



SECP

SECURITIES AND EXCHANGE
COMMISSION OF PAKISTAN

INSURANCE AS A TOOL OF SOCIAL SECURITY: LANDSCAPE OF PAKISTAN



EXECUTIVE SUMMARY

Objective of the Study



Goal:

Strengthen social security through insurance integration and policy reforms.










Focus:





Identify gaps in laws, improve enforcement, and expand coverage to underserved sectors.

Current Social Security Landscape in Pakistan

Pakistan Bureau of Statistics conducted a Labour Force Survey (LFS) in 2020–2021 to document the labour market of Pakistan at gross root level. The report along with SECP's survey paints the following picture:

| | Value (Million) | Percentage (%) |
|--|-----------------|----------------|
|  Total Population | 240 | 100% |
|  Working Age population | 159.8 | 67% |
|  Out of Labour Force | 88.1 | 37% |
|  Labour Force | 71.8 | 30% |
|  Employed | 67.3 | 28% |
|  Unemployed | 4.5 | 2% |
|  People covered under Compulsory Group Life Insurance | 9.5 | 3.9% |

A Birdview of the Employer's Compliance with EOBI and Group Life Insurance

| | Count | Percentage (%) |
|---|----------------|----------------|
|  Total Number of Companies | 222,144 | 100% |
|  Companies Registered with EOBI | 153,114 | 68.9% |
|  Number of Active Companies with EOBI | 100,936 | 45.5% |
|  Number of Entities Getting Group Life Insurance | 11,372 | 5% |

The above table reflects that out of the total registered companies, a major number are registered with EOBI. However, not all registered with EOBI are active. On the contrary, the number of entities getting compulsory group life insurance is quite low as compared to their compliance with EOBI requirement.

KEY CHALLENGES IDENTIFIED



Inadequate coverage under existing laws



Weak Implementation of Mandatory Insurance



Absence of a data-sharing for monitoring and enforcement of mandatory insurance



Scope limited to regular employees leaving contractual and part-time employees without coverage



Absence of a national level scheme for employees in informal sector



Lack of Standardized Products



CHAIRMAN'S MESSAGE

I am pleased to present this important report, *Role of Insurance in Social Security: Landscape of Pakistan*, on behalf of the Securities and Exchange Commission of Pakistan (SECP). This report reflects SECP's continued commitment to strengthening Pakistan's insurance sector as a tool for sustainable development, financial protection, and social inclusion.

The launch of SECP's Five-Year Strategic Plan for the Insurance Sector, titled "Journey to an Insured Pakistan" in 2024, marked a historic milestone for the Commission and the industry. It was crafted through extensive consultation with domestic stakeholders and informed by international best practices. The draft plan was reviewed by local and global experts at a high-level international conference, shared with key national forums such as the Special Investment Facilitation Council (SIFC), and circulated to ministries of finance, commerce, and other relevant institutions.

Key themes include modernization of legislation (such as amending the Insurance Ordinance and the Motor Vehicles Act, 1939), adoption of international financial reporting standards (IFRS-17), and implementation of a risk-based capital regime to improve the industry's financial resilience. The plan also prioritizes areas such as innovation, digitalization, and access to data; policyholder protection and market conduct; access to capital and reinsurance; improvement of ease of doing business; enforcement and expansion of mandatory insurance; promotion of takaful and inclusive insurance; development of disaster and agricultural insurance; enhanced advocacy and stakeholder engagement; public awareness; and capacity building within the insurance sector. Each of these priority areas is supported by a set of concrete action items designed to drive meaningful progress and systemic reform.

SECP's approach to reform and policy development is rooted in evidence-based decision-making. In line with this approach, and as part of our broader priority area on 'Enforcement and Expansion of Mandatory Insurance' under the Journey to an Insured Pakistan strategic plan, SECP has undertaken this detailed study titled "Role of Insurance in Social Security: Landscape of Pakistan." The report maps the current landscape of programs, schemes, and legal frameworks related to social protection and assesses their effectiveness in providing meaningful financial security. In doing so, it draws comparisons with successful models from other countries where insurance is used as a core instrument of social security.

Despite existing legal provisions such as the West Pakistan Industrial and Commercial Employment (Standing Orders) Ordinance, 1968, which mandates group life insurance for formal sector workers Pakistan has yet to harness the full potential of insurance in protecting its population. While provinces have adopted the ordinance following the 18th Amendment, enforcement remains limited. Today, only 9.5 million workers are covered through such schemes, leaving an estimated 62 million workers primarily in the informal sector, without any financial protection against life-altering events such as disability, accident, or the death of a breadwinner.

This report identifies significant gaps in coverage and proposes a set of recommendations to strengthen both the enforcement of existing laws and the integration of insurance into ongoing and future social protection efforts. Some major gaps identified include inadequate coverage and weak implementation under existing laws, and absence of any data-sharing for monitoring and enforcement of mandatory insurance. Among the proposed pathways is the development of a national-level insurance scheme tailored to informal sector workers, a segment often overlooked due to the absence of formal employment structures. However, this is positioned not as a standalone solution, but as one component of a larger effort to build a more inclusive, responsive, and resilient social protection ecosystem.

This report offers a timely, data-driven, and forward-looking roadmap for integrating insurance more meaningfully into Pakistan's social security framework. I commend the Insurance Division at SECP for producing this important piece of work and invite all relevant stakeholders, public and private, federal and provincial, to join hands in realizing our collective vision: a more financially secure and resilient Pakistan where no household is left unprotected in the face of adversity.

Akif Saeed
Chairman, SECP



COMMISSIONER'S MESSAGE

On behalf of the Insurance Division of Securities and Exchange Commission of Pakistan (SECP), I am pleased to present Insurance as a Tool of Social Security: Landscape of Pakistan which examines the current state of social protection in our country and highlights the critical role that insurance can—and must—play in strengthening resilience for all segments of society. This report offers an in-depth examination of international social security models alongside Pakistan's existing mechanisms: from compulsory group life insurance and health and accident schemes to retirement provisions and evaluates the current role of insurance as a social protection tool, highlights critical gaps in coverage, enforcement, data sharing, and product standardization, and outlines a strategic roadmap for legal, institutional, and technological reforms.

The Constitution of Pakistan under Principles of Policy states that it is responsibility of the state to promote social and economic well-being of the people and provide for all persona emoted in service of Pakistan or otherwise social security by compulsory social insurance or other means. In line with this provision of constitution, West Pakistan Industrial and Commercial Employment (Standing order) Ordinance 1968 mandates that every industrial establishments with 50 employees and every commercial establishment with 20 employees must get group insurance for its workmen. However, the data collected for this report from the insurance companies states that only 9.5 million employees are covered under group life insurance when as per the Labor force survey 2021 of Pakistan Bureau of Statistic, the proportion of working age population of the country is 159.8 million out of which 71.8 million are part of labour force signifying the huge gap between those who are covered under insurance and those who lack it.

The report further identified these critical gaps—the limited exploration of insurance as a social security tool, limited scope of existing labor laws with coverage offered only to regular employees and that too inadequate sum cover given the inflation, absence of any effective enforcement mechanisms, absence of standardized products, and the lack of national level schemes for informal sector workers. To address these deficiencies, the report proposes a forward looking Way Forward centered on five strategic actions: policy reforms for stronger legal frameworks, integration of insurance into existing social safety nets, enhanced data linkages for monitoring and enforcement, creation of a national social security scheme for informal workers, and development of standardized, affordable and accessible insurance products.

As we embark on the next phase of implementation, I call upon legislators, regulators, insurers, employers, and civil society to join hands in transforming these recommendations into reality. Together, we can build a comprehensive, inclusive social security ecosystem—one in which every Pakistani, regardless of income level or employment status, can face life's uncertainties with confidence and dignity. At the end, I want to thank the Chairman SECP for his support and commend the dedicated team at the Insurance Division for their unwavering commitment to evidence based policymaking with special recognition to Sofia Bibi, Assistant Director for writing this report.

Mujtaba Ahmad Lodhi
Commissioner Insurance

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I. INTRODUCTION

a. Overview of Social Security Mechanisms:

Social Security is the protection offered to vulnerable communities, groups and individuals in the time of distress. Social security systems ensure the minimum level of living to the needy by public assistance, and they also promote public health and social welfare. The primary goal of such programs is to mitigate socio-economic risks such as poverty, illness, disability, unemployment, and old age. Social security programs are generally established and administered by governments to ensure the welfare and well-being of citizens. Along with the government, the protection can be offered by employers, insurance companies and non-profit organizations. These programs are funded through various means, including taxation, social insurance contributions, and government budgets.

The implementation of social security mechanisms is guided by principles of social justice, equity, and solidarity, aiming to promote social cohesion and alleviate inequality within societies. The Constitution of Pakistan entails principles of social justice, equity and economic well-being for all citizens of the country. These principles provide guidance and direction for actions and decisions of all organs of the state hence binding the governments, policy makers and administrative departments to work towards a robust social security mechanism to ensure provision of social justice and economic well-being of all, especially of the vulnerable groups and individuals.

Article 38 of the Constitution of Pakistan under chapter-II Principles of Policy state that it is responsibility of the state to promote social and economic well-being of the people and provide for all person employed in the service of Pakistan or otherwise, social security by compulsory social insurance or other means. Furthermore, The Government of Pakistan has adopted United Nations Sustainable Development Goals (SDGs) under which the country is committed to ensure provision of social protection for all. SDG 1.3 requires the participating countries to “implement nationally appropriate social protection systems and measures for all and by 2030 achieve substantial coverage of the poor and the vulnerable.” Hence under the double responsibility of ensuring a sound and functional society security system for the country, government of Pakistan has introduced multiple initiatives. Some are directly under the government such as the universal health programs, pension programs for government employees, and health insurance.

b. Significance of Insurance in Social Security Enhancement:

Insurance plays a crucial role in enhancing social security by providing protection against unforeseen risks and uncertainties. By pooling resources from a large number of individuals, insurance mechanisms spread the financial burden of risks across society, ensuring that individuals are not unduly burdened by catastrophic events. In the context of social security, insurance programs offer a safety net for individuals and families facing challenges such as illness, disability, death, or loss of income. Health insurance, life insurance, disability insurance, and unemployment insurance are all examples of insurance products that contribute to social security enhancement.

Across the world, insurance is one of the most important mode of social security mechanism. The significance of insurance in social security can be assessed through the mandatory nature of insurances.

Compulsory insurance refers to the requirement imposed by law or regulations for individuals or entities to obtain certain types of insurance coverage. These mandates are typically put in place to protect the interests of the insured parties, as well as to safeguard broader societal interests such as public health, safety, and financial stability. The enforcement of compulsory insurance regulations is overseen by governmental authorities, regulatory bodies, or specialized agencies responsible for overseeing insurance markets. These entities establish and enforce the legal framework governing insurance requirements, monitor compliance, and impose penalties for non-compliance. Compulsory Insurance plays a significant role in Social Security mechanism. The nature and scope of these compulsory insurance vary from country to country but generally speaking, it includes compulsory life insurance, compulsory health insurance, compulsory disability insurance and compulsory unemployment insurance.

c. Components of Social Security Insurance

01 Compulsory Health Insurance

Health insurance schemes offer financial protection against the costs of medical care and treatment. They typically cover expenses related to hospitalization, outpatient services, prescription drugs, and preventive care, helping individuals access timely healthcare services without facing financial hardship. Social security programs may include provisions for financial assistance to individuals who suffer from injuries or disabilities that prevent them from working. These benefits help replace lost income, cover rehabilitation expenses, and support the individual's transition back into the workforce if possible. In some countries, disability insurance is either part of health insurance and in some countries, it is considered as a separate entity and form of insurance.

02 Compulsory Unemployment Insurance

Unemployment insurance is a vital component of the social security mechanism, providing financial support to individuals who find themselves temporarily out of work through no fault of their own. This safety net offers a lifeline to workers facing job loss, enabling them to cover essential expenses while actively seeking new employment opportunities. Moreover, unemployment insurance fosters social stability by safeguarding individuals and families against the adverse effects of joblessness, promoting resilience and economic security within communities.

03 Life Insurance

Life insurance provides financial security to dependents in the event of the policyholder's death. By ensuring a steady income or a lump-sum payment, it helps families maintain their standard of living, covers immediate expenses such as funerals, and mitigates the long-term financial impact of losing a breadwinner. It is a crucial element of social security in supporting the economic well-being of survivors.

04 **Disaster Insurance**

Disaster insurance protects individuals and communities from the economic devastation caused by natural and man-made disasters. By covering financial losses and facilitating recovery efforts, it helps populations rebuild their lives, reduces long-term poverty, and fosters resilience. When integrated into the social security system, disaster insurance ensures that vulnerable groups are not left destitute after calamities, aligning with the goals of sustainable development and risk mitigation.

05 **Income Protection Insurance**

Income protection insurance ensures a continuous income stream for individuals unable to work due to illness or injury. It fills the gap left by traditional disability benefits, helping policyholders meet living expenses and maintain financial stability. As part of the social security framework, it provides a safety net for permanent work incapacitation.

II. REVIEW OF INTERNATIONAL JURISDICTIONS:

For the purpose of this study, a jurisdictional analysis was conducted to examine how other countries have utilized insurance to serve as an effective social security mechanism. The countries included in this analysis are Thailand, UAE, Indonesia, and China. This analysis highlights various insurance schemes, programs, and coverage models, with a particular focus on mandatory mechanisms designed to enhance social security. These schemes are financed through different structures: some are fully employer-sponsored, while others rely on shared contributions between employers and employees, employers and governments, or governments and citizens.

1. Social Security Framework in Thailand:

Thailand has established Social Security Office (SSO) under Ministry of Labour to implement the Social Security Act 1990. Social Security Act provides basis and framework for development of comprehensive social security system in Thailand. Under the act, Section 39 dictates the compulsory insurance for every employer with one or more employees in the age bracket of 15-60 years to register the employee(s) with SSO.

The insured persons will receive 7 benefits including:

- i. Sickness Benefits
- ii. Maternity Benefits
- iii. Invalidity Benefits (Disability and Long-term illness)
- iv. Death/ Funeral Benefits
- v. Old-age Pension
- vi. Child allowance
- vii. Unemployment Insurance

2. Social Security in China:

In China, there are multiple laws and schemes for provision of social security however, the primary law is The Social Insurance Law of the People's Republic of China, which was introduced in 2010 and came into effect as of July 1, 2011 ((CLB), 2021). Under the law, each employer and individual within the boundary of the People's Republic of China shall, make social insurance contributions, and have the right to access the related contribution records and individual social insurance benefit. Each individual shall be entitled to social insurance benefits according to law, and have the right to exercise oversight over contributions made by the employer on his or her behalf (PRC, 2025).

Under the law, the primary five benefits offered to employees are:

- i. Basic Old-age Insurance
- ii. Basic Medical Insurance
- iii. Work Injury Insurance
- iv. Unemployment Insurance
- v. Maternity insurance

3. Social Security in UAE

Although UAE as a whole does not have a centralized social security system or law like China and Thailand but it is mandatory by law for employers in Abu Dhabi and Dubai to provide all workers with at least a basic level of health insurance under the Essential Benefits Plan for anyone earning less than Dh4,000 (\$1,089) a month. Similarly, UAE Under Federal Law No. 13 of 2022 has introduced Unemployment Insurance, for employees working in the public and private sectors of UAE. In simple words, UAE has two compulsory insurances:

- i. Health insurance
- ii. Unemployment insurance

4. Social Security in Indonesia

In 1992, the Social Insurance Scheme (Jamsostek) was set up for employees of private companies with more than ten employees and paying salaries greater than 1 million Indonesian Rupiah (IDR) (approximately US\$71) per month per employee. Under this scheme, the benefits offered are:

- i. Health insurance
- ii. Accident insurance
- iii. Old-age benefits
- iv. Pension Benefits
- v. Life Insurance

For health insurance, in 2014, National Social Health Insurance Scheme (JKN) was established which consolidated all previous health insurance schemes. JKN is administered by Badan Penyelenggara Jaminan Sosial Kesehatan (BPJS) Kesehatan. Under this scheme, for salaried workers, 4 per cent of their monthly payroll is paid by the employer and 1 per cent by themselves. Under Government Regulation 37 of 2021 (GR 37/2021), the government has introduced a new unemployment benefit program Job Loss Security Program (JLS). Employers will contribute 0.46 percent of their monthly wages to the JLS program, in which 0.22 percent is contributed by the government and the remaining 0.24 percent from the employer.

The following benefits are offered to employees under multiple insurance programs:

- i. Health insurance
- ii. Accident insurance
- iii. Old-age benefits
- iv. Pension Benefits
- v. Life Insurance
- vi. Unemployment insurance

5. Social Security in India

The Employees' State Insurance Scheme (ESIS) is a social security initiative established under the Employees' State Insurance Act of 1948. This scheme aims to safeguard employees from the financial burdens associated with sickness, maternity, disability, and employment-related fatalities. The ESI scheme is applicable to all factories and other establishments as defined in the ESI Act with 10 or more persons (20 or more in some states) employed in such establishments (shops, restaurants, hotels, cinema theatres, educational institutions and medical institutions, newspaper establishments etc). It also applies to the following establishments under the Central Government employing 20 or more persons engaged in, insurance business, non-banking financial companies (NBFCs), airport authorities, port trusts and warehousing establishments. This scheme provides financial coverage for the workers and their dependents' medical and maternity needs (Acharya, 2025).

The scheme provides following benefits:

- i. Medical Benefits/ Health Insurance
- ii. Income Protection/ Cash Benefits for Sickness
- iii. Maternity Benefit
- iv. Disability Benefits
- v. Life Insurance/ Dependent's Benefit

Both employer and employee contribute towards the ESI. The rates were revised in 2019 and new contributory rate is 0.75% for employee and 3.3.25% for employer (Health, 2025).

India has introduced several voluntary, standardized insurance schemes at both federal and state levels to enhance social security for the general public. These schemes are not mandatory for employers or employees but offer affordable, accessible coverage for those who choose to participate. The details of these schemes are provided below:

01 Pradhan Mantri Jeevan Jyoti Bima Yojana (PMJJBY)

It offers a one-year cover term life insurance, which is renewable from year to year, offering life insurance cover for death due to any cause including natural and accidental death. The scheme is administered by collaboration of various banks and life insurance companies.

Benefits and Premium Payable:

Rs.2 lakh is payable on a subscriber's death due to any cause.

The premium payable is Rs.436/- per annum per subscriber.

Eligibility:

All individual (single or joint) account holders of participating banks / Post office, in the age group of 18 to 50 years are entitled to join.

02 Pradhan Mantri Suraksha Bima Yojana (PMSBY)

The scheme is a one year cover Personal Accident Insurance Scheme, renewable from year to year, offering protection against death or disability due to accident. The scheme is administered through the Public Sector General Insurance Companies (PSGICs) and other general insurance companies in collaboration with participating Banks.

Benefits and Premium Payable:

• The benefits payable under the scheme on death or disability due to accident are as follows:

Rs. 2 Lakh
Sum Insured

Death

Rs. 2 Lakh
Sum Insured

Total and irrecoverable loss of both eyes or loss of use of both hands or feet or loss of sight of one eye loss of use of one hand or foot

Rs. 1 Lakh
Sum Insured

Total and irrecoverable loss of sight of one eye or

• Premium payable is Rs.20/- per annum per member.

03 Aam Aadmi Bima Yojana (AABY)

This scheme provides life and disability insurance to rural landless households particularly to the individuals aged 18–59 years. It offers coverage for natural death, accidental death, and disability. The scheme offers subsidy by the government on the premiums (ACKO, 2025). The scheme provides an array of occupations belonging to the 'Below Poverty Line (BPL) family'. The benefits offered are mentioned below:

Rs.30,000/

Death from
natural causes

Rs.75,000/

Accidental
death

Rs.37,500/

Partial disability

Rs.75,000/

Permanent total
disability

04 Atal Pension Yojana (APY)

- The APY scheme was launched on May 9, 2015 for any Indian citizen with a savings bank account and aged between 18 and 40 years can join APY.
- However, from October 1, 2022, any citizen who is or has been an income tax payer (as per the Income Tax Act, 1961) is no longer eligible to open a new APY account. However, existing subscribers who were not income tax payers at the time of joining, or who became income tax payers after joining, can continue to contribute and benefit from the scheme.
- APY offers a guaranteed minimum pension of Rs. 1,000 to Rs. 5,000 per month at the age of 60, depending on the contributions made by the subscribers.
- The Government of India co-contributed 50% of the subscriber's contribution or Rs. 1,000 per annum, whichever is lower, to eligible subscriber accounts for a period of 5 years (2015–2019). Subscribers can withdraw their pension at age 60 or in case of death of the subscriber, the spouse receives the pension.

05 Rashtriya Swasthya Bima Yojana (RSBY)

This scheme provides health insurance coverage for Below Poverty Line (BPL) families.

Eligibility

- Unorganized sector workers belonging to BPL category and their family members (a family unit of five) are the beneficiaries under the scheme.
- It is the responsibility of the implementing agencies to verify the eligibility of the unorganized sector workers and his family members who are proposed to be benefited under the scheme.
- The beneficiaries are issued smart cards for the purpose of identification.

Benefits

The beneficiary is eligible for such in - patient health care insurance benefits as designed by the respective State Governments based on the requirement of the people/ geographical area. However, the following minimum benefits in the package / scheme are:

- The unorganized sector worker and his family (unit of five) to be covered.
- Total sum insured to be Rs. 30,000/- per family per annum on a family floater basis.
- Cashless attendance to all covered ailments
- Hospitalization expenses, taking care of most common illnesses with as few exclusions as possible
- All pre-existing diseases to be covered
- Transportation costs (actual with maximum limit of Rs. 100 per visit) within an overall limit of Rs. 1000 (NPOI, 2025).

Funding Pattern

- Contribution by Government of India: 75% of the estimated annual premium of Rs. 750, subject to a maximum of Rs. 565 per family per annum. The cost of smart card to be borne by the Central Government.
- Contribution by respective State Governments: 25% of the annual premium, as well as any additional premium.
- The beneficiary to pay Rs. 30 per annum as registration/renewal fee.
- The administrative and other related cost of administering the scheme to be borne by the respective State Governments.

06 Ayushman Bharat - Pradhan Mantri Jan Arogya Yojana (PMJAY)

It offers health insurance coverage of up to ₹5 lakh per family annually for secondary and tertiary healthcare services. Beneficiaries are identified based on the Socio-Economic Caste Census (SECC) data, focusing on the poorest sections of society to access quality medical care.







Only poor and vulnerable families identified through the Socio-Economic Caste Census (SECC) are eligible for this scheme.

This is a centrally sponsored scheme implemented across all states and Union Territories, although the specific execution is carried out in collaboration with state governments.

07 Varishtha Pension Bima Yojana (VPBY)

This scheme is managed by the Life Insurance Corporation (LIC) of India and it offers a guaranteed pension with an annual return of 8% for a tenure of 10 years. Senior citizens can invest a lump sum to receive monthly, quarterly, half-yearly, or annual pension payouts.

A comparative table of the mandatory insurance schemes in above discussed jurisdictions is given below:

| Country | Coverage under Mandatory Insurance Schemes | | | | | | |
|---|--|--------------------------------------|-------------------------------|-------------------------------------|-----------------------|-------------------|---|
| Thailand  | Injury and sickness benefits | Maternity benefits Child Benefits | Disability benefits | Death benefits | | Old-age Benefits | Unemployment Benefits |
| China  | Medical Insurance | Maternity Insurance | Work-related Injury Insurance | | | Pension Insurance | Unemployment Insurance |
| UAE  | Health Insurance | | | | | | Unemployment Insurance |
| Indonesia  | Health Care Program | | Pension Benefits | Life Insurance | Accident Compensation | Old Age Benefits | Unemployment Benefit/ Job Loss security program |
| India  | Medical Benefits | Maternity Benefit | Disability Benefits | Life Insurance/ Dependent's Benefit | | | Income Protection/ Cash Benefits for Sickness |
| Pakistan  | | | Disability | Life Insurance | Accident Compensation | | |

III. CURRENT LANDSCAPE OF SOCIAL SECURITY SCHEMES / PROGRAMS IN PAKISTAN

Provision of Social Security by Compulsory Social Insurance under Constitution of Pakistan:

Article 38 of the constitution of Pakistan under chapter-2 Principles of Policy state that it is responsibility of state to promote social and economic well-being of the people and provide for all persons employed in the service of Pakistan or otherwise, social security by compulsory social insurance or other means.

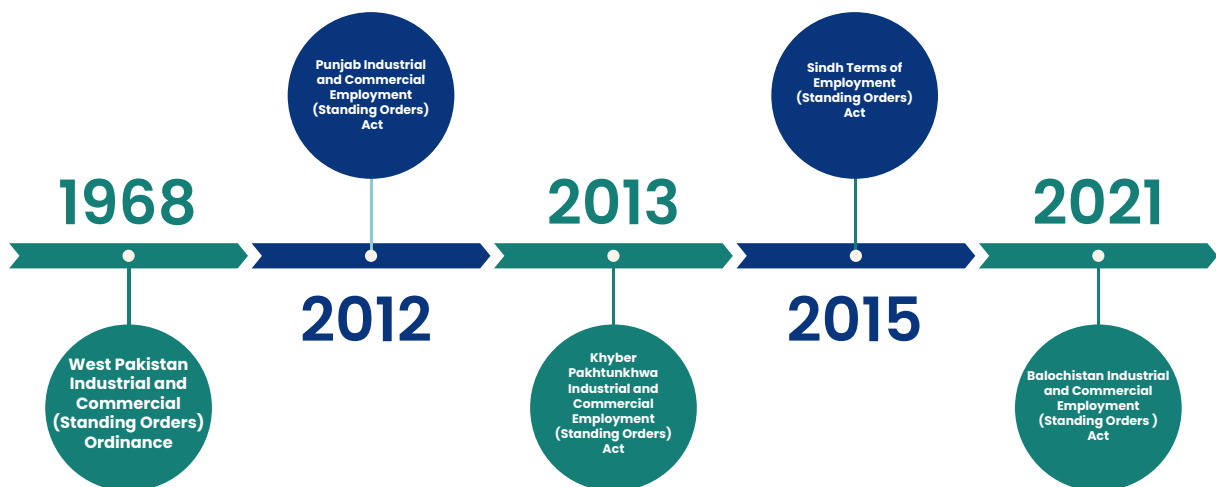
Implementing a robust social security system through insurance is essential to fulfilling this mandate, as it offers a sustainable solution to safeguard livelihoods, support vulnerable populations, and promote economic stability across the nation.

1. Social Security under the Labor Laws in Pakistan:

a. Compulsory Group Life Insurance under West Pakistan Industrial and Commercial Employment (Standing Order) Ordinance 1968:

The Primary law mandating group life insurance is West Pakistan Industrial and Commercial Employment (Standing Order) Ordinance 1968. The Section 10(B) of the West Pakistan Industrial and Commercial Employment (Standing Order) Ordinance 1968 state that provision of group insurance is mandatory for the employers in respect of their workmen, provided that the minimum number of employees in an industrial establishment is 50 and that of in a commercial establishment is 20.

Under the 18th amendment, subject of labor has been delegated as provincial matter. As a result, provinces have adopted the West Pakistan Industrial and Commercial Employment (Standing Order) Ordinance 1968 with amendments. An overview of this is as follows:



The amount of compensation payable has been defined under the provincial Workers Compensation Act. The details of which are as follows:

| | Punjab Workers' Compensation Act, 2013 | Khyber Pakhtunkhwa Workers' Compensation, Act 2013 | Sindh Workers' Compensation Act, 2015. | Balochistan Workers' Compensation Act, 2022 |
|----------------------|--|--|--|---|
| Life | Rs.400,000/- | Rs.300,000/- | Rs.500,000/- | Rs.500,000/- |
| Permanent Disability | Rs.400,000/- | Rs.300,000/- | Rs.500,000/- | Rs. 500,000/- |





Under the law, employers are mandated to ensure that all permanent employees are insured against risks such as natural death, disability, and injuries not encompassed by the Workmen's Compensation Act, 1923, or the Provincial Employees Social Security Ordinance, 1965. This statutory requirement underscores the employer's obligation to safeguard workers' financial security through compulsory insurance arrangements.

Data was collected on group life insurance provided by insurance companies under the 1968 Ordinance, along with group health and group accident insurance. The compiled data is presented as follows:

Current Status of Group Life Insurance:

The following table reflects the insurance coverage under the mandatory group life insurance under the West Pakistan Industrial and Commercial Employment (Standing Orders) Ordinance, 1968.





Group Life Insurance

| |  Number of Policies |  Number of Lives Insured |  Gross Annual Premium (Rs. In million) |  Claims paid (Rs. In million) |
|------|--|---|---|--|
| 2023 | 7,043 | 9,503,000 | 20,535 | 12,012 |
| 2022 | 6,506 | 8,550,483 | 18,347 | 12,378 |

Current Status of Group Health Insurance:





Data was also sought on group health insurance purchased by employers for their employees. The current status of group health insurance is shown in table below

Group Health Insurance

| |  Number of Policies |  Number of Lives Insured |  Gross Annual Premium (Rs. In million) |  Claims paid (Rs. In million) |
|------|--|---|---|--|
| 2023 | 6,761 | 4,247,547 | 28,615 | 24,869 |
| 2022 | 6,359 | 3,891,824 | 24,489 | 20,987 |

Current Status of Group Accident Insurance:

Information was also collected regarding group accident insurance provided by employers for their employees. The current state of group accident insurance is presented in the table below.

| Group Health Insurance | | | | | |
|--|---|---|--|------|------------|
|  Number of Policies |  Number of Lives Insured |  Gross Annual Premium (Rs. In million) |  Claims paid (Rs. In million) | | |
| 2023 | 1,724 | 2023 | 313 | 2023 | 98 |
| 2022 | 1,621 | 2022 | 338 | 2022 | 121 |

b. Employees Benevolent Fund and Group Insurance Act, 1969

This act established a Benevolent Fund for the common benefit of the employees of the Federal Government and certain autonomous bodies and to provide for their group insurance. This act covers individuals serving in various capacities within the federal structure of Pakistan, including members of All-Pakistan services, civil services of the Federation, and those holding civil posts related to federal affairs. It also includes secretarial staff of the National Assembly and Senate governed, officers and servants of the Supreme Court, and employees linked to the Chief Election Commissioner or Election Commission. Additionally, it covers officers or staff of specified autonomous bodies or organizations as notified by the Federal Government, and includes those on deputation, foreign service, study or training (within or outside Pakistan), or on leave.

Section 15 of the Act mandates the provision of a prescribed sum to the family of a deceased employee who dies during the course of employment, regardless of the cause of death. This provision acts as a fundamental safety net for the dependents of the deceased.

According to the Federal Employees Benevolent Fund and Group Insurance Act of 1969, employees of the federal government are mandated to make contributions, deducted at source from the employee's monthly income, to the benevolent fund and group life insurance, and are entitled to receive such benefits as mentioned below.

Benevolent Fund for Federal Government Employees:

Employees contribute roughly 2.4 percent of their monthly basic pay to the Benevolent fund. Following are the benefits offered to employees:

- Monthly Benevolent Grant: Covers death during service, retirement due to medical grounds, Death during retirement.
- Marriage Grant: Rs. 50,000 paid on marriage of one child of serving, retired or deceased employee.
- Burial Charges: Rs. 10,000 paid to families of employees who dies during service or after retirement.
- Farewell Grant: One month's pay paid on retirement of an employee after 20 years of service.
- Lump Sum Grant: Paid to employees on invalid retirement with 80% disability declared by Central Medical Board.
- Educational Stipends: For post matric studies excluding PhD for maximum two children of the employee.
- Reimbursement of Semester/Annual Fee: Reimbursed for children of serving, retired or deceased
- Government Employees studying in Public Sector Universities.

Group Insurance For Federal Government Employees:

| Group Insurance | | |
|-----------------|------------------------------|-------------|
| Monthly Pay | Rate of Monthly Contribution | Sum Assured |
| Upto 5,000 | 381 | 350,000 |
| 5,001 – 10,000 | 436 | 400,000 |
| 10,001 – 15,000 | 490 | 450,000 |
| 15,001 – 20,000 | 545 | 500,000 |
| 20,001 – 25,000 | 600 | 550,000 |
| 25,001 – 30,000 | 654 | 600,000 |
| 30,001 – 35,000 | 709 | 650,000 |
| 35,001 – 40,000 | 763 | 700,000 |
| 40,001 – 45,000 | 818 | 750,000 |
| 45,001 – 50,000 | 872 | 800,000 |
| 50,001 – 55,000 | 926 | 850,000 |
| 55,001 – 60,000 | 981 | 900,000 |
| 60,001 – 65,000 | 1,036 | 950,000 |
| 65,001 & above | 1,090 | 1,000,000 |

The above table mentions the rate of contribution employees must make, according to their monthly pay, to the Group Insurance Fund. In the event of an employee's death during service, the sum assured amount will be paid to the nominated family members of the employee.

c. Workers Welfare Fund

Workers Welfare Fund is a federally managed fund, under the administrative control of Ministry of Human Resource Development. It is an autonomous organization, run by a governing body with representation from all tripartite partners: government, employers and workers. The primary law for Workers Welfare Fund is Workers Welfare Fund Ordinance promulgated in 1971. The Ordinance is applicable to industrial establishments and other entities which are earning over Rs. 500,000 annually, and are mandated a 2% contribution of total assessable income under the Income Tax Ordinance 2001 to the Workers Welfare Fund.

Workers Welfare Boards operate in the provinces and these are established under the above-mentioned Ordinance for expanding the ambit of worker welfare activities under the Fund. The main functions of the Provincial Workers Welfare Boards are:

- Construction of residential colonies for the industrial labor
- Construction of schools for the children of industrial labor
- Construction of Dispensaries for industrial labor
- Construction of Drinking water supply schemes
- Provision of educational scholarships to workers' children
- Provision of Marriage Grant (Jahez Fund) of Rs. 100,000 for workers' daughters or female workers upon their own marriage, with no limit on the number of daughters eligible
- Provision of Death/Funeral Grant of Rs. 500,000 for the families of deceased workers.

2. Social Security Insurance under Health and Accident Schemes

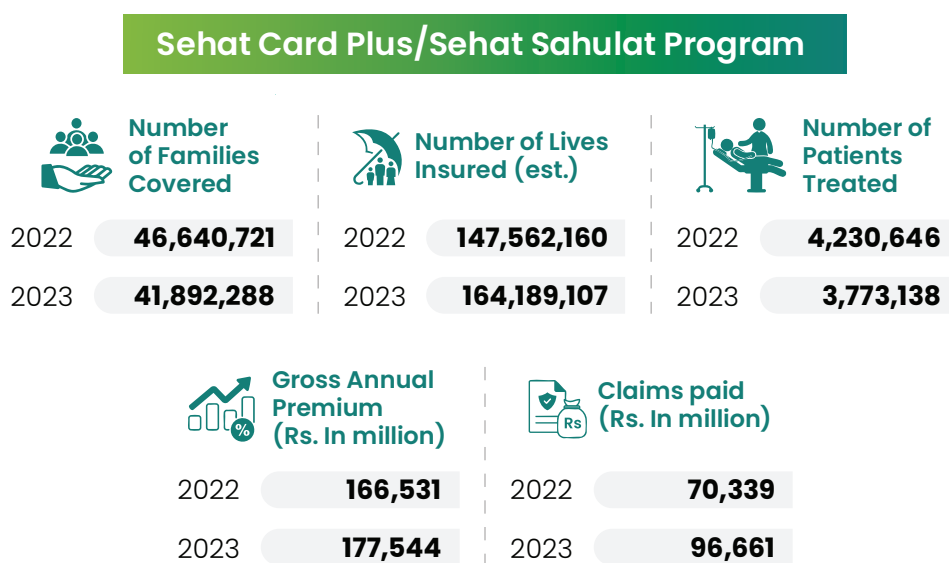
a. Prime Minister Health Program

Prime Minister Health Program (PMHP), also called Sehat Sahulat Program (SSP), is social health insurance initiative of the Federal Government of Pakistan in partnership with the provincial governments. SSP is a milestone initiative towards social welfare reforms; ensuring that the identified under-privileged citizens across the country get access to their entitled medical health care in a swift and dignified manner without any financial obligations. The SSP program's objective is to improve access of the poor population to good quality medical services, through a micro health insurance scheme. Furthermore, it also aims to improve the health status of the population, especially the poor, and to reduce poverty through a reduction in out-of-pocket (OOP) expenditure on health care. Currently, outpatient (OPD) services are not covered. Every provincial government is managing their Sehat Sahulat program under their own management structures. Sehat Sahulat Program is designed to provide Cashless Inpatient Services and comprehensive healthcare coverage for families in Sehat Sahulat Program.

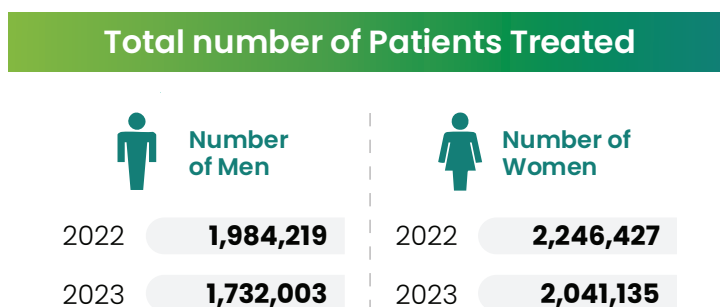
Some of the current forms of PMHP are:

- SCP** Sehat Card Plus
- SSP** Sehat Sahulat Program
- BHCP** Balochistan Health Card Program

Details of SCP/SSP/BHCP:



Patients treated under SCP/SSP/BHCP:



Geographical Data of SCP/SSP/BHCP:

| Areas | 2023 | | | | |
|--------------------|--------------------------------|-------------------------------|------------------------------|----------------------------|--------------------------------------|
| | Number of Lives covered (est.) | Gross Premium (Rs in million) | Claims paid (Rs. In million) | Number of patients treated | Percentage in terms of lives covered |
| Punjab | 109,307,310 | 135,853 | 68,241 | 2,899,377 | 67% |
| KPK | 38,614,625 | 30,207 | 23,439 | 1,098,068 | 24% |
| Balochistan | 8,117,659 | 1,160 | 128 | 12,871 | 5% |
| AJK | 5,032,563 | 6,255 | 3,248 | 139,858 | 3% |
| Sindh (Tharparkar) | 1,276,828 | 1,587 | 219 | 10,375 | 1% |
| Gilgit Baltistan | 944,154 | 1,369 | 752 | 44,618 | 1% |
| ICT | 895,969 | 1,114 | 634 | 25,479 | 1% |
| Total | 164,189,107 | 177,544 | 96,661 | 4,230,646 | 100% |

b. Benazir Income Support Program (BISP)

The Benazir Income Support Programme (BISP) was launched in July 2008 by the Government of Pakistan as a flagship social safety net initiative aimed at addressing poverty and supporting vulnerable households. It was introduced in response to the global financial crisis, rising food and fuel prices, and the economic challenges faced by low-income families. Named after the late Prime Minister Benazir Bhutto, BISP initially began as an unconditional cash transfer (UCT) program to provide basic income support to the poorest families. Over time, it has evolved into a comprehensive social protection system, incorporating conditional cash transfers (CCTs) for education and health, such as the Benazir Taleemi Wazaif and Nashonuma programs. The governing law of BISP is the Benazir Income Support Programme Act, 2010. Followings are the programs covered under BISP.

01 Annual Budget Allocation

Total Budget: PKR 471 billion (2023-24).

- Benazir Kafaalat: PKR 361.5 billion
- Benazir Nashonuma: PKR 32.27 billion
- Benazir Taleemi Wazaif: PKR 55.4 billion.
- Undergraduate Scholarships: PKR 6 billion

02 Poverty Alleviation (Kafaalat)

Kafaalat provides basic income support to meet essential needs of the poor people. It includes unconditional Cash Transfers (UCTs) which covers millions of families every year. Beneficiaries are determined through the Proxy Means Test (PMT) through the National Socio-Economic Registry survey. The welfare status of households is determined on a scale from 0-100. Households obtaining a score of 32 or lower are considered eligible for the program. In fiscal year 2023-2024, approximately 9.3 million families were provided cash transfers.

The quarterly stipend of PKR 8,750 under the program has increased to PKR 13,500 in January 2025.

03 Education (Benazir Taleemi Wazaif)

It included conditional cash transfer for increasing school enrolment, attendance, and reducing dropouts. Children of Active BISP Kafaalat beneficiary are eligible for this program. It covers primary, secondary, and higher secondary education

Eligibility:

- 4-12 (for enrollment in Primary education)
- 8-18 (for enrollment in Secondary education)
- 13-22 (for enrollment in Higher education)

Conditions:

- Admission in a school/Collee.

70 percent quarterly attendance within quarter.

Children Enrolled: Increased from 2.6 million (2022) to 7.52 million (2023).

Quarterly Stipends: Provided to incentivize school attendance, amounts vary by education level.

The payment schedule is as follows:

- Primary (per quarter): 2000 (per Boy), 2500 (per Girl)
 - Secondary (per quarter): 3000 (per Boy), 3500 (per Girl)
 - Higher (per quarter): 4000 (per Boy), 4500 (Per Girl)
- One-time graduation bonus for girls (Rs. 3000)

04 Health (Benazir Nashonuma)

It provides aid to pregnant and lactating women (PLW) and children under 24 months to improve nutrition and health outcomes. Active BISP Kafaalat beneficiaries are eligible for this program.

Beneficiaries: 770,000 mothers and children (2023), expanding to additional 500,000 families.

The payment schedule is as follows:

- Rs. 2000 per quarter per PLW (Boy Child, Age < 2years)
- Rs. 2500 per quarter per PLW (Girl Child, Age < 2 years)

05 Social Safety Nets via Emergency Cash Transfers

This kind of assistance programs are event-specific and provides one-time cash transfers during disasters like floods and pandemics. They are focused on response to socio-economic needs, including inflation and climate-related risks.

For instance, in response to the floods in 2022, PKR 70 billion were disbursed to 2.8 million households across country (PKR 25,000 per family). Vulnerable households were selected by using pre-existing socio-economic data and real-time assessments.

06 BISP Undergraduate Scholarship Programme

This program is focused on promotion of higher education. It is different from Benazir Taleemi Wazaif as it focuses on university students. The requirements are:



- Admission secured on merit.
- HEC recognized public sector universities only.
- Age limit as per Higher Education Institute (HEI).
- Degree programs allowed by HEC.
- Subsequent transfers are subject to minimum academic performance criteria set by HEI.
- Household income of the student must be less than or equal to Rs. 45,000 per month.

The benefit offered is payment of Tuition Fee + Rs. 40,000 per annum.

So far, Benazir Income Support Program has not included insurance as a tool for financial assistance to low-income households.

c. Sindh Universal Accident Insurance Scheme

Government of Sindh introduced universal accident insurance scheme in October 2016. This scheme offers sum cover of Rs. 100,000/- in case of accidental death to all 18 years and above residents of Sindh. The product offers benefits to the citizens whose centralized national identity card (CNIC) shows their present address to be in Sindh (irrespective of their domicile) and their accidental death occurred within the geographical boundaries of Province of Sindh. The list of accidents include terrorism, burning, target killing, electric shock, bomb blast, stampede, firing, flood, building collapse, fall from roof, riot and civil commotion, drowning, industrial accident, road/train/air accident, murder, snake bite, toxication, wild animal attack, hurricane and poisonous gas.

| | | | | | |
|---|------|-------|--|------|-------------|
|  Number of Claims | 2024 | 2,534 |  Claims Paid | 2024 | 253,400,000 |
| | 2023 | 2,017 | | 2023 | 201,700,000 |
| | 2022 | 1,259 | | 2022 | 125,900,000 |

3. Retirement Schemes for Employees in Private Sector:

a. Gratuity and Provident Fund under the Labor Laws:

i. Gratuity

Section 12 titled "Termination of Employees" of the West Pakistan Industrial and Commercial Employment (Standing Orders) Ordinance, 1968 states the following:

When a worker resigns or is terminated for any reason other than misconduct, they are entitled to gratuity. The amount will be 30 days wages multiplied to each completed year of service, and any service beyond six months is counted as a full year.

However, if the employer has set-up a provident fund for the employee where both the employer and employee has been making the contribution, then no gratuity will be paid.

In Punjab, Sindh and Islamabad Capital Territory (ICT) the threshold is set at least 20 workers for an organisation to be required to pay gratuity to its employees. In case of industrial establishments an additional condition applies which states that at least 50 employees should have been employed by the employer on any given day within the last 12 months. Similarly, in Balochistan and Khyber Pakhtunkhwa (KPK) the obligation to pay gratuity only applies to employers employing at least 20 workers. Again, in case of industrial establishments an additional condition applies which states that at least 21 employees should have been employed by the employer.

ii. Provident Fund

In Pakistan, employers can offer provident funds as a substitute for gratuity. Unlike the lump sum gratuity, a provident fund is an investment vehicle with contributions from both employee and employer. To qualify as a substitute, the employer must match the employee's contribution. However, there is no requirement of minimum contribution.

b. Employees' Old-age Benefits Institution (EOBI)

EOB Act 1976 was established with effect from April 01, 1976, to achieve the objective of Article 38 (C) of the Constitution, by providing for compulsory social insurance. It extends benefits of old-Age Pension, Survivor's Pension, Invalidity Pension and Old-Age Grant to insured persons or their survivors. EOBI is an autonomous Institution works under the control of Ministry of Overseas Pakistanis and Human Resource Development, Government of Pakistan. This Act is applicable to the private sector only while Government has created special systems for public-sector employees.

The main functions of EOBI are as follows:

- a. Identification & registration of establishments and industries.
- b. Identification & registration of insured persons
- c. Collection of contribution on the basis of minimum wages which is at 6%
- d. EOB fund management
- e. Provision of benefits as per laws

Every establishment having ten or more employees is mandatory to be registered with EOBI. Contribution shall be payable every month by the employer to the Institution in respect of every person in his insurable employment, at the rate of six percent of minimum wages as notified by the Federal Government i.e. five percent to be contribution by the employer and one percent to be deducted from the employees' salaries. OBI pension has increased from Rs. 8,500 to Rs. 10,000 for all minimum wages since January 2024. The pension for the month of January 2024 is now transacted to the bank accounts of pension holders.

c. Voluntary Pension Scheme (VPS)

The Securities and Exchange Commission of Pakistan (SECP) launched the Voluntary Pension System (VPS) in 2007. The legal framework for voluntary pension schemes was developed under VPS Rules, 2005. Under the VPS, all Pakistani nationals over the age of 18 years (salaried or self-employed) who have a valid National Tax Number (NTN) are eligible to participate in it. Total number of fund managers registered with SECP is 16, however, as of right now, only 13 are active and offering VPS.

A VPS is contributory pension scheme offered to employees of private sector. It is similar to a provident fund to the extent that both the employee and the employer contribute to the VPS. However, unlike provident funds a VPS does not need to be registered, owned or managed by the employer directly. Rather both the employee and the employer can make contributions to a VPS fund managed by asset management companies which makes VPS a much more cost-effective option for employers.

Asset allocation in VPS can be selected. Secondly, compared to a provident fund where all the employees invest in a single portfolio, VPS gives employees option for asset allocation. Hence, VPS gives employees the option to choose portfolios which better match their risk appetite and financial goals.

As per the Non-banking Financial Institutions sector summary report for 2024, number of active investor accounts on December 31, 2024 for voluntary pension schemes were 96,284. The total assets of Conventional and Shariah-compliant pension funds are 95.52 billion PKR.

d. Contributory Pension Scheme for Civil Employees:

Federal Government:

As per Finance Division, the federal government has decided to introduce Contributory Pension Fund Scheme for all the civil employees of federal government, including civilians paid from defence estimates who are appointed on regular basis on or after July 1, 2024.

This scheme would also be applicable to the personnel of Armed Forces appointed on regular basis on or after July 1, 2025.

The rate of contribution from the employees and the federal government is as under:

- Contribution at the rate of 10% of basic pay by employees
- contribution at the rate of 20% of basic pay of employees by federal government.

This rate of contribution is purely provisional at this stage and subject to changes later on (MoF, 2024).

Government of Khyber Pakhtunkhwa:

Similarly, the KPK government has successfully transitioned from traditional defined-benefit pensions to a Voluntary Pension System (VPS) for its civil servants. The new pension system has been launched for those employees who have joined the government service in the province on or after June 7, 2022. Under the KP Contributory Provident Fund Rules, 2022, both the employer and employee will contribute to the pension fund at the ratio of 1.2:1 in which the employer will contribute 12 per cent to the pensionable pay to the account and the employee 10 per cent. However, the employee can pay more than the fixed amount. The rules declare that the employers' contribution to the contributory pension fund will be in addition to the salary otherwise payable to the employee. Besides, the employee contribution will also be deducted at the source by the employer at the time of payment of salary.

The total number of KPK funds are 21. The Asset under Management (AUM) of the KPK pension fund is 2.16 billion PKR and number of participants are 18,406 as of Feb 28, 2025.

IV. IDENTIFICATION OF GAPS AND POSSIBILITY OF EXPANSION OF SOCIAL SECURITY PROVISION

a. Potential of Insurance as a tool of Social Security is not Fully Explored

Insurance as a critical element of social security remains absent from social protection initiative in Pakistan. Most mechanisms rely on direct payouts from government funds or dedicated social security reserves, focusing on immediate financial relief rather than sustainable, risk-sharing solutions. This approach places immense pressure on public finances, especially during crises like health emergencies or natural disasters, and limits the scope of these programs to address long-term vulnerabilities.

b. Limited Scope of Insurance under Existing Labor Laws (Industrial and Commercial Employment (Standing Orders) Ordinance, 1968)

- i. **Limited Coverage:** Existing laws provide insurance coverage exclusively for regular employees, leaving contractual and temporary workers without any protection. This gap exposes a considerable portion of the workforce to financial vulnerabilities, as they lack access to essential benefits like life insurance.
- ii. **Inadequate sum covers:** The sum covers specified for the workers in various statutes is not adequate due to ongoing inflation. As of right now, the sum cover ranges between Rs. 300,000/ in Khyber pakhtunkhawa to Rs.500,000/ in Sindh and Balochistan but with inflation this amount is not sufficient to help beneficiaries.
- iii. **Exclusion of Small Organizations Due to Employee Thresholds in Legal Requirements:** Current legal requirements mandate insurance coverage only for commercial entities with at least 20 employees and industrial entities with 50 or more employees. This leaves small organizations, which either have fewer employees or do not fall under the defined categories of commercial or industrial entities, without mandatory insurance coverage. As a result, a significant segment of the workforce employed in small businesses remains unprotected.

c. Potential for Insurance Integration in Benazir Income Support Program (BISP)

While the **Benazir Income Support Program (BISP)** is the largest social protection initiative in Pakistan, providing essential cash transfers to vulnerable households, insurance has not yet been explored as a potential tool to enhance its impact. Currently, BISP focuses on direct financial assistance, but unforeseen events such as health emergencies, natural disasters, or the loss of a breadwinner can still leave beneficiaries financially vulnerable. Integrating health, life, and disaster insurance within BISP could offer a sustainable way to strengthen social security, providing long-term financial resilience.

d. Lack of an Effective Mechanism for Enforcing Mandatory Insurance

As discussed in the previous section, compulsory group life insurance exists under the West Pakistan Industrial and Commercial Employment Ordinance, 1968. However, no enforcement mechanism has yet been developed to implement this law. Although some data is available on registered entities, there is no corresponding dataset for unregistered employers in Pakistan and the employees working with such employers; consequently, enforcement of this mandatory requirement remains inadequate. While many entities register with the Employees' Old-Age Benefits Institution (EOBI) requirements, there is a notable lack of adherence to group life insurance mandates. Out of 222,144 companies registered with SECP, over 153,114 are registered with EOBI while only 11,372 are buying compulsory group insurance. This gap leads to inconsistent compliance, leaving many employees without the intended financial protection.

e. Absence of Data-Sharing for Monitoring and Enforcement

Pakistan currently lacks a well-structured data-sharing mechanism that enables seamless coordination between regulatory bodies, labor departments, and insurance providers. The absence of linked datasets on registered companies, workforce size, and compliance with mandatory group life insurance requirements creates challenges in tracking enforcement. Without robust data-sharing linkages, labor department's face difficulties in verifying compliance in real time, leading to inconsistencies in enforcement and leaving employees vulnerable to financial insecurity.

f. Dearth of Standardized Products

The lack of standardized products for health life and accident insurance creates significant challenges for potential policyholders. Without uniform guidelines on coverage, benefits, and pricing structures, insurers design products with varying terms and conditions, leading to inconsistencies in protection levels.

g. Absence of National Level Scheme for Employees in Informal Sector

The informal sector, which constitutes a significant portion of Pakistan's workforce, remains largely excluded from social security frameworks due to the absence of any legal requirement mandating employee insurance. Without such regulations, informal sector workers are deprived of critical protections, including health insurance, group life insurance, and unemployment benefits. This gap not only exacerbates financial vulnerability for millions of workers but also hinders the broader goal of achieving financial inclusion.

WAYFORWARD

1. Strengthening Social Security Through Policy Reforms and Insurance Integration

The integration of insurance into social protection programs, poverty alleviation programs, disaster mitigation strategies and overall national social security is the way forward for strengthening social security in the country. It can serve as a powerful catalyst, transforming the current system from reliance on government pay-outs to a comprehensive, risk-sharing framework. This requires aligning existing policies with modern socio-economic realities and addressing gaps in areas such as disaster insurance, disability and accident insurance which remains largely neglected. The way forward begins with revising the policies of cash pay-outs at occurrence of financial distressing events to comprehensive insurance schemes with a proactive approach.

2. Improving the Scope of Existing Labor Laws

i. Amendments in Industrial and Commercial Employment (Standing Orders) Ordinance, 1968:

Following amendments are essential for enhancing the scope of social security provided to employees under the existing labor laws:

- **Extend Coverage to Contractual and Temporary Workers:** Enhance the scope of applicability of compulsory group insurance under The Sindh Terms of Employment (Standing Orders) Act, 2015 by including contractual and temporary workers.
- **Increase in Sum Cover:** Increase the minimum sum cover and linking it with the minimum wages so that the value of the minimum sum cover is automatically increased with the revision in minimum wages.
- **Revise Employee Thresholds for Insurance Mandates:** Current regulations require insurance coverage only for commercial entities with 20 or more employees and industrial entities with 50 or more employees, leaving small businesses and non-categorized organizations without mandatory coverage. To ensure broader inclusion, these thresholds should be revised.
- The proposed amendment in the relevant portion of Schedule IV of the Workmen's Compensation Act, 1923 as adopted by the difference provinces is as follows:

| AMOUNT OF COMPENSATION FOR | |
|---|---|
| DEATH | PERMANENT TOTAL DISABLEMENT |
| Higher of Rs. 720,000 or 60 times the minimum wage notified by the Provincial Government. | Higher of Rs. 720,000 or 60 times the minimum wage notified by the Provincial Government. |

ii. Proposal for Health Insurance under Labor Laws (Industrial & Commercial Employment Standing Order Ordinance, 1968):

Compulsory occupational health insurance is aimed to provide the minimum health insurance benefits to the employees of all commercial and industrial establishments to whom the West Pakistan Industrial & Commercial Employment Standing Order Ordinance, 1968 or their provincial counterparts are applicable.

The scheme is proposed to cover the group of individuals and their dependents (employees of an industrial or commercial establishment) who are full time workers and includes permanent, contractual, and temporary employees. The hospitalization benefit to each employee and their dependents is proposed to be provided on cashless basis for network hospitals and on reimbursement basis in case of out of network hospitals. The minimum coverage amount is higher of 28 times minimum monthly wage or Rs.500,000/- per annum. The coverage has been linked to the minimum monthly wage as prescribed by the federal or provincial government so that the limit gets revised every year when the minimum monthly wage is revised and the impact of inflation could be accounted for. The linking to minimum monthly wage is preferable because the flat amount limit goes obsolete after some years while it is not feasible to revise the law on yearly basis. At this stage, the outpatient services will not be covered except for maternity treatments.

Both proposals on enhancement of scope of group life insurance and introduction of group health insurance has been initiated by SECP and shared with multiple stakeholders already.

3. Integration of Insurance in Benazir Income Support Program (BISP)

BISP, as Pakistan's largest social safety net, supports millions of vulnerable families through cash transfers and other welfare programs. Integrating insurance into BISP can significantly enhance its impact by providing long-term financial resilience to beneficiaries. For example, incorporating health, life, or disability microinsurance alongside cash assistance can ensure families are protected from unforeseen medical expenses, loss of a breadwinner, or other financial shocks. This approach would reduce the direct burden on the government's budget by shifting some of the financial risk to insurers, making the program more sustainable. Additionally, beneficiaries would gain more than just temporary relief — they'd have access to structured, ongoing financial protection, fostering a shift from reliance on aid to greater self-sufficiency and resilience in the face of adversity. This integration could also pave the way for financial inclusion, linking vulnerable populations to formal financial services through insurance.

4. Enhancing Data Linkages for Effective Enforcement of Mandatory Insurance

Strengthening data-sharing linkages among key institutions is essential for the effective enforcement of mandatory insurance requirements across Pakistan. Establishing structured linkages among provincial Labor departments, SECP (for company registration data), EOBI (for employee benefit records), insurance companies (for policy verification), and NADRA (for death certificates) would enable seamless tracking of employer compliance and employee coverage. A well-coordinated data-sharing framework can help labor department's identify non-compliant entities, support data-driven policymaking, and ensure workers receive the social security protections they are entitled to. Additionally, enhancing digital connectivity between these institutions would improve transparency, streamline compliance for employers, and foster greater accountability across sectors.

5. National Level Social Security Scheme for the Informal Sector

To ensure comprehensive social protection across the country, there is a pressing need for a national-level social security scheme that provides inclusive coverage—particularly for workers in the informal sector. This includes women, domestic workers, daily wage laborers, agricultural workers, and other vulnerable segments of society who currently lack any formal financial safety net in times of emergencies such as illness, accidents, disability, or death. The proposed scheme can be designed with a strong focus on gender inclusivity and equity, recognizing that women and informal workers are disproportionately affected by economic shocks and have limited access to formal insurance or pension systems. To make the scheme viable and widely accessible, the government can play a catalytic role by offering subsidized premiums, especially for low-income individuals. Such public support will not only make the scheme affordable but also serve as an incentive for greater enrolment and participation. Over time, this initiative could foster a culture of risk protection, reduce poverty vulnerability, and strengthen national resilience to social and economic disruptions.

6. Availability of Standardized Products

Standardized products for health, term life, accident, critical illness, and disability insurance can play a crucial role in expanding social security coverage. By offering clear, predefined benefits, coverage limits, and pricing structures, these products ensure consistency and transparency for both employers and employees. For employers, they simplify the selection process, ensuring all workers receive fair and reliable coverage. Simultaneously, standardized voluntary products empower employees to independently purchase affordable, easy-to-understand insurance, even if their employers don't provide coverage. This dual approach fosters greater financial protection, encourages voluntary uptake, and ultimately broadens the reach of social security across the workforce.

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ACTION MATRIX

| Action Item | Primary Stakeholders | Secondary Stakeholders | Key Steps |
|--|---|---|---|
| Policy Reforms to Strengthen Social Security and Integrate Insurance | SECP (Insurance Division), Provincial Labor Departments | Insurance Companies, International Organizations (ILO) | Assessment of existing programs and proposals for integration of insurance as a component of social security |
| Expand Coverage Under Existing Labor Laws | Provincial Labor Departments, Ministry of Labor | SECP, Employers' Federations, ILO | Identify gaps in coverage, propose amendments for broader protection (e.g., health, disability), ensure alignment with international best practices |
| Develop and Launch Standardized Insurance Products | SECP, Insurance Companies | ILO | Define product guidelines, ensure affordability, incentivize voluntary uptake by individuals and employers |
| Integrate Insurance into BISP Programs | BISP Secretariat, Ministry of Poverty Alleviation and Social Safety | SECP, Insurance Companies, Development Partners (e.g., ILO, World Bank, UNDP) | Design microinsurance products for BISP beneficiaries, pilot in selected districts, scale up nationwide |
| Establish Data Linkages for Enforcement of Mandatory Insurance | Ministry of Labor, SECP, Provincial Labor Departments | NADRA, EOBI, FBR, Insurance Companies | Develop database infrastructure, link with existing platform (NADRA, EOBI), ensure real-time reporting and enforcement |
| Launch of National Level Social Security Scheme for Informal Sector | Ministry for Poverty Alleviation & Social Safety, Ministry of Labor, Provincial Governments, SECP | Microfinance Institutions (MFIs), Social Enterprises, NGOs | Issuance of a concept note followed by formation of a working group to define modalities for pilot |

Social Security Framework in Thailand

Under section 39 of Social Security Act 1990, following benefits are offered to employees in Thailand.

| Benefit Categories | Requirements/ Eligibility | Benefits details |
|--|--|---|
| | <ul style="list-style-type: none"> – Employer who runs a company that has at least one employee aged 15-60 years of age. – Employer must submit application for its employees within 30 days of the joining by the employee. – 15-60 years of Age | |
| | <p>Financing of the Social Security Fund is by tripartite contributions (employers, employees and the government) at the rate of 1.5 per cent each of the employees' wages, within certain limit of wage of 15,000 baht/month. If the salary exceeds such amount, it is netto bring for calculation of contribution. The additional contribution for old – age benefits and child allowance schemes are 3% from employers and employees and 1% from the government. For the last benefit, the unemployment benefit, employers and employees pay 0.5% of wages while the government pays 0.25% of wages (ASEAN, 2025).</p> | |
| Injury and sickness benefits | Paid contributions for at least 3 months out of the previous 15 months before the beginning of receiving medical services | Employees will receive medical care free of charge at the registered hospital and cash benefit 50% of wages maximum 90 days each time and not more than 180 days each year. |
| Maternity benefits | Paid contribution for at least 5 months within the last 15 months | Employees will receive 13,000-baht cash for each delivery and cash benefits 50% of wages for 90 days- no limit of confinements |
| Invalidity Benefits/ Disability benefits | Paid contribution at least 3 months within the last 15 months | Employees can reimburse medical fee up to 2,000 baht per month and receive cash benefits 50% of wages for the whole life |
| Death benefits/ Funeral Grant | Paid contribution for at-least one month within last 6 months before the death | The amount of 40,000 baht of the funeral grant shall be paid to the person who arranged the funeral plus grant fund for survivor |
| Child Benefits | Paid contribution for at least 12 months of the past 36 months | Employees will receive cash benefits for 600 baht per month per child for legitimate child who is under 6 years old: maximum 3 children |

| | | |
|-----------------------|---|---|
| Old-age Benefits | If the insured person is 55 years or above & paid contributions for at least 180 months | Employees will receive 20% of average wage of the last 60 months or 20% and 1.5% per additional 12 months of contributions above 180 months. |
| Old-Age Lump Sum | In case the insured persons have paid contributions for less than 12 months. If the insured persons have paid contributions for more than 12 months, | Employees will receive old-age lump sum at the age of 55 equal to the amount of contributions that they have paid to the fund. The old-age lump sum shall be paid equal to the contributions made by both insured person and employer plus interest at the rate set up by the SSO |
| Unemployment Benefits | The insured persons have paid contributions for a period of not less than 6 months within a period of 15 months | The laid off insured persons will receive 50% of wages for more than 180 days within 1 year Those who quit their jobs voluntarily will get 30% of wages for not more than 90 days and the accumulation days of receiving benefits are not more than 180 days within 1 calendar year. |

Social Security in China

The Social Insurance Law of the People's Republic of China was introduced in 2010 and came into effect as of July 1, 2011. Under the law, each employer and individual within the boundary of the People's Republic of China shall, according to law, make social insurance contributions, have the right to access the related contribution records and individual social insurance benefit credits, and request social insurance consultancy and other relevant services from a social insurance agency. Each individual shall be entitled to social insurance benefits according to law, and have the right to exercise oversight over contributions made by the employer on his or her behalf. The primary five benefits offered to employees are:

| Benefits | Requirements/Eligibility Criteria | | Details |
|---|-----------------------------------|----------------|--|
| | Employer Rates | Employee Rates | |
| Basic Old Age Insurance/ Pension Insurance | Around 20% | Upto 8% | <p>Chapter II: Basic Old Age Insurance</p> <p>Both employees and employers are required to make contributions to the pension system. Workers contribute based on their individual wage, at a rate of up to eight percent, while employers contribute a percentage of the total wages paid to their workforce, initially around 20 percent. Workers become eligible for pension benefits when they reach the statutory retirement age, but only if they have participated in the scheme for at least 15 years. As of the end of 2020, the number of people covered by both state pension plans reached 998 million, but 54.3 percent were covered by the supplementary urban and rural pension scheme. The number of people covered by the urban employee pension plan reached 456 million, of which the number of insured employees (329 million) accounted for about 71 percent of all urban employees. (Data source: National Bureau of Statistics, Ministry of Human Resources and Social Security)</p> |
| Medical Insurance | Around 6% | 2% | <p>Chapter III: Basic Medical Insurance</p> <p>Employer contributors are included in the pooled funds while worker contributions go to individual accounts. Once the worker has paid into the system for the requisite number of years, they are eligible for benefits without having to make additional contributions. The medical insurance fund pays for general outpatient expenses, treatment of serious illness and hospitalisation. Different regions have different regulations on minimum and maximum payment amounts and reimbursement ratios for employee medical insurance.</p> <p>According to the Statistical Bulletin of Medical Security Development in 2020, as of the end of 2020, the number of people participating in</p> |

Social Security in UAE

Although UAE as a whole does not have a centralized social security system or law like China and Thailand but it is mandatory by law for employers in Abu Dhabi and Dubai to provide all workers with at least a basic level of health insurance under the Essential Benefits Plan for anyone earning less than Dh4,000 (\$1,089) a month. Similarly, UAE Under Federal Law No. 13 of 2022 has introduced Unemployment Insurance, for employees working in the public and private sectors of UAE. In simple words, UAE has two compulsory insurances, details of which are given below:

| Benefits | Requirements | Details |
|---|--|---|
| Health Insurance | Mandatory by the law for employers | General practitioner visits, emergency treatments, referrals to specialists as well as surgical, investigative and maternity procedures (Webster, 2023). |
| | Abu Dhabi Employees and dependents (up to three children) | Basic coverage in Abu Dhabi provides workers with access to Dh250,000 of care, but pharmacy expenses are capped at Dh1,500 a year. |
| | Dubai Dubai residents who have monthly salary of less than AED 4,000 and dependents who are only employed (Jacobs, 2023). | Employee Only The annual limit provided by basic care is Dh150,000, with a pharmacy limit of Dh1,500. |
| Unemployment Insurance (January 1, 2023) | <ul style="list-style-type: none"> all employees in the private sector, state government, or federal government. To enrol within 4 months of obtaining initial work permit approval. Insured must have been insured for no less than 12 continuous months for claiming benefits | 60% of the insured's basic salary and subject to a maximum of AED 10,000 per month for Category 1 contributions (Portal, 2024) |
| | <ul style="list-style-type: none"> AED 5 per month for employees earning basic salary of AED 16000 or less | |
| | <ul style="list-style-type: none"> AED 10 per month or employees earning a monthly basic salary of more than 16,00 AED (Jones, Khoja, & Thomas, 2023). | AED 20,000 per month for Category 2 contributions, for a period of no more than three months from the date of the insured's unemployment per claim subject to a maximum of 12 months' compensation in aggregate during the insured period of service in the UAE |

Social Security in Indonesia

In 1992, the Social Insurance Scheme, Jamsostek was set up for employees of private companies with more than ten employees and paying salaries greater than 1 million Indonesian Rupiah (IDR) (approximately US\$71) per month per employee. Under this scheme, the benefits offered are:

- vii. Health insurance
- viii. Old-age Benefits
- ix. Work Injury Insurance

For health insurance, in 2014, National Social Health Insurance Scheme (JKN) was established which consolidated all previous health insurance schemes. JKN is administered by Badan Penyelenggara Jaminan Sosial Kesehatan (BPJS) Kesehatan. Under this scheme, central and local governments provide subsidies for the poorest 40 per cent of the population. It is also funded by social security contributions from workers and employers. For salaried workers, 4 per cent of their monthly payroll is paid by the employer and 1 per cent by themselves, while non-salaried workers (informal sector) and non-workers' pay a fixed contribution based on their choice of inpatient ward class.

Under Government Regulation 37 of 2021 (GR 37/2021), the government has introduced a new unemployment benefit program Job Loss Security Program (JLS). Employers will contribute 0.46 percent of their monthly wages to the JLS program, in which 0.22 percent is contributed by the government and the remaining 0.24 percent from the employer.

The scheme has announced an adjustment to the maximum salary limit for the 2024 Pension Benefits Program, setting it at IDR 10,042,300 (USD 643.5). The minimum pension benefit for 2024 is set at IDR 393,500 (USD 25.3), while the maximum pension benefit will be capped at IDR 4,718,200 (USD 302.3).

| Benefits | Requirements/ Eligibility Criteria | Details |
|--|---|--|
| | mandatory for all businesses employers must register their employees | |
| JKN / National Social health insurance schemes | Private sector: 1 % employee 4% employer Public sector: 2%employee and 3% government. | The benefits are dependent on the type of benefits bought. For formal sector employees, the program covers employee, employees' spouse and three dependent children. Health care program also takes into fold non-employees, self-employed and non-formal workers Three classes and defined premiums. |
| Accident Compensation | 0.1- 1.7% employer (Acclime, 2024) | Employees will get compensation for any injuries or medical treatment if they experience any kind of accident while working for the company. The contribution will depend on the work risk. |
| Old Age Benefits | 3.7% employer, 2% employee | Depending on the number of years served and number of years contribution paid, the benefits are decided. |
| Pension Benefits | 2% employer and 1% employee | Pension is guaranteed under the program. |

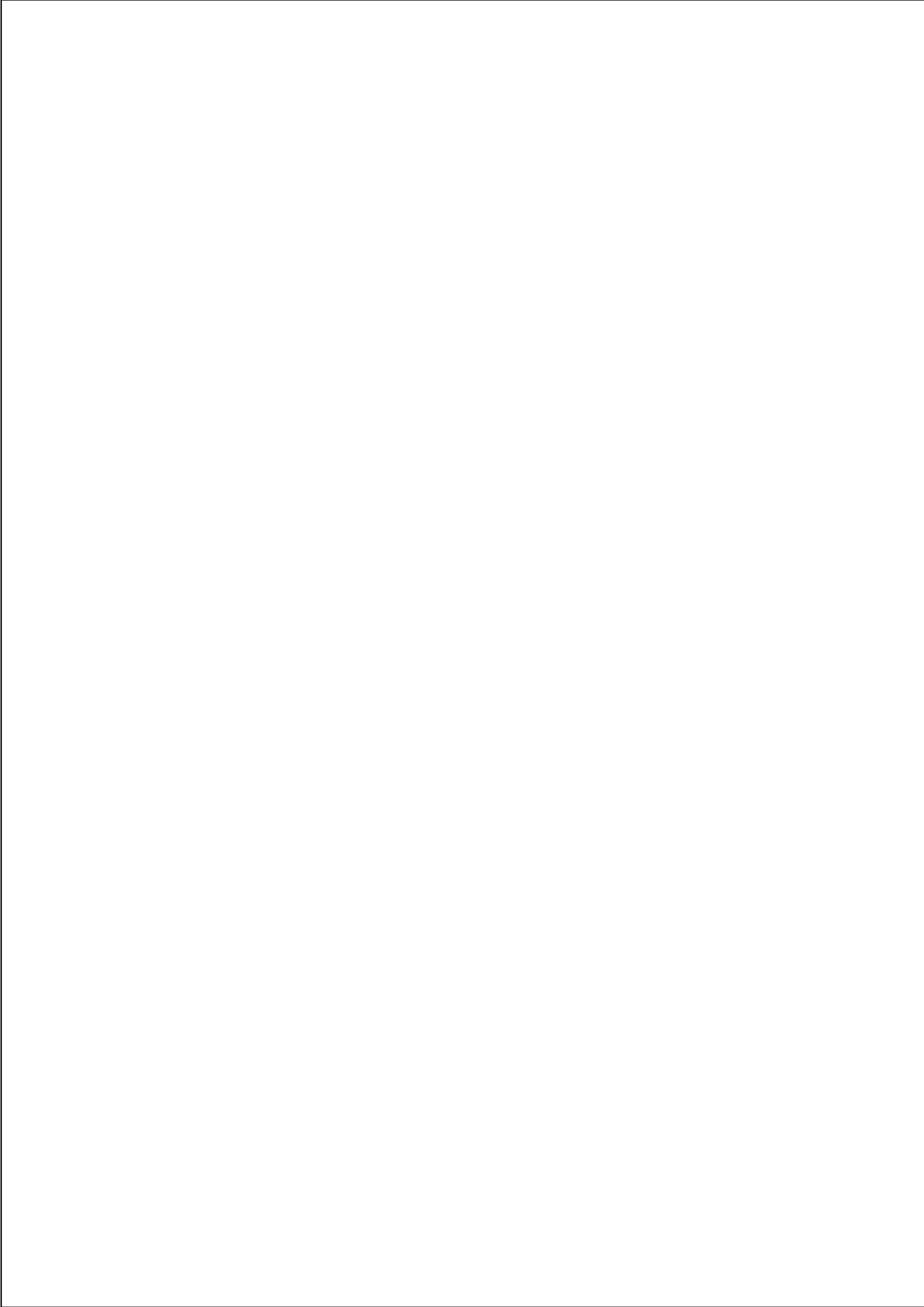
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|--|--|---|
| Life Insurance | 0.2% | Employer has to buy mandatory life insurance for its employees. |
| Unemployment Benefit / Job Loss security program (JLS) | 0.22% government 0.24% employer Total= 0.46% | The program offers participants a cash stipend - the participant can receive 45 percent of the monthly wage (capped at 5 million rupiah (US\$319)) for the first three months, and then 25 percent for the following three months. The program will also provide career counseling as well as online and offline training. (Kaylana, 2024) |

Social Security in India

Both employer and employee contribute towards the ESI. The rates were revised in 2019 and new contributory rate is 0.75% for employee and 3.325% for employer (Health, 2025).

- Employer Contribution: 3.325%
- Employee Contribution: 0.75%

| Benefits | Details |
|---|--|
| Medical Benefits/ Health Insurance | Insured employees and their families receive comprehensive medical coverage from the first day of employment. There is no limit on the amount spent on their treatment. Even after retirement or permanent disability, the insured person and their spouse can continue to receive medical care by paying a small annual fee of ₹120. |
| Income Protection/ Cash Benefits for Sickness | Employee can receive a sickness benefit of 70% of wages if they are sick for up to 91 days a year. To qualify, one must have worked and contributed for at least 78 days in the previous six months. |
| Maternity Benefit | Employees are eligible for 26 weeks of maternity benefit for up to two pregnancies. To qualify, one must have contributed for at least 70 days in the past two contribution periods. |
| Disability Benefits | ESIS offers financial security in the event of a temporary or permanent disability. Employee receive 90% of wages until recovery for temporary disablement due to an employment injury, irrespective of time of employment or contribution. In case of permanent disability, a monthly payment of 90% of wages is available for life. |
| Life Insurance/ Dependent's Benefit | This benefit works as family health to protect employee dependents in case of demise of employee due to a work-related injury. Dependents will receive a monthly payment of 90% of employee wages. |





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**NIC Building, Jinnah Avenue, Blue Area, Islamabad.
www.secp.gov.pk**