Government of the People's Republic of Bangladesh
Ministry of Labour and Employment

Advancing Worker Protection in Bangladesh: A Roadmap for the National Social Insurance Scheme

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Purpose of the Document

This document sets out the proposed legal design, institutional arrangements, and operational roadmap for establishing a National Social Insurance Scheme (NSIS) in Bangladesh. It provides the foundation for policy decisions, legislative development, and phased implementation of the scheme. The document aims to guide the Government and key stakeholders in designing a sustainable, inclusive, and efficient social insurance system for workers, with particular attention to coverage expansion, financial viability, and alignment with national development priorities. It also serves as a reference for coordination among ministries, development partners, and social partners to ensure a coherent and well-sequenced rollout of the NSIS.

Draft

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List of acronyms and abbreviations

ALMP	Active Labour Market Policies
ASSET	Accelerating and Strengthening Skills for Economic Transformation
BBS	Bangladesh Bureau of Statistics
BDT	Bangladeshi Taka
BEF	Bangladesh Employers' Federation
BEPZA	Bangladesh Export Processing Zones Authority
BEZA	Bangladesh Economic Zones Authority
BGMEA	Bangladesh Garment Manufacturers and Exporters Association
BKKB	Bangladesh Karmachari Kalyan Board (Bangladesh Employees Welfare Board)
BKMEA	Bangladesh Knitwear Manufacturers and Exporters Association
BLA	Bangladesh Labour Act
BLR	Bangladesh Labour Rules
BLWF	Bangladesh Labour Welfare Foundation
BPJS	Badan Penyelenggara Jaminan Sosial (Social Security Agency, Indonesia)
CF	Central Fund
COVID-19	Coronavirus Disease 2019
DGUV	Deutsche Gesetzliche Unfallversicherung (German Social Accident Insurance)
DIFE	Department of Inspection for Factories and Establishments
EIS	Employment Injury Scheme
EPZ	Export Processing Zone
ESIC	Employees' State Insurance Corporation (India)
ESIS	Employees' State Insurance Scheme (India)
FY	Fiscal Year
GED	General Economics Division (Planning Commission, Bangladesh)
ILO	International Labour Organization
ISSA	International Social Security Association
LFS	Labour Force Survey
LIMA	Labour Inspection Management Application
LIMS	Labour Information Management System

LMIS	Labour Market Information System
LRC	Labour Reform Commission (Bangladesh)
MCBP	Mother and Child Benefit Programme
MI	Maternity Insurance
MIS	Management Information System
MoLE	Ministry of Labour and Employment
NGO	Non-Governmental Organization
NID	National Identity (Card/Number)
NSIS	National Social Insurance Scheme
NSSS	National Social Security Strategy
OSH	Occupational Safety and Health
PES	Public Employment Services
RMG	Ready-Made Garment
SEIP	Skills for Employment Investment Programme
SSU	Social Security Unit
UI	Unemployment Insurance
UNICEF	United Nations Children’s Fund
UWPP	Unemployed Workers’ Protection Programme
VSS	Vietnam Social Security

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Advancing Worker Protection in Bangladesh: A Roadmap for the National Social Insurance Scheme

Executive Summary

The National Social Insurance Scheme (NSIS) Roadmap will provide a phased and strategic pathway for gradually establishing a coherent, contributory, and rights-based social insurance system in Bangladesh. It outlines the institutional, legal, financial, and administrative steps required to strengthen worker protection against employment injury, unemployment, maternity, and sickness-related risks through a sustainable and collectively financed framework aligned with national priorities and international labour standards.

Bangladesh's economy has grown rapidly over the last two decades, creating new opportunities for employment, industrialization, and poverty reduction. Yet millions of workers and their families remain highly vulnerable to sudden shocks. A workplace accident, unexpected job loss, pregnancy-related work interruption, or illness can quickly push households into financial insecurity. In many cases, workers lose income immediately, while families struggle to manage basic living expenses, healthcare costs, debt, food security, children's education which has adverse impact of overall wellbeing of a worker.

Bangladesh already has important legal and policy foundations for worker protection. The Bangladesh Labour Act (BLA), 2006 and subsequent amendments recognize employment injury compensation, maternity benefits, and other labour protections. Public-sector employees also benefit from more advanced maternity-related provisions, while several welfare and social assistance programmes support vulnerable groups. However, the overall protection landscape remains fragmented and uneven. Existing support is spread across labour laws, employer obligations, welfare funds, public programmes, and pilot initiatives. As a result, protection often depends on where a person works, whether an employer complies with legal obligations, and whether institutional support mechanisms are financially and administratively available when needed.

The proposed National Social Insurance Scheme (NSIS) aims to address these gaps through a more predictable, rights-based, and sustainable system of worker protection.

The NSIS was first envisioned includes four core branches:

- Employment Injury Insurance
- Unemployment Insurance
- Maternity Insurance
- Sickness Insurance

The roadmap recognizes that Bangladesh has reached an important policy moment. The Employment Injury Scheme (EIS) pilot has already demonstrated that social insurance can work in practice. At the same time, the establishment of the Social Security Unit (SSU) within the

Ministry of Labour and Employment and recent labour law reforms have created momentum for broader institutional transformation.

The central message of the roadmap is clear: Bangladesh now has the opportunity to move from fragmented and employer-dependent protection towards a coherent, comprehensive national social insurance system that protects workers with dignity and supports inclusive economic development.

What Makes Contributory Social Insurance Different?

Contributory social insurance differs from traditional welfare assistance or employer compensation systems. Under social insurance:

- ***Risks are shared collectively across workers, employers, and in some cases the State.***
- ***Financing is pre-arranged through contributions rather than ad hoc payments after crises occur.***
- ***Benefits become legal entitlements rather than discretionary support.***
- ***Workers receive income protection during periods when they are temporarily unable to earn.***
- ***Protection is designed to be more predictable, equitable, and financially sustainable over time.***

The roadmap of NSIS is intended to complement, rather than replace, existing social assistance programmes. While social assistance programmes provide tax-financed support to vulnerable populations, social insurance provides earnings-related protection linked to employment and contributions.

The roadmap also emphasizes that social insurance is not only a technical financing reform. It is fundamentally about strengthening trust, social solidarity, labour market resilience, and social justice. A credible system can reduce vulnerability, improve labour market stability, support productivity, and strengthen confidence among workers and employers alike.

At the same time, international labour standards highlight that social insurance systems should progressively move toward minimum standards of adequacy, coverage, governance, and legal protection to ensure that benefits remain meaningful and effective for workers and their families.

Current Gaps in Worker Protection

NSIS Branch	Current Status
Employment Injury	The Bangladesh Labour Act provides an important statutory foundation for employment injury protection through employer liability provisions. However, the existing system faces important limitations in ensuring predictable, equitable, and sustainable protection on a scale. Workers often experience delays, legal disputes, uneven compensation, and limited long-term rehabilitation or income security.

	The EIS pilot, launched in 2022 in export-oriented sectors, has introduced several important innovations: • *No-fault protection* • *Digital claims administration* • *Direct payment to beneficiaries* • *Pension-type benefits for disability and death* • *Tripartite governance involving government, employers, and workers* • *Emerging approaches to rehabilitation and long-term income protection* The pilot has demonstrated that a more structured and humane approach is operationally feasible in Bangladesh. However, the roadmap identifies potential threats that progress could stall if a permanent legal, financial, and institutional framework is not established before the pilot period concludes in 2027.
Unemployment	Bangladesh currently does not have a formal unemployment insurance system. Existing protection mechanisms remain limited mainly to severance-type provisions, retrenchment compensation according to BLA, and small-scale support programmes through Unemployed Workers' Protection Programme (UWPP) with limited sectoral coverage. The roadmap highlights that future unemployment protection should combine temporary income security with active labour market measures such as skills development, employment services, re-skilling, and support for reintegration into employment. This linkage will be important for strengthening both worker resilience and labour market productivity.
Maternity	Current maternity protection remains uneven across sectors and employment categories. Private-sector workers rely mainly on employer-financed maternity leave provisions under the Bangladesh Labour Act, while public-sector employees receive comparatively stronger protection. Many women working in informal or non-standard forms of employment remain outside effective coverage. The roadmap notes that when maternity-related costs are borne solely at enterprise level, this may unintentionally create labour market distortions affecting women workers. A contributory maternity insurance arrangement would help distribute costs more fairly while strengthening women's income security during maternity-related absences from work. The roadmap also emphasizes that maternity protection should be understood not only as leave entitlement, but also as part of a broader social protection and

	labour market inclusion agenda linked to women's employment, income security, non-discrimination, and wellbeing.
Sickness	Sickness-related support remains fragmented and limited. Workers often depend on short duration leave arrangements or discretionary employer support. There is currently no comprehensive contributory mechanism providing reliable income replacement during temporary illness. The roadmap emphasizes that future sickness protection will need to balance income security, administrative feasibility, and links with healthcare and rehabilitation systems.

Why a Phased and Differentiated Approach is Necessary

A central insight of the roadmap is that the four NSIS branches are not equally ready for implementation.

Employment injury insurance has already moved beyond conceptual discussion through the EIS pilot and therefore offers practical institutional learning and administrative experience.

Unemployment, maternity and sickness insurance, however, still require:

- ***Further legal and regulatory development***
- ***Financing and contribution design***
- ***Administrative preparation***
- ***Institutional capacity building***
- ***Actuarial analysis and data systems***
- ***Awareness raising and stakeholder engagement***

For this reason, the roadmap recommends a phased reform strategy rather than attempting simultaneous implementation across all branches. This approach reflects international experience and is also consistent with ILO Convention No. 102, which recognizes progressive realization and gradual extension of social protection according to national capacity and institutional readiness.

Institutional Vision and Governance

The roadmap proposes a long-term vision of establishing a Social Insurance Authority under a unified legal framework.

Over time, the Social Insurance Authority gradually oversee:

- ***Branch-wise fund management***
- ***Contribution collection***
- ***Claims administration***
- ***Digital systems integration***
- ***Accountability and audit mechanisms***
- ***Grievance management***

- ***Tripartite governance arrangements***

Until that stage is reached, the roadmap recommends strengthening the Social Security Unit (SSU) as the transitional coordination hub.

The roadmap repeatedly stresses that successful implementation will depend heavily on whether workers and employers believe contributions are managed fairly, transparently, and professionally:

- ***Tripartite social dialogue***
- ***Transparency in fund management***
- ***Strong accountability systems***
- ***Financial sustainability***
- ***Evidence-based expansion***
- ***Public trust and institutional credibility***

The Proposed Implementation Roadmap

Phase	**Key actions and Focus Area**
Phase I: Foundation Building (Years 1–2)	• Institutionalizing gains from the EIS pilot • Strengthening the SSU • Developing legal and actuarial groundwork • Building digital and administrative systems • Expanding stakeholder consultation and awareness • Preparing pilot frameworks for maternity, sickness, and unemployment insurance
Phase II: Legal Consolidation and Selective Expansion (Years 2–6)	• Formalizing legal structures • Gradually introducing payroll-based contributions • Strengthening governance and compliance systems • Expanding operational readiness • Extending selected benefits where institutional readiness exists

	The roadmap cautions against introducing contribution collection before adequate institutional capacity, accountability arrangements, and public confidence are established.
Phase III: System Consolidation and Expansion (Years 7–10 and beyond)	• Establishment of the NSIA • Integrated digital systems • Wider sectoral coverage • Improved administrative capacity • Progressive expansion beyond the formal sector The roadmap also recognizes that extending contributory social insurance to workers in the informal economy will require gradual adaptation, innovative financing approaches, and simplified administrative mechanisms.

In conclusion, NSIS roadmap presents a realistic but ambitious pathway for strengthening worker protection in Bangladesh. Rather than relying primarily on fragmented employer liability arrangements and uneven support systems, the roadmap proposes a gradual transition toward a modern social insurance architecture built on solidarity, shared responsibility, legal entitlement, adequacy of protection, and institutional accountability.

The transition will require political commitment, technical preparation, institutional learning, financial sustainability, and sustained cooperation among all stakeholders. If implemented carefully and inclusively, the NSIS could become one of the most important social protection reforms in Bangladesh’s history, helping ensure that workers and their families are better protected against the uncertainties of work and life.

The long-term goal is a coherent national social insurance system that contributes to inclusive growth, decent work, social justice, and resilience for Bangladesh’s working-age population.

1. Background

Bangladesh has made significant progress in expanding social protection over the past two decades, particularly through tax-financed social assistance programmes targeted at older persons, persons with disabilities, widowed women, and vulnerable households. These programmes have contributed to poverty reduction and improved income security for many vulnerable groups. However, as Bangladesh advances towards upper-middle-income status and seeks to accelerate inclusive economic growth, a major gap remains in the protection available to the working-age population against loss of earnings arising from employment-related and life-cycle risks.

Workers are exposed to a range of contingencies that can result in sudden and significant loss of income and reduced household welfare. These include employment injury, sickness, maternity, unemployment, and other life cycle or labour market risks, as well as broader shocks linked to economic downturns, public health crises, technological change, and climate-related events. In line with international social security standards, particularly ILO Convention No. 102, these contingencies are recognized as core risks that require structured protection through social security systems. In Bangladesh, the impact of such risks is often more pronounced due to the prevalence of informal employment, weak employment security, and limited access to effective income replacement mechanisms. As a result, even short-term interruptions in earnings can have immediate and far-reaching consequences, including reduced household consumption, rising indebtedness, disruption of children's education, and increased vulnerability to poverty and long-term economic insecurity.

Addressing these risks is essential not only for protecting workers but also for strengthening economic resilience and supporting Bangladesh's long-term development ambitions. A productive and competitive economy requires workers to be protected against income shocks, employers to operate within a stable labour market environment, and households to maintain their capacity to consume, invest, and contribute to economic growth even during periods of adversity.

In this context, contributory social insurance assumes particular importance. Through collective risk pooling and pre-arranged financing arrangements, social insurance provides predictable and rights-based protection against defined contingencies. It enables workers and their families to maintain a degree of income security when earnings are interrupted due to sickness, maternity, employment injury, or unemployment, while also supporting labour market participation and economic recovery. Unlike employer-liability arrangements, ad hoc assistance measures, or discretionary welfare support, social insurance establishes institutional mechanisms that provide protection as an entitlement and distribute risks across workers, employers, and society.

The importance of social insurance extends beyond worker protection. Internationally, social insurance constitutes one of the two foundational pillars of universal social protection systems, alongside tax-financed social assistance. The ILO Social Protection Floors Recommendation, 2012 (No. 202), calls for countries to progressively build comprehensive social protection systems that guarantee protection across the life cycle through a combination of social assistance and social insurance measures. Similarly, the ILO Social Security (Minimum Standards) Convention, 1952 (No. 102), identifies protection against sickness, maternity, employment injury, unemployment, old age, invalidity, and survivorship as core branches of social security. The progressive extension of social insurance is therefore not only a labour market reform but also a key pathway towards achieving universal social protection and fulfilling Sustainable Development Goal Target 1.3.

For Bangladesh, the development of a National Social Insurance Scheme (NSIS) represents a strategic opportunity to modernize the social protection system, strengthen protection for workers and their families, support formalization, improve labour market resilience, and advance the realization of universal social protection. The establishment of the NSIS is also consistent with the broader national aspiration of creating a more inclusive, equitable, and productive economy in which workers enjoy greater economic security and protection against life cycle and employment-related risks. By complementing existing social assistance programmes, social insurance can help create a more balanced and sustainable social protection architecture capable of protecting people throughout their lives while supporting economic transformation.

Reflecting its significance, the nationwide roll-out of the NSIS was identified as a priority reform under both Phase I (2016–2021) and Phase II (2021–2026) of the National Social Security Strategy (NSSS) Action Plan. The NSSS envisaged four initial branches of social insurance: employment injury, maternity, sickness, and unemployment insurance. In practice, however, implementation progress has remained limited. Among the four branches, only the Employment Injury Scheme (EIS) has advanced to the pilot stage. Introduced in 2022 for workers in the export-oriented ready-made garment sector, the pilot has subsequently been expanded to the footwear and leather sectors and to workers employed within export processing zones. The remaining branches—maternity, sickness, and unemployment insurance—have yet to move beyond the preparatory and conceptual stages.

Recent developments nevertheless indicate renewed momentum for social insurance reform. The establishment of the Social Security Unit (SSU) within the Ministry of Labour and Employment in June 2025 created an institutional focal point for advancing the agenda. Amendments to the Bangladesh Labour Act adopted in November 2025 and subsequently enacted by Parliament in April 2026 provide for the establishment of an Employment Injury Scheme Fund with the potential for expansion across industries. In parallel, the Labour Reform Commission, established following the July 2024 mass uprising, strongly endorsed the expansion of social insurance as part of its recommendations to improve labour protection and worker welfare. Similar recommendations emerged from the Taskforce on Re-strategizing the Economy, which identified implementation of the NSIS as an important component of broader social protection reform and inclusive economic transformation.

These developments coincide with a broader policy environment in which employment generation, worker welfare, social justice, and social security have gained renewed prominence within national development discussions and political reform agendas. Together, they present a timely opportunity to translate longstanding policy commitments into a practical implementation programme.

As the current NSSS implementation period concludes in June 2026, Bangladesh stands at an important juncture. While the experience gained through the EIS pilot, the establishment of SSU, and the growing consensus around social insurance reform have created favourable conditions for progress, significant challenges remain. These include the absence of a comprehensive legal framework, limited institutional capacity, unresolved financing and governance questions, and low awareness among employers and workers regarding the principles and benefits of social insurance. Addressing these challenges requires a coherent implementation strategy capable of translating years of analytical work, stakeholder consultations, and policy commitments into an operational and sustainable National Social Insurance Scheme.

Against this backdrop, this report presents a comprehensive framework and implementation roadmap for advancing the NSIS in Bangladesh. It examines the existing protection landscape and the major gaps relating to employment injury, maternity, sickness, and unemployment risks; analyses the legal, financial, administrative, and institutional dimensions of implementation; and identifies the governance arrangements required to manage the scheme as an integrated national system. Building on this assessment, the report proposes a phased and institutionally realistic roadmap designed to guide the progressive development and implementation of the NSIS over the coming years.

2. Social Insurance and the NSIS Branches in Bangladesh

2.1 Social insurance: Conceptual clarification

Social insurance is still an emerging concept in Bangladesh's policy discourse. While the National Social Security Strategy (NSSS) 2015 introduced both the term and the broader framework of the National Social Insurance Scheme (NSIS)[1], further conceptual clarity is required on how social insurance is defined and how it differs from broader social protection, social assistance, employer liability, and private insurance. This distinction is particularly important in the Bangladesh context, where the design and feasibility of the NSIS depend on a shared and accurate understanding of these concepts.

Social protection is an umbrella term covering a range of public policies and programmes designed to protect individuals and households against poverty, vulnerability, and lifecycle or labour market risks (ILO 2012; ILO 2024). Within this framework, social assistance and social insurance represent two distinct but complementary instruments[2].

Social assistance refers to non-contributory transfers financed primarily through general taxation. Entitlements are not linked to prior contributions. In Bangladesh, programmes such as the Mother and Child Benefit Programme (MCBP), old-age allowances, widow allowances, and disability allowances fall within this category. These programmes play an important role in poverty reduction and supporting vulnerable groups, but they are not designed to provide structured, earnings-related protection against employment-related risks.

Social insurance operates on a different institutional and financial logic. It is based on risk pooling, pre-financed contributions, and legally defined entitlements (OHCHR and ILO 2025). Workers, employers, and in some cases the State contribute to a common fund. When a covered contingency occurs, eligible members receive benefits according to rules established in law. Benefits may be linked to prior earnings depending on scheme design, but the core principle remains collective risk-sharing across a broad contributing population. This mechanism allows protection against risks that individuals or single employers would struggle to absorb alone, such as employment injury, sickness, unemployment, or maternity-related income loss. Participation is typically mandatory within the defined scope of coverage to ensure financial sustainability and uphold the principle of solidarity.[3]

A simple example from Bangladesh helps illustrate the distinction. The Mother and Child Benefit Programme provide a tax-financed cash transfer to eligible mothers to support maternal and child well-being. In contrast, maternity insurance under the NSIS would aim to provide income

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[1] The NSSS 2015 envisaged the NSIS as the contributory pillar of social protection for the working-age population, distinct from tax-financed social assistance programmes.

[2] In practice, national social protection systems often include both mechanisms in parallel. Social assistance may provide basic income support to poor or vulnerable households, while social insurance is typically designed to protect contributors against specified contingencies through pre-arranged financing and legal entitlement.

[3] Mandatory participation helps sustain broad-based risk pooling by ensuring that coverage is not confined only to those who expect to claim benefits immediately or more frequently.

replacement during maternity-related work interruption through a contributory, rights-based system linked to employment. While both serve important social objectives, they operate through fundamentally different financing and entitlement structures.

A further distinction relevant in Bangladesh is between social insurance and employer-liability-based arrangements. Under employer liability, the responsibility for compensation rests directly with the employer when a defined contingency occurs. Although such systems may provide some protection, they often face challenges related to uneven compliance, enforcement limitations, and the financial capacity of individual firms. They may also create unintended labour market distortions, particularly where the full cost of risk is concentrated at enterprise level. For example, full employer liability for maternity benefits may discourage the hiring or retention of women workers. Social insurance addresses this limitation by pooling risks across employers and workers through pre-arranged financing mechanisms, thereby reducing reliance on individual firm capacity and ensuring more predictable and equitable protection (ILO 2014). This does not necessarily eliminate employer responsibilities entirely[4], but it shifts the primary burden of protection from individual firms to a collective system.

It is also important to distinguish between public social insurance and private insurance. Private insurance is generally voluntary, contract-based, and commercially operated. Premiums are often risk-based, and access depends on individual willingness and ability to pay. In contrast, public social insurance is established by law, with mandatory coverage within its scope. Contributions, benefits, and governance arrangements are defined through legislation rather than commercial contracts. Its primary objective is social protection and income security, not profit generation (OHCHR and ILO 2025). Within this framework, the NSIS, as envisaged under the NSSS, should be understood as a public social insurance system rather than a commercial insurance product.

This distinction is particularly important because policy discussions in Bangladesh have at times reflected assumptions more consistent with private insurance logic than with social insurance principles. Approaches such as voluntary participation or narrowly risk-based pricing may appear administratively simple, but they would weaken the solidarity and risk pooling that are fundamental to a functioning social insurance system. For the NSIS to achieve its intended objectives, it must therefore be designed as a mandatory, solidarity-based public system grounded in shared responsibility and legal entitlement.

Table 2.1: **Key differences between social insurance and private insurance**

Dimension	**Social insurance (public system)**	**Private insurance**

[4] This is particularly relevant in settings where labour-law-based employer obligations already exist. A move towards social insurance does not always eliminate such obligations at once; rather, it may gradually reduce dependence on them by shifting protection towards a pooled and more predictable institutional arrangement.

Primary objective	Income security, social protection, and solidarity	Profit-oriented risk coverage and financial gain
Legal basis	Established by law and public policy	Based on private contracts
Participation	Generally mandatory for those within scope	Voluntary (individual choice)
Financing	Contributions from workers, employers, and often the State	Premiums paid by individuals or firms
Risk pooling	Broad pooling across workers, employers, and sometimes the State	Limited pooling based on individual contracts and risk profiles
Benefit entitlement	Defined legal entitlements under law	Defined by contract terms and conditions
Eligibility criteria	Based on legal coverage rules (employment, contribution history, contingencies)	Based on underwriting, risk assessment, and contract acceptance
Risk assessment	Collective and solidarity-based	Individual risk-based pricing
Equity dimension	Strong redistribution and solidarity across income and risk groups	Limited redistribution; reflects individual risk and affordability
Coverage objective	Universal or broad-based coverage within defined categories	Market-driven coverage depending on ability to pay
Sustainability logic	Social solidarity and cross-subsidization	Financial viability and profitability
Governance	Public institutions, tripartite or statutory oversight	Private companies regulated by financial authorities

Source: Adapted from International Labour Organization (ILO) social security standards and guidance on social protection systems, including *ILO Social Protection Floors Recommendation, 2012 (No. 202)* and *ILO World Social Protection Report 2024–26*, as well as OHCHR & ILO (2025) technical guidance on social security systems.

2.2. NSIS schemes: Core principles and international standards

Contributory social insurance is neither a recent innovation nor a policy instrument confined to advanced economies. It has also been adopted, expanded, and consolidated across many developing countries, including some whose levels of economic development and administrative capacity are not far removed from those of Bangladesh today. Countries such as Viet Nam, Thailand, Indonesia, India, and Cambodia have established contributory arrangements covering one or more of the major contingencies affecting the working-age population.

In the case of Bangladesh, as noted earlier, the NSIS for the working-age population comprises four branches viz., employment injury insurance, maternity insurance, sickness insurance, and unemployment insurance to address different contingencies underpinned by a common institutional logic. Each is concerned with protecting workers against a defined interruption or loss of earnings arising from circumstances that individuals and single employers may find difficult to manage on their own. In that sense, the NSIS is intended to provide a structured basis for extending protection against major labour-market and lifecycle risks through a coherent contributory framework.

Several core principles should run across the four branches. One is solidarity, reflected in the pooling of contributions so that the costs of specified contingencies are shared across a broader insured population rather than borne solely by affected individuals or by single employers. Another is entitlement, whereby benefits are provided according to rules established in law rather than left to discretion. A third is shared financing, typically involving employers and workers, and in some cases the State, in ways that help make protection more predictable and financially sustainable. Another one is gradualism, since the extension of social insurance often takes place in stages, with differences in sequencing, scope, and institutional readiness across schemes (ILO 2021; ILO 2024a).[5]

The International Labour Organization (ILO) has long played a central role in shaping social security principles and standards through its conventions, recommendations, and related guidance. These instruments do not prescribe a single institutional model, nor do they require all countries to adopt identical design features. They do, however, provide an established normative basis for the kinds of protection that the NSIS seeks to introduce. ILO Convention No. 102 sets out minimum standards across the main branches of social security, while more specialised conventions and recommendations elaborate the requirements relating to employment injury, maternity, unemployment, and sickness (ILO 2021; ILO 2024a).[6]

Overall, the ILO instruments point towards a set of global standards for protection against defined contingencies, legal entitlement to benefits, some degree of collective financing, and the

[5] Gradualism is particularly relevant in settings where schemes begin with narrower formal-sector coverage and are then extended over time as legal, administrative, and financial capacity improves.
[6] Convention No. 102 is the only international treaty that addresses social security in a comprehensive manner across nine contingencies, while later instruments provide higher or more specialised standards in particular branches.

progressive extension of coverage.[7] They also suggest that while the four branches differ in subject matter, each forms part of a wider architecture of social security for workers. A summary of the principal ILO instruments relevant to the four proposed NSIS branches is presented in Table 2.2.

Table 2.2: A summary of the relevant ILO conventions and recommendations with respect to the four NSIS branches

NSIS branch	Relevant ILO convention(s) and recommendation(s)	What they cover	Selected standards / key provisions
Employment injury insurance	C102; C121; R121; R202	Workplace accidents, occupational diseases, temporary and permanent incapacity, death, medical care, rehabilitation, and survivors' benefits	Convention No. 121 requires protection against employment injury contingencies, including occupational disease, on a no-fault basis, and provides for periodic cash benefits for permanent incapacity at not less than 60% of previous earnings, together with survivors' benefits, medical care, and rehabilitation. Recommendation No. 121 further elaborates matters such as commuting accidents and presumptive treatment of occupational diseases (ILO, 2022).
Maternity insurance	C102; C183; R191; R202	Maternity leave, cash benefits, medical care, employment protection, non-discrimination, and breastfeeding-related support	Convention No. 183 requires at least 14 weeks of maternity leave, including six weeks of compulsory postnatal leave. Cash benefits should be at least two-thirds of previous earnings, and maternity-related medical care should include prenatal, childbirth, and postnatal care. Recommendation No. 191 encourages 18 weeks of leave and, where feasible, full wage replacement (ILO, 2014).
Unemployment insurance	C102; C168; R176; R202	Income replacement during involuntary unemployment and support for return to work	Convention No. 102 requires protection against loss of earnings due to unemployment and provides for periodic payments of at least 45% of the reference wage. Convention No. 168 raises this to at least 50%, links protection more explicitly with employment promotion measures, and provides for waiting periods not exceeding seven days, with benefit duration extending up to 26 weeks per case or 39 weeks over two years, depending on the design used (ILO, 2013).
Sickness insurance	C102; C130; R134; R202	Income replacement during temporary incapacity due to sickness, together	Convention No. 130 requires cash sickness benefits at not less than 60% of previous earnings and provides for a duration of not less than 52 weeks per case. It also requires

[7] Social insurance should also be seen in relation to the broader idea of a social protection floor. Under ILO Recommendation No. 202, social protection floors are nationally defined sets of basic social security guarantees intended to ensure at least a minimum level of income security and access to essential health care for all. Contributory social insurance schemes are not a substitute for such floors; rather, they complement them by providing higher and more structured levels of protection against specific contingencies, particularly for workers facing interruptions to earnings due to employment injury, maternity, sickness, or unemployment. In this sense, the floor establishes the minimum base of protection, while social insurance helps build more comprehensive and sustainable levels of support above that minimum (ILO, 2012).

		with access to medical care	curative medical care and, where relevant, preventive care for protected persons. Recommendation No. 134 encourages wider coverage, stronger access to care, and progressive improvements in benefit levels and conditions (ILO, 2021b).

Source: Authors' compilation based on ILO conventions, recommendations, and related guidance.

Table 2.2 shows that while each branch addresses a different type of risk and therefore has its own specific design features, the standards consistently point towards legal entitlement, adequate protection, and some degree of collective responsibility in financing and governance. At the same time, the standards do not impose a rigid institutional template, as will be discussed later in this report. They leave room for national adaptation, including in relation to sequencing, financing arrangements, and the pace at which coverage is extended.

There are, however, some differences in emphasis across branches. The standards on employment injury place particular weight on no-fault protection, medical care, rehabilitation, and survivors' benefits.[8] In the case of maternity, the standards go beyond cash benefits and medical care to include employment protection and non-discrimination, which is especially relevant where the cost of maternity is borne solely by employers. The unemployment standards are distinctive in linking income support with measures to facilitate re-entry into employment, while the sickness standards underline the close relationship between cash benefits and access to medical care.

For Bangladesh, the value of these standards lies less in any expectation of mechanical replication than in the broad guidance they provide for building the NSIS. They make clear that the four branches are not arbitrary additions to a national policy agenda. They correspond to widely recognized areas of worker protection and rest on principles that have long informed social security design across different legal and institutional settings. At the same time, the standards allow room for gradualism and differentiated implementation, which is particularly relevant in the Bangladesh context, where the four branches are not all at the same stage of readiness.[9]

2.3. Why a differentiated approach for the implementation of the four NSIS branches is necessary

Although the four proposed branches of the NSIS form part of a broader social insurance framework, they differ significantly in terms of policy readiness, institutional development, and implementation capacity. They cannot therefore be expected to move forward at the same pace or through identical reform pathways. In the Bangladesh context, a differentiated and phased

[8] No-fault protection is a central feature of employment injury social insurance, as it ensures that workers who suffer occupational accidents or diseases receive timely and predictable medical care and income support without having to establish liability. By removing the need to prove negligence, such arrangements limit costly and protracted disputes, reduce the risk of injured workers falling into hardship, and help promote a more open and safety-conscious workplace environment.

[9] In this sense, the ILO standards are better understood as a normative compass than as a blueprint requiring identical institutional design across countries.

approach is likely to be more practical, both because the branches are at different stages of development and because the institutional requirements associated with each are not the same.

Employment injury insurance stands apart from the other branches in this respect. It is the only area in which a pilot has already been launched, administrative systems have begun to take shape, and practical institutional experience has been accumulated. This progress should now be consolidated and used as a foundation for the wider social insurance agenda. The experience gained from the EIS pilot, in such areas as governance, claims administration, digital systems, and tripartite engagement, can provide useful lessons for the gradual development of maternity, sickness, and unemployment insurance.

The other three branches remain at a much earlier stage. While analytical work and policy discussions have advanced to varying degrees, further efforts will still be needed on raising awareness, legal design, financing arrangements, benefit structures, administrative systems, and implementation readiness. A phased approach is therefore warranted. It would allow Bangladesh to build on the progress already made where conditions are more favourable, while giving adequate time and attention to the branches that require further preparation before operationalisation.

3. The Four NSIS Branches: Current Status, Reform Needs, and Strategic Direction

The protection of workers against employment-related risks in Bangladesh remains uneven and fragmented, shaped by a mix of labour-law-based provisions, employer-liability arrangements, limited public support measures, and a number of emerging reform initiatives. These do not yet constitute a coherent social insurance system for the working-age population. A closer examination of the four proposed branches of the NSIS is therefore necessary to assess the present state of protection, the main gaps that persist, and the broad direction in which reform will need to proceed.

3.1. Employment Injury Insurance

3.1.1. Existing employment injury protection and its limitations

Employment injury insurance occupies a distinctive place within the proposed National Social Insurance Scheme as it is the only branch that has moved beyond conceptual and design work into operational piloting, and it therefore offers Bangladesh a rare combination of policy experience, administrative learning, and practical evidence. This matters not only because workplace accidents can impose severe costs on workers and their families, but also because the experience of this branch has already begun to show what a shift from employer liability to social insurance may look like in practice.

At present, protection against employment injury in Bangladesh rests primarily on the Bangladesh Labour Act (BLA), 2006 and the Bangladesh Labour Rules (BLR), 2015, which together establish an employer-liability framework for compensation in cases of employment induced accidents, occupational diseases, disablement, and death. Under Section 150 of Chapter XII of the Bangladesh Labour Act, employers have been mandated the legal responsibility for providing compensation in cases of employment injury. In addition, Section 89 requires employers to cover the costs of medical treatment for injured workers until cured, subject to the detailed provisions of the Act. The statutory framework provides for lump-sum compensation for death and permanent disablement and temporary income support for a limited period in cases of temporary incapacity.[10] These provisions represent an important legal acknowledgement of employment injury risks; however, the model itself remains narrow and fragile. Protection depends heavily on the solvency, compliance, and reporting behaviour of individual employers. Procedurally, the BLA establishes a litigation-based model: workers must take legal action to claim compensation, and disputes are adjudicated by the Labour Court under Section 166. This often results in delayed settlements and uneven enforcement benefits, and the overall structure offers little to no mechanism of rehabilitation, sustained income support, or predictable long-term protection for workers and their dependants (ILO 2022a; LRC 2025).[11]

The current architecture also includes two institutional mechanisms that sit alongside the employer-liability provisions of the Bangladesh Labour Act, but neither of them constitutes an employment injury insurance scheme in the strict sense. In export-oriented sectors, especially the ready-made garment (RMG) industry, the Central Fund (CF), established under the Bangladesh Labour Rules, has played an important role in supporting compensation payments, particularly where employer compliance is weak or where firms are no longer in a position to meet their liabilities. The CF is financed primarily through a levy of 0.03 per cent on the value of export Letters of Credit. For workers outside the export-oriented sectors, the institutional landscape is even thinner. In principle, some support may be available through the Bangladesh Labour Welfare Foundation (BLWF), which is financed through 0.5 per cent of the net profits of profitable enterprises, but this remains limited and does not amount to a structured employment injury protection mechanism. Unlike a social insurance arrangement, neither the CF nor the BLWF is based on actuarially assessed, wage-linked contributions, nor do they provide a system of periodic income replacement, rehabilitation, or survivors' pensions as legal entitlements. Their role is therefore supplementary rather than foundational. They may provide some support within the existing fragmented landscape, but they cannot substitute for a permanent, rights-based employment injury insurance system built on clearer social insurance principles.

International experience points in a similar direction. Many countries that now operate more structured employment injury schemes moved away from pure employer liability towards pre-

[10] The BLA prescribes a tiered compensation structure. In the case of death, a lump-sum payment of BDT 200,000 is mandated for dependents. For permanent total disablement, workers receive a lump-sum of BDT 250,000, while permanent partial disablement is compensated proportionally, reflecting the assessed loss of earning capacity. In cases of temporary disablement, compensation is payable for the duration of incapacity, or for a maximum period of one year, whichever is shorter, following a four-day waiting period. The benefit is structured as full monthly wages for the first two months, two-thirds of monthly wages for the subsequent two months, and one-half of monthly wages for the remaining period. For long-term or occupational disablement, compensation is payable at 50 per cent of monthly wages for a period of up to two years.

[11] Chapter XII of the Bangladesh Labour Act, 2006 sets out the principal employment injury compensation provisions. The April 2026 amendment further provided for the creation of an Employment Injury Scheme Fund with the possibility of extension to all industries.

arranged financing, no-fault protection, and periodic benefits administered through a dedicated institutional mechanism. Cambodia's National Social Security Fund, Thailand's Workmen's Compensation Fund, Indonesia's Jaminan Kecelakaan Kerja programme under BPJS Ketenagakerjaan, and Viet Nam's employment injury arrangements within the broader compulsory social insurance system all illustrate this shift in different ways (Republic of Indonesia 2023; Viet Nam, National Assembly 2015) (See Annex A1). Their institutional designs vary, but several broad lessons are relevant for Bangladesh. These include the importance of moving beyond sole reliance on litigation and employer liability, ensuring predictable and legally enforceable benefits, linking cash compensation with medical care and rehabilitation, and providing an administratively credible mechanism through which workers can claim benefits without bearing the burden of proving employer fault.

3.1.2. The EIS Pilot: design, implementation, and key learnings

The Employment Injury Scheme (EIS) Pilot was launched in June 2022 as the first operational step towards such a transition. Initially introduced for workers in the export-oriented RMG sector, it has since been extended to the footwear and leather sector and to the export processing zones. The Pilot represents a significant institutional departure from the traditional employer-liability model. It is built on the no-fault principle, under which eligible workers or their survivors may receive benefits without having to establish employer negligence, and without recourse to the Labour Court or any separate claims filing by the worker. The Pilot combines the existing lump-sum support available through the Central Fund with an EIS top-up financed through a dedicated account, thereby introducing periodic pension-type payments for permanent total disability and death.[12] These pensions are earnings-related with death benefits amounting to 40–60 per cent of the deceased worker's wage depending on family size, while permanently and totally disabled workers receive up to 60 per cent of their wage as a monthly pension, payable for life or for the duration of the contingency. This benefit structure is different from the BLA's lump-sum model, which provides a fixed one-time payment irrespective of the duration of disability or the worker's ongoing financial needs. The pilot also relies on a more structured claims administration process, involving digital accident reporting, verification procedures, and direct payment to beneficiaries (EIS 2024; ILO 2025).

Several aspects of the Pilot are worth noting. First, it has shown that a more rules-based and centralised approach to employment injury protection is feasible within the Bangladesh context. Second, it has generated practical learning on governance, claims administration, digital systems, and tripartite oversight. Third, it has produced actuarial and administrative evidence that was previously absent, thereby narrowing one of the major constraints to national scheme design. Fourth, the Pilot has been accompanied by a sustained process of national tripartite consultation. Three national tripartite workshops have been convened, bringing together government, employers, and workers' representatives to discuss benefit and coverage design, institutional governance, and post-2027 financing arrangements. These workshops have produced a degree of consensus on several important questions such as the retention of the Pilot's benefit

[12] The top-up pensions are financed through voluntary brand contributions of 0.019 per cent of sourcing value, under the oversight of the EIS Tripartite Governance Board and subject to strict financial governance rules adopted by the Board.

apportionment rules, phased sectoral extension based on actuarial and risk criteria, the prioritization of long-term disability and death benefits in the early years of the national scheme with rehabilitation and short-term income replacement to follow as financial and administrative capacity matures, and core governance principles including tripartite representation and a clear separation between board oversight and executive management. This nationally grounded consensus is a significant institutional asset, distinguishing the EIS from a purely donor-driven pilot and providing a foundation for the legislative and governance work that lies ahead.

At the same time, the Pilot remains transitional in character. The current financing arrangements, including brand-supported top-up contributions, cannot be assumed to provide the basis for a permanent national scheme. The Pilot is also concentrated in selected sectors, and the extension of coverage beyond these sectors will require legal consolidation, a sustainable contribution structure, stronger administrative capacity, and a clearer long-term institutional home (ILO 2025).

Recent policy developments have strengthened the case for taking this transition forward. The Bangladesh Labour Act, 2006 (as amended, April 2026), under section 151, provides for the establishment of an Employment Injury Scheme Fund, to be constituted by the Government through rules.[13] The amended provisions establish the legal framework for the creation of the Fund and empower the Government to determine its governance, financing arrangements, benefit design, and administrative modalities through subsequent rules, while allowing for its phased application across specified sectors or industries. Importantly, once the scheme is applied to designated sectors, the existing employer liability for employment injury compensation under Section 150 will no longer apply, signalling a shift towards a more structured and collective mechanism for employment injury protection.

Consolidating progress towards a permanent national scheme

For Bangladesh, the broad direction of reform is therefore less about proving the case for employment injury insurance than about consolidating and institutionalising a transition that has already begun. The priority now is to preserve the gains made under the EIS Pilot, clarify the legal and financial basis of a permanent scheme, and build a national architecture that can gradually extend protection beyond the sectors currently covered. In this respect, employment injury insurance should be seen not as one branch among many at an early conceptual stage, but as the leading edge of the wider NSIS agenda. The progress already made in this area provides Bangladesh with an opportunity that should be carefully protected and built upon.[14] Table 3.1 summarises the current system of employment injury protection and its transition under the EIS Pilot.

[13] Bangladesh Labour (Amendment) Act, 2026 (Act No. 43 of 2026), Bangladesh Gazette (Extraordinary), 10 April 2026.

[14] The EIS Pilot is scheduled to conclude in June/July 2027. While the Bangladesh Labour (Amendment) Act, 2026 provides an important legal basis for establishing an Employment Injury Scheme Fund, the effectiveness of the transition will depend on the timely formulation of implementing rules and the operationalisation of institutional arrangements. In the absence of these, there remains a risk that the transition from pilot to a fully functioning national scheme may be incomplete at the point of pilot closure.

Table 3.1 Employment injury protection in Bangladesh: current architecture and transition under the EIS Pilot

Component	Current basis / institution	Nature of protection	Main strengths	Main limitations / transition issues
Employer-liability provisions under the BLA, 2006	Chapter XII of the BLA and related rules	Compensation for death, temporary disablement, permanent disablement, and occupational disease; employer-funded medical treatment	Provides a statutory basis for employment injury compensation and recognizes occupational disease in law	Relies on employer solvency and compliance; largely litigation-based; benefits remain limited and often lump-sum in character; weak rehabilitation and long-term income protection
Central Fund (CF)	BLR-based tripartite fund for export-oriented sectors, especially RMG	Supports lump-sum compensation and related payments; important operational platform in the current system	Helps sustain compensation where employer compliance is weak; has become a key institutional mechanism in export sectors	Not a wage-based contributory insurance fund; not built on actuarial principles; largely tied to lump-sum support; sectoral confined
EIS Pilot	Pilot launched in 2022 under MoLE with ILO and DGUV support	Combines CF lump-sum support with EIS top-up pension payments for permanent total disability and death; structured claims administration and digital reporting	Introduces no-fault protection, more predictable benefits, direct payment, institutional learning, and practical evidence for scale-up	Still transitional; financing model not yet fully settled for long-term national roll-out; coverage remains selective; requires legal consolidation
Emerging national direction	2025 BLA amendment, SSU establishment, and LRC recommendations	Movement towards a permanent Employment Injury Scheme Fund and wider sectoral extension	Signals growing policy support for institutionalising employment injury insurance	Requires durable financing, stronger administration, wider coverage, and a clear statutory and governance framework

Source: Authors' compilation from different sources.

3.2. Maternity insurance

3.2.1 Existing maternity protection provisions and current gaps

Maternity protection in Bangladesh remains fragmented, with provisions spread across labour law, public service rules, tax-financed support measures, and statutory welfare funds. This dispersed landscape provides some degree of protection to selected groups of women, but it does not amount to a coherent maternity insurance arrangement for working women as a whole. The resulting pattern is one of uneven coverage, variable benefit design, and sharp differences in the basis on which support is provided.

For private-sector workers, the principal statutory framework is the Bangladesh Labour Act (BLA) 2006, together with the Bangladesh Labour Rules (BLR) 2015. Under this framework, eligible women workers are entitled to 120 days of paid maternity leave, with cash benefits formally intended to provide full wage replacement (Bangladesh Labour Act 2006). Following the most recent amendment enacted in April 2026, the earlier requirement of taking leave in two fixed blocks, 8 weeks before childbirth and 8 weeks after childbirth, has been relaxed, allowing greater flexibility in the timing of leave based on notification to the employer. Eligibility, however, remains conditional on at least six months of continuous service and is restricted to women with no more than two surviving children.[15]

While the legal framework continues to mandate full wage replacement, the method used to calculate maternity benefits has undergone important changes. Under the earlier provision in the Act, the per-day wage was typically calculated based on the average earnings received during the three months preceding the notification of leave. The 2022 amendment to the BLR revised this approach by linking benefit calculation to the wage of the month preceding leave divided by 26 days. Concerns have been raised by worker representatives and labour rights advocates that this revised method may reduce the effective benefit received, particularly for workers whose earnings are irregular, overtime-dependent, or not consistently recorded. Notably, despite these concerns, the latest amendment to the BLA enacted in April 2026 retained the revised calculation method introduced through the BLR. More broadly, the framework remains limited in scope, applying primarily to workers in the organised private sector and leaving the overwhelming majority of women in informal employment outside statutory maternity protection (ILO 2024a).

A further limitation of the current framework is that it rests overwhelmingly on employer liability. This means that the cost of maternity cash benefits is borne at the enterprise level rather than through a broader system of collective financing. While such an arrangement may provide protection on paper, it tends to produce uneven compliance in practice and may also create adverse incentives in the labour market. Where maternity-related costs are borne solely by employers, women workers may face discrimination in hiring, retention, or promotion,

[15] The restriction of statutory maternity benefits to women with no more than two surviving children remains a distinctive feature of the BLA framework and raises concerns from both equity and labour-rights perspectives, particularly considering Bangladesh's declining fertility and the wider objective of strengthening women's labour-force participation.

particularly in labour-intensive sectors employing large numbers of young women (ILO 2014). The problem is not only one of legal entitlement, but also of how that entitlement is financed.

Public-sector provisions are considerably more generous. Government employees are entitled to six months of fully paid maternity leave under the Government Service Rules, and similar provisions have been extended to some other categories of employees, including private school teachers and employees in the banking sector (Bangladesh Bank 2023; Government of Bangladesh n.d.). These arrangements show that Bangladesh has already accepted, at least for some groups, a broader maternity protection norm than that embodied in the BLA. At the same time, they also highlight the fragmented nature of the present system, since the level of protection depends heavily on occupational location rather than on any coherent national framework.

The tax-financed Mother and Child Benefit Programme (MCBP) provides another form of support, but it serves a different purpose. The programme offers a monthly transfer to selected vulnerable mothers for a fixed period, with a stronger focus on maternal and child well-being, nutrition, and early childhood development than on earnings-related income replacement (UNICEF 2023). It is therefore better understood as a social assistance measure than as maternity insurance. In parallel, the Central Fund (CF) and the Bangladesh Labour Welfare Foundation (BLWF) provide limited maternity grants in export-oriented and non-export sectors respectively, but these are fixed and grant-based forms of assistance rather than contributory, rules-based entitlements linked to prior earnings.[16]

Therefore, while Bangladesh does have labour-law provisions, more favourable public-service arrangements, tax-financed support for poor mothers, and selected welfare-fund grants (Table 3.2), these do not provide a systematic and equitable basis for protecting women workers against maternity-related interruption of earnings. The core weaknesses include reliance on employer liability, limited effective coverage, fragmentation across sectors and institutions, and the absence of a structured contributory mechanism capable of providing predictable income protection to working women.

[16] The CF and BLWF may provide maternity-related financial assistance, but such support is fixed in amount and does not constitute earnings-related maternity protection. Their role is therefore supplementary rather than constitutive of maternity insurance.

Table 3.2 Current maternity-related provisions relevant to the NSIS

Provision / scheme	Coverage	Benefit provided	Financing basis	Main limitation for maternity insurance purposes
Bangladesh Labour Act and Rules	Eligible private-sector women workers in covered establishments	120 days of paid maternity leave; statutory cash benefit intended to replace wages	Direct employer liability	Narrow effective coverage; service condition and two-child limit; uneven compliance; enterprise-level financing may discourage hiring of women
Government service rules and selected sectoral variations	Government employees and some selected occupational groups	Six months of fully paid maternity leave	Public budget or sector-specific administrative arrangements	More favourable protection, but fragmented and not based on a unified national scheme
Mother and Child Benefit Programme (MCBP)	Selected poor and vulnerable mothers	Monthly transfer for a defined period, oriented towards maternal and child well-being	General taxation	Social assistance rather than earnings-related maternity protection
Central Fund (CF)	Workers in export-oriented sectors	Fixed maternity grant and additional support for complications	0.03% levy on export Letters of Credit	Grant-based support; sector-limited; not linked to wages or insurance principles
Bangladesh Labour Welfare Foundation (BLWF)	Workers in non-export industries	Fixed maternity grant and some support for complications	0.5% levy on net profits of profitable enterprises	Limited and uneven support; not a contributory maternity insurance mechanism

Source: Authors' compilation from different sources.

3.2.2 International experience and key lessons for Bangladesh

International experience shows that maternity protection is most effective where it is treated as a structured part of social security rather than as a narrow employer-level obligation. The strongest systems do not rely only on leave provisions in labour law. They combine legal entitlement, some form of collective financing, and institutional arrangements that reduce the burden on individual employers while providing women with more predictable protection during maternity-related absence from work.

India offers one relevant illustration. Under the Employees' State Insurance Scheme (ESIS), insured women are entitled to maternity cash benefits equivalent to full average wages for 26 weeks in the case of childbirth and six weeks in the case of miscarriage or medical termination of pregnancy, subject to prescribed contribution conditions (ESIC n.d.). For workers outside the scope of ESIS, however, protection continues under the Maternity Benefit Act through employer liability. India therefore demonstrates a hybrid approach in which contributory social insurance and employer liability coexist, at least during a period of uneven coverage. Viet Nam provides another important example. Under its social insurance system, eligible women workers receive six months of maternity leave financed through social insurance, with cash benefits paid at 100 per cent of the average salary on which social insurance contributions were based in the six months preceding leave (Viet Nam Social Security n.d.). This arrangement is complemented by the wider health financing system, illustrating that maternity cash benefits and maternity-related medical care can be institutionally linked without necessarily being administered through a single scheme.

Thailand and the Philippines offer further useful lessons. Thailand combines broad healthcare coverage with maternity cash benefits under its social security system, and recent amendments have extended maternity leave from 98 to 120 days while also introducing paid paternity leave (Nishimura & Asahlaw 2025). The Philippines' 105-Day Expanded Maternity Leave Law provides full wage replacement financed through the Social Security System and has extended coverage even to some women outside standard formal employment relationships (Republic of the Philippines 2019). These experiences differ in design, but they point in the same broad direction: maternity protection is more coherent and less discriminatory where financing is pooled, benefits are clearly defined, and the costs are not left entirely to the employing firm.

The main lessons for Bangladesh can be summarized as follows. First, maternity protection works better when it is built on collective financing rather than sole employer liability.[17] Second, the cash benefit element needs to be designed in ways that provide meaningful income replacement while reducing incentives for discrimination against women workers. Third, maternity cash benefits and maternity-related medical protection may be developed together or in a sequenced manner, but both require clearer institutional anchoring than is presently the case in Bangladesh.[18]

3.2.3 Broad direction for maternity insurance under the NSIS

Against this backdrop, the broad direction of reform under the NSIS should be towards a maternity insurance arrangement that moves away from exclusive reliance on employer liability and towards a more structured system of contributory protection. Such an approach would not imply that the present legal framework is irrelevant. On the contrary, existing statutory leave provisions and current benefit norms provide an important baseline from which reform must proceed. The more substantive issue is whether maternity-related income protection can be

[17] A shift towards contributory maternity insurance does not necessarily require the immediate disappearance of all employer obligations. In many settings, labour-law provisions and insurance-based arrangements coexist during a period of transition, although the medium-term direction is generally towards reducing sole enterprise-level financing of maternity benefits.

[18] The distinction between maternity cash benefits and maternity-related medical care is important for scheme design. Some countries finance both through a unified social insurance architecture, while others separate income protection from health-service financing, depending on institutional arrangements and health-system development.

financed and administered in a way that is more predictable, more equitable, and less likely to distort employer behaviour.

In practical terms, this points towards a scheme that would protect women workers against maternity-related interruption of earnings through pooled financing and legally defined benefits, while allowing for a phased approach to the treatment of medical costs. Some preparatory work has already moved in this direction. Studies undertaken in Bangladesh have examined both the financing of maternity-related medical costs and the contribution requirements associated with maternity cash benefits, indicating that the analytical basis for reform is beginning to emerge (Moazzem et al. 2025; Government of Bangladesh 2020). The challenge now is to translate this work into a coherent institutional pathway.

The eventual design of maternity insurance under the NSIS will need to resolve a number of questions, including the treatment of current employer-liability provisions, the relation between maternity cash and maternity-related medical benefits, and the scope for progressive inclusion of women workers outside standard formal employment. Those issues are taken up later in the report. At this stage, the central point is that maternity protection in Bangladesh has already moved beyond being simply a matter of leave rules under labour law. The question is now how to build a more coherent and financially sustainable system that protects women workers while reducing the burden and distortions associated with the existing model.

3.3. Unemployment insurance

Bangladesh does not yet have a dedicated unemployment protection system that can provide temporary income replacement during periods of involuntary job loss while also supporting workers' return to employment. What exists instead is a mix of labour-law provisions, limited public assistance, and underdeveloped labour market interventions. These arrangements offer some degree of support under particular circumstances, but they do not amount to unemployment insurance in the proper sense. A closer examination is therefore necessary to understand both the existing landscape and the broad direction in which reform will need to proceed (Razzaque 2022; ILO 2024a).

3.3.1 Existing unemployment-related protection and current gaps

The principal source of formal protection for workers who lose employment remains the Bangladesh Labour Act (BLA), 2006, (as amended 2026). The Act provides for lay-off compensation, retrenchment benefits, discharge compensation, termination payments, and, in some circumstances, compensation upon resignation. These provisions are important and should not be dismissed. They may cushion the immediate shock of job separation for some formal workers. Yet they are based on employer liability and severance-type compensation, not on pooled social insurance. They do not provide regular income replacement during a spell of unemployment, nor do they establish any institutional basis for linking benefit receipt with re-employment support (Government of Bangladesh 2006; Razzaque 2022).

The current landscape also includes the Unemployed Workers' Protection Programme (UWPP), introduced in October 2020 in response to employment disruptions in export-oriented industries during the COVID-19 period. Initially focused on laid-off workers in the garment and leather sectors, the programme was later extended to selected workers in other export-oriented industries, including jute, frozen food, and shipbuilding. The UWPP is significant because it represents an explicit policy acknowledgement that involuntary unemployment may require public support beyond the narrow confines of employer liability. Even so, it remains a temporary and narrowly targeted assistance mechanism rather than a contributory unemployment insurance scheme. Its coverage is selective, benefit duration is short, and its financial basis depends on budgetary and development-partner support rather than on pre-arranged contributory financing.[19]

A further weakness lies in the underdeveloped state of active labour market policies and employment services. International practice suggests that unemployment protection works best when cash support is linked with job search assistance, counselling, skills development, and labour market intermediation. In Bangladesh, however, the relevant architecture remains thin. Some skills development programmes and public employment schemes exist, and digital systems such as the Labour Market Information System (LMIS), the Labour Information Management System (LIMS), and the Labour Inspection Management Application (LIMA) have begun to take shape. Nevertheless, these interventions remain fragmented and do not yet provide the kind of integrated support that a functioning unemployment insurance system would require (Bista and Carter 2017; ILO 2024a). Table 3.3 summarises the main unemployment-related protection arrangements currently available in Bangladesh and indicates why they fall short of a genuine unemployment insurance system.

Two points follow from the above landscape scanning. First, Bangladesh already has some mechanisms that touch on unemployment-related risk, but they operate through very different logics than unemployment insurance. Secondly, none of them provides what unemployment insurance is meant to provide: earnings-related income replacement during involuntary unemployment, financed on a contributory basis, with clear institutional arrangements for administration and labour market reintegration.[20]

[19] The UWPP may continue to serve a useful role, especially where unemployment shocks are concentrated in particular sectors or where contributory coverage remains incomplete. Its continuing relevance, however, does not alter its basic character as a public assistance mechanism rather than an unemployment insurance scheme.

[20] The distinction is important because unemployment assistance, severance compensation, and unemployment insurance serve different purposes. Assistance is usually tax-financed and targeted; severance is employer-liability-based and tied to job separation; unemployment insurance is contributory and is intended to provide temporary income replacement during involuntary unemployment.

Table 3.3: Unemployment-related protection measures in Bangladesh

Arrangement / mechanism	Who is covered	Nature of support provided	Financing basis	Main limitation from a UI perspective
Lay-off compensation under BLA (Section 16)	Workers in the establishment's worker register (excluding casual workers) with at least 1 year of continuous service	Temporary compensation during lay-off; if lay-off extends beyond 45 days and continues for a further 15+ days without mutual agreement, employer must pay additional compensation for that extended period	Individual employer liability	Coverage conditional on register inclusion and 1-year service threshold, leaving short-tenure and badli/casual workers entirely unprotected; not an insurance benefit and not linked to re-employment support
Retrenchment, discharge and termination compensation under BLA (Sections 20, 22 and 26)	Permanent workers and other covered workers subject to statutory conditions, including those dismissed or removed	Notice pay and lump-sum compensation upon separation; resignation entitles workers to service-linked tiered gratuity.	Individual employer liability	One-off compensation rather than periodic income replacement; depends on compliance and employer capacity
Unemployed Workers' Protection Programme (UWPP)	Selected laid-off workers in specified export-oriented industries	Temporary public cash support for eligible unemployed workers	Budgetary support and development-partner financing	Narrow sectoral coverage, short duration, and non-contributory design; closer to unemployment assistance than to unemployment insurance
Skills and employment support programmes (e.g. SEIP, ASSET, public works)	Selected workers, youth, and vulnerable groups	Training, temporary work opportunities, and employability support	Public and project financing	Fragmented interventions rather than an integrated unemployment protection architecture
Labour market information and digital systems (LMIS, LIMS, LIMA)	Workers, firms, and regulators in varying degrees	Information, registration, inspection, and reporting support	Public and project financing	Useful administrative building blocks, but not a substitute for benefit administration or employment services

Source: Compiled from Government of Bangladesh (2006), Razzaque (2022), Ministry of Finance (2025), and relevant programme documents.

3.3.2 International experience and key lessons for Bangladesh

International experience shows that unemployment insurance systems are usually built gradually rather than introduced in fully developed form. Their design has differed across countries, but some broad lessons are recurrent. In developed economies such as Canada and Japan, unemployment insurance has long functioned as an automatic stabiliser during downturns and has been closely linked to labour market administration. In a number of Asian developing countries, including the Republic of Korea, Thailand, Malaysia, and Viet Nam, contributory unemployment protection has also been introduced through phased approaches, often beginning with formal-sector workers and then expanding over time as administrative systems and institutional capacity improved (Carter et al. 2013; Bista and Carter 2017).

Three lessons are especially relevant for Bangladesh. The first is that unemployment insurance should not be confused with severance pay. Severance and retrenchment compensation may soften the immediate shock of dismissal, but they do not provide a continuing stream of income support during a period of joblessness. The second is that benefit design needs to be realistic. Qualifying conditions that are too strict, or contribution histories that are too long, may make a scheme formally sound but practically inaccessible, particularly in labour markets marked by job turnover and incomplete records. The third is that unemployment insurance works best when it is linked to employment services and active labour market measures rather than operating as a stand-alone cash transfer (Razzaque 2022; ILO 2024a).

These lessons suggest that Bangladesh should neither aim for an overly ambitious design from the outset nor rely indefinitely on fragmented arrangements. What is needed instead is a contributory framework that is modest enough to be workable in the early stages but strong enough to establish the institutional foundations of a genuine unemployment protection system.

3.3.3 Broad direction for unemployment insurance under the NSIS

In broad terms, the direction of reform is now reasonably clear. A future unemployment insurance branch under the NSIS would need to be contributory, initially focused on parts of the formal sector where employment relationships and payroll records are sufficiently traceable, and linked as far as possible to the gradual development of labour market services. It should also be clearly distinguished from both the severance-related provisions of the BLA and the taxpayer-financed UWPP. The former are employer-liability arrangements tied to specific forms of separation; the latter is a temporary assistance programme that may continue to play a complementary role for groups outside immediate contributory coverage, but it cannot substitute for a structured insurance mechanism.[21] The design issues that will need to be addressed are summarised in Table 3.4.[22] These questions are not technical details alone. They

[21] A contributory unemployment insurance scheme does not need to eliminate all existing labour-law-based protections from the outset. In practice, transitional coexistence may be necessary, provided the relationship among the different mechanisms is clearly defined.

[22] The discussion here focuses on broad design direction rather than detailed actuarial parameters. Questions such as replacement rates, duration, and contribution rates would require dedicated modelling and tripartite consultation before operationalization.

will determine whether unemployment insurance can evolve into a credible branch of the NSIS rather than remain a recurring policy aspiration.

Table 3.4: Design issues for unemployment insurance

Design issue	Key question for Bangladesh	Why it matters	Indicative direction
Initial coverage	Which workers and sectors can realistically be included first?	Immediate universalisation is not feasible in a labour market dominated by informality and weak records	Begin with traceable formal-sector segments and expand gradually
Relationship with BLA severance provisions	How should insurance benefits relate to lay-off, retrenchment, and termination compensation?	Overlap or ambiguity could create duplication and resistance from employers	Clarify legal interaction so UI complements or gradually rationalises existing employer-liability provisions
Benefit adequacy and duration	What level and duration of income support would be realistic and sustainable?	Benefits that are too low provide little protection; benefits that are too ambitious may undermine sustainability	Adopt modest but meaningful earnings-related support consistent with actuarial analysis and international standards
Qualifying conditions	How much prior contribution or work history should be required?	Excessive qualifying conditions can leave most workers outside effective coverage	Use conditions that protect financial integrity without making access unrealistic
Financing and burden-sharing	How should costs be shared among workers, employers, and the State?	The financing structure will shape sustainability and political acceptability	Rely primarily on shared contributions, with the State supporting administration and system development
Link with ALMPs and employment services	How can UI be tied to job search, training, and re-employment support?	Without this, UI risks becoming detached from labour market reintegration	Develop UI alongside employment services, labour market information, and activation measures
Administrative systems	What records, claims systems, and digital platforms are needed?	Contribution tracking and claims administration depend on reliable data systems	Build on evolving registries and digital labour-market systems while strengthening their interoperability
Relationship with UWPP	What role should the existing public assistance programme continue to play?	Confusion between assistance and insurance could blur policy design	Retain UWPP, where necessary, as a complementary tax-financed support mechanism outside the contributory UI branch

Source: Compilation based on Razzaque (2022), Bista and Carter (2017), Carter et al. (2013), and the current institutional context in Bangladesh.

At this stage, therefore, the case for unemployment insurance in Bangladesh rests less on any expectation of immediate full-scale implementation than on the need to move from fragmented protection towards a clearer institutional pathway. The existing BLA provisions, the UWPP, and the embryonic state of labour market services all have a place in that transition, but none removes the underlying need for a contributory unemployment insurance branch under the NSIS.

3.4. Sickness insurance

Sickness-related income protection in Bangladesh remains highly fragmented. Existing arrangements are split across public-sector leave rules, short-duration sick leave under labour legislation, limited medical allowances, welfare-type support, and a small number of employer-provided schemes. These provisions provide some support in particular segments of the labour market, but they do not constitute a structured sickness insurance system capable of offering predictable and rules-based protection against temporary loss of earnings due to illness.[23] A closer assessment is therefore needed to understand both the present landscape and the broad direction in which reform under the NSIS may need to proceed.

3.4.1 Existing sickness-related protection and current gaps

At present, sickness-related protection in Bangladesh differs sharply between the public and private sectors. Public-sector employees benefit from a more elabourate set of provisions, including a fixed monthly medical allowance, extended sick leave under the Bangladesh Service Rules and the Prescribed Leave Rules, and access to support through the Bangladesh Employees Welfare Board (BKKB) for more serious illness. Private-sector workers, by contrast, are primarily covered by Section 116 of the Bangladesh Labour Act (BLA), 2006, which provides 14 days of paid sick leave per calendar year, alongside a limited set of medical and welfare-related supports that vary considerably across employers (PiHR 2025a; PiHR 2025b).[24]

The public-sector framework is broader in formal terms, but it is not without weaknesses. The standard medical allowance of BDT 1,500 per month under the National Pay Scale 2015 has remained unchanged for a prolonged period, and its real value has been eroded by inflation and rising treatment costs. Sick leave provisions are more generous than those available to private-sector workers, but they arise from administrative service rules rather than from a broader social insurance mechanism. Access to further support through the BKKB may ease treatment costs in some cases, particularly for serious illness, yet this too remains a welfare-type arrangement rather than an insurance branch providing structured wage replacement during temporary incapacity (BKKB 2023).

For private-sector workers, the limitations are more pronounced (Table 3.5). The legal entitlement to 14 days of paid sick leave is narrow in duration and does not extend to a more systematic form of income replacement where illness is prolonged. Medical allowances are not mandated in any standardised way and are left largely to employer policy. Some larger firms provide health

[23] In this section, sickness insurance is used to mean structured income protection during temporary incapacity for work due to illness. It is distinct from general health financing or reimbursement of treatment costs, although the two may be institutionally linked

[24] The BKKB is a welfare-type support mechanism for government employees and related beneficiaries. Its grants may help meet treatment costs, but they do not amount to a rules-based sickness insurance branch providing periodic earnings replacement.

insurance or additional medical support, but such arrangements are concentrated among a small group of larger employers and do not create uniform or portable entitlements. For prolonged illness, the legal framework shifts away from sickness protection towards discharge and compensation provisions, meaning that sustained income protection during illness is largely absent (Bangladesh Labour Act 2006; PiHR 2025b).[25]

Table 3.5: Existing sickness-related protection arrangements in Bangladesh

Provision / arrangement	Who is covered	Nature of support	Financing basis	Main limitation from a sickness insurance perspective
Government sector medical allowance and sick leave	Government employees	Monthly medical allowance; extended sick leave under service rules; additional welfare support in some cases	Public budget and employee-supported welfare mechanisms	Not a contributory sickness insurance system; benefit structure not designed around earnings-related income replacement
Private-sector sick leave under the BLA	Private-sector employees covered by labour law	14 days of paid sick leave per year at full pay	Employer liability	Very limited duration; no structured protection for prolonged illness; no pooled financing
Bangladesh Employees Welfare Board (BKKB)	Government employees, retirees, and eligible family members	Medical grants for treatment and serious illness	Employee contributions, government grants, and investment income	Welfare-type support rather than legal entitlement to periodic sickness benefits
Employer-provided medical or insurance support	Workers in selected larger firms	Medical allowances, group health coverage, or employer-specific benefits	Employer policy / employer-funded schemes	Fragmented, uneven, and non-portable; no standardised protection across workers
CF / BLWF medical assistance[26]	Selected workers in export and non-export sectors	Lump-sum or discretionary medical support in some cases	Levies on export value or enterprise profits	Supplementary support only; not sickness insurance and not designed to replace earnings during illness

Source: Authors' compilation from different sources.

The position of workers outside the formal wage sector is weaker still. Most informal workers have no access to paid sick leave or structured income protection during illness and must rely on personal savings, household coping strategies, or irregular forms of assistance. The consequences are compounded by significant out-of-pocket health expenditures, which can

[25] The public-private contrast in sickness protection is particularly important in Bangladesh because the wider structure of labour-market informality means that many workers remain outside even the limited protections formally available under labour legislation.
[26] The Central Fund (CF) and the Bangladesh Labour Welfare Foundation (BLWF) may in some cases provide medical assistance to workers in export and non-export sectors respectively, but these are supplementary support mechanisms rather than sickness insurance arrangements.

intensify both short-term hardship and longer-term vulnerability (World Bank 2025; Khan et al. 2025). In this respect, the present landscape remains far removed from a sickness insurance system built on pooled financing, legal entitlement, and predictable protection against temporary interruption of earnings.

As Table 3.5 shows, the present framework is fragmented not only by sector but also by institutional logic. Some arrangements are based on employer liability, some on public service rules, and some on discretionary welfare-type support. What is missing is a unified mechanism through which workers can receive defined and reasonably adequate income protection during temporary incapacity for work. This gap is central to the case for considering sickness insurance as a branch of the NSIS.

3.4.2 International experience and key lessons for Bangladesh

International experience suggests that sickness protection can be organised in different ways, but durable systems generally move beyond sole reliance on individual employers. In India, the Employees' State Insurance Scheme provides sickness cash benefits and medical care through a contributory social insurance system, with benefits linked to prior contributions and certified incapacity. Viet Nam also provides sickness benefits through its broader social insurance framework, combining wage replacement with an institutionalised mechanism for medical certification. By contrast, Indonesia continues to rely largely on an employer-liability approach for non-occupational sickness, which places the burden on individual firms rather than on a pooled financing arrangement (ESIC 2024; Government of Bangladesh 2020).

The experience of advanced economies points in a similar direction, even though institutional arrangements vary. Germany combines an initial period of employer-paid sick pay with subsequent benefits paid through statutory health insurance, while Sweden also uses a mixed model in which employers carry an initial short-term obligation before the public social insurance system takes over. Canada and Japan, in different ways, likewise provide structured sickness-related income protection that is not left solely to ad hoc employer discretion. The common lesson is not that all countries follow one design, but that effective sickness protection generally depends on a clearer institutional arrangement linking wage replacement to medical certification and to some form of pooled or publicly organised financing (Government of Bangladesh 2020).

For Bangladesh, three lessons are especially relevant. First, short-duration paid sick leave, while useful, is not a substitute for a sickness insurance branch where illness leads to a longer interruption of earnings. Second, the credibility of any such branch depends on the availability of accessible and trusted medical certification. Third, a gradual move towards pooled financing can reduce the unevenness that arises when protection depends too heavily on employer size, sector, or willingness to provide support. These lessons do not imply immediate full-scale replication of foreign models, but they do underline the limitations of the current fragmented framework.

3.4.3 Broad direction for sickness insurance under the NSIS

The eventual development of a sickness insurance branch under the NSIS would need to be anchored in a clearer distinction between short-term leave, medical assistance, and structured income protection during temporary incapacity for work. In practical terms, this means moving beyond the current mix of limited sick leave, medical allowances, and discretionary support towards a system in which insured workers become entitled to cash benefits when illness interrupts earnings for a defined period. Such a branch would also require agreed rules on coverage, medical certification, waiting periods, benefit duration, and financing arrangements. The relation between a future sickness insurance scheme and the existing 14-day sick-leave provision under the BLA would need to be carefully managed so that the introduction of insurance does not weaken existing protections at the enterprise level.

Given present constraints, a gradual and differentiated approach is likely to be necessary. The immediate priority is not rapid large-scale roll-out, but the development of the legal, administrative, and medical-certification foundations on which a viable branch could later rest. In that process, the objective should be to create a more predictable and coherent framework for income protection during illness, while keeping open the possibility of later extension as institutional capacity and financing arrangements become stronger. In this respect, sickness insurance remains one of the least developed branches of the NSIS, but also one of the areas where the weaknesses of the current system are especially visible.

4. Cross-cutting challenges in implementing the NSIS

The preceding sections have examined the four proposed branches of the National Social Insurance Scheme separately. Despite differences in maturity and design, the four branches confront a remarkably similar set of structural constraints. A clearer view of these shared constraints is therefore necessary, not only because it helps explain the limited progress made thus far, but also because the later discussion on governance and the roadmap depends on an understanding of the broader institutional, legal, financial, and administrative conditions within which the NSIS must be developed.

4.1 Limited conceptual clarity and stakeholder awareness

Although the NSSS introduced the idea of a National Social Insurance Scheme more than a decade ago, social insurance remains unevenly understood in policy and implementation circles. Its distinction from social assistance, employer-liability-based protection, or even private insurance products is not clear to many stakeholders. Such conceptual ambiguity has practical consequences. It affects how employers perceive the cost of participation, how workers understand their rights, and how public institutions interpret their own roles in scheme design and implementation. The problem is not one of terminology alone; it goes directly to the feasibility of building a contributory system that depends on shared understanding of solidarity, pooled financing, and legally defined entitlements (GED 2015; ILO 2024a).

4.2 Absence of an overarching legal framework

A second challenge lies in the absence of an overarching legal framework for the NSIS as a whole. While labour-law provisions, public employment rules, welfare funds, and pilot arrangements provide partial foundations in different areas, Bangladesh still lacks a comprehensive statutory basis defining the scope, institutional architecture, financing principles, and governance arrangements of the proposed social insurance branches. This legal gap has different implications across schemes. In employment injury, it is especially pressing because the transition from the current pilot arrangement to a permanent national system requires a firmer statutory base, possibly a dedicated EIS law. In maternity, unemployment, and sickness insurance, the absence of a common legal framework makes it harder to clarify the relationship between future contributory arrangements and existing employer-liability or tax-financed provisions.[27]

4.3 Financing, cost-sharing, and transition from employer liability

Financing remains one of the most delicate issues across the four branches. Bangladesh's existing arrangements are rooted largely in employer liability, limited public support, or small welfare-type mechanisms. Moving from that landscape to social insurance involves more than identifying contribution rates. It requires agreement on how costs should be shared, what liabilities would remain with employers, and how workers would view contributory financing in areas where some legal protections already exist. This issue is particularly sensitive in maternity and sickness, where employers may fear additional burdens, and in unemployment insurance, where, along with the above, the interaction between severance-type payments and insurance benefits will need careful treatment. While Bangladesh's narrow fiscal space limits the scope for relying on tax-financed protection for the working-age population, a contributory social insurance approach offers a more durable route only if financing arrangements are perceived as fair, predictable, and institutionally credible (Taskforce Committee 2025; Government of Bangladesh 2020).[28]

4.4 Weak administrative and institutional capacity

Even where policy intent exists, implementation depends on administrative capability. Social insurance requires systems for registration, contribution collection, record maintenance, claims processing, benefit disbursement, grievance handling, audit, and financial oversight. Bangladesh does not yet possess a mature institutional platform capable of managing these functions across multiple branches at scale. The establishment of the Social Security Unit within the Ministry of Labour and Employment is an important step, but it remains at an early stage of development. Administrative weaknesses are also visible in fragmented worker databases, limited

[27] The Labour Reform Commission has recommended an integrated social protection law and a mandatory social security fund, reinforcing the view that piecemeal arrangements are unlikely to be sufficient for the longer-term development of the NSIS (LRC 2025).

[28] The fiscal and political economy issues are not identical across branches. In employment injury, the financing question is tied closely to the transition from the current pilot to a permanent scheme. In maternity and sickness, the interaction with existing employer obligations is especially sensitive. In unemployment insurance, the main issue is how a future contributory benefit would relate to severance-type protections and temporary public support such as the UWPP.

interoperability among existing systems, thin inspection capacity, and the absence of a full-fledged insurance administration for most branches. The practical progress made under the EIS Pilot shows that some institutional functions can be built and tested, but it also highlights how much system development is still required before the NSIS can move from policy concept to routine operation (ILO 2025; Government of Bangladesh 2020).

4.5 Labour market informality and coverage constraints

The predominance of informal employment poses another fundamental challenge. Social insurance works most effectively where employment relationships, earnings, and contribution obligations can be identified and administered with reasonable certainty. In Bangladesh, however, informal work continues to dominate the labour market, limiting the immediate scope for payroll-based contributory protection. This does not mean that social insurance is irrelevant. It does mean, however, that coverage expansion will need to be gradual and that the initial focus is likely to remain on those segments of the workforce where registration, contribution collection, and compliance can realistically be managed. The issue is particularly acute for maternity and sickness protection, since large proportions of the affected workforce, especially women workers, remain outside formal employment relationships. Any national social insurance agenda must therefore be aligned with broader efforts to strengthen labour market formalization, worker registration, and administrative traceability (BBS 2024; World Bank 2025).[29]

4.6 Data, actuarial, and information gaps

The development of social insurance branches also depends on reliable data. Contribution rates, benefit formulas, coverage strategies, and long-term financial sustainability cannot be determined with confidence in the absence of adequate actuarial and administrative information. Bangladesh still faces significant gaps in this regard. Data on workplace accidents and occupational disease have begun to improve through the EIS process, but major weaknesses remain in relation to sickness incidence, unemployment duration, maternity-related expenditure, earnings histories, and worker-level records. These limitations complicate the task of designing schemes that are both financially sustainable and practically workable. They also increase the risk of either over-designing schemes that cannot be financed or under-designing schemes that provide too little meaningful protection (Government of Bangladesh 2020; Razzaque 2022).

4.7 Branch-specific institutional demands within a common framework

Although the NSIS is envisaged as a coherent social insurance framework, the four branches place somewhat different demands on institutions and delivery systems. Employment injury requires specialised arrangements relating to accident reporting, disability assessment, medical care, rehabilitation, and survivors' benefits. Maternity insurance raises questions about the interface between cash protection, employment protection, and maternity-related health services. Unemployment insurance cannot be separated from the development of labour market

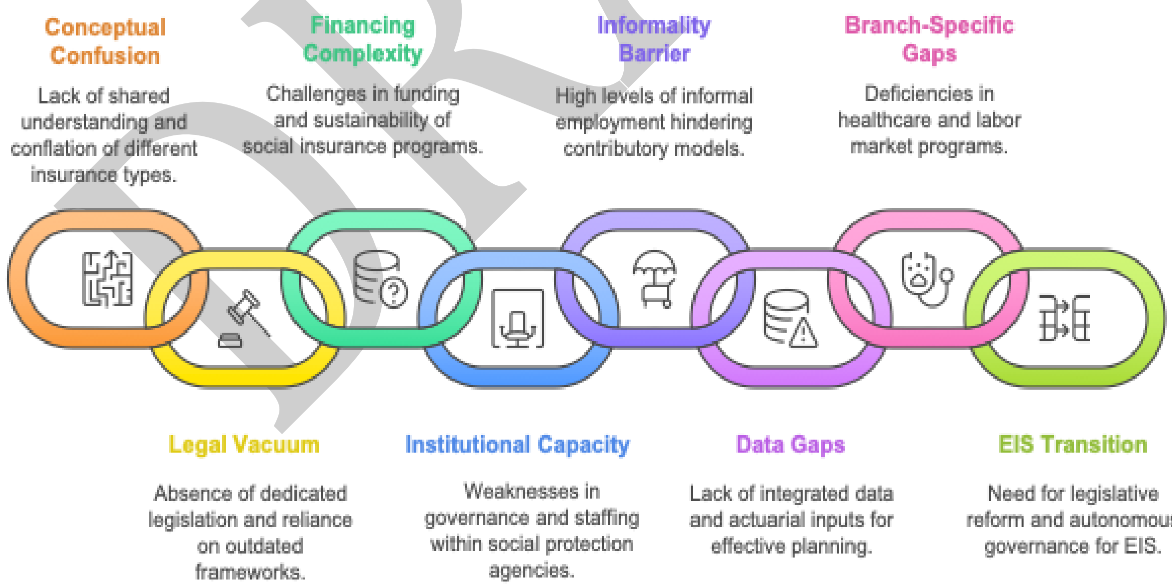
[29] This helps explain why most discussions of the NSIS, including under the NSSS, have implicitly or explicitly pointed to gradual extension beginning with the more administratively traceable segments of the labour force rather than immediate universal contributory coverage.

services, job-search support, and active labour market policies. Sickness insurance depends heavily on the availability of credible medical certification and on how income protection interacts with health-care access. These differences do not undermine the case for a unified social insurance framework. They do, however, mean that implementation cannot be reduced to a single administrative template across all branches (Bista and Carter 2017; ILO 2024a).[30]

4.8 Protecting the current momentum on employment injury

The cross-cutting constraints discussed above apply across the NSIS, but employment injury presents an additional issue of timing and institutional momentum. Since this has moved into pilot implementation and generated practical experience in governance, claims management, digital systems, and benefit delivery, its progress should be consolidated. Its transition to a permanent employment injury system will require legal, financial, and institutional decisions within a limited timeframe, particularly because the present arrangement is transitional in design. A broader NSIS agenda that fails to recognize this could unintentionally slow the one branch that has already moved beyond concept and design. For that reason, the cross-cutting analysis reinforces a broader point: system-building is necessary, but it must proceed in a manner that uses the EIS experience as an asset and protects the gains already made (ILO 2025; EIS 2024).[31]

Figure 4.1: Cross-cutting challenges in implementing the NSIS



Source: Authors' illustration.

[30] The existence of different institutional requirements across branches does not imply that the NSIS should be treated as four unrelated schemes. Rather, it suggests that a common framework will need to accommodate differentiated administrative pathways and varying implementation timetables.
[31] The EIS Pilot is scheduled to conclude at the end of June 2027. Without an adequate statutory successor arrangement, the current brand-financed top-up pensions would cease, with the system reverting largely to the employer-liability framework under the Bangladesh Labour Act.

5. Institutional Architecture and Governance Pathway for the NSIS

Institutional governance, in the context of social insurance, concerns the legal basis, Organizational arrangements, financial controls, accountability structures and decision-making processes through which schemes are directed, administered and supervised. It determines who is responsible for policy, fund management, contribution collection, claims administration and oversight, and how these functions are coordinated across institutions and how confidence in the system is built and sustained over time. In a contributory system, governance is central to credibility, financial integrity and long-term viability.

5.1. Governance considerations for the NSIS

The governance challenge in Bangladesh is made more complex by the uneven starting point across branches. The EIS has advanced considerably further than the other three through piloting, institutional experimentation and the gradual development of operational systems. By contrast, maternity, sickness and unemployment insurance remain largely at the conceptual and design stage. The SSU has only recently been established and is still in an early phase of institutional development. The CF and the BLWF also remain part of the broader institutional landscape, though they were not designed on contributory insurance principles and are not social insurance institutions in a strict sense. Devising a governance pathway that is credible, properly sequenced and responsive to both workers' needs and existing institutional constraints is therefore by no means straightforward. Such a pathway must protect and build on the progress already made in EIS, avoid premature or disruptive restructuring, give the SSU a realistic but meaningful role, and keep sight of the longer-term objective of a coherent and professionally administered multi-branch social insurance system.

Against this backdrop, several governance dimensions require careful consideration: the legal and policy basis, institutional mandates, administrative and technical capacity, branch-wise financial management, compliance and enforcement, data and digital systems, accountability mechanisms, and structured social dialogue, as outlined in Table 8. These dimensions do not prescribe a single model but provide an analytical framework for assessing what a credible NSIS would require, both during transition and in its longer-term institutional form. As international experience suggests, governance arrangements that are legally clear, financially disciplined, and anchored in stakeholder confidence are more likely to support sustainability, coverage, and public trust. For Bangladesh, institutional design should therefore be approached as a strategic exercise in building a resilient and legitimate social insurance system.

Table 5.1: Governance dimensions critical for a credible and effective NSIS in Bangladesh

Governance dimension	Core issues to be addressed	Relevance for NSIS design in Bangladesh
1. Legal and policy foundation	Enabling legal framework defining branches, coverage, responsibilities, contribution principles, benefit entitlements, and oversight arrangements; consistency with NSSS and relevant ILO standards; provision for periodic review and amendment	Essential for moving from discretionary or fragmented arrangements to enforceable and rules-based social insurance; particularly important for clarifying the relationship between new NSIS branches and existing labour-law or welfare-fund provisions
2. Transitional and long-term institutional architecture	Clear allocation of roles among MoLE, SSU, EIS structures, CF, BLWF, and any future NSIA; distinction between short-term transition arrangements and long-term institutional end-state	Particularly important as Bangladesh has different schemes at different levels with certain institutional mechanisms with potential roles. EIS is relatively advanced, SSU is new, and CF and BLWF remain institutionally relevant
3. Branch-specific administration and functional coordination	Determination of which functions should remain scheme-specific and which should be centralised, such as registration, ICT, actuarial analysis, reporting, and audit	Helps avoid both excessive fragmentation and premature over-centralization; supports phased integration across the four branches
4. Administrative and technical capacity	Capacity for registration, contribution collection, claims processing, digital payments, actuarial analysis, inspection, grievance handling, and internal controls; development of skilled personnel and operating procedures	A critical constraint in Bangladesh, where institutional readiness varies widely across schemes and where SSU capacity remains at an early stage
5. Financial governance and fund separation	Branch-wise accounting, ring-fencing of funds, budgeting, auditing, actuarial review, reserve policy, and investment rules	Particularly important to build confidence among employers and workers that contributions for one branch will not be diverted to another; also critical where legacy welfare funds continue to operate alongside social insurance
6. Role of supplementary welfare funds	Clear recognition of CF and BLWF as supplementary worker-support mechanisms rather than core social insurance institutions; clarification of how they relate to insurance branches without duplication or institutional conflict	Important for political and administrative realism; helps avoid unnecessary resistance while recognising the limitations of existing funds as a basis for full social insurance
7. Regulation, enforcement, and compliance	Employer registration, payroll reporting, contribution enforcement, inspection systems, sanctions for evasion, and incentives for compliance	Necessary to expand the contributory base and ensure fairness, especially where under-reporting, informality, and weak enforcement remain persistent challenges
8. Data systems and digital integration	Unified registry architecture, worker identification, contribution histories, claims records, interoperability with NID and relevant government systems, and cybersecurity safeguards	Central to portability, fraud reduction, administrative efficiency, and evidence-based decision-making; also necessary for eventual scaling beyond initial pilot arrangements
9. Governance, accountability, and transparency	Tripartite oversight, internal controls, external audit, public reporting, grievance redress, and disclosure of financial and performance information	Needed to build legitimacy and trust in a contributory system, particularly in a context where new institutions must demonstrate credibility early
10. Social dialogue and stakeholder engagement	Institutionalised consultation with employers, workers, and relevant ministries; communication and awareness-building; mechanisms for structured policy feedback	Especially important in Bangladesh, where understanding of social insurance remains uneven and stakeholder buy-in will be decisive for reform viability
11. Monitoring, evaluation, and adaptive learning	Performance monitoring, periodic review, actuarial reassessment, and feedback loops for policy adjustment	Supports gradualism and course correction, which are essential given the uneven maturity of the four branches and the likelihood of phased implementation

Source: Authors' compilation.

5.2. Cross-country experiences in social insurance governance: Lessons for designing the NSIS

A selective review of India, Indonesia and Viet Nam, each of which operates a multi-branch or specialised social insurance institution, reveals a number of institutional principles that appear consistently important for effective governance. First, the principal social insurance institutions in all three countries operate on the basis of clear legal authority rather than discretionary administrative arrangements. India's ESIC is established under the Employees' State Insurance Act with defined statutory roles for each governing body. Indonesia's BPJS Ketenagakerjaan functions as a public legal entity with a formal separation between supervisory and executive functions. Viet Nam's VSS rests on a clearly defined legal framework with an established governance structure. The implication for Bangladesh is straightforward: a credible NSIS cannot rely indefinitely on ad hoc arrangements.

Second, governance works best where strategic oversight, day-to-day administration and broader policy supervision are differentiated rather than conflated. Third, stakeholder participation through tripartite or multi-stakeholder governance is consistently associated with greater legitimacy and confidence. Fourth, fund protection and branch-wise financial discipline are central to all three systems: Indonesia explicitly prohibits cross-fund subsidization, ESIC operates with statutory ring-fencing, and VSS manages multiple off-budget trust funds, each tied to its statutory purpose. Fifth, digitalization and contribution administration are increasingly important, with all three countries moving toward digital remittance, electronic records and app-based claims processing. Sixth, routine oversight, audit and public reporting are built into the core institutional architecture, not treated as optional add-ons.

These experiences do not offer Bangladesh a ready-made blueprint. They point, rather, to a set of core governance attributes that should inform the country's own choices: clear legal basis, institutional role clarity, stakeholder representation, protected and prudently managed funds, digital administrative systems, and robust mechanisms of audit and accountability. A detailed, parameter-by-parameter comparison of the governance structures of ESIC, BPJS Ketenagakerjaan, and VSS, covering legal basis, board composition, fund management, contribution administration, audit arrangements, and key lessons for Bangladesh, is provided in Table A6 in the Annex.

5.3. Bangladesh's institutional starting point and governance options for the NSIS

Bangladesh's present institutional landscape does not offer a readily available administrative base for a unified social insurance system, but neither is it devoid of relevant institutional assets. The most developed experience is the EIS Pilot, which has generated significant practical lessons in tripartite oversight, claims processing, digital case handling, benefit delivery and administrative coordination. The governance design of the broader NSIS should avoid any restructuring that could interrupt or weaken this progress. EIS should be used as a source of institutional learning, not as a component to be destabilised in pursuit of premature symmetry across all four branches.

The SSU provides, for the first time, a designated organizational focal point within MoLE for social insurance development. At this stage, however, the SSU is unlikely to be in a position to assume full operational responsibility for multiple branches. Its immediate and more realistic role is to act as the central coordinating and reform-management body for the NSIS transition, especially for the three branches apart from the EIS. This would include guiding legal and institutional preparation, supporting tripartite and inter-ministerial coordination, establishing common administrative and digital standards, supervising pilot design, and preparing the ground for a more formalised institutional structure. The LRC Report lends further momentum to this institutional direction, recommending the creation of a Department for Workers' Social Protection and Welfare under MoLE, responsible for implementing universal social protection programmes, overseeing social and health insurance schemes, and administering a national digital labour registration system covering all categories of workers (LRC 2025). While the precise institutional relationship between this proposed department and the SSU will need to be determined through further policy development, the LRC recommendation signals strong domestic support for a dedicated institutional structure for social insurance administration.

The CF and the BLWF occupy a different position. Both are embedded in the worker-welfare landscape and will continue to matter institutionally, but neither was designed as a social insurance mechanism. Their revenue bases are not linked to actuarially assessed branch-specific liabilities, their benefit structures are not built around contributory entitlements, and their financial arrangements do not support the stable, wage-linked risk pooling required for a mature social insurance system.[32] Their limitations are structural rather than merely operational. At the same time, they should not be displaced or wound down as the NSIS evolves. A more plausible approach is to regard them as continuing supplementary welfare mechanisms, capable of coexisting with the insurance system while remaining distinct from it. Their future role may remain important in relation to worker assistance that falls outside the scope of contributory insurance.

The broader worker-protection landscape also includes the UWPP, which should be regarded as a taxpayer-financed unemployment support mechanism outside the contributory structure of the NSIS. Its relevance to the NSIS lies in the administrative and policy lessons it may offer, not in its incorporation into the financing or governance architecture of unemployment insurance. For ease of reference. Table 5.2 summarises the principal institutions and schemes currently relevant to worker protection and indicates their relationship to the emerging NSIS architecture.

[32] The CF contribution is taken as 0.03 per cent of export value, which fluctuates with international market conditions rather than reflecting workforce size or insurable risk. BLWF's financing depends on profitability, which is similarly unstable as a basis for insuring employment-related contingencies.

Table 5.2: Principal worker protection institutions and schemes and their relationship to the emerging NSIS architecture

Entity / scheme	Present character	Current role	Relationship to the NSIS	Likely role over time
Social Security Unit (SSU)	New administrative and coordinating unit under MoLE	Coordinates social insurance development; supports legal, institutional, and technical preparation	Inside the transition architecture of the NSIS, but not yet a full social insurance authority	Transitional reform nucleus that may evolve into, or be absorbed within, the future NSIA
Central Fund (CF)	Statutory worker-welfare fund, not social insurance	Provides selected worker-support benefits, especially in export-oriented sectors; hosts EIS-related arrangements at present	Outside the core contributory NSIS, but relevant as a transitional and supplementary institutional platform	Continues as a supplementary welfare mechanism, distinct from core social insurance financing
Bangladesh Labour Welfare Foundation (BLWF)	Statutory worker-welfare fund, not social insurance	Provides selected worker-support benefits in non-export sectors	Outside the core contributory NSIS, but potentially relevant in transitional hosting arrangements	Continues as a supplementary welfare mechanism, distinct from core social insurance financing
Employment Injury Scheme (EIS)	Most advanced social insurance branch, presently piloted	Provides the leading institutional experience in governance, claims handling, digital systems, and benefit delivery	Core branch of the emerging NSIS; should be protected and used as a source of institutional learning	Expected to become a permanent branch within the NSIS and later within the NSIA
Maternity insurance	Proposed NSIS branch, still at design stage	No full scheme yet; policy and design work underway	Core future branch of the NSIS	To be gradually developed and integrated into the NSIS architecture
Unemployment insurance	Proposed NSIS branch, still at design stage	No contributory scheme yet; preparatory work and roadmap exist	Core future branch of the NSIS	To be introduced gradually under the NSIS
Sickness insurance	Proposed NSIS branch, still at design stage	No contributory scheme yet; preparatory work and design discussion underway	Core future branch of the NSIS	To be introduced gradually under the NSIS
Unemployed Workers Protection Programme (UWPP)	Taxpayer-financed support mechanism, not social insurance	Provides temporary support against unemployment for eligible workers	Outside the contributory NSIS architecture	May continue as a complementary tax-financed mechanism alongside, but distinct from, unemployment insurance
National Social Insurance Authority (NSIA)	Proposed future statutory authority	Not yet established	Long-term institutional destination of the NSIS	Expected to become the unified statutory authority overseeing the principal contributory branches

Source: Authors' compilation

Considering the above issues, visible progress already made on the EIS, the establishment of SSU, and the existing operation arrangement of CF and BLWF, the institutional direction of governance arrangements for the NSIS and any related reform measures should be best conceived in two layers: a long-term institutional destination, and a transitional governance strategy.

5.4. Long-term vision: A National Social Insurance Authority

In the longer term, Bangladesh should aim to establish a legally mandated National Social Insurance Authority (NSIA) capable of overseeing and administering the principal branches of contributory social insurance under a coherent statutory framework. Such an authority would provide the institutional anchor for a mature multi-branch system, with clear arrangements for contribution collection, branch-wise fund management, claims administration, audit, grievance handling and strategic oversight. It would operate under a tripartite or tripartite-plus governance structure, supported by professional capacity in actuarial analysis, fund management, digital systems, legal compliance and administration. A unified social insurance registry and interoperable information systems would underpin portability across sectors and employment relationships, while routine actuarial review and independent audit would support financial discipline and transparency. This longer-term vision remains important, but it should be approached as the eventual institutional direction rather than the immediate starting point. Bangladesh is not yet in a position to move directly to a fully integrated NSIA without a transitional phase of institutional development, legal preparation, system testing and stakeholder confidence-building.

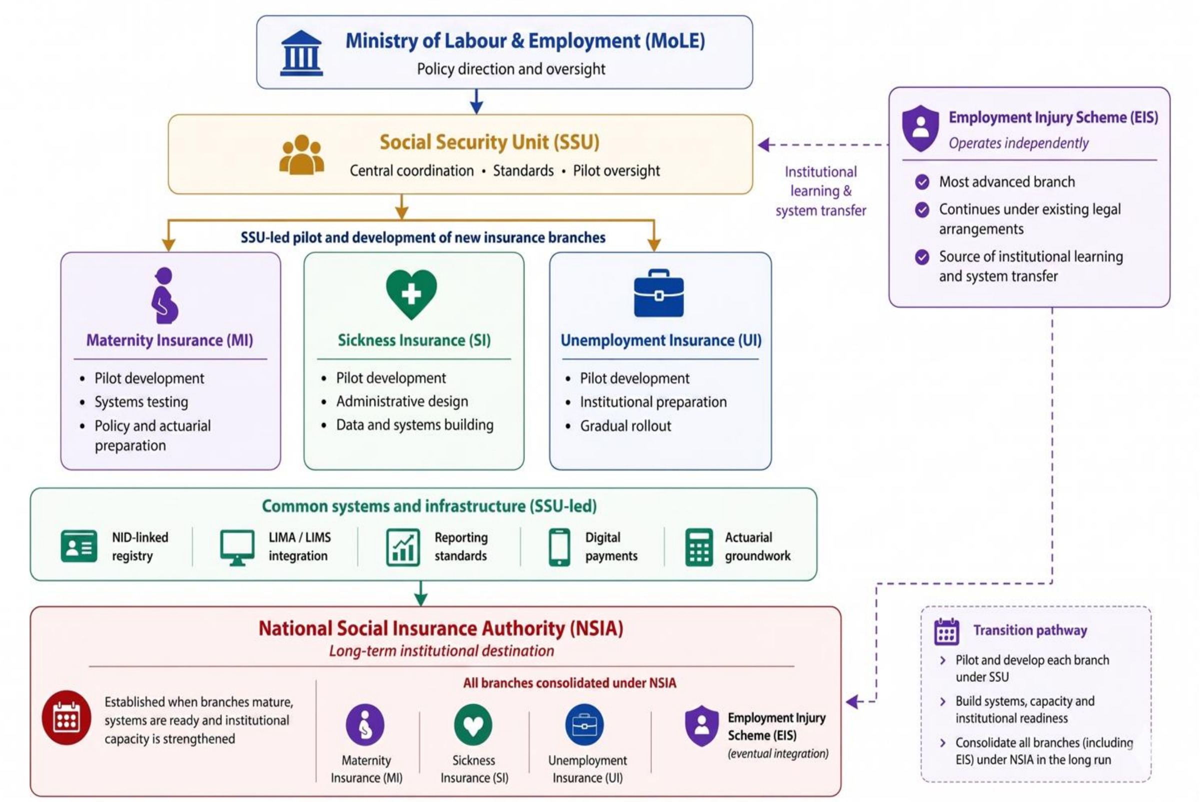
5.5. Transitional governance options

Two transitional options appear plausible. They are not rigid alternatives in the sense that one must be accepted and the other discarded permanently. Rather, they represent two different transition logics, each with distinct advantages and risks. Presenting them as options is likely to be more constructive than advancing a single definitive model at this stage, particularly given the diversity of stakeholder interests and the uneven maturity of the different branches.

Option 1: SSU-led transitional coordination model

Under this option, EIS would continue along its current path during the transition period, without being drawn into a broader restructuring. This would preserve the integrity of the Pilot and allow its governance and administrative systems to continue maturing. For maternity, sickness and unemployment, the SSU would serve as the central transitional coordination hub, developing and overseeing pilot arrangements, coordinating stakeholder consultations, supporting legal and actuarial preparation, establishing administrative and digital standards, and supervising branch-specific implementation arrangements. Importantly, the SSU would function as the institutional nucleus around which the non-EIS branches are incubated, rather than as a fully fledged benefit-paying agency from the outset. The principal strength of this option is that it is cautious and conceptually clean. Its principal weakness is that it may be slower and may place substantial developmental pressure on the SSU, which does not yet have the staffing, legal autonomy or operational depth to manage three emerging branches in a fully integrated way.

Figure 5.1: SSU-led transitional coordination model



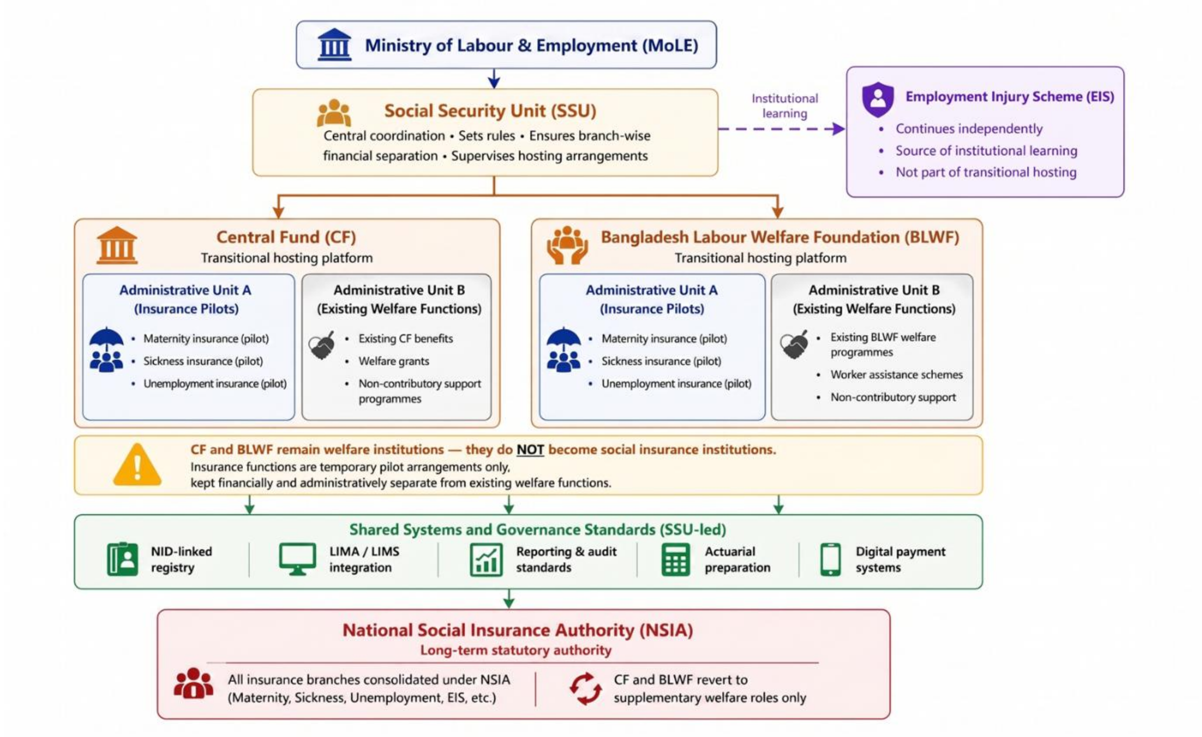
Source: Authors' illustration.

Option 2: Transitional hosting model using existing welfare funds

Under this option, the transition would make more active use of existing institutional platforms, especially the CF and BLWF, while still recognising that they are not themselves social insurance institutions. The basic logic would be to use these funds as transitional hosting arrangements for selected pilot and administrative functions, under common policy direction and standards set by the SSU. EIS would continue to be protected as the most advanced branch. The attraction lies in pragmatism: it builds on institutions that already exist and may allow earlier operational experimentation. However, CF and BLWF should not be portrayed as evolving directly into full social insurance institutions. Their role would be transitional and supplementary. The main risk is that it may prolong institutional complexity and blur the distinction between supplementary welfare functions and contributory insurance if not guided by clear standards, branch-wise financial separation, and a credible pathway toward eventual consolidation.

Under this option, the SSU would play a pivotal but carefully delimited role as the central coordinating and standard-setting body, providing the common governance spine across the transitional arrangements. This would involve guiding pilot design, establishing harmonised administrative rules and reporting standards, ensuring branch-wise financial separation, coordinating actuarial and legal preparation, promoting interoperability of digital systems, and convening tripartite and inter-ministerial dialogue. Just as importantly, the SSU would need to monitor the boundary between supplementary welfare functions and contributory insurance functions so that the use of CF and BLWF as hosting platforms does not dilute the institutional logic of social insurance.

Figure 5.2: Transitional hosting model using existing welfare funds



Source: Authors' illustration.

Common governance principles across both options

Regardless of which transitional path is chosen, a number of governance principles should apply from the outset. First, the progress made under EIS should be explicitly protected; no governance reform should compromise the institutional and operational gains of the Pilot. Second, the SSU should be recognized as the transitional reform nucleus, but its role should be realistic: coordination, standards-setting and system development rather than immediate full-scale administration. Third, branch-wise financial separation should be maintained as a core principle; funds raised for one branch should not be used to finance another. Fourth, CF and BLWF should be treated as continuing supplementary mechanisms rather than as substitutes for social insurance. Fifth, integration should begin with systems and governance standards rather than immediate Organizational merger: worker identification, registries, contribution records, claims protocols, audit rules and digital payment architecture should be progressively harmonised before full institutional consolidation is attempted. Sixth, stakeholder consultation should remain central throughout.[33] Finally, as legal and administrative capacity strengthens and a statutory framework is enacted, the SSU could gradually evolve into the envisaged NSIA, with EIS incorporated as one of the four constituent branches.

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[33]Given the novelty of social insurance reform in Bangladesh and the diversity of institutional interests involved, a structured options-based approach, combined with a clear indication of principles and trade-offs, is more constructive than locking the discussion into a single rigid governance model at this stage.

6. A Consolidated Roadmap for the NSIS

The governance options outlined above suggest that the institutional development of the NSIS should be approached as a phased transition rather than as an immediate move to a fully consolidated authority. The sequencing of reform is crucial. Institutional arrangements must evolve in a manner that protects the EIS, gives the SSU a realistic role, and allows the CF and BLWF to continue in supplementary form without being confused with the emerging insurance architecture. At the same time, the roadmap should make practical use of administrative resources and mechanisms that already exist, where these can strengthen implementation without blurring the conceptual boundaries of the NSIS. The UWPP, meanwhile, should continue to be treated as a separate, tax-financed support mechanism for workers facing unemployment shocks, rather than as a branch of contributory social insurance.

6.1 Guiding Principles for the Implementation

The roadmap is guided by several considerations.

- First, the progress already achieved under the Employment Injury Scheme should be preserved and consolidated rather than disrupted. In this context, the development of a separate roadmap for this particular branch may be more appropriate and is therefore recommended.
- Second, the less advanced branches, maternity, unemployment, and sickness insurance, will require further design work, legal preparation, institutional testing, and administrative development before wider operationalisation becomes feasible.
- Third, the transition should build on existing institutional assets where these are useful, but without blurring the distinction between supplementary welfare mechanisms and contributory social insurance.
- Fourth, sequencing matters. The credibility of the NSIS will depend not only on policy intent but also on whether implementation proceeds in a manner that is administratively realistic, financially disciplined, and capable of building confidence among workers, employers, and public institutions.

6.2 EIS Branch-Specific Roadmap

The EIS roadmap translates the institutional lessons of the Pilot and the emerging tripartite consensus on scheme design into a sequenced, three-phase implementation plan spanning from 2026 to 2035. The sequencing logic is one of institutional necessity rather than administrative convenience: legal enactment must precede mandatory financing, and a permanent authority must be established before coverage can expand to new sectors. Furthermore, actuarial evidence from the Pilot must inform contribution-rate setting before the financing model is finalized while occupational medicine and rehabilitation capacity must be built before medical care and rehabilitation can be incorporated as scheme benefits. Because the EIS is the most operationally advanced branch of the NSIS, the roadmap is also designed with a broader institutional purpose of providing a practical template for the other social insurance branches as they develop. Table 6.1 sets out the priority actions and sequencing across all three phases.

Table 6.1: EIS Branch-specific Roadmap

Phase & Period	Priority Actions
Phase I: **Foundational and Transitional Actions** *2026 – July 2027*	***Legal framework*** • Enact Employment Injury Insurance Act by July 2027, aligned with C.121; define coverage, benefits, stakeholder obligations, governance, and enforcement mechanisms; resolve legal ambiguities on commuting accidents, occupational diseases (presumptive basis), dependency categories, and disability classifications; establish legal basis for phased sectoral extension grounded in risk analysis, actuarial sustainability, and identified financing. ***Transition from Pilot to permanent fund*** • Consolidate coverage in export-oriented RMG, leather/footwear, and EPZs; continue insurance-based approach with employer financing, drawing on CF, BEPZA fund, and EIS Pilot account surpluses; consider adding ship recycling sector; bring in BLWF-contributing sectors (domestic RMG, pharmaceuticals, tobacco, telecommunications) if political decision is taken; EIS Governing Board to propose expansion strategy based on cost of coverage, occupational risk level, and identified financing sources. ***Development of National EIS database and MIS*** • Transition existing MIS to permanent EIS; integrate employer registration, contribution tracking, claims processing, and benefit disbursement; finalize technical specifications for interoperability with DIFE's LIMA to enable coherent accident reporting, real-time monitoring, and actuarial review. ***Establishment of national EIS Authority by 2027*** • Establish an independent national EIS Authority with tripartite governance by July 2027; organizational divisions to cover claims and benefits, finance and investment, MIS and data management, legal and policy, medical assessment and rehabilitation planning, communications, and internal audit; progressively strengthen capacity as coverage extends. ***Building occupational medicine capacity including assessing occupational diseases*** • Strengthen occupational medicine capacity before Pilot concludes, particularly for disability assessment and identification of occupational diseases; continue within national system as part of an integrated rehabilitation and return-to-work approach ***Awareness and capacity development of tripartite partners*** • Provide technical and operational training for government officials, employers, and workers' representatives on claims management, compliance, and digital systems; run awareness campaigns on rights and obligations; begin gradual establishment of district-level EIS support units.
Phase II: Institutionalization and Phased Vertical and Horizontal Expansion *2027 – 2032*	***Continuation of sectoral risk-rating exercise and identification of funding for long-term benefits*** • Refine and expand sectoral risk-rating exercise to provide actuarial basis for differentiated contribution rates and decisions on additional sector inclusion; feed into financial risk management and investment framework; identify funding for long-term benefits by sector before extension proceeds. ***Phased sectoral expansion for long-term benefits*** • Gradually extend long-term benefit coverage to additional sectors based on sectoral readiness, administrative capacity, and contribution compliance; each inclusion phase informed by the EIS Governing Board's expansion timeline and actuarial evidence. ***Introduction of medical rehabilitation services and short-term benefits*** • Introduce benefits in defined sequence: rehabilitation services first then return-to-work support through medical assessments, physiotherapy, occupational therapy, and specialist referral; followed by short-term temporary disability compensation; then medical care benefits thus progressively completing alignment with full C.121 standard

Phase III: Consolidation, System Integration, and Nationwide Rollout *By 2035*	***Integration with national social protection framework*** • Progressively link EIS to broader NSIS architecture; facilitate coordination with sickness, maternity, and unemployment insurance branches as they develop; establish shared-services arrangements in IT, communications, and financial management to support convergence toward a future unified social insurance institution. ***Nationwide scale-up and continuous monitoring*** • Achieve universal coverage of all economic sectors; conduct regular actuarial valuations, financial audits, and policy reviews to ensure sustainability, transparency, and responsiveness; develop enhanced data analytics and injury-surveillance systems to inform sector-specific prevention strategies and long-term policy reform. ***Sustained awareness-raising and capacity-building*** • Continue awareness-raising and capacity-building across all sectors throughout this phase; reinforce employer and worker compliance; ensure administrative and technical capacities evolve in line with the expanding scope of the scheme. This must be treated as the mechanism through which expansion produces effective rather than merely formal coverage.

Source: Authors' compilation.

6.3 Roadmap for three other NSIS branches: Maternity, Sickness and Unemployment schemes

Phase I (Years 1 to 2): Institutional preparation, transitional coordination and pilot alignment

The first phase should concentrate on putting in place the institutional conditions for credible transition. At this stage, one key priority is the creation of a coherent governance and administrative foundation upon which later expansion can rest. The SSU should be formally designated, through appropriate government order or administrative decision, as the central coordinating body for the NSIS transition. Its role should include leading policy preparation, coordinating across ministries and social partners, establishing common standards, and guiding the design of pilot and transitional arrangements for the less advanced branches. At the same time, the limits of its current capacity should be recognized. Its function in this phase should be strategic, supervisory, and system-building rather than that of a full operational insurer.

During this phase, the institutional gains already made under EIS should be preserved and built upon with its continuation along the existing trajectory. The experience of EIS should instead be used as a practical reference point in designing administrative workflows, digital systems, claims management procedures, reporting standards, and oversight arrangements for the other branches. In this way, EIS would serve as the principal source of institutional learning for the wider NSIS transition. Existing mechanisms already associated with EIS, including digital reporting and case-handling processes, can provide an important starting point for broader systems development.

The other three branches viz., maternity, sickness, and unemployment, should in this phase remain in a preparatory and pilot-development stage. Depending on which transitional governance option is adopted, this may involve either branch-specific pilot arrangements developed under direct SSU oversight or selected administrative hosting arrangements supported by existing institutions such as the CF and BLWF. In either case, the central objective should be to test systems, generate administrative experience, and gather the data necessary for actuarial analysis and legal design. This should not be treated as full operationalisation. Rather, it is a period of controlled institutional incubation. In the case of unemployment, it will be important to distinguish clearly between the future contributory insurance branch and the current Unemployed Workers Protection Programme (UWPP). UWPP may continue as a separate public assistance mechanism, including during the transitional period, but it should not be treated as the institutional core of a future unemployment insurance scheme. Instead, its operational experience may be reviewed selectively to identify lessons for temporary income support design, claims handling, and outreach to affected workers.

A major cross-cutting task in Phase I should be the development of common administrative and digital foundations. The SSU should lead the gradual development of a unified registry architecture, with NID-linked identification, contribution and claims records, and interoperable digital standards capable of being expanded over time. This work should be designed not from scratch but in active engagement with databases and platforms already established by government. In particular, the Labour Inspection Management Application (LIMA), with its provision for online accident reporting and labour law compliance data, can provide a useful institutional base for employment injury administration and compliance monitoring. The Labour Information Management System (LIMS), which already includes databases on enterprises, workers, and job opportunities, may offer an important foundation for enterprise registration, worker records, and, in due course, interfaces relevant to unemployment-related administration and labour market services. The Single Registry for Social Protection, although currently outside the MoLE system and not yet inclusive of CF and BLWF beneficiaries, is also relevant from the standpoint of future coordination between contributory and non-contributory mechanisms, especially where social insurance and tax-financed support may need to coexist. What is required at this stage is not immediate merger of all databases, but a cle ar roadmap for interoperability, data standards, and institutional linkage.

A common framework for claims protocols, reporting formats, audit trails, grievance handling, and data governance should also be introduced at this stage, even if administrative delivery remains institutionally differentiated. Tripartite and inter-ministerial consultation should be intensified throughout this phase. Since the transition to social insurance involves not only technical design but also a redefinition of institutional roles and financing responsibilities, sustained dialogue with employers, workers, and relevant ministries will be indispensable. Phase I should also initiate the legal and actuarial groundwork required for later reform. This includes drafting the outline of the future NSIS Act, clarifying the relationship between insurance branches and existing labour-law or welfare-fund provisions, and beginning actuarial work on contribution structures, branch liabilities, and financing options.

Phase II (Years 2 to 6): Legal consolidation, selective operational expansion and contribution readiness

By the second phase, the transition should move beyond preparatory alignment and begin to consolidate the institutional architecture more firmly. The immediate objective at this stage should be to translate pilot learning, administrative experience, and actuarial work into a more formalised and legally grounded structure. The SSU should continue to lead the transition, but with a stronger mandate, deeper technical capacity, and more clearly established operational relationships with the relevant branch arrangements.

During this phase, legal preparation should move towards enactment. The draft NSIS law should be refined through stakeholder consultation and technical review, with particular attention to the legal basis for contribution collection, branch-specific fund management, governance structures, reporting obligations, and the relationship of the future authority to existing institutions. The objective should be to establish the statutory framework within which such an authority can emerge in a phased and orderly way.

Administrative and operational development should proceed selectively and with discipline. For EIS, this phase should be about a solid, sustainable scheme footing, including coverage expansion and strengthening of its financing and specialised administrative features that have already proven workable. For maternity, sickness, and unemployment, the pace of operational expansion should depend on readiness. If pilots or transitional arrangements have generated sufficient experience and data, more formal branch-level administrative arrangements may begin to take shape under harmonised governance standards. However, the temptation to accelerate all branches simultaneously should be resisted if the underlying systems remain weak.

A central issue in Phase II is contribution readiness. The introduction of payroll-based social insurance contributions should not be driven by arbitrary timetables alone, but by legal, administrative, and actuarial preparedness. Before contribution collection begins, employers and workers must be able to see a credible institutional structure, clear branch-wise financial separation, reliable record systems, and transparent accountability arrangements. If these conditions are met, contribution collection could begin gradually, initially among larger and more administratively traceable enterprises, with digital payroll interfaces and auditable systems. At all times, branch-specific financing should remain ring-fenced. Contributions collected for one branch should not be used to finance another, and any continuing role of the CF and BLWF should remain clearly supplementary and outside the core insurance accounts. Here again, LIMS will be particularly important, since enterprise and worker databases play a pivotal role in supporting registration, contribution tracing, and later portability. Likewise, the evolving digital architecture around LIMA may remain relevant for compliance and reporting functions.

In parallel, the relationship between unemployment insurance and UWPP should become clearer in this phase. UWPP may continue to operate and even expand as a taxpayer-financed support programme for workers affected by abrupt labour market shocks. However, the future unemployment insurance branch under the NSIS should be developed as a distinct contributory mechanism with its own legal basis, financing logic, and eligibility rules. In practical terms, this means that UWPP may continue to serve as a complementary social assistance instrument, especially where contributory coverage remains incomplete, while unemployment insurance is gradually built on its own institutional foundation.

By the end of this phase, the institutional basis for a statutory authority should be largely in place, even if full consolidation under the NSIA is still unfolding.

Phase III (Years 7 to 10 and beyond): Establishment of the NSIA, system consolidation and gradual extension

The third phase should focus on consolidating the institutional architecture under a statutory National Social Insurance Authority and progressively extending the coherence and reach of the system. By this stage, the NSIA should be formally established under the relevant law, with clearly defined governance arrangements, including tripartite or tripartite-plus oversight, professional executive management, branch-wise fund administration, and formal audit and grievance mechanisms. The transfer from SSU-led transition to NSIA-led governance should be managed carefully and incrementally. This should be understood less as a sudden institutional replacement and more as the formalization and consolidation of functions that have already been progressively built during the earlier phases.

In this phase, common systems should be further integrated. A unified registry, interoperable data architecture, consolidated reporting standards, and digital contribution and claims platforms should become operational across the insurance branches. However, institutional consolidation should not be equated with administrative uniformity in every respect. EIS, in particular, may still need to retain specialised operational features and technical procedures reflecting its more advanced development and the nature of employment injury administration. Consolidation should therefore be guided by functional efficiency rather than by formal symmetry alone. At this stage, the institutional relationship between the NSIA digital backbone and existing platforms such as LIMA, LIMS, and the Single Registry should also be clearer and more operational. Rather than replacing all pre-existing systems, the NSIA should seek to build interoperability and defined data-sharing arrangements, allowing the broader architecture of worker protection, labour market administration, and social protection to become more coherent over time.

The role of CF and BLWF should by this stage be more clearly settled. They should continue, where appropriate, as supplementary worker-welfare mechanisms financing or supporting non-insurance benefits that remain outside the NSIS. Their data systems should, however, be linked with the broader NSIA information architecture to improve transparency, avoid duplication, and support policy coherence. What should be avoided is any continued ambiguity over whether these welfare funds are part of the core contributory social insurance system. By this stage, that distinction should be institutionally and financially clear. In similar fashion, UWPP should, where still retained, be situated clearly outside the contributory NSIS as a complementary tax-financed income support mechanism, albeit one that can be coordinated with the broader labour market and social protection architecture.

The third phase should also create the basis for gradual expansion beyond the initial formal-sector core. Any extension to informal workers or more flexible contribution arrangements should proceed cautiously and in line with institutional capacity, subsidy availability, and administrative feasibility. The objective should not be to force universalisation prematurely, but to begin building credible mechanisms for wider inclusion while preserving the integrity of the system as it matures.

6.4 Cross-cutting requirements across all phases

Several requirements cut across the full roadmap and should be treated as continuing priorities rather than phase-specific tasks. One is institutional capacity-building. The development of social insurance administration requires specialised capabilities in actuarial analysis, digital governance, fund management, legal compliance, and inspection that cannot be assumed to exist automatically. A second is the strengthening of digital infrastructure, especially registries, payment systems, audit trails, and cybersecurity safeguards. A third is transparency and accountability, including regular actuarial review, external audit, and public reporting. A fourth is sustained communication and social dialogue, since the success of the NSIS transition will depend as much on stakeholder confidence and understanding as on technical design.

The above phases imply that the institutional governance of the NSIS should evolve through deliberate sequencing. If pursued in this way, the transition from the current fragmented worker-welfare landscape to a more coherent social insurance architecture will be more likely to command stakeholder confidence, preserve the gains already made under EIS, and provide a realistic basis for the long-term development of a statutory NSIA.

7. Enablers for institutional strengthening

The establishment of the NSIS will critically depend on the formal choice of institutional model, but also on the underlying capabilities, systems, and coordination mechanisms that allow that model to function in practice. These enablers, discussed below, are best understood as the cross-cutting foundations that can help the NSIS develop into a credible, transparent, and resilient social insurance system over time.

Human resources and professional capacity

The development of professional and specialised capacity will be one of the most decisive determinants of whether the NSIS can evolve into a functioning institution. Social insurance administration requires technical skills that are not typically concentrated within conventional public administration structures, including actuarial analysis, fund management, claims administration, digital systems management, compliance monitoring, legal interpretation, and data analytics. The SSU, and in due course any successor institution, will therefore need to invest systematically in building and retaining a cadre of personnel with these competencies. This may require structured partnerships with national training institutions, universities, and professional bodies, as well as technical collaboration with organizations such as the ILO and ISSA. Exposure to regional institutions with more advanced experience in social insurance administration, including through peer-learning arrangements, may also be useful. Over time, Bangladesh may need to consider a dedicated training and resource function for social insurance administration so that institutional knowledge is not built on an ad hoc basis alone, but progressively embedded within the system itself.

Digital infrastructure, registry development, and management information systems

A robust digital backbone will be essential to both operational efficiency and institutional credibility. A future NSIS cannot rely on fragmented paper-based administration or scheme-specific data silos if it is to support contribution tracking, claims processing, portability, auditability, and branch-wise fund management. The gradual development of an integrated management information system should therefore be treated as a central pillar of institutional strengthening. Such a system should, over time, link identity, enterprise registration, contribution records, benefit histories, and payment channels through secure and interoperable platforms. In the Bangladesh context, this should build pragmatically on existing administrative assets. Platforms such as LIMA, LIMS, EIS-related digital systems, and relevant social protection registries should be progressively aligned through common data standards and interoperability protocols. This does not require immediate technical merger of all systems, but it does require a clear institutional strategy for data integration. As the system matures, data protection, privacy safeguards, and cybersecurity arrangements will become increasingly important and should be built into the architecture from an early stage.

Financial governance, actuarial discipline, and audit systems

Institutional credibility in social insurance depends heavily on the integrity of financial management. This is likely to be especially important in Bangladesh, where social insurance remains relatively unfamiliar and contributors will need assurance that the funds being collected are being used transparently and for their intended purposes. Strong financial governance should therefore be embedded from the outset, even during the transitional stages. This includes branch-wise accounting, ring-fenced fund management, clear budgeting and disbursement rules, regular actuarial assessments, and a prudent approach to reserve and investment policy. External audit arrangements, including review by the Comptroller and Auditor General and, where appropriate, independent external audit, will be important for transparency and confidence-building. In due course, once a statutory authority is established, a formal governance structure for fund oversight may be required, potentially involving tripartite participation in monitoring investment policy, reserve adequacy, and compliance with prudential norms. The adoption of recognized public sector accounting and reporting standards would further strengthen fiscal credibility and help reassure employers, workers, and development partners alike.

Communication, awareness, and grievance redress

The transition to social insurance is not only an institutional and technical process; it is also a process of building understanding and trust among those who will contribute to and depend on the system. This makes communication and grievance redress central enabling functions rather than peripheral public-relations activities. Workers and employers will need clear information about the distinction between contributory insurance and existing welfare-type arrangements, the meaning of branch-wise entitlements, the basis of contribution obligations, and the procedures for claims and complaints. Without this, misunderstanding, resistance, and low compliance are likely to persist. Communication therefore needs to be regular, accessible, and tailored to different stakeholder groups, using a combination of digital channels, help desks, field-level outreach, and collaboration with trade unions, employer bodies, and community networks. Equally important is the establishment of credible grievance redress and appeals systems. These should allow contributors and beneficiaries to challenge errors, delays, or unfair treatment in ways that are transparent and procedurally fair. A visible and functioning grievance mechanism can play an important role in demonstrating that the NSIS is accountable to its members rather than merely administratively distant.

Coordination, policy coherence, and institutional interface management

Because the NSIS touches labour regulation, social protection, finance, digital administration, and in some branches potentially health service provision, institutional coordination will remain a major enabling factor throughout the transition. A fragmented governance environment can undermine implementation even where scheme design is technically sound. For that reason, maintaining policy coherence across ministries, agencies, and supporting systems should be treated as a continuing institutional task. A standing inter-ministerial coordination arrangement, with a clear anchoring role for the MoLE and the SSU during transition, would help align legal reform, budgeting, data systems, and implementation responsibilities. A technical working arrangement involving relevant ministries, employers' Organizations, workers' representatives, and development partners could also provide a practical forum for social dialogue and problem-solving. Where branches involve healthcare-related components, stronger interface arrangements with the Ministry of Health and Family Welfare, health facilities, and local authorities would become particularly important. More broadly, coordination should not be understood only in formal bureaucratic terms. It also involves managing the interface between contributory social insurance and supplementary or tax-financed mechanisms, including CF, BLWF, UWPP, and the broader social protection data ecosystem, so that the overall system becomes more coherent without collapsing important conceptual distinctions.

Monitoring, evaluation, and institutional learning

A further enabling factor is the establishment of an effective monitoring, evaluation, and institutional learning. Because the NSIS will evolve gradually and asymmetrically across branches, the system will need regular feedback on what is working, where bottlenecks are emerging, and how institutional arrangements should be adjusted. This calls for results-oriented monitoring, periodic review of operational performance, actuarial reassessment, and the willingness to recalibrate design features in light of evidence. In the Bangladesh context, where institutional experimentation, particularly through EIS, is already generating lessons, this capacity for learning and adaptation may prove especially important. A reform of this scale cannot be expected to proceed in a perfectly linear way. What matters is whether the institutions involved are able to absorb experience and improve over time.

The aforementioned enablers do not sit outside the roadmap; they underpin it. As the country strengthens its professional capacity, digital systems, financial governance, communication mechanisms, and inter-institutional coordination, it will also strengthen the practical foundations upon which a credible and durable social insurance system can be built. Over time, these same enablers will support the maturation of the NSIS itself as well as a more coherent and resilient architecture of worker protection and social security more broadly.

8. Conclusion

Bangladesh has reached a point where expanding social protection for the working-age population is no longer merely aspirational; it is increasingly necessary for sustaining economic progress, supporting a just transition in a rapidly transforming labour market, and fulfilling the State's obligations under international social security standards. The country's existing mechanisms for protecting workers against employment-related risks, fragmented across employer-liability provisions, statutory welfare funds and small-scale assistance programmes, have proven insufficient. The COVID-19 pandemic made this clear. Episodes of job loss, workplace injury, illness and maternity continue to impose financial shocks that most households are unable to absorb, and the prevailing system is not designed to provide sustained, predictable or rights-based protection at scale.

The analysis presented in this report demonstrates, however, that the building blocks for a national social insurance system already exist, even if they operate separately and unevenly. The EIS Pilot has generated operational experience in claims administration, digital case management, bank-to-beneficiary payments and tripartite governance. The Central Fund and the Bangladesh Labour Welfare Foundation represent established institutional platforms with accumulated resources. The Social Security Unit has been created to coordinate reform. Technical groundwork has been undertaken for each branch: feasibility studies for unemployment and sickness insurance, framework studies for maternity, and actuarial and administrative cost data from the EIS Pilot. The November 2025 amendment to the Bangladesh Labour Act, providing for an Employment Injury Scheme Fund, represents a tangible legislative signal. These foundations may be sufficient to support the early stages of transition, provided the process follows a carefully sequenced approach and allows for gradual consolidation based on evidence.

The roadmap set out in this report offers a realistic and phased pathway for moving from the current fragmented system to a coherent, contributory National Social Insurance Scheme. It does not assume that all four branches can be launched simultaneously at full scale. Rather, it recognizes that each branch is at a different stage of readiness and proposes a sequencing that reflects this reality. Employment injury insurance, where the Pilot has created an operational foundation, requires the most immediate action: the enactment of a dedicated Employment Injury Insurance law before the Pilot concludes in June 2027. Maternity, unemployment and sickness insurance require further preparatory work on design parameters, actuarial evidence, legal frameworks and institutional capacity before operational launch. The roadmap accommodates this variation within a common three-phase structure: institutional preparation and pilot alignment (Years 1 to 2), legal consolidation and introduction of contributions (Years 2 to 6), and establishment of the NSIA, system consolidation and gradual extension (Years 7 to 10 and beyond). Two transitionary institutional pathways are proposed for stakeholder consideration, both leading toward the same long-term destination: an autonomous National

Social Insurance Authority operating under tripartite governance with legally protected, branch-separated funds.

The challenges are substantial. The report has identified them clearly: limited conceptual understanding of social insurance among stakeholders, the absence of an overarching legal framework, the complexity of transitioning from employer liability to pooled financing, weak administrative and institutional capacity, the structural constraints imposed by 84 per cent informal employment, and significant data and actuarial gaps. None of these challenges is insurmountable, and none is unique to Bangladesh. The countries examined in this report, including India, Viet Nam, Thailand, Indonesia and Cambodia, have all confronted similar obstacles and have introduced or expanded contributory social insurance at comparable levels of per capita income and institutional capacity. Their experience confirms that the transition is ambitious but not unprecedented, and that the most common route is to begin with the formal sector, build operational credibility, and extend coverage over time.

Realising the NSIS will require more than technical design. It will depend on sustained political commitment, continuous tripartite engagement, and a willingness to treat social insurance as a serious structural reform rather than a peripheral addition to the existing safety-net system. The financing strategy must be framed as a rationalisation of existing employer liabilities, not as a new cost layer, and the transition must be managed so that neither workers nor employers are disadvantaged during the process. The first steps are both urgent and achievable: empowering and resourcing the SSU to function as an effective coordinating body; enacting the EIS law to secure the Pilot’s gains; beginning the drafting of a comprehensive NSIS Act; launching structured tripartite consultations on the design parameters for maternity, unemployment and sickness insurance; and investing in the digital infrastructure and data systems that all four branches will require.

If approached with care, sustained commitment and openness to adaptation, the NSIS has the potential to transform Bangladesh’s social protection architecture. A contributory system grounded in the principles of solidarity, risk-pooling and legal entitlement would move the country beyond fragmented, discretionary and largely employer-dependent arrangements toward a more predictable, coherent and resilient model of protection for the working-age population. It would reduce household vulnerability to income shocks, support women’s labour force participation by removing the discriminatory effects of individual employer liability for maternity, provide a mechanism for income support during periods of unemployment and illness, and deliver adequate compensation for workplace injuries. In doing so, it would serve not only the immediate interests of workers and their families, but also the broader goals of inclusive economic growth, labour market formalization, and social cohesion. The choice before Bangladesh is no longer whether to build a national social insurance system, but how to begin, and this report provides the roadmap for that beginning.

References

Bangladesh Bank. 2023. "All Banks Must Follow Similar Rule on Maternity Leaves: Bangladesh Bank". *The Business Standard*. https://www.tbsnews.net/economy/banking/all-banks-must-follow-similar-rule-maternity-leaves-bangladesh-bank.

Barr, N. (2020) The economics of the welfare state. 6th edn. Oxford: Oxford University Press.

BBS (Bangladesh Bureau of Statistics). 2024. *Labour Force Survey 2024: Final Report*. Dhaka.

Bista, Chandra Prasad, and John Carter. 2017. *Unemployment Protection: A Good Practices Guide and Training Package – Experiences from ASEAN*. Bangkok: ILO Regional Office for Asia and the Pacific. http://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/documents/publication/wcms_571465.pdf.

BKKB (Bangladesh Karmachari Kallyan Board). 2023. "Terms of Reference for Implementation of Smart Welfare Service (SWS)", 10 April 2023.

Carter, John, Mariko Bedard, Chandra Prasad Bista, and Ippei Tsuruga. 2013. *Comparative Review of Unemployment and Employment Insurance Experiences in Asia and Worldwide*. ILO.

EIS (Employment Injury Scheme Pilot). 2024. *Employment Injury Scheme Pilot: Annual Report 2023–2024*. Dhaka: Ministry of Labour and Employment. https://eis-pilot-bd.org/publications.

ESIC (Employees' State Insurance Corporation). n.d. "About Us". Accessed May 2025. https://esic.gov.in/.

———. 2024. "Sickness Benefits", 2 July 2024. https://romp.esic.gov.in/sickness-benefits.

Finance Division. 2025. *Social Security Budget Report FY2025–26*. Dhaka: Ministry of Finance, Government of Bangladesh.

GED (General Economics Division). 2015. *National Social Security Strategy (NSSS) of Bangladesh*. Dhaka: Planning Commission, Government of Bangladesh. https://socialprotection.gov.bd/publications.

Government of Bangladesh. 2006. *Bangladesh Labour Act, 2006* (Act No. 42 of 2006). Ministry of Labour and Employment, Dhaka.

———. 2020. *Study on Contribution Requirements for Maternity Cash Benefits in Bangladesh*. Dhaka.

———. n.d. "Gazette Notification No. 39783/53134 on Maternity Leave for Public Sector Employees". Ministry of Public Administration. https://www.dpp.gov.bd/upload_file/gazettes/39783_53134.pdf.

Hindriks, J. and De Donder, P. (2003) 'The politics of redistributive social insurance', Journal of Public Economics, 87(12), pp. 2639–2660, available at, https://www.sciencedirect.com/science/article/abs/pii/S0047272702000786 and accessed on 7 April 2026.

ILO. 2012. *Social Protection Floors Recommendation, 2012 (No. 202)*. Geneva.

———. 2013. *Unemployment Insurance, Income Security Measures and Active Labour Market Policies in ASEAN*. Geneva. https://www.ilo.org/publications/unemployment-insurance-income-security-measures-and-active-labour-market.

———. 2014. *Maternity and Paternity at Work: Law and Practice across the World*. Geneva. https://www.ilo.org/publications/maternity-and-paternity-work-law-and-practice-across-world.

———. 2021. *Building Social Protection Systems: International Standards and Human Rights Instruments*. Geneva. https://www.ilo.org/publications/building-social-protection-systems-international-standards-and-human-rights.

———. 2021b. *Instruments concerning Medical Care and Sickness Benefits*. Geneva. https://www.ilo.org/media/86196/download.

———. 2022. *Instruments concerning Employment Injury Benefit*. Geneva. https://www.ilo.org/media/94746/download.

———. 2022a. "Potential Framework for Employment Injury Scheme in Bangladesh". Dhaka.

———. 2024. *World Social Protection Report 2024–26: Universal Social Protection for Climate Action and a Just Transition*. Geneva. https://www.ilo.org/sites/default/files/2024-09/WSPR_2024_EN_WEB_1.pdf.

———. 2024a. *Social Security (Minimum Standards) Convention, 1952 (No. 102): General Observation*. Geneva. https://www.ilo.org/publications/social-security-minimum-standards-convention-1952-no-102-general.

———. 2025. "Guidance Note on the Transition from the EIS Pilot to a National Employment Injury Scheme". Dhaka. https://www.ilo.org/sites/default/files/2025-05/bangladesh_establishing_eis_guidance_note_may_2025.pdf.

International Labour Organization (ILO) and Office of the United Nations High Commissioner for Human Rights (OHCHR) and (2025) *Fact Sheet No. 39: Right to Social Security*. Geneva: OHCHR and ILO. Available at: https://www.ohchr.org/en/publications/fact-sheets/fact-sheet-no-39-right-social-security (Accessed: 25 April 2026).

Khan, Jahangir A.M., Farhana Sehrin, Ziaul Quayyum, Abdur Razzaque Sarker, and M.S. Rahman. 2025. "Factors Affecting Out-of-Pocket Expenditures for Chronic and Acute Illnesses in Bangladesh". *PLoS One* 20 (4): e0320429. https://doi.org/10.1371/journal.pone.0320429.

LRC (Labour Reform Commission). 2025. *Report of the Labour Reform Commission*. Dhaka: Government of Bangladesh.

Moazzem, Khondaker Golam, et al. 2025. "Framework for Financing Maternity-Related Medical Costs in Bangladesh". Dhaka: Centre for Policy Dialogue.

Nishimura and Asahlaw. 2025. "House of Representatives Approves Amendments to Thailand's Labour Protection Act: Extended Maternity Leave and Paternity Leave", 1 August 2025. https://www.nishimura.com/en/knowledge/publications/20250801-114716.

OHCHR (Office of the United Nations High Commissioner for Human Rights) and ILO. 2025. *Right to Social Security*. Fact Sheet. OHCHR and ILO.

PiHR. 2025a. “Medical Allowance in Bangladesh”, 21 January 2025. https://mypihr.com/medical-allowance-bangladesh.

———. 2025b. “Leave Policy in Bangladesh”, 26 March 2025. https://mypihr.com/leave-policy-in-bangladesh/.

PwC (PricewaterhouseCoopers). 2024. *Study on Framework for Introduction of National Social Insurance Scheme in Bangladesh*. Dhaka: Social Security Policy Support (SSPS) Programme, Cabinet Division and General Economics Division of Bangladesh Planning Commission. https://socialprotection.gov.bd/wp-content/uploads/2024/04/Study-on-Framework-for-Introduction-of-NSIS-in-Bangladesh.pdf.

Razzaque, Mohammad A. 2022. “Towards an Unemployment Insurance Scheme in Bangladesh: A Preliminary Feasibility Assessment”. Technical Note. ILO.

Republic of Indonesia. 2023. *Government Regulation No. 49 of 2023 on Work Accident Security*. https://www.bpjsketenagakerjaan.go.id/assets/uploads/peraturan/PP_Nomor_49_Tahun_2023_English_%281%29.pdf.

Republic of the Philippines. 2019. *Republic Act No. 11210: An Act Increasing the Maternity Leave Period to One Hundred Five (105) Days for Female Workers and Providing for Other Purposes*. https://lawphil.net/statutes/repacts/ra2019/ra_11210_2019.html.

Taskforce Committee. 2025. *Report of the Taskforce on Re-strategising the Economy*. Dhaka: Government of Bangladesh.

UNICEF. 2023. “Policy Note: Scaling Up the Mother and Child Benefit Programme”. UNICEF Bangladesh. https://www.unicef.org/bangladesh/en/media/8421/file/Scaling%20up%20for%20the%20Mother%20and%20Child%20Benefit%20Programme.pdf.

Viet Nam, National Assembly. 2015. *Law on Occupational Safety and Health, 2015*.

Viet Nam Social Security. n.d. “Maternity Benefits”. Accessed May 2025.

World Bank. 2025. *Raise the Bar: Improving the Prospects of Youth and Migrants in Bangladesh*. Washington, DC. https://openknowledge.worldbank.org/entities/publication/0109b28c-5d39-4106-9119-5c152e441d77.

Annex

Table A1: Cross-country comparison of the Employment Injury Scheme

Countries	Coverage & Eligibility	Benefits	Claims & Processing	Financing Model
Cambodia	Mandatory for formal-sector workers; administered by NSSF; phased expansion beyond garment sector.	Medical care at 100%; temporary disability 100% wages; permanent disability pension varies by degree; survivors' pensions/lump sums.	Claims managed by NSSF administration; inspections and investigations by NSSF; appeals foreseen but weakly operational.	Employer-funded; uniform contribution rate of 0.8% of wages.
India	Compulsory for formal workers in establishments (≥10 employees); covers workplace and commuting accidents and notified occupational diseases. Informal/gig workers to be included under new Code.	Full medical care; 90% wage replacement for temporary disability; lifetime pension for permanent disability; survivors get 90% wage + Rs 10k funeral grant + rehab.	Employer reports; claims via IP portal; resolved online within 15–21 days.	Mixed: 3.25% employer + 0.75% employee (4% total); state co-funds medical.
Indonesia	Mandatory for all wage workers (incl. foreign ≥6 months). Covers all workplace and commuting accidents. Voluntary coverage for some non-wage workers.	100% medical care + rehab. Temporary: 100% wage (6 mo), then 50% (months 7–12). Permanent: lump-sum = (disability %) × 80 × monthly wage. Death: 60% × (80 × monthly wage) + funeral grant (IDR 10 M). Extras: rehab aids, scholarships.	Employer/worker files claim to BPJS within 48 h. Requires accident form, medical report, ID. BPJS reviews and pays approved benefits directly.	Employer-only: JKK 0.24–1.74% + JKM 0.3% of wages (risk-based). National pool managed by BPJS.
Thailand	Mandatory for employees; WCF for work injuries, SSF for other risks.	Medical care at 100%; temporary disability ~60% wages (up to 1 year); permanent disability ~60% wages; survivors ~60% wages.	Administered by SSO; WCF Committee decides appeals; Medical Committee provides advisory input.	Employer-funded; risk-based rates 0.2–1%; wage cap THB 240,000 per year.
Viet Nam	Mandatory for all employees under Social Insurance Law (incl. foreign workers ≥1 year). Covers work, break, and commuting accidents, occupational diseases on official list. Benefits start at ≥5% capacity loss.	Full medical & rehab. 5–30% disability → lump-sum; ≥31% → monthly pension; ≥81% → pension + attendance allowance. Survivors: pension + ≥30 months' salary.	Worker/employer submits a claim (within 30 days) to VSS online/by mail. Processed in 10 days. No-fault principle maintained; paid directly to the bank.	Employer-only contribution = 0.5% payroll (0.3% for low-risk). Central fund under state.

Source: Author's compilation form different sources.

Table A2: Comparison of Bangladesh's maternity protection system against some selected countries

Country	Coverage (who)	Financing mix	Cash benefit (level & duration)	Medical package / anchor	Eligibility / waiting criteria	Admin body	Key lesson for Bangladesh
Bangladesh	Formal sector (private+public), informal largely excluded.	Employer liability (BLA); small schemes (CF, BLWF, MCBP).	120 days leave with 100% wages (low compliance)	Maternal health services mainly through public services, fragmented small schemes.	Service length conditions; parity restrictions (≤2 children)	MoLE/DIFE, MoHFW, CF/BLWF.	NSIS-based pooled MI can reduce fragmentation and ensure equity; requires legal consolidation.
India	Formal sector under ESI; other formal establishments under MBA	ESI (employee + employer contributions); MBA (employer liability)	ESI: 100% wages for 26 weeks; MBA: 26 weeks (first two children), 12 weeks thereafter	ESI: package via ESIC facilities; MBA: employer-based facilities	ESI: ≥70 days contributions in the two preceding contribution periods; MBA: ≥80 days work in past 12 months	ESIC for ESI; Employers for MBA	Hybrid model enables gradual transition, combining insurance with employer obligations
Philippines	All female workers in public/private sectors, including informal and voluntary contributors.	For private-sector, the employer advances the benefit and is reimbursed by SSS. For self-employed/ voluntary SSS members (including informal sector), the benefit is paid directly by SSS	105 days at 100% average daily salary credit; +15 days for solo parents; 60 days for miscarriage/ETP.	Pre-, peri-, postnatal care via PhilHealth packages.	At least 3 months SSS contributions in 12 months before childbirth.	SSS & PhilHealth.	Full wage replacement through SSS ensures continuity; integrated medical via PhilHealth.
Thailand	Private sector employees under Social Security; civil servants separately covered with more generous benefits.	Tripartite contributions (employers, workers, government) to	98 days (45 full pay employer + 45 half pay SSO + 8; Draft bill (2025) extends to	Maternity care through Universal Coverage/SSO accredited facilities.	At least 5 months of contributions in the past 15 months to qualify for SSO cash benefits	Social Security Office (SSO).	Shared financing reduces employer burden; integrated with universal health coverage.

		Social Security Fund.	120 days (75 full pay, 45 half pay)[34].				
Viet Nam	Employees in formal sector under compulsory social insurance; partial voluntary mechanisms.	Employer + employee contributions to Social Insurance; state plays regulatory role.	100% of average salary for 6 months; 1 month extra for multiple births (verified in national law).	Maternity health via national health insurance network (public/private empanelled).	Contribution history required (e.g., at least 6 months contributions within last 12 months).	Viet Nam Social Security (VSS).	Pooled benefits remove employer liability; integrated service network simplifies medical claims.
Japan	Employees under Employment Insurance and Health Insurance.	Employer + employee contributions; public co-financing for health insurance.	Maternity allowance (EHI): 2/3 of wages for 42 days before and 56 days after childbirth (extensions for multiple/complicated births). Childbirth lump-sum allowance (all schemes): JPY 500,000 per birth to offset delivery expenses.	Comprehensive maternity care under statutory health insurance.	For maternity allowance, must be enrolled in EHI at the start of leave. The lump-sum is available to all insured persons (EHI/NHI)	Health Insurance Associations (EHI) & municipal governments (NHI)	Cash and medical split across systems but coordinated; effective with strong registries.
Germany	All employed women covered under statutory health insurance (SHI), with provisions also available for those outside SHI through alternative public arrangements.	Joint financing through statutory health insurance and employer contributions, with employers topping up benefits to ensure full wage replacement.	14 weeks of maternity leave (6 weeks before and 8 weeks after childbirth), extended in special cases (e.g., premature or multiple births). Cash benefits ensure 100% wage replacement—SHI provides a fixed daily amount, and employers top up the remaining balance.	All maternity-related healthcare services (prenatal, delivery, postnatal care) are fully covered through SHI.	Women must be insured under SHI and employed to receive full maternity benefits. Eligibility depends mainly on insurance coverage rather than a fixed contribution period, while women outside SHI receive limited public support.	SHI pays a fixed daily maternity benefit (up to a capped amount), while employers top up the remaining portion to ensure 100% wage replacement; the Federal Social Insurance Office supports women outside SHI.	Integrated system combining full income protection, universal healthcare coverage, and shared financing, reducing both financial burden and employer risk.

[34] As of July 2025, amendments extend maternity leave to 120 days and introduce 15 days paid paternity leave (Nishimura & Asahlaw, 2025)

Canada	All eligible workers under the federal Employment Insurance (EI) system; applies across provinces, with additional flexibility for parental leave sharing between parents	Payroll-based contributions to the Employment Insurance system (shared by employers and employees), complemented by publicly funded universal healthcare for maternity-related services.	15 weeks of maternity leave compensated at approximately 55% of average weekly earnings (subject to a cap), followed by optional parental leave (up to 12 months standard or 18 months extended at lower replacement rates).	Comprehensive medical care (prenatal, delivery, postnatal) is fully covered under the public healthcare system	600 insured hours of work in the 52 weeks before the start of the claim or since the start of last claim, whichever is shorter	Federal Employment Insurance	Flexible design combining income support and shared parental leave, with full medical coverage reducing out-of-pocket burden and enhancing accessibility.

Table A3: Cross-country comparisons of unemployment insurance

Country	Qualification criteria	Exclusion criteria	Duration of benefit	Benefit levels
India	For "The Rajib Gandhi Shramik Kalyan Yojona (RGSKY)" -At least three years' contribution is mandatory to register under the scheme -Employees with a monthly salary not exceeding Indian rupees 21,000 and working in a factory or firm with at least 10 workers are eligible to receive the benefits. For "Atal Bimit Vyakti Kalyan Yojona (ABVKY)" -Insured person should have been in insurable employment for a minimum period of two years. -Insured person should have contributed at least 78 days during each of the preceding four contribution periods. -The employee should not get unemployed due to misconduct, superannuation, or voluntary - retirement.	-Self-employed workforce - Salaried workers in factories or firms with less than 10 workers.	For "The Rajib Gandhi Shramik Kalyan Yojona (RGSKY)" - Maximum period of two years An additional one year with less benefits For "Atal Bimit Vyakti Kalyan Yojona (ABVKY)" -for a maximum period of 90 days of unemployment. This benefit can be received only once in the lifetime of the insured person. -	For "The Rajib Gandhi Shramik Kalyan Yojona (RGSKY)" - 50% of the beneficiary' average daily salary (in two years preceding unemployment) - 25% of the beneficiary's average daily salary for an additional year For "Atal Bimit Vyakti Kalyan Yojona (ABVKY)" -25% of the average daily salary (calculated for the previous four contribution periods)
Malaysia	-Insured persons must have paid 12 months of contributions within the previous 24 months -Will pay benefits when involuntarily unemployed -No benefits paid for: voluntary resignation; end of fixed-term contract; retirement -Must register for job placement - -Must be available for work	- - Foreign workers, domestic workers, self- employed people, business owners, and their spouses as well as members of the armed forces and police	- Three to six months of benefit are payable to qualified jobseekers	- Malaysia has a progressively declining benefit rate, as follows (% of monthly wage) - 80% for the 1st month - 50% for the 2nd month - 40% for the 3rd and 4th months 30% for the 5th and 6th months

Thailand	- At least six months of contributions in the 15 months before the termination - Registered with the employment office - Termination of employment not due to a job vacation, a pre- meditated criminal act against the employer, or an illegal act resulting in serious damage to the employer's business.	Not available	- Unemployed workers who are laid off get up to 180 days within one year - Unemployed workers who voluntarily resign only receive up to 90 days within one year - Following the 2008 economic crisis, UI compensation was extended to 240 days for workers unemployed in 2009	- Unemployed workers who are laid off receive 50% of insured earnings, based on the highest paid three months in the nine months before job loss - Unemployed workers who voluntarily resign only receive 30% of insured earnings
Viet Nam	- Paid UI contributions for at least 12 months within the previous 24 months - Registered for unemployment with the employment service centre - Applied for UI benefits with working 15 days after the date of registration - Jobless for 15 working days after registering - Not in a receipt of a pension	- Workers hired on short-term contracts	Months of work / Months of benefits 12-47: 3 48-59: 4 60-71: 5 72-83: 6 84-95: 7 96-107: 8 108-119: 9 120-131: 10 132-143: 11 144 or more: 12 -	-The benefit rate is 60% of the average contributory earnings over the previous six months, limited to 20 times the value of minimum wages - -Benefit rate and duration apply similarly either the termination is voluntary or involuntary
Canada	- 420 to 700 hours of insured work in last year, depending on the regional unemployment rate - New entrants need 910 hours - Voluntary quitters and those fired due to misconduct are denied benefits Good reasons for quitting are accepted	- - Self-employed and business owners	- Regular benefits: 14 to 45 weeks of benefits, depending on hours worked and regional unemployment rate - Benefits are paid every two weeks	- - 55% of average weekly earnings to a maximum of CAD $547 (in 2018)

Japan	- Basic allowance requires at least six months of insurable employment in previous two years Involuntarily unemployed or extra three months waiting period	- Those older than 65 years (except for continuously insured older workers) - Part-time workers with fewer than 20 hours (except insured day workers) - Occasional workers with fewer than 31 days of work Seasonal workers expected to work fewer than four months and 30 hours of work	- Duration depends on age, reason of unemployment and period of paid contributions - Separation due to bankruptcy or redundancy: 90 to 330 days - Other separations: 90 to 150 days - Fixed term contract: 90 to 150 days - Voluntary separations (all ages) 90 to 150 days after extra waiting period of three months	-Daily rate depends on average wages over the previous six months: JPY 2330-4650: 80%; JPY 4650-11770: 80% - 50%; JPY 11770-15780: 50% -If aged above 60 to 64 years, the 50% of above table is replaced by 45%.
Republic of Korea	- Must have worked at least 180 days in previous 18 months with a minimum of 60 hours per month - Unemployed workers must register for job placement - Must be available for work - Penalty imposed if job offers are rejected or leave their job voluntarily	- Companies engaged in farming, forestry, fishing, and housekeeping - Workers working less than a month (fewer than15 hours a week) Those with family ties to the employer	- Depends on age and work; 90 to 180 days if under 30; 90 to 210 days if between 31 and 50; 90 to 240 days if over 51 or with disabilities - Extended benefits may be paid for extra 60 days under strict criteria for those who exhaust benefits High unemployment extended benefits applied when the ratio of job-seeking benefit recipients to all EI-insured persons exceeds a certain level.	- EI benefit paid is 50% of the standard daily wage based on average wage - If a worker finds a job quickly, they receive 50% of their remaining benefits as a re-employment bonus
Thailand	- At least six months of contributions in the 15 months before the termination - Registered with the employment office - Termination of employment not due to a job vacation, a pre- meditated criminal act against the employer, or an illegal act resulting in serious damage to the employer's business.	Not available	- Unemployed workers who are laid off get up to 180 days within one year - Unemployed workers who voluntarily resign only receive up to 90 days within one year - Following the 2008 economic crisis, UI compensation was extended to 240 days for workers unemployed in 2009	- Unemployed workers who are laid off receive 50% of insured earnings, based on the highest paid three months in the nine months before job loss - Unemployed workers who voluntarily resign only receive 30% of insured earnings
United States	- Who lost a job through no fault of his/her own - able to work, available to work, and actively	- Some states do not cover part-time workers unless they are willing to	- UI benefit amount varies greatly depending on the state and the worker's previous earnings	- Workers are eligible for UI benefits for a maximum of 26 weeks

	seeking work - have earned at least a certain amount of money during a base period prior to becoming unemployed	take a full-time job - Workers who leave a job voluntarily - People who are looking for their first job - Re-entrants who previously left the labour force voluntarily	- Average UI benefit is slightly over $300 per week	

Source: Adapted from Razzaque (2022), based on Carter et al. (2013), Stone & Chen (2014), Bista & Carter (2017), Asenjo & Pignatti (2019), and Bedard et al. (2020).

Table A4: Provisions in peer countries: Indonesia, India, and Viet Nam regarding sickness Insurance scheme.

Feature	Indonesia	India	Viet Nam
Framework	Direct employer-liability model for short-term non-occupational disease.	Social insurance model.	Unified, compulsory social insurance system.
Governing Law	Labour Law No. 13 of 2003.	Employees' State Insurance Act, 1948.	Social Insurance Law (2014, transitioning to 2024 Law).
Administrative Body	Individual Employers (direct payment). BPJS does not handle sickness cash benefits.	Employees' State Insurance Corporation (ESIC).	Viet Nam Social Security (VSS).
Coverage	All employees in the formal sector with an employment relationship.	Non-seasonal factories and establishments with ≥10 employees; employees earning up to ₹21,000/month.	All employees (Viet Namese and foreign)
Eligibility	Medically certified sickness from the first day of employment.	Contribution for at least 78 days in the preceding 6 months contribution period. 9 months waiting period for new entrants.	Participation in the compulsory social insurance scheme; claim must be certified by a medical institution.
Contribution Rates	No specific contribution. Income compensation is paid from employer's fund.	Employer: 3.25% of gross wages. Employee: 0.75% of gross wages.	Only Employer contribute 3.0% of employees' gross salary.
Benefit Rate	Tapering Scale: First 4 months: 100% of salary. Months 5-8: 75% of salary. Months 9-12: 50% of salary. Post 12 months: 25% of salary.	70% of average daily wages.	75% of the salary base used for social insurance contributions. Employees of the People's Army and Public Security forces get benefits equal to 100 per cent of their monthly wage in the month before their leave.
Benefit Duration	Up to 12 months with tapering pay, after which pay is 25% until employment termination.	Maximum of 91 days during two consecutive benefit periods (approx. 1 year).	Contribution < 15 years : 30 days/year. Contribution15-30 years : 40 days/year. Contribution > 30 years: 60 days/year. Prolonged Illness: Up to 180 days/year.
Waiting Period	None. Entitlement begins from the first day of medically certified sickness.	2 days (waived if sickness recurs within 15 days).	Not Specified
Financing Model	Direct Employer Liability (No risk-pooling).	Contributory Social Insurance (Risk-pooled).	Contributory Social Insurance (Risk-pooled).

Source: Compilation from various sources.

Table A5: Cross-country comparison among developed countries regarding sickness insurance scheme.

Feature	Canada	Germany	Japan	Sweden
Framework / Model	Federal social insurance program with significant provincial gaps in complementary policy.	Dual-payer social insurance model: Employer liability followed by social insurance.	Universal social insurance model, with no mandatory employer-paid sick leave.	State-Employer partnership model: Employer liability followed by a state-run system.
Administrative Body	Federal Government via the Employment Insurance (EI) program.	Employer (first 6 weeks), then Statutory Health Insurance Fund (Krankenkasse).	Health Insurance System (Employment-based or National Health Insurance).	Employer (first 14 days), then Swedish Social Insurance Agency.
Coverage	Employees in insurable employment. Does not cover most self-employed individuals.	Universal for all employees.	Universal for all residents enrolled in a health insurance scheme.	Universal for all individuals who live or work in Sweden.
Eligibility	Accumulation of at least 600 hours of insurable employment in the last 52 weeks; >40% decrease in weekly earnings due to medical reason.	Employer Pay: Begins with employment. Sickness Pay (Krankengeld): After the first 6 weeks of illness.	Enrolment in a health insurance scheme; unable to work due to non-occupational illness.	Employer Pay (sjuklön): From day 1 of employment. Sickness Benefit: From day 15, based on SGI.
Contribution Rate	Employees contribute 1.64% of their insurable earnings, deducted directly from their pay. Employers contribute 1.4 times the employee's premium for each worker.	General contribution rate is 14.6% of an employee's gross salary, split equally between the employer and the employee, at a rate of 7.3%	both the employer and employee pay around 5% employee's gross salary.	Only Employers contribute 3.55 % of employees' gross salary.
Benefit Rate	55% of average insurable weekly earnings, up to a maximum ($695/week in 2025).	Employer: 100% of salary. Krankengeld: 70% of gross salary (capped at 90% of net).	Two-thirds (67%) of the person's standard monthly salary (averaged over the last 12 months).	80% of qualifying income (for both employer-paid and state-paid periods).
Benefit Duration	Maximum of 26 weeks.	Maximum of 78 weeks (including the first 6 weeks paid by the employer) within a 3-year period for the same condition.	Cumulative total of 1 year and 6 months for the same illness.	Not specified, but assessments are made at 90 and 180 days to evaluate work capacity.
Waiting Period	1-week waiting period.	None for employer pay. The 6-week employer period precedes social insurance benefits.	3 consecutive days. Benefits are paid from the 4th day.	A "qualifying day" deduction (karensavdrag) equivalent to 20% of a week's sick pay.

Source: Compilation from different sources.

Table A6: Comparative overview of selected social insurance governance models

Governance parameter	India: Employees' State Insurance Corporation (ESIC)	Indonesia: BPJS Ketenagakerjaan	Viet Nam: Viet Nam Social Security (VSS)
Legal basis and institutional character	Statutory corporate body administering the ESI scheme under the Employees' State Insurance Act, 1948. It operates under a clear legal framework with formal rules for meetings, board functioning, and executive powers.	Public legal entity operating on a non-profit basis under the National Social Security System Law and BPJS Law. It is legally distinct from ministries, although subject to statutory oversight and reporting.	Government-attached specialised social insurance agency administering social insurance, health insurance, and unemployment insurance through a unified national system. Its Organizational basis is defined through the Law on Social Insurance and related decrees and official VSS Organizational documents.
Broad governance model	Multi-tiered statutory social insurance corporation with tripartite and wider stakeholder participation. Governance combines board-level decision-making, committee-based executive oversight, and medical advisory structures.	Two-tier governance model with a Supervisory Board and a Board of Directors. The model separates strategic oversight from executive management and embeds programme governance in a public-law institutional form.	Vertically integrated public system combining central direction with provincial and district administration. Governance is more state-centred than in India or Indonesia, but still includes formal board-led oversight and broad administrative integration.
Apex governing body	The Corporation, chaired by the Union Minister for Labour and Employment. It is the apex body of the system.	Supervisory Board, with executive management carried out separately by the Board of Directors.	Management Board, supported by the General Director and a central-to-local administrative apparatus.
Stakeholder representation	Broad multi-stakeholder composition including central and state governments, employers, employees, medical professionals, and parliamentary representatives. The system also provides for Standing Committee and Medical Benefit Council structures.	Supervisory Board includes representatives of government, employers, workers, and the public. The wider oversight ecosystem also includes the National Social Security Council.	More state-led in structure, though official VSS materials show representation from major state institutions and social partners in the broader governance arrangement.
Executive management	Director General serves as Chief Executive Officer of the Corporation and is responsible for implementing decisions of the Corporation, Standing Committee, and Medical Benefit Council.	Board of Directors manages daily operations, budgeting, service delivery, and implementation, subject to supervisory approval and statutory reporting.	General Director manages day-to-day operations, supported by deputies and functional departments covering collections, benefits, inspection, and fund management.
Relationship with government ministries	Ministry of Labour and Employment provides strategic direction and regulatory oversight; Parliament reviews annual reports and audited statements. State governments are closely involved in medical service delivery.	Linked to the President, the National Social Security Council, the Ministry of Manpower, the Ministry of Finance, and financial regulators. This creates a layered oversight structure rather than direct ministerial administration.	Closely connected to central government. VSS is government-attached, with links to the Prime Minister, Ministry of Finance, labour authorities, and health authorities depending on the branch and function.
Territorial or subnational structure	Multi-level governance with Regional Boards, Local Committees, and significant state-level responsibility for hospitals and dispensaries.	Nationally organised institution with branch and service networks, but not a federal structure in the Indian sense. Operational reach is national, with standardised programme management and reporting.	Strong vertical integration from central to provincial and district levels. This is one of the defining features of the VSS model.
Fund structure and financial separation	ESIC operates through the ESI Fund with statutory controls, internal accounts systems, and formal budgeting processes. The scheme has ring-fenced social insurance financing and audited annual accounts.	Manages separate social security programme funds, legally distinct from operational budgets. Cross-fund subsidization is not permitted, which is an important governance feature.	Operates multiple off-budget funds for social insurance, health insurance, and unemployment insurance, with fund use tied to statutory purpose and conservative financial management.

Contribution collection and record systems	Contribution collection is digital through the ESIC portal and e-Challan system, creating an auditable trail from employer remittance to scheme accounts.	Employer registration and contribution remittance are handled through banking and digital channels. BPJS also provides online and app-based interfaces for participants and employers.	Contribution collection is increasingly digital, with e-portal use, electronic records, and formal procedures for contribution collection and social insurance book/card management.
Benefit administration and payment	Cash benefits are disbursed through ESIC branch structures and electronic transfers; medical benefits are delivered through ESIC facilities, state facilities, and tie-up arrangements.	Benefits follow programme-specific procedures and are increasingly processed digitally, including direct or cashless transfer arrangements for eligible claims.	Uses a mix of employer-mediated and direct payment arrangements depending on benefit type; VSS also administers social insurance books, cards, and digital service interfaces.
Audit and oversight	Internal audit systems are formalised through ESIC audit manuals; external audit is undertaken by the Comptroller and Auditor General, and reports feed into higher accountability channels.	Subject to internal oversight, independent audit, and state audit review, alongside reporting to DJSN and other oversight bodies. Annual and integrated reporting is publicly available.	Oversight includes internal control, reporting up the state hierarchy, and state audit review. Official reporting and Organizational documentation are publicly available through VSS channels.
Investment approach	Conservative investment orientation with formal oversight and annual accounts disclosure. ESIC publications and accounts indicate prudential management and formal reserve/investment treatment.	Programme funds are invested under prudential rules, with audited financial reporting and regulatory oversight. Public reporting shows a structured investment and financial governance framework	Highly conservative approach, with investments channelled into low-risk assets and strict limits linked to state-directed fund protection.
Digitalization and information systems	Strong digital contribution and administrative systems, though still operating within a complex federal and multi-tier institutional setting.	Strong emphasis on digital service delivery, participant access, and public reporting through official portals and integrated reports.	Increasingly digital administration, including public service portals and electronic contribution and registration procedures.
Most relevant governance lesson for Bangladesh	Demonstrates the value of tripartite governance, statutory clarity, differentiated bodies for oversight and technical guidance, and auditable digital contribution systems, but also shows the complexity that can arise in a highly layered institutional design.	Shows the importance of a specialised public legal entity, formal separation of programme funds, separation between supervision and execution, and strong reporting discipline.	Illustrates the feasibility of a unified and vertically integrated national structure with strong administrative coherence, though in a more state-centred model than Bangladesh may initially be ready for.

Notes: For India, the table draws mainly on the official ESIC publications portal, ESIC annual report and annual accounts publications, the official rules governing the Employees' State Insurance Corporation, Standing Committee and Medical Benefit Council, the ESIC audit manuals, and the Comptroller and Auditor General's performance audit of ESIC. These sources support the entries on legal basis, board structure, multi-tier governance, digital contribution collection, audit, and financial controls. For Indonesia, information is drawn mainly on BPJS Ketenagakerjaan's official annual-report and audited financial-report pages, the audited 2024 financial statements, and official materials linked to the BPJS legal and governance framework. These sources support the entries on institutional character, Supervisory Board and Board of Directors structure, digital administration, separate programme funds, and audit/reporting arrangements. For Viet Nam, information is taken mainly from the official VSS English portal, including the Organizational structure pages and VSS profile material, together with official or quasi-official legal and procedural references relating to social insurance administration and contribution collection. These sources support the entries on government-attached institutional form, vertical integration, management structure, digitalization, and fund administration.