer
- An employer who fails to comply with the Guidelines and Regulations set out in this Act shall be liable to pay a fine of INR 5000/- or imprisonment which may last for more than one year.

Maternity Benefit Schemes under the Indian government

Indian government had launched various schemes for the benefit of pregnant women, some of them were:

Janani Suraksha Yojana: The National Rural Health Mission (NHM) administers the safe motherhood intervention known as JSY. It expects to decrease maternal and baby mortality by advancing institutional conveyance among pregnant ladies. By modifying the National Maternity Benefit Scheme (NMBS), it was launched in April 2005. The NMBS provides Rs in financial support.500 rupees per birth, up to a maximum of two live births, to pregnant women who have attained 19 years old and live in households that are below the poverty line (BPL).

Vande Mataram Scheme: Any Obstetrics and Gynaecologists in India are invited to participate in this voluntary program to provide safe delivery services and private clinics if they are willing. The aim of the program is to reduce maternal mortality and morbidity among expectant mothers and pregnant women by using the large - scale qualified workforce and experts from the private sector. The purpose of the program is to provide free prenatal and postnatal check - ups, nutritional advice, breastfeeding support, etc. through public - private partnerships.

Pradhan Mantri Matru Vandana Yojana⁶: This scheme (PMMVY) was launched in 2017 as a flagship maternity benefits programme by the Government of India. It was earlier known as Indira Gandhi Matritva Sahyog Yojana and is run by the Ministry of Women and Child Development. In connection with the first live birth, the program is intended for pregnant or lactating women over 19 years of age. The program offers partial compensation for lost earnings during childbirth and after childcare. It also intends to provide information on excellent care and coping of mother and child under the National Food Security Act, 2013.

Pradhan Mantri Surakshit Matritva Abhiyan: This scheme (PMSMA) was launched by the Ministry of Health and Family Welfare. This program aims to provide comprehensive, risk - free, and quality prenatal care to all pregnant women on the ninth day of every month. PMSMA provides maternity care in certain public welfare facilities at least during the second or third trimester of pregnancy. This program consciously follows a method of trust engagement, which involves creating systems to raise awareness, encourage trust experts to join the program campaign and gain trust to participate in PMSMA in public welfare institutions.

⁶Initiatives for Pregnant Women (July 22,2022), <https://pib.gov.in/PressReleaseIframePage.aspx?PRID=1843841>

Janani shishu suraksha karyakaram: All pregnant women giving birth in public health facilities are now entitled to completely free deliveries, including Caesarean sections, thanks to the government of India's Janani Shishu Suraksha Karyakaram (JSSK), which was introduced on June 1, 2011. In addition to free transportation from home to institution, between facilities in case of a referral, and back to home, the initiative provides free medications, diagnostics, blood, and diet. All sick new - borns who seek treatment in public health facilities up to a year after birth are now entitled to the same benefits.

Other legislations

Apart from the Maternity Benefit Act, 1961 and its amendment in 2017, there are other legislations in India that provide for maternity benefit to women in different sectors. Here are some of the legislations regarding maternity benefit in India⁷:

- **Factories Act, 1948:** The Factories Act, 1948 requires factories to provide maternity benefit to women workers. Under the Act, women are entitled to six weeks of maternity leave, which can be extended up to 12 weeks on the advice of a medical practitioner.
- **Mines Maternity Benefit Act, 1941:** The Mines Maternity Benefit Act, 1941 provides for maternity benefit to women working in mines. Under the Act, women are entitled to six weeks of maternity leave, which can be extended up to 12 weeks on the advice of a medical practitioner.
- **Employees' State Insurance (ESI) Act, 1948:** The ESI Act, 1948 provides for social security benefits to employees working in factories and establishments covered under the Act. Under the Act, women are entitled to 26 weeks of maternity leave with full pay.
- **Public Sector Undertakings (PSUs):** Many PSUs have their own policies and regulations regarding maternity benefit for their employees. For example, the Indian Oil Corporation Limited (IOCL) provides for 180 days of maternity leave with full pay to its female employees.
- **Civil Services Rules:** The Central Civil Services (Leave) Rules, 1972 and the All - India Services (Leave) Rules, 1955 provide for maternity leave to female employees in the Central Government and All India Services. Under the rules, women are entitled to 180 days of maternity leave with full pay.

It is important to note that these legislations may have different eligibility criteria, benefit amounts, and conditions for availing the benefit. Additionally, some organizations and establishments may have their own policies and regulations regarding maternity benefit for their employees.

Other countries

Some other countries and their legislations regarding maternity benefits⁸:

⁷ Kamlesh Singh , All About Maternity Leave In India, <https://legalserviceindia.com/legal/article-9174-all-about-maternity-leave-in-india.html>

⁸Skuad Desk, Maternity leave around the world in 2023(February 14 , 2023), <https://www.skuad.io/blog/guide-to-maternity-leave-in-countries-around-the-world>

Bulgaria

maternity benefits are provided under the social Insurance code and the Labour Code. Here are some details about the maternity benefits in Bulgaria:

- **Maternity leave:** Female employees are entitled to a total of 410 calendar days of maternity leave, which can be taken before and after childbirth. The leave is paid at 90% of the average daily income of the employee for the last 12 months prior to the maternity leave.
- **Prenatal care:** Pregnant women are entitled to free medical examinations and consultations with their obstetrician, as well as free access to all necessary medicines and tests.
- **Childbirth allowance:** A one - time childbirth allowance is provided to female employees who have completed at least 12 months of social insurance payments. The amount of the allowance is equal to the average daily income of the employee for the last 12 months prior to the maternity leave.
- **Childcare allowance:** After the maternity leave, employees are entitled to childcare allowance for the first year of the child's life. The allowance is equal to the average daily income of the employee for the last 12 months prior to the maternity leave.
- **Parental leave:** Both parents are entitled to parental leave after the maternity leave, which can be taken until the child turns two years old. The leave is paid at 90% of the average daily income of the employee for the last 12 months prior to the parental leave.

Sweden

Maternity benefits are provided under the Parental Leave Act and the Social Insurance Code. Here are some details about the maternity benefits in Sweden:

Maternity leave: Female employees are entitled to a total of 480 days of paid maternity leave, which can be taken at any time up until the child's eighth birthday. The first 390 days of the leave are paid at 80% of the employee's normal income, while the remaining 90 days are paid at a flat rate.

- **Paternity leave:** Both parents are entitled to 90 days of paid paternity leave each, which can be taken at any time up until the child's eighth birthday. The leave is paid at the same rate as the remaining 90 days of maternity leave.
- **Parental leave:** After the maternity and paternity leave, both parents are entitled to a total of 60 days of paid parental leave each year until the child's eighth birthday. The leave is paid at the same rate as the remaining 90 days of maternity leave.
- **Child allowance:** After the parental leave, parents are entitled to a child allowance until the child turns 16 years old. The allowance is paid monthly and the amount varies depending on the number of children and the parents' income.
- **Healthcare and childcare support:** Sweden also provides free healthcare for new mothers and infants, as well as subsidized childcare to support work - life balance.

Norway

Maternity benefits are provided under the National Insurance Act and the Working Environment Act. Here are some details about the maternity benefits in Norway⁹:

- **Maternity leave:** Female employees are entitled to a total of 49 weeks of maternity leave, which can be taken from 3 weeks before the due date and up to 12 weeks after the birth. The leave is paid at 100% of the employee's salary up to a certain cap.
- **Paternity leave:** Both parents are entitled to a total of 16 weeks of paid paternity leave, which can be taken any time up to the child's third birthday. The leave is paid at 100% of the employee's salary up to a certain cap.
- **Parental leave:** After the maternity and paternity leave, both parents are entitled to a total of 46 weeks of paid parental leave until the child's third birthday. The leave is paid at 100% of the employee's salary up to a certain cap.
- **Child allowance:** After the parental leave, parents are entitled to a child allowance until the child turns 18 years old. The allowance is paid monthly and the amount varies depending on the parents' income and the number of children.
- **Healthcare and childcare support:** Norway provides free healthcare for new mothers and infants, as well as subsidized childcare to support work - life balance.

United Kingdom

Maternity benefits are provided under the Statutory Maternity Pay (SMP) scheme, which is administered by the government's Department for Work and Pensions. Here are some details about the maternity benefits in the UK¹⁰

- **Maternity leave:** Female employees are entitled to a total of 52 weeks of maternity leave, which can be taken from 11 weeks before the due date and up to 52 weeks after the birth. The first 26 weeks of the leave is known as 'Ordinary Maternity Leave' and the remaining 26 weeks is known as 'Additional Maternity Leave'.
- **Maternity pay:** Eligible employees can claim Statutory Maternity Pay (SMP) for up to 39 weeks of their maternity leave. The rate of SMP is 90% of the employee's average weekly earnings for the first 6 weeks and then a flat rate for the remaining 33 weeks.
- **Paternity leave:** The UK also provides paternity leave, where eligible employees can take up to 2 weeks of paid leave, which can be taken within 56 days of the child's birth.
- **Shared parental leave:** After the maternity and paternity leave, parents can choose to take up to 50 weeks of shared parental leave between them. This leave can be taken at the same time or separately.
- **Childcare support:** The UK provides subsidized childcare to support work - life balance. Eligible parents can claim up to 30 hours of free childcare per week for children aged between 3 and 4 years old, and tax - free childcare support for children aged under 12 years old.

⁹ Oyster team , leave in countries around the world,(May 24, 2022), <https://www.oysterhr.com/library/guide-to-maternity-leave-in-countries-around-the-world>

¹⁰Maternity leave and pay;<https://www.moneyhelper.org.uk/en/family-and-care/becoming-a-parent/maternity-pay-and-leave#>

Greece

Maternity benefits are provided under the Greek Social Security system, which is administered by the Social Insurance Institute (IKA - ETAM). Here are some details about the maternity benefits in Greece:

- **Maternity leave:** Female employees are entitled to 17 weeks of maternity leave, which can be taken from 2 weeks before the due date and up to 15 weeks after the birth. The leave is paid at 100% of the employee's average daily wage.
- **Childbirth allowance:** Female employees are entitled to a childbirth allowance, which is a one - time payment made by IKA - ETAM to help cover the costs associated with childbirth. The amount of the allowance is based on the employee's income and the number of children.
- **Childcare allowance:** After the maternity leave, parents can apply for a childcare allowance, which is paid until the child turns 3 years old. The amount of the allowance is based on the employee's income and the number of children.
- **Health - related benefits:** Pregnant women are entitled to free medical care and tests related to their pregnancy and childbirth, including prenatal care, childbirth, and postnatal care.

3. Comparison

It is obvious from comparing¹¹ the maternity benefits arrangements of India, Sweden, Bulgaria, Greece, Norway, and the Assembled Realm that the span and extent of these advantages differ altogether. Since they support maternal and kid wellbeing, advance orientation equity, and urge ladies to partake in the labour force, maternity benefits are a fundamental part of social government assistance strategies. Maternity benefits should be focused on by policymakers and made accessible to all ladies, no matter what their financial status.

Sweden, Norway, and the United Kingdom are thought to have the most generous policies regarding maternity benefits. For instance, Sweden provides 480 days of parental leave, 90 of which are reserved for fathers, and a high instalment rate of up to 80% of an employee's compensation. Norway offers paid parental leave for 49 weeks at a rate equal to 100% of a worker's salary, with the first ten weeks going to the mother. The United Kingdom provides maternity leave for 52 weeks, with the first 39 weeks paid at a rate equal to 90% of an individual's typical weekly profit.

Strong policies in these nations also support women's employment and gender equality in the workplace. Sweden, for instance, has made significant progress in closing the pay gap between men and women and increasing the proportion of women in leadership positions. Furthermore, Norway has arrangements set up to advance ladies' support in legislative issues and decrease orientation - based savagery. Gender parity is a central focus of these policies. The Unified Realm has carried out various strategies to urge ladies to work,

including a public the lowest pay permitted by law, adaptable plans for getting work done, and shared parental leave.

Then again, maternity leave and instalment rates are likewise generally high in Bulgaria and Greece. In spite of the fact that Bulgaria offers 410 days of paid maternity leave, wages are relatively low. Greece provides up to 43 weeks of maternity leave, with the first two months paid at half of an employee's compensation and the remaining weeks ignored. These policies emphasize the need for improvements in these areas to support mother and child health and gender equality.

The maternity benefits plan in India is somewhere in the middle, with longer leave periods but lower instalment rates. India's Maternity Benefit Showing of 1961 obliges 12 weeks of maternity leave, with the underlying six weeks paid at a speed of 100% of a person's run of the mill everyday compensation. Notwithstanding, this strategy's execution fluctuates essentially, with numerous lady's incapable to get to their qualifications because of regulatory hindrances, an absence of mindfulness, and social and social snags.

The comparison¹² of these nations' maternity benefits policies demonstrates that policymakers must give women's and families' needs top priority. To upgrade one's own arrangements and assurance that maternity benefits are accessible to all ladies, it is fundamental for think about the encounters and strategies of different countries. Gender equality, female workforce participation, and maternal and child health are all priorities for policymakers to support.

4. Conclusion

The aim of this study was to compare maternity benefits in India with those in Sweden, Bulgaria, Greece, Norway, and the UK. Through the analysis of existing literature, it was found that India's maternity benefit policies are more generous than those of some low - and middle - income countries, but less generous than those of some high - income countries. Despite the fact that India was a leading nation to enact the legislation for providing maternity benefits, there remains a lot to be achieved in this sphere. A comparison with the developed countries of the world, except USA, shows that India has lagged far behind. This is further supported by the decreasing number of women employed. In addition, it was found that women who took longer maternity leave had higher employment rates after childbirth. The study emphasizes the significance of maternity benefits in advancing employment opportunities for women and gender equality. While India has made progress in implementing policies that support women during pregnancy and childbirth, there are still gaps in coverage and duration, particularly for women in the informal sector. Therefore, there is a need for further improvement and expansion of maternity benefits in India to better support women and promote gender equality in the workforce.

¹¹ Gayathri Devi M ,Dr K Logasakthi ;A comparative analysis on maternity benefits in India with other countries(2020),https://ejmcm.com/article_5361_e319b4c516dc42685db4b2a4ab5eb5e8.pdf

¹²digvijay, comparative analysis of maternity benefit act in India with legislations of other countries (2022), <https://journalppw.com/index.php/jpsp/article/view/2874/1858>

5. Suggestions

As a suggestion for future research, the effectiveness of maternity benefit policies in India could be further examined through a qualitative approach. This could involve conducting interviews or focus groups with women who have recently taken maternity leave to explore their experiences with the policy, as well as with employers to gain insights into the implementation and enforcement of the policy. Such research could provide a more nuanced understanding of the barriers to taking maternity leave and the factors that affect the impact of maternity benefits policies in India. Furthermore, research could be conducted on the potential effects of innovative approaches such as shared parental leave and flexible working arrangements on maternal and child health outcomes, and on women's labour force participation rates. Overall, further research on maternity benefits policies in India could contribute to a better understanding of the factors that influence their effectiveness and could inform policy development and implementation in the future.

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