

INTERNATIONAL LAW  
JOURNAL

---

**WHITE BLACK  
LEGAL LAW  
JOURNAL  
ISSN: 2581-  
8503**

*Peer - Reviewed & Refereed Journal*

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

[WWW.WHITEBLACKLEGAL.CO.IN](http://WWW.WHITEBLACKLEGAL.CO.IN)

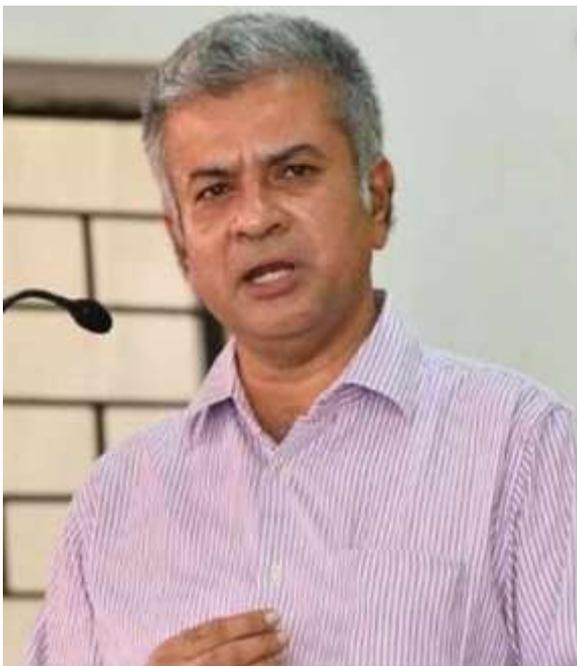
### **DISCLAIMER**

No part of this publication may be reproduced or copied in any form by any means without prior written permission of Editor-in-chief of White Black Legal – The Law Journal. The Editorial Team of White Black Legal holds the copyright to all articles contributed to this publication. The views expressed in this publication are purely personal opinions of the authors and do not reflect the views of the Editorial Team of White Black Legal. Though all efforts are made to ensure the accuracy and correctness of the information published, White Black Legal shall not be responsible for any errors caused due to oversight or otherwise.

WHITE BLACK  
LEGAL

## **EDITORIAL** **TEAM**

### **Raju Narayana Swamy (IAS ) Indian Administrative Service** **officer**



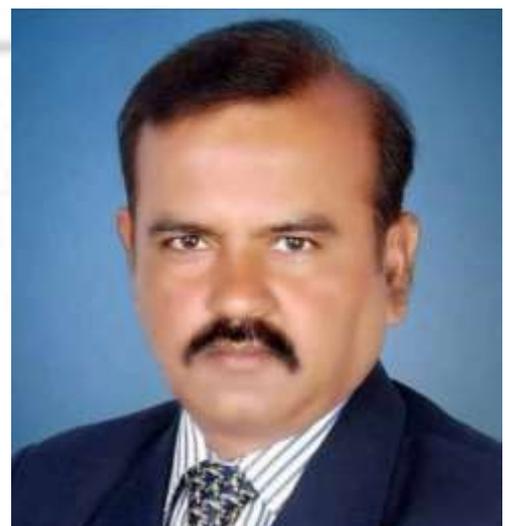
Dr. Raju Narayana Swamy popularly known as Kerala's Anti Corruption Crusader is the All India Topper of the 1991 batch of the IAS and is currently posted as Principal Secretary to the Government of Kerala . He has earned many accolades as he hit against the political-bureaucrat corruption nexus in India. Dr Swamy holds a B.Tech in Computer Science and Engineering from the IIT Madras and a Ph. D. in Cyber Law from Gujarat National Law University . He also has an LLM (Pro) ( with specialization in IPR) as well as three PG Diplomas from the National Law University, Delhi- one in Urban Environmental Management and Law, another in Environmental Law and Policy and a third one in Tourism and Environmental Law. He also holds a post-graduate diploma in IPR from the National Law School, Bengaluru

and a professional diploma in Public Procurement from the World Bank.

diploma in Public

### **Dr. R. K. Upadhyay**

Dr. R. K. Upadhyay is Registrar, University of Kota (Raj.), Dr Upadhyay obtained LLB , LLM degrees from Banaras Hindu University & Phd from university of Kota.He has succesfully completed UGC sponsored M.R.P for the work in the ares of the various prisoners reforms in the state of the Rajasthan.



## **Senior Editor**

### **Dr. Neha Mishra**



Dr. Neha Mishra is Associate Professor & Associate Dean (Scholarships) in Jindal Global Law School, OP Jindal Global University. She was awarded both her PhD degree and Associate Professor & Associate Dean M.A.; LL.B. (University of Delhi); LL.M.; Ph.D. (NLSIU, Bangalore) LLM from National Law School of India University, Bengaluru; she did her LL.B. from Faculty of Law, Delhi University as well as M.A. and B.A. from Hindu College and DCAC from DU respectively. Neha has been a Visiting Fellow, School of Social Work, Michigan State University, 2016 and invited speaker Panelist at Global Conference, Whitney R. Harris World Law Institute, Washington University in St.Louis, 2015.

### **Ms. Sumiti Ahuja**

Ms. Sumiti Ahuja, Assistant Professor, Faculty of Law, University of Delhi,

Ms. Sumiti Ahuja completed her LL.M. from the Indian Law Institute with specialization in Criminal Law and Corporate Law, and has over nine years of teaching experience. She has done her LL.B. from the Faculty of Law, University of Delhi. She is currently pursuing Ph.D. in the area of Forensics and Law. Prior to joining the teaching profession, she has worked as Research Assistant for projects funded by different agencies of Govt. of India. She has developed various audio-video teaching modules under UGC e-PG Pathshala programme in the area of Criminology, under the aegis of an MHRD Project. Her areas of interest are Criminal Law, Law of Evidence, Interpretation of Statutes, and Clinical Legal Education.



### **Dr. Navtika Singh Nautiyal**

Dr. Navtika Singh Nautiyal presently working as an Assistant Professor in School of law, Forensic Justice and Policy studies at National Forensic Sciences University, Gandhinagar, Gujarat. She has 9 years of Teaching and Research Experience. She has completed her Philosophy of Doctorate in 'Intercountry adoption laws from Uttranchal University, Dehradun' and LLM from Indian Law Institute, New Delhi.



### **Dr. Rinu Saraswat**

Associate Professor at School of Law, Apex University, Jaipur,  
M.A, LL.M, Ph.D,

Dr. Rinu have 5 yrs of teaching experience in renowned institutions like Jagannath University and Apex University. Participated in more than 20 national and international seminars and conferences and 5 workshops and training programmes.

### **Dr. Nitesh Saraswat**

E.MBA, LL.M, Ph.D, PGDSAPM  
Currently working as Assistant Professor at Law Centre II, Faculty of Law, University of Delhi. Dr. Nitesh have 14 years of Teaching, Administrative and research experience in Renowned Institutions like Amity University, Tata Institute of Social Sciences, Jai Narain Vyas University Jodhpur, Jagannath University and Nirma University.  
More than 25 Publications in renowned National and International Journals and has authored a Text book on Cr.P.C and Juvenile Delinquency law.



### **Subhrajit Chanda**

BBA. LL.B. (Hons.) (Amity University, Rajasthan); LL. M. (UPES, Dehradun) (Nottingham Trent University, UK); Ph.D. Candidate (G.D. Goenka University)

Subhrajit did his LL.M. in Sports Law, from Nottingham Trent University of United Kingdoms, with international scholarship provided by university; he has also completed another LL.M. in Energy Law from University of Petroleum and Energy Studies, India. He did his B.B.A.LL.B. (Hons.) focussing on International Trade Law.

## ***ABOUT US***

WHITE BLACK LEGAL is an open access, peer-reviewed and refereed journal provided dedicated to express views on topical legal issues, thereby generating a cross current of ideas on emerging matters. This platform shall also ignite the initiative and desire of young law students to contribute in the field of law. The erudite response of legal luminaries shall be solicited to enable readers to explore challenges that lie before law makers, lawyers and the society at large, in the event of the ever changing social, economic and technological scenario.

With this thought, we hereby present to you

# **AN ANALYSIS ON MATERNITY PROTECTION AND HUMAN RIGHTS**

AUTHORED BY: C DHANALAKSMI<sup>1</sup>

B.Com., LL.B (HONS)

## **ABSTRACT:**

*Maternity protection is a cornerstone of human rights, ensuring the health, dignity, and economic security of working mothers. This paper examines the interplay between maternity protection laws and human rights principles, highlighting the importance of aligning national legislation with international standards such as the International Labour Organization's (ILO) Maternity Protection Convention No. 183 and the Universal Declaration of Human Rights. A comparative analysis of global maternity policies reveals successes in promoting gender equality and safeguarding maternal and child well-being, alongside gaps in coverage for informal workers and enforcement challenges. The study underscores the role of international organizations in advocating for inclusive maternity benefits and proposes actionable reforms to bridge disparities across diverse socioeconomic contexts. By harmonizing legal frameworks with human rights norms, maternity protection can contribute to more equitable and inclusive workplaces globally.*

**Key Words:** *Maternity Protection, Human Rights, International Standards, Maternity Benefit Act, ILO Convention No. 183, Labor Law.*

## **INTRODUCTION:**

The concept of maternity protection emerged in response to the harsh realities faced by working women during the industrial revolution in the late 19th and early 20th centuries. At that time, women were entering the workforce in large numbers but often faced exploitative working conditions, long hours, and little to no support during pregnancy or childbirth. Recognizing these challenges, early labor rights movements advocated for protective measures, marking the beginning of maternity protection as a legal concept. Because, the experience of motherhood is universally recognized as one of the most pivotal stages in a woman's life. For working

---

<sup>1</sup> IV Year- B.COM.LL.B (HONS.)- School Of Excellence in Law, TNDALU.

women, this period is not only a profound personal transition but also a phase that demands systemic support to ensure their rights, health, and dignity are upheld. Maternity protection emerges as a critical aspect of this support, blending labor rights and human rights to create an environment where women can embrace motherhood without fear of discrimination or economic insecurity. By safeguarding women during pregnancy, childbirth, and postpartum recovery, maternity protection not only benefits the individual but also contributes to societal and economic progress.

One of the earliest milestones in maternity protection was the adoption of the **International Labour Organization's (ILO) Maternity Protection Convention No. 3 in 1919**, which called for a minimum of six weeks of maternity leave for women and included provisions for healthcare support during pregnancy. This marked the international community's first formal step toward recognizing the importance of safeguarding the rights of working mothers. Over the decades, additional conventions and treaties built upon these foundational principles, expanding protections and adapting to the changing nature of the workforce.

As labor laws evolved, maternity protection began to encompass broader aspects of women's rights. The mid-20th century saw the integration of maternity protection into human rights frameworks, with instruments like the **Universal Declaration of Human Rights (1948)** affirming the rights of mothers and children to special care and assistance. The adoption of the **International Covenant on Economic, Social, and Cultural Rights (1966)** further reinforced this commitment, recognizing maternity protection as an essential aspect of economic and social rights.

During this period, national governments began enacting maternity benefit laws to reflect these International standards. In contrast to this, many developing nations faced challenges in implementing similar measures due to economic and social barriers.

The introduction of the **ILO Maternity Protection Convention No. 103 in 1952** marked another significant advancement. This convention expanded maternity leave to 12 weeks and prohibited dismissal based on pregnancy status. These developments demonstrated a growing recognition of the importance of maternity protection not just as a labor issue but as a fundamental human right.

Currently, Maternity protection is a global concern, with significant variations in how countries implement and enforce these rights. The latest standard, the **ILO Maternity Protection Convention No. 183 (2000)**, emphasizes key protections, including:

- A minimum of 14 weeks of paid maternity leave.
- Workplace health and safety measures for pregnant and nursing mothers.
- Prohibition of discriminatory practices related to maternity.

Developed nations, such as Canada, Germany, and Japan, often have extensive maternity benefit systems, providing paid leave, job security, and healthcare services. However, even among these countries, disparities exist, particularly in the duration and inclusivity of leave policies.

### **GLOBAL FRAMEWORK ON MATERNITY PROTECTION:**

The International Labour Organization (ILO) was founded in 1919, international labour standards have been established to provide maternity protection for women workers. The ILO Maternity Protection Convention, 2000 (No. 183) represents the minimum standards, whereas the accompanying ILO Maternity Protection Recommendation, 2000 (No. 191) encourages additional measures.<sup>2</sup> Key elements of maternity protection include:

- *Maternity leave duration:* The mother's right to a period of rest in relation to childbirth is a crucial means of safeguarding health and nutrition of the mother and her child. Convention No. 183 states that maternity leave should not be less than 14 weeks, while Recommendation No. 191 suggests that maternity leave be at least 18 weeks.
- *Amount of maternity leave cash benefits:* The right to cash benefits during absence for maternity leave is intended to ensure that the woman can maintain herself and her child in proper conditions of health and with a suitable standard of living. Maternity leave cash benefits aim to replace a portion of the income lost due to the interruption of the woman's economic activities, giving practical effect to the provision for leave. Convention No. 183 states that cash benefits should not be less than two-thirds of the woman's earnings prior to taking leave, while Recommendation No. 191 encourages raising the benefits to the full amount of previous earnings.

---

<sup>2</sup><https://www.who.int/data/nutrition/nlis/info/maternity-protection-compliance-with-international-labour-standards>

- *Source of maternity leave cash benefits:* The source of benefits is important due to potential discrimination in the labour market if employers have to bear the full costs. Convention No. 183 stipulates that cash benefits shall be provided through compulsory social insurance or public funds, and that individual employers shall not be liable for maternity leave benefits without that employer's specific agreement.
- *Breastfeeding breaks and breastfeeding facilities:* The right to continue breastfeeding a child after returning to work is important since duration of leave entitlements generally is shorter than the WHO recommended duration of exclusive and continued breastfeeding. Convention No. 183 states that women shall have the right to one or more daily breaks or a daily reduction of hours of work for breastfeeding, which is to be counted as working time and remunerated accordingly. Recommendation No. 191 states that where practicable, provision should be made for the establishment of facilities for nursing under adequate hygienic conditions at or near the workplace.

The fact that motherhood requires special care and attention is reflected in Article 25(2) of the Universal Declaration of Human Rights, 1948 which says: "Motherhood and childhood are entitled to special care and assistance. All children whether born in, or out of, wedlock, shall enjoy the same social protection." Similarly Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) also says that In order to prevent discrimination against women on the grounds of marriage or maternity and to ensure their effective right to work, States Parties shall take appropriate measures:

- (a) To prohibit, subject to the imposition of sanctions, dismissal on the grounds of pregnancy or of maternity leave and discrimination in dismissals on the basis of marital status;
- (b) To introduce maternity leave with pay or with comparable social benefits without loss of former employment, seniority or social allowances;

Article 9 of the International Covenant on Economic, Social and Cultural Rights, 1966<sup>3</sup> recognizes "the right of everyone to social security, including social insurance". It requires parties to provide some form of social insurance scheme to protect people against the risks of sickness, disability, maternity, employment injury, unemployment or old age; to provide for

---

<sup>3</sup> International Covenant on Economic, Social and Cultural Rights, U.N. Doc. A/6316 (1966).

survivors, orphans, and those who cannot afford health care; and to ensure that families are adequately supported. Benefits from such a scheme must be adequate, accessible to all, and provided without discrimination.<sup>4</sup>

Keeping in view the Convention of the International Labour Organisation and the fact that there was a need for providing maternity benefits, Article 42 of the Constitution directs the State to make provision for maternity relief. In pre-Independent India, in 1941 the Mines Maternity Benefit Act was passed. This Act was applicable to only those women who were working in mines. In 1948 the provision for maternity benefit was made under the Employees State Insurance Act and in 1951 under the Plantations Labour Act. Some State legislation also provided for maternity benefit. The scope of qualifying conditions for payment, the rate and period of benefit was not uniform under these Acts, therefore in 1961 the Maternity Benefit Act was enacted to remove these disparities and to have uniform rules. In order to reduce the disparities relating to maternity provisions under the various State and Central Acts referred to above, the Central Government enacted a new Act, called the Maternity Benefit Act in 1961. By the end of the year 1972, the Act was extended to the whole of the Indian Union. It applies to every establishment belonging to the Government except those factories or establishments to which provisions of the Employees' State Insurance Act, 1948 are applicable. It applies to every establishment wherein persons are employed for the exhibition of equestrian, acrobatic and other performances. It repealed the Mines Maternity Benefit Act, 1941, and the Bombay Maternity Benefit Act, 1929. The State Governments have been empowered to extend all or any of the provisions of this Act to any other establishment or class of establishments, industries, commercial, agricultural or otherwise, with the approval of the Central Government by giving not less than two months notice of its intention of doing so.

### **MATERNITY RIGHTS UNDER DIFFERENT INDIAN LAWS:**

As already stated in India, the Maternity Benefit Act of 1961 is not the only piece of legislation that provides for maternity protection or benefit. The Employees' State Insurance Act, 1948 and the Central Civil Services Rules, 1972 are other legislations that cover maternity protection. Apart from these Statutes there are certain conditional cash transfer schemes to provide maternity benefits to women.

---

<sup>4</sup> The Committee on Economic, Social and Cultural Rights adopted General Comment No. 19, The Right to Social Security, UN Doc E/C.12/GC/19, art. 9 (2008).

(a) **The Employee's State Insurance Act, 1948:** The object of the Employees' State Insurance Act, 1948 is to provide for certain benefits to employees in case of sickness, maternity and employment injury and to make provisions for certain other matters like funeral expenses, dependants' benefit, medical benefit and disablement benefit. The main object of the Act is to evolve a scheme of socio-economic welfare, making elaborate provisions in respect of it. This Act extends to the whole of India. The provisions of this Act apply, in the first instance, to all factories including factories belonging to the Government other than seasonal factories. The Central Government in consultation with the Employees' State Insurance Corporation or the State Government with the approval of the Central Government may extend different provisions of the Act or any of them to any other establishment or class of establishments, industrial, commercial, agricultural or otherwise. But for any such extension of the provisions the appropriate Government has to give six months' notice.

(i) **Benefits given under the Act** The Employees' State Insurance Act, 1948, one of the most important social legislations in India, have been enacted to provide for various benefits in different contingencies. As per this Act, insured women workers get sickness benefit, disablement benefit, dependants' benefit, medical benefit and funeral expenses along with insured men workers. In addition to the above benefits, insured women workers also get maternity benefits. Section 46 (b) of the Act says that "Periodical payments to an insured woman in care of confinement or miscarriage or sickness arising out of pregnancy, confinement, premature birth of child or miscarriage, such women being certified to be eligible for such payments by an authority specified in this behalf by the regulations, is hereinafter referred to as Maternity Benefits.

(b) **Maternity Benefit Act, 1961**, is a significant piece of legislation in India designed to protect the employment of women during the maternity period and ensure their welfare. The Act applies to establishments such as factories, mines, plantations, shops, and other entities employing 10 or more people, with provisions aimed at promoting the health and well-being of pregnant and nursing mothers.

### **Key Provisions of the Act:**

- **Eligibility:** Women are entitled to maternity benefits if they have worked for at least 80 days in the 12 months preceding the expected delivery date.

- *Maternity Leave:* Initially, the Act provided for 12 weeks of paid maternity leave. However, following the Maternity Benefit (Amendment) Act, 2017, this has been increased to 26 weeks, of which up to 8 weeks can be availed before delivery.
- *Adoptive and Commissioning Mothers:* The 2017 amendment also included provisions for adoptive mothers and commissioning mothers, granting them up to 12 weeks of leave from the date of adoption or delivery of the child.
- *Crèche Facility:* The amendment mandates that establishments with 50 or more employees must provide crèche facilities, enabling working mothers to care for their children during working hours.
- *Prohibition of Dismissal:* The Act prohibits the dismissal or discrimination against a woman on grounds of maternity. Employers are obligated to provide maternity benefits, failing which they can face penalties.
- *Medical Bonus:* If no prenatal or postnatal medical care is provided by the employer, the woman is entitled to a medical bonus as determined by the state government.
- *Nursing Breaks:* Post-delivery, women are entitled to nursing breaks in addition to their regular breaks.

### **Importance of the Act:**

The Act plays a pivotal role in safeguarding the rights of working women by ensuring job security and financial independence during maternity. It also contributes to improving maternal and child health by allowing adequate recovery time after childbirth and enabling mothers to bond with their newborns. The Maternity Benefit Act, 1961, is a step toward gender equality and social welfare, aligning India's labor laws with global standards.

### **JUDICIAL ENDEAVOUR TOWARDS MATERNITY RIGHTS:**

*Municipal Corporation of Delhi v. Female Workers*<sup>5</sup>, the Union of Female Workers who were not on regular rolls, but were treated as temporary workers and employed on Muster roll, claimed that they should also get maternity benefit like regular workers. The court held that the provisions of the Act would indicate that they are wholly in consonance with the Directive Principles of State Policy, as set out in Article 39 and in other Articles, especially Article 42. A woman employee, at the time of advanced pregnancy cannot be compelled to undertake hard labour as it would be detrimental to her health and also to the health of the fetus. It is for this

---

<sup>5</sup>Municipal Corporation of Delhi v. Female Workers (2000) SCC 224

reason that it is provided in the Act that she would be entitled to maternity leave for certain periods prior to and after delivery.

*Air India v. Nargesh Mirza*,<sup>6</sup> the relevant regulation of Air India Corporation, Act and Indian Airlines Corporation, Act, was challenged on the ground that there was a discrimination between the retirement and termination conditions pertaining to air hostesses and those of male pursers forming part of the same cabin crew and performing similar duties. These conditions were that an air hostess will be retired from service: (1) On attaining the age of 35 years, or (2) On marriage, if it took place within four years of service, or (3) On first pregnancy. So far as condition (3) was concerned the court took strong exception to it and held it to be “grossly unethical” and as smacking of “deep rooted sense of utter selfishness at the cost of all human values”. Having taken the Air Hostesses in service and after utilizing her services for 4 years, to terminate her services if she becomes pregnant would amount to compelling her not to have any children. The ability / capacity to continue to work after having children is an individual matter and whether she would find it difficult to look after the children or not is her personal matter which affects the Air Hostesses concerned and not the airline. Pregnancy is not a disability; it is a “natural consequence of marriage” and any distinction made on the ground of pregnancy is extremely unreasonable and manifestly arbitrary. This condition was held to be unconstitutional as violative of article 14 and was struck down.

*Mini K.T. v. Life Insurance Corporation of India*,<sup>7</sup> also upheld the right of a woman to take leave for an extended time for looking after her child suffering from autism. The Court held that motherhood is integral to the dignity of the woman and that she can't be asked to choose between motherhood and employment.

### **RECOMMENDATIONS:**

- To extend maternity benefits to women in the informal sector and gig economy, who are often excluded from formal labor protections.
- To ensure strict enforcement of maternity protection laws through regular inspections and penalties for non-compliance.

---

<sup>6</sup> Air India v. Nargesh Mirza, (1981) 4 SCC 335.

<sup>7</sup> Mini K.T. v. Life Insurance Corporation of India, WP(c) No.22007 of 2012(A) , Decided on 21-12-2017

- To make awareness to the public by educating employers and employees about maternity rights and benefits.
- To promote workplace cultures that value and support working mothers, challenging stereotypes and biases.

## CONCLUSION:

Maternity protection lies at the heart of human rights, embodying the principles of dignity, equality, and justice. It is a critical mechanism to ensure that working women can navigate the challenges of pregnancy and motherhood without compromising their health, financial security, or professional aspirations. Grounded in international frameworks such as the Universal Declaration of Human Rights, the International Covenant on Economic, Social, and Cultural Rights, and the International Labour Organization's conventions, maternity protection sets global benchmarks for safeguarding women's rights at work. While these frameworks highlight the universal importance of maternity protection, significant disparities persist in their implementation across countries, particularly in informal sectors and the gig economy. As societies advance, aligning national laws with international standards becomes imperative. Maternity protection is not merely a labor issue—it is a testament to a society's commitment to gender equality and social justice.

## REFERENCES:

- (n.d.). *C183. Maternity Protection Convention, 2000 (No.183)*. [https://normlex.ilo.org/dyn/nrmlx\\_en/f?p=NORMLEXPUB:55:0::NO::P55\\_TYPE,P55\\_LANG,P55\\_DOCUMENT,P55\\_NODE:REV,en,C183,/Document](https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:55:0::NO::P55_TYPE,P55_LANG,P55_DOCUMENT,P55_NODE:REV,en,C183,/Document)
- (n.d.). *Maternity protection and parental leave entitlements*. Social Protection and Human Rights. <https://socialprotection-humanrights.org/key-issues/social-protection-systems/maternity-protection/>
- (n.d.). *Maternity protection: Compliance with international labour standards*. <https://www.who.int/data/nutrition/nlis/info/maternity-protection-compliance-with-international-labour-standards>
- Vinod, *Maternity Benefit Act, 1961*, (Dec. 21, 2005), [https://labour.gov.in/sites/default/files/the\\_maternity\\_benefit\\_act\\_1961\\_0.pdf](https://labour.gov.in/sites/default/files/the_maternity_benefit_act_1961_0.pdf).
- Ilo. (2015, August 3). *UNHCHR request for contribution: The enhancement of international cooperation in the field of human rights*.

[https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@africa/@ro-abidjan/documents/instructionalmaterial/wcms\\_388232.pdf](https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@africa/@ro-abidjan/documents/instructionalmaterial/wcms_388232.pdf).

- (2021, January 4). [https://whiteribbonalliance.org/wp-content/uploads/2022/05/WRA\\_RMC\\_Charter\\_FINAL.pdf](https://whiteribbonalliance.org/wp-content/uploads/2022/05/WRA_RMC_Charter_FINAL.pdf)
- Maine, D., & Yamin, A. E. (1999). Maternal mortality as a human rights issue: measuring compliance with international treaty obligations. *Human rights quarterly*, 21(3), 563-607.
- Dr. Lalit Dadwal, *Maternity Rights for Working Women and Law in India: A Critical Analysis*, 3 International Journal of Social Science and Economic Research 6883 -6907 (2018).
- Yamin, A. E. (2013). Applying human rights to maternal health: UN Technical Guidance on rights-based approaches. *International Journal of Gynecology & Obstetrics*, 121(2), 190-193.
- Cook, R. J., Wilson, O. A. F., & Dickens, B. M. (2001). *Advancing safe motherhood through human rights* (p. 27). World Health Organization, [Department of Reproductive Health and Research].
- Cruz, A. (2012). *Good practices and challenges on the Maternity Protection Convention, 2000 (No. 183) and the Workers with Family Responsibilities Convention, 1981 (No. 156): A comparative study*. ILO.

WHITE BLACK  
LEGAL