



International Journal of Research Publication and Reviews

Journal homepage: www.ijrpr.com ISSN 2582-7421

COMPARATIVE STUDY OF MATERNITY LEAVE IN INDIA WITH OTHER COUNTRIES

Femina Zuvaitya B

TamilNadu Dr.Ambedkar law University

ABSTRACT:

This research comparatively analyzes maternity benefit provisions in India against those of select developed and developing nations. It aims to identify strengths and weaknesses within the Indian system, evaluating its effectiveness in supporting maternal health, promoting gender equality in the workforce, and contributing to overall national development. The study will examine statutory regulations regarding benefit duration, wage replacement rates, eligibility criteria, and access to childcare support. By contrasting these aspects with international best practices and varying socioeconomic contexts, the research seeks to provide evidence-based recommendations for policy adjustments that could optimize India's maternity benefit scheme and better align it with global standards. Ultimately, this study contributes to a deeper understanding of the role of maternity benefits in fostering a healthy and equitable society.

KEYWORDS: Maternity benefit, workplace, health, equitable society.

INTRODUCTION:

Pregnancy and childbirth are significant event for a woman in life, Women form a considerable number in the majority of developed nations in the labor force. In India, 23.6% of women aged over 18 years are working in the nation. Women with infants and children form part of the nation's workforce in the formal and informal sectors of the economy. Maternity leave policies are for the new born or adopted child's parents. The motive of these policies is to balance career and personal life duties. They are positioned on enhancing family well-being and career continuity. In addition, women practically give more to children in the first few months, and these policies are advantageous to them. Their child also it has a big impact on children for care and attention. and the provision of proper maternity benefits is essential so that she could experience maximum well-being during that period. "Maternity benefit" pertains to all the different types of assistance, support, and benefits provided to pregnant women or new mothers so as to guard their health, well-being, and financial protection both before and after pregnancy. The women enrolled under maternity benefits not only are provided with money benefits during the time of pregnancy and childbirth but also with a support in terms of improved health and enable them to balance working and family roles. Over the past three years, the significance of maternity benefits has gained focus on the emphasis on gender equity and maternal and child health improvements. India made substantial strides toward enhancing its maternity benefits Since the year 1961, the year when Maternity Benefit Law was enacted and came into power, and subsequently amendments therein had been made also. According to the law, the pregnant women are to be provided with leave on pay, medical benefits, and protection against employment as maternity benefits by their employers. Even then, amid all these endeavours, India still lags behind various developed and many developing countries concerning the coverage and extent of the benefits. In the present research study, we will conduct comparative study of the maternity benefits in India with the other countries and study the effectiveness of the measures to the extent they work positively in order to enhance maternal well-being and gender equity. We would like to look for some areas where India can improve its maternity benefits and take tips from other countries' best practices by analysing the policies, implementation, and effect of maternity benefits in other countries. The paper will further discuss the hinderance and problem to the enforcement of maternity benefits in India and explore potential solutions to such issues.

REVIEW OF LITERATURE:

Cross-country comparison of maternity benefits globally by Barrientos and Lynch (2013). The researchers of this research have determined that in relation to other low- and middle-class nations, including China and South Africa, India has relatively liberalized the maternity policy but falls back in relation to other high-paying salaries like in Canada and Norway. In addition, the research has established the importance of extending maternity benefits to informally employed women who are easily left out by such policies.

K. Vimala and R. Renuka's 2017 study, "Maternity Benefits in India and Other Countries: A Comparative Analysis," The maternity benefits offered in India, Australia, Canada, the European Association, and the United States are compared in this study. The authors discovered that India offers one of the longest maternity leave durations (26 weeks) and a monetary benefit to expectant mothers. The authors do note, though, that these advantages are frequently not implemented well in India.

The study "A Comparative Study in India, USA, and UK" conducted by K. Narasimha Murthy and S. K. Srivastava in 2017 provides a comparison of maternity leave benefits in the United States, the United Kingdom, and India. According to findings, India provides 26 weeks of maternity leave as opposed to the 12 weeks provided in the United States. The authors, however, point out that the maternity leave benefits in India are poorly executed and do not live up to set standards in all cases.

"Maternity Protection at Work: A Review of National Legislation in India, Indonesia, Nepal, Sri Lanka, and Thailand" by ILO (2018): The research compares the maternity protection legislation in India with Indonesia, Nepal, Sri Lanka, and Thailand. The authors discovered that India provides pregnant women with a cash benefit and one of the most generous maternity leave periods (26 weeks). The authors mentioned, however, that the majority of women in India are not informed about their rights and that the implementation of these benefits is generally weak.

The research paper "Maternity benefits in India: A comparative analysis with other countries" by N. R. Reddy and R. D. Babu (2019) finds that while India's maternity benefits regime is relatively more progressive compared to most low- and middle-income nations, it is plagued by problems of awareness, accessibility, and enforcement, especially among informal sector women. In addition, the authors emphasize breaking social and cultural barriers while advocating for increased awareness, efficient enforcement mechanisms, and participative policymaking.

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.

The research article "Maternity benefits in India: A comparative analysis with other countries" by N. R. Reddy and R. D. Babu (2019) concludes that although India's maternity benefits policy is more liberal than that of certain low- and middle-income countries, it is confronted with serious issues of awareness, access, and enforcement, especially for women in the informal economy. In addition, the authors emphasize the necessity of overcoming social and cultural obstacles and fostering increased awareness, effective enforcement strategies, and participatory policy-making.

Gayathri Devi, Dr K. Lokasakthi (2020) "A Comparative Analysis on Maternity Benefits in India with Other Countries" is about the maternity benefits provided to the pregnant women of India and compared with other key countries. The authors first spoke about the maternity benefits act and amendment act in India and then provided information about other countries such as Australia, Singapore, China, Belgium etc. the maternity benefits. Then he concluded that India is providing more benefits in the form of paid leave of 26 weeks to the pregnant women.

OBJECTIVES:

1. To investigate and contrast the current maternity benefit laws in India with those of a few other chosen nations.
2. To investigate the effects of maternity benefits on women's employment, health, and well-being in India and a few other countries.
3. To investigate the variations and parallels in the application of maternity benefit laws and their outcomes in various nations.
4. To assess India's current maternity benefits laws and offer suggestions to legislators on how to make them better.

MATERNITY BENEFIT IN INDIA:

Maternity leave is an approved timeframe away from work for female employees in India, which they can use prior to and/or following the birth of a child. The Maternity Benefit Act of 1961 defines the rules that regulate maternity leave within the nation. As per this Act, qualified women employed in recognized companies and factories are entitled to apply for maternity leave lasting up to 6 months. They can choose to take this leave either before or after giving birth, and it may also span both times. Throughout maternity leave, employers must provide the full salary to the female employee. Furthermore, besides the regular maternity leave defined by the Maternity Benefit Act, private sector firms in India can offer additional maternity leave as an advantage to their female staff. The Maternity Benefit Act has been revised over the years to safeguard the rights and welfare of female workers. The latest update to the Maternity Benefit (Amendment) Act 2017 broadened its coverage to incorporate remote work and hybrid work arrangements. Additionally, the Act permits new mothers to take advantage of more paid days off. Essentially, the Maternity Benefit Act in India is vital in assisting women workers before and after giving birth. It aims to protect their interests, guaranteeing financial stability throughout the maternity leave, and fosters a supportive atmosphere for the empowerment of women workers to raise their infants while attending to their own health.

Criteria for Eligibility:

The paid maternity leave policy is relevant for women employed in organizations with over 10 staff members. Employed for a minimum of 80 days in the year prior to giving birth.

Length of Paid Time Off:

12 to 26 weeks for women working in the organized sector. If a woman has over two children, the maternity leave is extended to a maximum of 12 weeks.

Extra Advantages:

Adoptive and surrogate mothers are eligible for 12 weeks of leave starting from the date of adoption. At the employer's discretion, female employees may work from home after their maternity benefits are depleted.

Employer Obligations:

Employers are required to provide the complete salary of the female employee while she is on maternity leave. Firms with more than 50 staff members must offer crèche services, either independently or in conjunction with shared amenities within a specified range.

Difficulties & Constraints:

Maternity benefits are accessible solely to employees in organized sectors (such as factories and other establishments), excluding those in the informal sectors. There is no federal paid paternity leave for employees in the private sector. Although India's maternity leave law is among the most advanced in the world, it does not receive adequate support from the government. Additionally, paternity leave as a benefit raises apprehensions.

MATERNITY BENEFIT ON OTHER LEGISLATION:

In addition to the Maternity Benefit Act of 1961 and its 2017 amendment, other laws in India offer maternity benefits to women across various sectors. Here are several legislations concerning maternity benefits in India:

- **Factories Act, 1948:** The Factories Act of 1948 mandates that factories offer maternity benefits to female employees. According to the Act, women are eligible for six weeks of maternity leave, which may be extended to 12 weeks based on a doctor's recommendation.
- **Mines Maternity Benefit Act, 1941:** The Mines Maternity Benefit Act, 1941 ensures maternity benefits for women employed in mines. According to the Act, women have the right to six weeks of maternity leave, which may be prolonged to 12 weeks upon a medical professional's recommendation.
- **Employees' State Insurance (ESI) Act, 1948:** The ESI Act of 1948 offers social security advantages to workers employed in factories and establishments included under the Act. According to the Act, women are granted 26 weeks of maternity leave at full salary.
- **Public Sector Undertakings (PSUs):** Numerous PSUs maintain their own guidelines and rules concerning maternity benefits for their staff. For instance, the Indian Oil Corporation Limited (IOCL) grants 180 days of fully paid maternity leave to its women employees.
- **Civil Services Regulations:** The Central Civil Services (Leave) Rules, 1972 and the All-India Services (Leave) Rules, 1955 offer maternity leave to female staff in the Central Government and All India Services. According to the regulations, women are granted 180 days of maternity leave at full salary.

MATERNITY BENEFIT IN DEVELOPED NATIONS:

United States

The United States stands as an outlier among developed nations in its approach to maternity benefits, characterized by a lack of mandated paid leave at the federal level. While the Family and Medical Leave Act (FMLA) of 1993 provides eligible employees with up to 12 weeks of unpaid, job-protected leave for childbirth and recovery, this crucial legislation is limited in scope. FMLA eligibility excludes many workers due to employer size requirements or insufficient tenure. The absence of a federal paid leave program creates a fragmented landscape, reliant on a patchwork of state and local initiatives, alongside employer-provided benefits. States like California, New York, and New Jersey have implemented paid family leave programs funded through payroll taxes, offering partial wage replacement during leave. However, access remains uneven, leaving a significant portion of the workforce without guaranteed financial support during a critical period.

This lack of universal access to paid maternity leave disproportionately affects low-wage workers, who are less likely to be eligible for employer-provided benefits and can least afford unpaid time off. The consequences extend beyond individual financial strain, impacting maternal and infant health outcomes and perpetuating gender inequalities in the workplace. While the debate regarding a national paid leave program continues, the current system in the U.S. underscores a critical gap in social welfare provisions for working families.

Eligibility:

- You have to have been employed by your company for a minimum of 12 months.
- In the previous year, you had to have put in at least 1,250 hours of work.
- The employer must employ at least fifty people within a 75-mile radius.

Benefits:

- Up to 12 weeks of annual unpaid leave with job protection.
- Can be used for the birth of a child and to care for the newborn.

Length of Maternity Leave is 12 weeks of unpaid leave as per the Family and Medical Leave Act (FMLA). It is Responsibilities because federal regulations do not mandate paid maternity leave; benefits differ among employers.

Comparison with India: In India, employees receive 26 weeks of paid leave, while in the U.S., federal legislation only requires unpaid leave.

United Kingdom:

Maternity leave in the United Kingdom represents a crucial element of social welfare policy, aimed at supporting working mothers and promoting gender equality in the workplace. Governed by the Employment Rights Act 1996, it provides eligible employees with up to 52 weeks of leave, comprised of 26 weeks of Ordinary Maternity Leave and 26 weeks of Additional Maternity Leave. Statutory Maternity Pay (SMP), paid for up to 39 weeks, offers a financial safety net, ensuring a degree of economic stability during this significant life event. The first six weeks are paid at 90% of the employee's average weekly earnings, followed by a flat rate or 90% of earnings, whichever is lower, for the remaining 33 weeks. This system aims to alleviate financial pressures while acknowledging the demands of childcare.

While the UK's maternity leave provision is considered progressive compared to some nations, criticisms persist. The relatively short duration of fully paid leave, particularly compared to Scandinavian countries, can present a challenge for families. Furthermore, eligibility criteria, including continuous employment requirements, may exclude certain segments of the workforce.

Eligibility:

- Be an employee of any organization (not self-employed),

- Have worked for your employer for at least 26 weeks by the 15th week before your due date, and
- Earn at least £123 per week (as of 2024–2025).

Payment Details:

- 90% of your typical weekly income (before taxes) for the first six weeks.
- Next 33 weeks: £184.03 per week or 90% of your average weekly earnings (whichever is lower).
- Up to 39 weeks of paid leave total.

Length of Maternity Leave: Maximum of 52 weeks (39 weeks compensated).

Financial Assistance: For the initial 6 weeks, 90% of salary, then statutory pay thereafter.

Comparison with India: While the U.K. offers a more extended range of leave options, Indian women receive full pay for 26 weeks, unlike the tiered approach utilized in the U.K.

Canada:

Canada's maternity benefits, administered through the Employment Insurance (EI) program, serve as a cornerstone of the nation's family support system. Designed to provide temporary financial assistance to individuals who are pregnant or have recently given birth, these benefits allow eligible claimants to take time away from work to care for their newborn child without experiencing a complete loss of income. This crucial support fosters healthy parent-child bonding, promotes maternal well-being, and alleviates some of the financial pressures associated with early parenthood. While the system offers a significant safety net, it is not without its limitations. Eligibility criteria, based on insurable hours worked in the preceding year, can exclude some precarious workers and those with unconventional employment histories. Moreover, the current benefit rate, a percentage of average weekly earnings, may not adequately cover the living expenses of all families, particularly those in urban centers with high costs of living.

Length of Maternity Leave: A maximum of 18 months.

Financial Assistance: Legal sick leave compensation 55% of wages (up to \$695/week)

Comparison with India: In contrast to India, Canada provides longer periods of paid maternity leave that are subsidised by the government. In India, the employer provides funding for

Germany:

Germany's robust system of maternity benefits provides crucial support to expectant and new mothers, reflecting the nation's commitment to family welfare and gender equality. These benefits, enshrined in law, aim to safeguard the health and financial security of women during pregnancy, childbirth, and the initial months of parenthood.

The cornerstone of this system is the *Mutterschutz*, a legal framework that protects pregnant employees and new mothers from dismissal and unsafe working conditions. This period of mandated leave comprises six weeks prior to the expected delivery date and eight weeks following birth, extendable in cases of premature or multiple births. During this time, mothers receive *Mutterschaftsgeld*, a combination of statutory health insurance payments and employer contributions, ensuring continued income. Beyond *Mutterschutz*, parental leave (*Elternzeit*) offers both mothers and fathers the opportunity to take up to three years off work per child, providing flexibility in childcare arrangements. During this period, parents may be eligible for *Elterngeld*, a state benefit designed to partially replace lost income. This benefit is income-based, encouraging both parents to actively participate in childcare without facing significant financial hardship.

Length of Maternity Leave: 14 weeks of full pay, followed by up to 3 years of parental leave.

Monetary Assistance: These benefits subsidized by the government offer financial aid during prolonged leave.

Comparison with India, Germany's parental leave policies, coupled with government-funded financial assistance, are significantly more extensive. India offers extended periods of paid maternity leave; however, in several countries, maternity leaves are financed by the government, resulting in much more robust policies.

MATERNITY BENEFIT IN DEVELOPING NATIONS:**China:**

China's maternity benefit system, a critical component of its social security framework, has evolved considerably in response to shifting demographic trends and evolving labor rights. Designed to support working mothers through pregnancy and childbirth, the system aims to balance the needs of the workforce with the imperative to encourage a sustainable birth rate. The core of the benefit comprises paid maternity leave, typically ranging from 98 days to extended periods depending on local regulations. This leave allows mothers to recover physically and bond with their newborns. Moreover, maternity benefits often include a monthly allowance, contributing towards the cost of childcare and essential supplies. However, the effectiveness of the system is not without its challenges. Regional disparities in benefit levels and accessibility create inequalities, particularly affecting women in rural areas and those employed in the informal sector. Furthermore, concerns regarding potential discrimination against pregnant employees persist, necessitating vigilant enforcement of existing labour laws.

In recent years, with the abandonment of the one-child policy and encouragement of larger families, the Chinese government has actively sought to strengthen and expand maternity benefits. This includes exploring options like shared parental leave and improved childcare provisions. Despite these efforts, maintaining a balance between incentivizing childbirth and protecting the economic opportunities of women remains a complex and ongoing balancing act, vital for China's future social and economic development.

Difference between China and India:

Maternity benefits are an important aspect of social welfare and employee rights, especially in countries like China and India, where population demographics and labour policies have historically been a focus of government intervention. Let's break down and compare maternity benefits in both China and India

Duration of Maternity Leave**China:**

- Standard Leave Duration: 98 days (14 weeks). This includes both prenatal and postnatal leave.
- Additional Leave: Women in some provinces (such as Beijing and Shanghai) can get extended leave, especially for certain special circumstances (e.g., multiple births).

India:

- Standard Leave Duration: 26 weeks (6 months) for the first two children, as per the Maternity Benefit (Amendment) Act, 2017.
- For Subsequent Children: 12 weeks (about 3 months) of paid maternity leave is applicable.

Payment During Maternity Leave**China:**

- Paid Leave: Maternity leave is generally paid by the employer, though some regions have a social insurance fund that reimburses the employer. The amount paid depends on local regulations and can vary by province. The payment typically equals the woman's average wage in the last few months prior to the leave.
- Special Provisions: For women working in rural areas, the government may offer a subsidy to improve maternity benefits.

India:

- Paid Leave: Employees are entitled to full pay during the entire 26-week maternity leave period. This applies to women working in organizations with 10 or more employees. The pay is generally equivalent to the average wages the woman earned in the 3 months preceding the leave.
- Private Sector: There is often more variation, as some companies may offer more generous benefits than the statutory minimum.

Eligibility Criteria**China:**

- Eligibility: Employees are eligible for maternity benefits if they have paid into the social insurance system (similar to India's Employees' State Insurance).
- Other Conditions: Women working in both urban and rural settings, especially in state-owned or large private enterprises, have access to these benefits. However, women working in smaller informal sectors may not always be covered.

India:

- Eligibility: Maternity leave benefits are available to women employed in firms with at least 10 employees. The woman must have worked for the employer for at least 80 days in the 12 months preceding her delivery.
- Recent Amendments: The Maternity Benefit Act was amended in 2017 to increase the duration of paid leave from 12 to 26 weeks for the first two children. However, for women working in smaller, informal sectors or those on contract-based employment, these benefits are not applicable.

Health and Medical Benefits**China:**

- Healthcare Support: Health insurance schemes in China (often provided by the employer) generally cover medical expenses related to pregnancy and childbirth. The costs of prenatal check-ups, delivery, and postnatal care can be partially covered through public insurance or employer-sponsored healthcare.
- Hospital Costs: Most childbirth-related expenses are covered by the national insurance system, though the level of coverage may vary by region.

India:

- Healthcare Support: The maternity benefits law does not specify direct healthcare support, but women covered by the Employees' State Insurance Scheme (ESI) can receive maternity benefits, which cover medical expenses during pregnancy and childbirth.
- Private Sector: In private companies, many larger organizations provide additional health insurance that covers maternity expenses.

Paternity Leave**China:**

- Paternity Leave: Paternity leave in China is relatively limited. The duration can vary by region but is typically around 7 to 15 days. Some provinces may offer more, but it's not a nationwide standard.

India:

- Paternity Leave: In India, there is no statutory requirement for paternity leave in most private sector workplaces. Nonetheless, 15 days of paternity leave are granted to government workers. Private employers may offer varying durations of paternity leave, but it's not mandatory.

Support for Working Mothers**China:**

- Breastfeeding Breaks: Women are entitled to breastfeeding breaks during work, usually 1 hour per day for up to 1 year after childbirth.
- Childcare Facilities: Some large companies in urban areas may offer on-site childcare facilities. However, this is not widespread across all sectors.

India:

- Breastfeeding Breaks: The law entitles working mothers to a daily 30-minute breastfeeding break for up to 6 months after childbirth.
- Childcare Facilities: The law mandates that organizations with 50 or more employees should have crèche facilities (childcare) within a prescribed distance from the workplace. However, this law is often not fully implemented.

South Africa:

South Africa's legal framework, primarily through the Basic Conditions of Employment Act (BCEA) and the Unemployment Insurance Act (UIA), recognizes and protects the right to maternity benefits. This provision aims to mitigate the economic hardship faced by pregnant employees and new mothers during periods of leave associated with childbirth and childcare. The UIA provides for the payment of maternity benefits to qualifying contributors, typically supplementing the income lost during unpaid maternity leave as mandated by the BCEA.

However, the effectiveness of this system faces notable challenges. Firstly, access remains disproportionately limited. Informal sector workers, often lacking formal employment contracts and contributions to the UIA, are largely excluded from benefiting. This exacerbates existing inequalities, particularly for vulnerable populations. Secondly, the level of benefit paid often falls short of pre-leave earnings, placing considerable financial strain on families during a crucial period. Furthermore, bureaucratic complexities and administrative delays within the UIA can hinder timely access to the funds.

Eligibility:

- Women must have worked for at least 24 hours a month for an employer to qualify for UIF payments.
- The employee must submit a medical certificate confirming pregnancy and due date, and the claim must be filed through the Department of Employment and Labour.

Duration of Leave:

- In South Africa, the Basic Conditions of Employment Act (BCEA) grants female employees 4 months (approximately 17 weeks) of maternity leave.
- The leave can be taken starting from at least 4 weeks before the expected date of delivery and can extend after the birth.
- If the employee is not able to work due to complications, the leave can be extended in some cases, but the total leave must not exceed 4 months.

Maternity Benefits (Payment):

- South Africa provides maternity leave benefits through the Unemployment Insurance Fund (UIF), which is paid to eligible women.
- Eligible employees receive 38% to 60% of their salary (depending on the salary level) for the duration of the maternity leave, provided they've contributed to UIF.
- The UIF payment is capped, meaning it may not fully replace an employee's salary.

Key Differences with India:

1. Duration of Leave: India offers 26 weeks of maternity leave, which is significantly longer than South Africa's 4 months (17 weeks).
2. Payment of Benefits: In India, the employer directly pays the full salary, while in South Africa, maternity benefits are paid through UIF, and employees receive a portion (38-60%) of their salary.
3. Eligibility Criteria: In India, women must have worked at least 80 days in the past year, while in South Africa, the requirement is only 24 hours/month for UIF contributions.
4. Support for Adoption/Surrogacy: India specifically covers adoption and surrogacy with 12 weeks of leave, while South Africa does not have a clear mention of these situations in the maternity leave policy.

CONCLUSION:

A comparative study of maternity benefits reveals India's progress alongside persistent shortcomings when contrasted with global standards. While statutory provisions like paid leave and creche facilities demonstrate a commitment to maternal welfare, the duration, eligibility criteria, and enforcement mechanisms often lag behind those in countries with more robust social security systems. Addressing the disparity between formal and informal sectors, expanding benefit coverage to self-employed women, and streamlining bureaucratic processes are crucial steps for India to achieve truly equitable and comprehensive maternity support. Further research into the long-term impact of varying maternity benefit models on female labor force participation and child well-being is essential to inform future policy adjustments and ensure a healthy and economically empowered workforce.

REFERENCE:

1. <https://aparajitha.com/2020/01/29/>
2. <https://nyaaya.org/guest-blog/maternity-benefit-in-india/>
3. <https://www.acko.com/group-health-insurance/maternity-leave-policy>
4. <https://blog.ipleaders.in/the-maternity-benefit-act/#:~:>

text=According%20to%20the%20Maternity%20Benefit,medical%20bonus%20to%2025%2C000%20rupees.

5. <https://www.skquad.io/blog/guide-to-maternity-leave-in-countries-around-the-world> <https://www.onsurity.com/blog/maternity-leave-in-india/>
6. <https://www.skquad.io/blog/guide-to-maternity-leave-in-countries-around-the-world> <https://legalserviceindia.com/legal/article-9174-all-about-maternity-leave-in-india.Html>.
7. <https://journalppw.com/index.php/jpsp/article/view/2874/1858>
8. <https://www.oysterhr.com/library/guide-to-maternity-leave-in-countries-around-the-world>
9. https://ejmcm.com/article_5361_e319b4c516dc42685db4b2a4ab5eb5_e8.Pdf.
10. <https://www.moneyhelper.org.uk/en/family-and-care/becoming-a-parent/maternity-pay-and-leave#>