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The Necessity of Maternity Protection for Cambodian Mothers

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Executive Summary

- Maternity Protection is a fundamental human right that has been recognized and protected by the International Labor Organization (ILO) since 1919. Over 120 countries globally have legally mandated provisions for paid maternity leave and health benefits, with most developed nations implementing such policies.
- Paid maternity leave should not be a trade-off for mothers, as it enhances women's labor force participation after delivery, supports mothers' labor market by allowing them to take time off from work after childbirth and safely return to their pre-giving birth job, helping maintain their employment and reduce the need to start over when they re-enter the labor market.
- There are still many working mothers who do not have the access to maternity protection such as mothers in the informal economy. It is significant to incorporate an inclusive, comprehensive legal framework for them. Moreover, the workplace must tackle the street types that perpetuates women to not take maternity leave and must strictly follow the maternity guideline to encourage mothers to come back to work.

Introduction

Maternity Protection does not happen by chance. It was the hard work of many American and European feminists, including trade unions and activists in 1919, which led to the 1919 maternity protection convention by the International Labor Organization (ILO).¹ However, the expansion of coverage for women employed in different sectors has evolved over time. For the case of France, uncompensated maternity leave was introduced in 1909. However, not all mothers get to enjoy the benefits. In 1919, when France ratified the ILO convention, only teachers received maternity leave payment. Later on in 1929, civil servants began to have the access to such an entitlement and the other working mothers had to wait until 1979.²

According to ILO:

"Maternity Protection includes maternity leave; health protection at work for pregnant and breastfeeding women; cash and medical benefits; employment protection and non-discrimination; and breastfeeding support after returning to work. It also includes a number of workplace family friendly policies and practices, including flexible working arrangements, paternity and parental leaves, and childcare support."³

The Maternity Protection Convention, 2000 (No. 183), constitutes the latest international labor regulation regarding maternity protection. Maternity protection is a fundamental human right that is inherent and universally recognized and protected, based on the inherent dignity and worth of every individual. According to this recent report by ILO, over 120 countries globally have legally mandated provisions for paid maternity leave and health benefits⁴. Notably, the majority of developed nations have implemented such policies, with the exception of Australia, New Zealand, and the United States (except 8 states). While the majority of the world is racing toward a level

¹ Mona L. Siegel. 29 November 2019. "The Forgotten Origins of Paid Family Leave". *The New York Times*. Available at: <https://www.nytimes.com/2019/11/29/opinion/mothers-paid-family-leave.html>

² The Global People Strategist. 19 January 2022. "Benefits in France". Maternity Available at: <https://www.globalpeoplestrategist.com/maternity-benefits-in-france/>

³ ILO.n.d. "International Labor Standards on Maternity protection". Available at: <https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/maternity-protection/lang-en/index.htm>

⁴ ILO. 16 February 1998. "More than 120 Nations Provide Paid Maternity Leave". Available at https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_008009/lang-en/index.htm

playing field for women in the labor force, a small part of the world has been running backward, some stuck in one place and others are also making remarkable moves.

In order to understand the big picture of the importance of maternity protection and to ask the right questions, there is a need to gain a deeper understanding of the subject matter by looking into the history and other existing and relevant documents.

Why paid maternity leave should not be a trade-off for mothers

Based on the World Bank's calculation in India, an increase of 1% in employment would drive 0.6% in GDP growth.⁵ Labor participation is one of the main catalysts for economic growth as it fuels higher production and consumption of products and services. Hence, incentivizing more women to keep their jobs after pregnancy is sustaining the economy. Thinking like an economist and looking into this, the concept of opportunity cost that goes as "the actual cost of something is what you have to give up to get it" is something that the employers have to take into account. It's the opportunity cost associated with the absence of a mandatory paid maternity leave policy. Assessing the impacts of diverse parental leave programs entails a multifaceted task. The objective of parental leave policy encompasses several dimensions. The main rationale for the establishment of parental leave policies was first centered on safeguarding the well-being and longevity of newborns, as well as facilitating the postpartum recovery of mothers. However, it goes beyond health benefits for mothers and children. According to a study, paid leave enhances women's labor force participation after delivery.⁶ First, paid maternity leave supports mothers' labor market by allowing them to take time off from work after childbirth and safely return to their pre-giving birth job. This helps maintain their employment and reduces the need to start over when they re-enter the labor market. In addition to this, paid maternity leave also advocates for better gender equality in the workplace. Without time-off to take care of the newborns, mothers are prone to reduce long-

⁵ The Times of India. 11 April 2023. "Importance of employment opportunities in today's global economy". Available at: [https://timesofindia.indiatimes.com/india/importance-of-employment-opportunities-in-today s-global-economy-explains-expert/articleshow/99393236.cms?from=mdr](https://timesofindia.indiatimes.com/india/importance-of-employment-opportunities-in-today-s-global-economy-explains-expert/articleshow/99393236.cms?from=mdr)

⁶ Britni Wilcher & Kelly Jones. 12 March 2020. "Reducing maternal labor market detachment: A role for paid family leave". *Washington Center for Equitable Growth*. Available at: <https://equitablegrowth.org/working-papers/reducing-maternal-labor-market-detachment-a-role-for-paid-family-leave/>

term earnings prospects, impede skills enhancement, limit career prospects, and hinder access to social security, including a sufficient pension throughout old life.

Secondly, the paid maternity leave also correlates with the breastfeeding proportion for infants since mothers have more time and resources to breastfeed their newborns.⁷ The implementation of enhanced breastfeeding practices has the potential to prevent the loss of over 820,000 children's lives on a global scale annually.⁸ According to the Scaling Up Nutrition Network (SUN), the implementation of extended paid maternity leave can yield several positive outcomes. These include a potential reduction in newborn death rates by as much as 13 percent, and the facilitation of positive parent-child relationships, hence fostering enhanced growth and development among children.⁹

In addition, according to the same report, a comprehensive examination of existing scholarly works reveals that the provision of paid parental leave has the potential to contribute positively to many Sustainable Development Goal (SDG) outcomes that are pertinent to the well-being of both mothers and children.¹⁰ There exists a positive correlation between the provision of paid leave and improved baby health outcomes, such as reduced infant death rates and increased rates of vaccinations, across many countries with different levels of national income.

The nations that offer the greatest legally mandated paid maternity leave are as follows: the Czech Republic, which provides a duration of 28 weeks; Hungary, with a duration of 24 weeks; Italy, with a duration of 21 months; Canada, with a duration of 17 weeks; and Spain and Romania, both providing a duration of 16 weeks. Denmark, Norway, and Sweden all have comprehensive paid

⁷ Amanda R. Cooklin , Heather J. Rowe , Jane R.W. Fisher.2012. "Paid parental leave supports breastfeeding and mother-infant relationship: A prospective investigation of maternal postpartum employment."*Australian and New Zealand Journal of Public Health*, 36(3), 249–256. Available at: <https://doi.org/10.1111/j.1753-6405.2012.00846.x>

⁸ Hellen Keller International. 12 July 2018. "Statement from Helen Keller International". Available at: <https://helenkellerintl.org/our-stories/statement-helen-keller-international/>

⁹ Council for Agricultural and Rural Development. 2019. "The Second National Strategy for Food Security and Nutrition 2019-2023". Available at:<https://scalingupnutrition.org/sites/default/files/2022-06/national-nutrition-plan-cambodia.pdf>

¹⁰ Jody Heymann & et al.2017."Paid parental leave and family wellbeing in the sustainable development era". *Public Health Rev* 38, 21.Available at: <https://doi.org/10.1186/s40985-017-0067-2>

leave policies that allow either parent to take time off, albeit a certain part is specifically allocated for the mother. Commencing on May 1, 2013, Vietnam emerged as one of the pioneering nations within the lower- to middle-income category to implement a policy granting the mother a six-month period of remunerated maternity leave, commonly referred to as six-month paid maternity leave (6mo-PML).¹¹

Cambodian Mothers and Their Entitlements

The significance of protecting the well-being of employed mothers has been acknowledged by the Cambodian Government through the implementation of paid maternity leave and associated benefits for workers, as stipulated in the 1997 Labor Law.¹² The female labor force participation in Cambodia is seeing a consistent growth, hence emphasizing the growing need of maternity protection for the overall well-being of individuals. The Ministry of Women's Affairs (MoWA), in accordance with the Neary Rattanak V strategy plan for the period of 2019-2023, pledges to put the notion of "Work-life balance" as the priority for all women.¹³ In Cambodia, the garment and textile sector is one of the largest employers, with a significant proportion of female workers. Approximately 90 percent of garment workers are women, according to research by Better Factories Cambodia (BFC).¹⁴ Therefore, maternity protection must be addressed in order to advance gender equality and safeguard the rights of female workers in the sector.

The maternity protection in Cambodia has its coverage from the pre-pregnancy to post-pregnancy. According to Cambodian Labor Law, mothers are granted the entitlement to a one-hour daily break, which can be broken into two 30-minute intervals, for the purpose of breastfeeding a child

¹¹ Võ Ngọc Nhi. 10 March 2023. "POLICY ANALYSIS: Conditions for enjoying maternity benefits in Vietnam 2023". Available at: <https://lawnet.vn/thong-tin-phap-luat/en/tu-van-luat/conditions-for-enjoying-the-maternity-benefits-in-vietnam-2023-internet-image-112932.html>

¹² Council for the Development of Cambodia. (n.d). "Employment and Labor Law". Available at: <https://cdc.gov.kh/laws-and-regulations/employment-and-labor/>

¹³ Ministry of Women's Affairs. (2019). "Neary Rattanak V". Available at: <https://www.mowa.gov.kh/wp-content/uploads/2021/02/Neary-Rattanak-V-final-Eng.pdf>

¹⁴ Better Factories Cambodia. 04 November 2022. "Mainstreaming gender equality in the Cambodian garment sector". Available at: <https://betterwork.org/mainstreaming-gender-equality-in-the-cambodian-garment-sector/>

who is under the age of one year.¹⁵ These additional breaks are separate from regular breaks and cannot be subtracted from regular break time. It is mandatory for companies with a workforce over 100 individuals to have a designated space for nursing purposes. If the company is unable to build up a daycare center on its premises for children older than eighteen months, female employees may enroll their children in any childcare facility, with the employers covering the fees.¹⁶

There is no data on hand regarding the number of nurseries and breastfeeding places that are available nationwide. The Ministry of Health had only recently started running its first nursing room and kid's nursery at the National Maternal and Child Health Center due to worries about an absence of babysitters.¹⁷ Likewise, on October 19, 2022, the Ministry of Labor and Vocational Training set up a meeting with Helen Keller International to examine strategies for promoting nutrition and nursing of newborn and young children in the workplace. The initiative's main objectives were to provide lactation rooms and to educate both employees and employers about the value of breastfeeding and good nutrition. Hence, the initiative would provide lactation rooms at 28 target locations in Phnom Penh, Kandal, Kampot, and Kompong Thom with all necessary equipment.¹⁸

Duration of leave

Moreover, female employees in Cambodia are entitled to a minimum of 90 days of maternity leave under the country's labor laws. This consists of 60 days of paid leave, which is covered by the employers, and an additional 30 days of unpaid leave. The paid leave may be taken either before or after childbirth, depending on the employee's preferences. Likewise, female employees are entitled to receive their regular compensation throughout the maternity leave period, which should

¹⁵ 184 & 185 of the Labour Law, promulgated by Royal Order No. CS/RKM/0397/01 of 13 March 1997 (amended in 2021). Available at: <https://prake.org/labour-law/maternity-and-work/breastfeeding>

¹⁶ ILO. 13 March 1997. "Kram Dated March 13, 1997 on the Labor Law." Available at: <https://www.ilo.org/dyn/travail/docs/701/labour>

¹⁷ Mom Kunthear. 26 April 2022. "Ministry: Breastfeeding Rooms in all Institutions." Phnom Penh Post. Available at: <https://www.phnompenhpost.com/national/ministry-breastfeeding-rooms-all-institutions>

¹⁸ Long Kimmarita. 19 October 2022. "Breastfeeding Facilities Coming to Factories." Phnom Penh Post. Available at: <https://www.phnompenhpost.com/national/breastfeeding-facilities-coming-factories>

be half of their average wage. This compensation must be paid, and the employer cannot end the employment contract while the employee is on maternity leave. In order to receive the wage benefits from the employers, there are some statutory conditions required such as the minimum of one year work duration.¹⁹

Cash Transfer

Importantly, starting from June 1st, 2019, the Ministry of Health has been implementing a "cash transfer program" for expectant mothers from families with an ID Poor card to further improve maternal and child health outcomes. Under the scheme, pregnant mothers will receive up to four times of \$10 in cash during the first stage when they come for antenatal care. New moms will get an additional one-time payment of \$50 following delivery in a medical facility. In the final stage, moms will receive \$10 up to ten times each for postpartum checkups for themselves and their newborns, until their children are two years old.²⁰ To claim the subsidies, workers who are 26 weeks or more must fill out a form at the NSSF office no later than three months before the due date of the baby, and provide a fetal echocardiography letter with the expected delivery date, a membership card from the NSSF or the Health Equity Fund, a Khmer identity card, and a contact number as proof of their eligibility.²¹

According to a recent announcement from the Royal Government of Cambodia, the cash transfer rate for the Equity Card Family program for expectant mothers and young children will double as of August 1st, 2023.²² The cash support for prenatal check-ups is offered up to four times.

¹⁹ ILO. 31 January 2013. "Practical Challenges for Maternity Protection in the Cambodian Garment Industry." Available at: https://www.ilo.org/asia/publications/WCMS_203802/lang--en/index.htm

²⁰ WHO. 27 June 2019. "Government-sponsored Cash Transfer Scheme to Benefit Poor Women and Children and Improve Access to Health: New Release." Available at: <https://www.who.int/cambodia/news/detail/27-06-2019-government-sponsored-cash-transfer-scheme-to-benefit-poor-women-and-children-and-improve-access-to-health-services>

²¹ Charles Chau. 6 May 2021. "Pregnant Workers in Cambodia Benefit From Government Subsidies." Available at: <https://hrmasia.com/pregnant-workers-in-cambodia-benefit-from-government-subsidies/#:~:text=To%20claim%20the%20subsidies%2C%20workers%20who%20are%20pregnant,Fund%2C%20Khmer%20identity%20card%20and%20a%20contact%20number.>

²² Kim Yutharo. 01 August 2023. "Cash support programme for expectant mothers rolled out". Available at: <https://www.phnompenhpost.com/national/cash-support-programme-expectant-mothers-rolled-out>

Likewise, the card offers allowance help for postpartum check-ups and vaccinations for infants up to age 2 up to four times each for \$20. A mother who gives birth to a single child will receive \$100 in financial assistance, a mother who gives birth to twins will receive \$150, and a mother who gives birth to triplets will receive \$200.²³ Under a government cash transfer program launched in June 2019, more than 170,000 pregnant mothers and children under the age of two have received social protection stipends totaling \$10 million.²⁴

Tackling Motherhood Penalty

The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) declares that the imposition of penalties on women due to their decision to bear children is a violation of their fundamental human rights. According to the Convention, women are entitled to both engage in familial responsibilities and pursue employment, while receiving fair compensation for their efforts.²⁵ The Cambodian Constitution forbids employers from firing employees because they are pregnant, but it does not mention the pregnancy-based discrimination in recruiting or failing to extend a pregnant employee's contract. To further address these issues, the ILO Maternity Protection Convention No. 183 (2000) has made it illegal to fire a woman while she is pregnant, on leave, or for a certain amount of time after she returns to work. It also outlines restrictions on discrimination in hiring and recruiting, such as the use of pregnancy tests.²⁶ However, Cambodia has not yet ratified this convention No.183.²⁷ In accordance with the report from ILO on gender equality in clothing manufacturers, workers said that factory managers would

²³ Oxfam in Cambodia. 15 August 2023. "Cash Transfer Program for Pregnant Women and Children Under 2 Years Old from Equity Card Family." Available at:

https://www.facebook.com/plugins/post.php?href=https%3A%2F%2Fwww.facebook.com%2FOxfaminCambodia%2Fposts%2Fpfbid02jdwQ6GoUPvLw9znHnspmTpSsqib2mwZkZmpyRgHmVj3xFTUMTKme2uGTqzOOiY9AI&show_text=true&width=500

²⁴ Lay Samean. 2 February 2021. "\$10M in Cash Subsidies Benefit 170K Pregnant Women, Infants." Phnom Penh Post. Available at: <https://phnompenhpost.com/national/10m-cash-subsidies-benefit-170k-pregnant-women-infants#:~:text=A%20pregnant%20woman%20leaves%20Phsar%20Doeum%20Thkov%20Health,government%20cash%20transfer%20programme%20implemented%20since%20June%202019.>

²⁵ OHCHR. 1979. "Convention on the Elimination of All Forms of Discrimination against Women". Available at: <https://www.ohchr.org/sites/default/files/Documents/ProfessionalInterest/cedaw.pdf>

²⁶ ILO. 31 January 2013. "Practical Challenges for Maternity Protection in the Cambodian Garment Industry." Available at: https://www.ilo.org/asia/publications/WCMS_203802/lang--en/index.htm

²⁷ ILO. 15 June 2000. "C183 - Maternity Protection Convention, 2000 (No. 183)". Available at: https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C183

not hire women who were clearly pregnant, which perpetuates the motherhood penalty. Likewise, short-term contract employees with pregnancies were less likely to have their contracts renewed, which allowed their supervisors to forgo offering maternity benefits. Additionally, factory managers have frequently neglected to provide pregnant workers with appropriate accommodation like more frequent toilet breaks or lighter work without a reduction in pay. Moreover, employees frequently leave workplaces as their pregnancy progresses because managers humiliate them for being slow and unproductive.²⁸

A Story of Hope

Cambodia, as a small nation with significant progress on empowering and protecting working mothers, has promoted decent work, narrowed the gender gap and even incentivized the locals to use the domestic medical service, which will gradually improve the healthcare system in the Kingdom. Based on the findings of the Cambodia Demographic and Health study conducted between 2021 and 2022, it can be observed that there has been a notable decrease in maternal, newborn, and child death rates in Cambodia when compared to the study conducted in 2014. The survey year witnessed a decline in the maternal death rate, with a decrease from 170 to 154 per 100,000 births.²⁹

According to the data from the National Social Security Fund (N.S.S.F), in just over 20 days after the introduction of the new scheme, a total of more than 2 billion riels was provided by the Royal Government to pregnant women and children under 2 years of age through the new scheme.³⁰ The 2 billion riels were provided to 2,750 women who received prenatal check-up, 1,100 mothers for postpartum check-up, 754 kids who were under 2 years of age according to Heng Sophannarith, Deputy Director General and spokesman for the N.S.S.F.

²⁸ Human Rights Watch. 11 March 2015. "Work Faster or Get Out." Available at:

<https://www.hrw.org/report/2015/03/12/work-faster-or-get-out/labor-rights-abuses-cambodias-garment-industry>

²⁹ National Institute of Statistics. June 2022. "Cambodia Demographic and Health Survey 2021-2022". Available at <https://dhsprogram.com/pubs/pdf/PR136/PR136.pdf>

³⁰ NSSF. 22 August 2023. "In just over 20 days, a total of more than 2 billion riels was provided by the Royal Government to pregnant women and children under 2 years of age through the NSSF". Available at <http://bitly.ws/SNDe>

There is a beautiful story from UNICEF about Ms. Bo Channthy who is a mother of three kids.³¹ Her youngest child is two-month-old who was born with a cleft lip. Through these quarterly appointments, Channthy got to know a midwife who gave her advice on nutrition, baby care, and supplemental feeding as well as checked to be sure all of her kids had received the required vaccinations.

“Without the monthly transfer, I would have had to decide between buying rice, vegetables, milk, and meat to feed my family and being able to afford school uniforms, notebooks, and other supplies to support my son’s education, during COVID-19 pandemic. With the help of the cash transfer, I am trying to put aside a little money every month towards a bicycle so my daughter can attend school next year”, she added”.

With the cash transfer, Channthy was able to use it for her basic needs and to support her youngest child, so that she could use the money she earned to support her middle child for his education.

While many mothers are accessing the benefits provided by the government, there are still a lot of mothers in the shadows. Citing the Cambodia Labor Force Survey in 2019, 88.3% of the employed persons worked in informal employment.³² About 90% of the mothers who are working in the informal economy have no or limited access to maternity protection according to Oxfam³³. Oxfam also emphasizes that the absence of maternity protection benefits for female workers in informal employment could continue to expose women to more economic shocks and gender inequality. The initial purpose of labor and social security legislation was to safeguard the rights and interests of employees who are engaged in formal enterprises and possess specific contractual agreements. However, there has been a notable rise in the number of individuals engaged in "non-traditional

³¹ Jesse Lee Gray. 24 May 2022. "Social protection holds strong for mothers and young children". *UNICEF*. Available at: <https://www.unicef.org/cambodia/stories/social-protection-holds-strong-mothers-and-young-children>

³² National Institute of Statistics. 2019. "Report on the Cambodia Labour Force Survey 2019". Available at: https://www.nis.gov.kh/nis/CLFS/CLFS19_Final_Full%20Report_EN.pdf

³³ Lim Solinn. 18 June 2021. "Maternity Protection: The key to a dignified life for all women in Cambodia & ASEAN". *Oxfam in Cambodia*. Available at: <https://cambodia.oxfam.org/latest/blogs/maternity-protection-key-dignified-life-all-women-cambodia-asean>

forms of employment" characterized by ambiguous, temporary, fragmented, or concealed employment arrangements. The rise of "platform workers" has also raised more concerns and questions on their nature of work and access to those social benefits. This is a reminder that there is still more work needed to be done.

The Ways Forward

About a century ago, the feminist leaders, trade unions and activities made a move that still relieved a lot of burdens on women till the present time. The study found out that working women frequently have challenges while attempting to navigate the delicate relationship between their professional obligations and familial duties, as well as the pressures associated with meeting societal standards regarding their job performance and motherhood.³⁴ With the pressure from societal expectation, mothers who use their maternity leaves have been viewed as incompetent or rarely got the opportunity for promotions at work. Numerous women face a dilemma when they must make a decision between attaining professional achievement and establishing a family. Therefore, in order to bridge the gender inequality gap, there are many things that need to be done.

Putting human development at the heart of ASEAN, all member states aim to improve the welfare and livelihoods of its population by ensuring fair and equal access to opportunities. On the regional-level, the member states need to revisit the ILO convention on maternity protection attentively. However, due to the nature of the ILO convention, which functions more as a benchmark rather than a set of binding regulations, there are several nations that do not consistently adhere to the ILO guidelines within their own national labor legislations. Therefore, there is a necessity to do a comparative analysis of maternity leave policies across ASEAN Member States to share the good practices and data for future learning.

Moreover, in order to promote the full empowerment of women upon their re-entry into the workforce, it is necessary for companies and organizations to eliminate prejudices against those

³⁴ Morgenroth, T. and M. Heilman.2017, "Should I stay or should I go? Implications of maternity leave choice for perceptions of working mothers", *Journal of Experimental Social Psychology*, Vol. 72, pp. 53-56, Available at: <https://doi.org/10.1016/j.jesp.2017.04.008>.

who take maternity leave. The inclusion of returning women in the workforce presents a valuable reservoir of talent that may effectively address skill deficiencies, enhance organizational diversity, and hence yield quantifiable advantages such as reduced employee attrition and increased financial profitability. Women should not be compelled to make a decision between pursuing their ambitions and engaging in child-rearing, as both are a blessing in their own way.

Empowering mothers working as casual wage workers, self-employed and domestic workers in the informal economy is also very important, particularly for countries like Cambodia, where informal workers are everywhere in the nation.

According to the report from ILO³⁵, "in the urban areas, the informal economy workers include self-operators of motor-taxis and cyclos, street vendors, shoe-shiners, garbage collectors, vehicle repairers, small-scale gasoline sellers, brick workers, construction workers and domestic workers. In rural areas, they are farmers and workers in non-farm activities such as fishing, fish processing, mining, spinning and weaving, food processing, handicraft-making and vending".

Therefore, the government and all employers must provide an inclusive and comprehensive legal framework. This can be achieved by social concertation, where informal workers' voices and concerns can be expressed without threats.

While working to improve and expand these powerful protections for all mothers across all sectors in Cambodia, the status quo progress cannot be unnoticed and applauded. This reflects the Kingdom's commitment to human development index, gender equity for the Cambodian people, regardless of the low-income-status. Together, we can make motherhood a blessing, not a curse for all working mothers.

³⁵ ILO. 2006. "Handbook on Decent Work in the Informal Economy in Cambodia". Available at: https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/publication/wcms_bk_pb_126_en.pdf

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