

supervisors; coaching and “stay-in-touch” policies during leave; updates, counselling and gradual return to work through temporary part-time and family-friendly working time arrangements (Cuomo and Mapelli, 2009). Social dialogue in the workplace proves essential to establish mutually agreed maternity planning.

Supporting ILO member States in the progressive shift from employer liability systems to maternity leave benefits financed by social security systems is a priority of ILO technical assistance. This includes the following activities: information on maternity protection and social security labour standards; support to enable the ratification and effective implementation of ILO instruments; evidence-based awareness-raising among governments, parliaments, employers’ and workers’ organizations of the benefits of maternity protection, especially for the most vulnerable workers, and the need to create fiscal space to finance it; technical expertise in the review and drafting of the legislation; preparation of financial, actuarial⁴⁹ and feasibility studies, based on comparative international experience and good practices; training in the administration of short-term benefits and support in the progressive implementation and extension of benefits to low-income and informal workers (see box 2.3).

Non-contributory schemes (such as social assistance) base benefit eligibility on some level of financial need on the part of the woman (or her household). It is not necessary that the woman is or was previously working and no previous contributions are necessary from beneficiaries or their employers as a condition of entitlement to receive relevant benefits, though means tests are usually applied. Social assistance is typically financed by public funds (i.e., state general revenues and/or earmarked taxes) and administered by governments alone, often at the local level. In national laws and social protection programmes, cash benefits for social assistance are generally flat rate and lower than those provided by social insurance.

National practice shows that, in the case of maternity, non-contributory schemes can play a number of different roles in funding maternity leave payments. They can:

- (1) act as the sole source of funding of employment-related maternity cash benefits: this is the case only in Australia, Georgia, New Zealand and the

United Kingdom, where benefits remain largely income related (up to a ceiling in New Zealand), with the exception of Australia, where a flat rate at the minimum wage level is paid;

- (2) complement, typically at a flat rate, earnings-related benefits provided by social insurance (in Bosnia and Herzegovina, Croatia, Greece and Japan) or employers (Hong Kong (China), Singapore and Denmark);
- (3) provide a substitute for contributory maternity cash benefits where workers who would otherwise be eligible for receipt of maternity benefits fail to meet the qualifying conditions for the applicable regime, subject to the means tests that might be required, in line with Article 6.6 of Convention No. 183 (see box 2.4 and section 2.4: *Scope and eligibility requirements*);
- (4) more recently, act as the sole source of funding of non-employment related minimum benefits, which are paid to workers in the informal economy or low-income women in general, who are not affiliated or contributing to any social security system. This is in line with the ILO Social Protection Floors Recommendation, 2012 (No. 202), which advocates the establishment of basic social security guarantees, including those related to maternity, for all residents who are unable to work. In certain cases, conditions related to the recipient’s behaviour may apply (e.g., the mother may be required to undergo regular medical check-ups during pregnancy or to give birth in a health facility).

While this report will document examples of non-contributory schemes under points 3 and 4 above, the global review systematically covers contributory and non-contributory schemes under points 1 and 2 above. As shown in section 2.4: *Scope and eligibility requirements* below, these provisions usually apply only to women employed in the formal economy and standard employment, and thus in many countries, especially low and middle-income countries, only this minority enjoy maternity benefits from social security schemes. Moreover, as shown in figure 2.3, in the majority of countries national provisions do not meet the ILO maternity protection replacement income standards of two-thirds of previous income.