
FROM SURVIVAL TO SILENCE: MAPPING CRIMINAL ACCOUNTABILITY IN LABOUR EXPLOITATION UNDER INDIA'S NEW LABOUR CODES

Atharv, CHRIST (Deemed to be) University, Delhi NCR

ORCID ID: <https://orcid.org/0009-0003-9022-4955>

ABSTRACT

India's recent consolidation of labour legislation into four codes covering wages, industrial relations, social security, and occupational safety aim to simplify compliance while extending formal recognition to categories such as gig and migrant workers. Yet, questions persist regarding how effectively this framework responds to concrete instances of labour exploitation. This chapter examines a specific and underexplored dimension of the reform: the limited role of criminal law in addressing violations that directly affect vulnerable workers, including non-payment of wages, unsafe working conditions, and work-related injuries or deaths.

Focusing on the interaction between the Labour Codes and the Bharatiya Nyaya Sanhita, 2023, the chapter argues that many labour violations continue to be treated primarily as regulatory or administrative matters, even where the underlying harm is serious. Through a doctrinal and analytical approach, supported by illustrative scenarios drawn from sectors such as construction and platform-based work, the analysis highlights the gap between statutory protection and actual enforcement outcomes. Attention is paid to the shift toward monetary penalties, compounding of offences, and the inspector-cum-facilitator model, and how these developments influence the likelihood of criminal prosecution.

Rather than assuming systemic failure, the chapter carefully evaluates the structural, legal, and institutional factors that shape enforcement practices. It ultimately suggests that the effectiveness of labour reform depends not only on expanding coverage, but also on clarifying when and how criminal law should intervene. By foregrounding the experiences of vulnerable workers within a precise legal framework, the chapter seeks to contribute to ongoing debates on accountability, deterrence, and the future direction of labour governance in India.

Keywords: Labour Codes, Criminal Liability in Labour Law, Labour Law Enforcement, Labour Exploitation, Gig and Informal Workers.

Introduction

In recent years, India has undertaken a significant restructuring of its labour law framework through the consolidation of multiple statutes into four codes—namely, the Code on Wages, 2019; the Industrial Relations Code, 2020; the Social Security Code, 2020; and the Occupational Safety, Health and Working Conditions Code, 2020. This reform seeks to simplify compliance, expand coverage to previously unregulated sectors, and introduce a more uniform system of regulation. Notably, the framework formally recognises categories such as gig and platform workers and provides for broader social security coverage. At the same time, the enforcement design of these codes places considerable emphasis on monetary penalties, compounding of offences, and a facilitative inspection mechanism.

Within this statutory structure, an important issue arises in relation to the treatment of labour violations that result in tangible harm. For instance, non-payment or delayed payment of wages is addressed under the Code on Wages, 2019 primarily through penalties and recovery mechanisms. Similarly, violations relating to unsafe working conditions under the Occupational Safety, Health and Working Conditions Code, 2020 may attract fines and, in specified circumstances, imprisonment. However, the practical application of these provisions often raises a narrower legal question: under what conditions do such violations transition from regulatory non-compliance to matters warranting criminal prosecution?

This question must be examined in light of the constitutional framework. The Constitution of India guarantees equality before the law (Article 14) and prohibits forced labour (Article 23), while judicial interpretation of Article 21 has consistently emphasised the protection of life and dignity in conditions of work. In addition, Directive Principles such as Articles 39, 41, and 42 articulate the State's responsibility to secure just and humane conditions of labour. These provisions collectively establish that labour protection is not merely a regulatory objective but a constitutional commitment.

The interaction between this constitutional mandate and the present enforcement model becomes particularly relevant when labour violations involve serious consequences, such as workplace injury, hazardous exposure, or sustained wage deprivation. In such situations, the general criminal law framework—now codified under the *Bharatiya Nyaya Sanhita, 2023*—provides for offences relating to negligence, harm, and unlawful exploitation. The extent to which these provisions are invoked alongside labour law violations, however, remains limited

and requires careful examination.

This chapter addresses that specific intersection. It does not proceed on a general assumption of systemic failure but instead analyses how the current legal framework classifies and responds to labour-related harm. Three aspects are central to this inquiry. First, the design of penal provisions within the Labour Codes and their reliance on fines and compounding mechanisms. Second, the role of enforcement authorities, particularly under the inspector-cum-facilitator model, in determining the course of action. Third, the conditions under which general criminal law provisions may be engaged in addition to, or in place of, regulatory penalties.

The analysis is doctrinal in nature and is supported by illustrative situations drawn from sectors such as construction and platform-based work, where issues of wage payment, safety, and accountability frequently arise. The objective is to identify how the legal system currently distinguishes between regulatory violations and criminal offences, and whether this distinction adequately reflects the seriousness of the harm involved.

By situating labour exploitation within both statutory and constitutional frameworks, this chapter seeks to clarify the scope and limits of criminal law intervention under the reformed regime. It argues that a precise understanding of this boundary is essential to ensuring that the objectives of labour reform—namely, protection, fairness, and accountability—are effectively realised in practice.

Evolution of Labour Law in India

India's labour law framework has undergone a structural transition from a fragmented statutory regime to a consolidated code-based system. Prior to the recent reform, labour regulation was governed by multiple central enactments often identified as 29 major laws¹ each addressing specific aspects such as wages, industrial disputes, social security, and workplace safety. While this framework developed incrementally to respond to sector-specific needs, it also resulted in overlapping provisions, varied definitions (for example, of “worker” or “wages”)², and multiple compliance authorities. These features were widely noted in official discussions on labour reform as creating complexity in compliance and challenges in enforcement

¹ India, Ministry of Labour & Employment, Report of the Second National Commission on Labour 40–52 (2002).

² India, Planning Commission, Eleventh Five Year Plan 2007–2012, vol. 1, at 95 (2008).

consistency.

The post-reform framework replaces this multiplicity with four consolidated statutes:

- Code on Wages, 2019³
- Industrial Relations Code, 2020⁴
- Social Security Code, 2020⁵
- Occupational Safety, Health and Working Conditions Code, 2020⁶

The stated objective of this consolidation, as reflected in government policy documents and explanatory materials, is to simplify the legal structure, promote ease of doing business, and extend protection to a broader category of workers, including those in unorganised and platform-based sectors. The codes introduce uniform definitions, digitised compliance mechanisms, and a common registration framework, with the intention of reducing procedural fragmentation while maintaining core labour protections.

At the level of regulatory approach, the reform reflects a discernible shift in emphasis. Earlier labour legislation, particularly in areas such as industrial disputes and workplace safety, incorporated detailed regulatory controls supported by penal provisions, including imprisonment for specified violations. In contrast, the Labour Codes place greater reliance on graded monetary penalties, compounding of certain offences, and an inspector-cum-facilitator system⁷. This model is designed to encourage voluntary compliance and reduce adversarial enforcement, while retaining the possibility of stricter action in defined circumstances.

This transition has implications for how labour law is positioned within the broader legal system. The move toward a facilitative and compliance-oriented framework does not eliminate penal provisions; rather, it **reconfigures the circumstances in which punitive measures are applied**. For example, under the new codes, several offences that previously attracted immediate prosecution may now be subject, in the first instance, to monetary penalties or

³ Code on Wages, 2019, No. 29 (India).

⁴ Industrial Relations Code, 2020, No. 35 (India).

⁵ Code on Social Security, 2020, No. 36 (India).

⁶ Occupational Safety, Health and Working Conditions Code, 2020, No. 37 (India).

⁷ Occupational Safety, Health and Working Conditions Code, 2020, § 34 (India).

compounding mechanisms, with imprisonment typically reserved for repeated or serious violations.

From an evaluative standpoint, this development can be understood as an attempt to balance regulatory efficiency with worker protection. However, it also raises a narrower and more specific issue relevant to this chapter: whether the current structure sufficiently distinguishes between routine non-compliance and violations that result in significant harm, such as unsafe working conditions leading to injury or persistent non-payment of wages. The concern here is not that punitive provisions have been removed, but that their operational threshold and frequency of use may be affected by the overall design of enforcement mechanisms⁸.

In this context, the evolution of labour law in India reflects not merely a legislative consolidation, but a reorientation in enforcement philosophy from a system characterised by multiple statutes and direct penal consequences to one that emphasises streamlined compliance, with calibrated use of criminal sanctions. Understanding this shift is essential for assessing how effectively the current framework addresses situations where labour violations intersect with issues of accountability and harm.

4. Vulnerable Workers under the New Regime

The consolidation of labour laws into four codes expands the formal coverage of labour regulation and introduces new categories of workers within the statutory framework. However, the extent to which this inclusion translates into effective protection depends on how these provisions operate in practice. This section examines three categories—daily wage workers, gig and platform workers, and migrant workers—using recent official data and policy reports to assess their position under the current regime.

4.1 Daily Wage Workers

Daily wage workers are predominantly situated within the informal sector, where employment is characterised by short-term or task-based engagement. According to the Periodic Labour Force Survey (PLFS) 2022–23 released by the Ministry of Statistics and Programme Implementation, approximately 80–85% of India's workforce is engaged in informal or

⁸ India, Parliament, Standing Comm. on Labour, Report No. 11, Occupational Safety, Health and Working Conditions Code, 2019, 17th Lok Sabha, Ministry of Labour & Employment, at 35 (2020).

unorganised employment,⁹ depending on the classification used.

For workers who rely on daily earnings, continuity of payment is directly linked to subsistence. The Code on Wages, 2019 introduces a statutory framework for minimum wages¹⁰ and timely payment across sectors, along with provisions for claims and penalties. At the same time, the enforcement mechanism largely operates through inspection, claims authorities, and monetary penalties, with criminal prosecution generally limited to specific or repeated violations.¹¹

This structure indicates that while wage protection is formally recognised, its effectiveness depends on the ability of workers to access grievance mechanisms and the way violations are pursued by authorities. The legal framework provides remedies, but their practical use is shaped by factors such as awareness, documentation, and administrative follow-through.

4.2 Gig and Platform Workers

The Social Security Code, 2020¹² introduces, for the first time in Indian labour legislation, statutory recognition of gig and platform workers. This inclusion reflects the documented expansion of platform-based work in India. According to the report “*India’s Booming Gig and Platform Economy*” (2022) by NITI Aayog, the gig workforce was estimated at 7.7 million workers in 2020–21, with projections indicating growth to 23.5 million by 2029–30¹³.

The Code provides for the formulation of social security schemes for these workers, including insurance and welfare measures¹⁴. However, it does not classify gig workers as traditional employees, and therefore questions relating to employer responsibility, particularly in contexts of workplace risk or income disruption, remain defined differently from standard employment relationships.¹⁵

This distinction is significant for enforcement. While welfare provisions can be extended through schemes, the attribution of liability in cases of harm or unfair practices is not structured

⁹ India, Ministry of Statistics & Programme Implementation, National Statistical Office, Periodic Labour Force Survey (PLFS) Annual Report 2022–2023, at 45 (2023).

¹⁰ The Code on Wages, 2019, § 6, No. 29, Acts of Parliament, 2019 (India).

¹¹ People’s Union for Democratic Rights v. Union of India, (1982) 3 SCC 235 (India).

¹² Code on Social Security, 2020, § 2(35) (India).

¹³ India, NITI Aayog, *India’s Booming Gig and Platform Economy: Perspectives and Recommendations on the Future of Work*, at 12–15 (2022).

¹⁴ Code on Social Security, 2020, § 114 (India).

¹⁵ The Indian Federation of App-Based Transport Workers (IFAT) v. Union of India, W.P. (C) No. 1068 of 2021 (India).

in the same way as in conventional employer–employee arrangements. The framework thus marks an important step in recognition, while leaving certain aspects of accountability to be further developed through policy and implementation.

4.3 Migrant Workers

Inter-state migrant workers constitute a substantial segment of the labour force, particularly in sectors such as construction, manufacturing, and services. The Economic Survey of India (2020–21)¹⁶ and subsequent policy discussions have noted the scale of internal migration linked to employment, though precise figures vary due to the nature of mobility and documentation.

The Occupational Safety, Health and Working Conditions Code, 2020¹⁷ incorporates provisions relating to inter-state migrant workers, including registration, portability of benefits, and access to welfare measures. These provisions aim to address earlier gaps in coverage by integrating migrant workers into a common regulatory framework.

At the level of implementation, certain practical considerations remain relevant. These include registration processes, inter-state coordination, and access to grievance mechanisms, particularly where workers are employed through contractors or move across jurisdictions¹⁸. The presence of these factors does not negate statutory protection, but it affects the conditions under which such protection can be effectively accessed.

The current framework demonstrates a clear expansion in the legal recognition of vulnerable categories of workers. At the same time, the effectiveness of this recognition is closely linked to enforcement mechanisms and access to remedies.

Inclusion within the statutory framework does not, by itself, ensure that protection is realised in practice.

This observation is intended as a measured evaluation rather than a general critique. It highlights the need to examine how legal provisions operate across different forms of work, particularly where employment is informal, platform-mediated, or geographically mobile. Such

¹⁶ India, Ministry of Finance, Department of Economic Affairs, Economic Survey 2020–2021, vol. 2, at 210–212 (2021).

¹⁷ Occupational Safety, Health and Working Conditions Code, 2020, ch. XI (India).

¹⁸ In re Problems and Miseries of Migrant Labourers, (2021) 16 SCC 10 (India).

an analysis is essential for understanding how labour law interacts with questions of accountability, including the role of criminal law in addressing serious violations.

5. Criminal Law Framework and Labour Violations

The legal response to labour-related harm in India operates through two parallel but distinct frameworks: the general criminal law and the specialised labour law regime. Understanding how these frameworks interact is essential to assess whether serious labour violations—such as unsafe working conditions, wage deprivation, or coercive labour—are treated as matters of criminal accountability or primarily as regulatory non-compliance.

5.1 Criminal Law Structure

The general criminal law framework is now governed by the Bharatiya Nyaya Sanhita, 2023, which replaced the earlier penal code and came into force in 2024.

The Sanhita provides a structured classification of offences that may become relevant in the context of labour-related harm. These include:

- **Causing death by negligence:**¹⁹ The statute explicitly provides punishment for acts resulting in death due to rash or negligent conduct.
- **Culpable homicide (not amounting to murder):** Where the degree of harm and knowledge is higher, liability may arise under more serious provisions.
- **Unlawful compulsory labour:** The law recognises coercive or forced labour as a punishable offence.²⁰
- **Negligent conduct endangering life or safety:** Provisions also address acts involving unsafe handling of machinery, buildings, or hazardous conditions.²¹

These provisions establish that criminal law can address labour-related harm where conduct results in injury, death, or coercion. However, the application of these provisions depends on how a particular incident is classified—either as a criminal offence or as a regulatory violation

¹⁹ Bharatiya Nyaya Sanhita, 2023, No. 45, § 106 (India).

²⁰ Bharatiya Nyaya Sanhita, 2023, § 146 (India).

²¹ Bharatiya Nyaya Sanhita, 2023, No. 45, § 287 (India).

under labour legislation.

5.2 Penal Provisions in the Labour Codes

The Labour Codes incorporate their own system of penalties for violations of statutory duties.

These include provisions relating to:

- non-payment or delayed payment of wages
- breach of safety obligations
- non-compliance with working conditions and welfare measures²²

The enforcement structure under the codes generally emphasises:

- **Monetary penalties** imposed for contraventions
- **Compounding offences**, allowing certain violations to be settled without prosecution
- **Graded punishment**, where imprisonment is typically reserved for repeated or serious violations

For instance, under the Occupational Safety, Health and Working Conditions Code, 2020, courts are empowered to impose fines and may direct that a portion of the fine be paid as compensation to victims or their families in cases of serious injury or death.²³

This indicates that statutory design incorporates both punitive and compensatory elements. At the same time, the primary mode of enforcement remains regulatory, with criminal prosecution structured as a secondary or escalated response.

Key Issue

The interaction between these two frameworks gives rise to a specific legal question:

When does a labour violation transition from a regulatory breach under labour law

²² Code on Wages, 2019, No. 29, § 56 (India).

²³ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 96 (India).

to a criminal offence under general penal law?

Based on statutory design, many labour violations such as wage defaults or safety non-compliance are initially addressed through penalties, inspections, and administrative mechanisms²⁴. Criminal law provisions become relevant where the nature of harm satisfies the threshold of offences such as negligence, coercion, or endangerment of life.

This structure does not exclude criminal liability; rather, it places primary emphasis on regulatory compliance, with criminal law operating in defined circumstances. From an evaluative perspective, this approach reflects an attempt to balance enforcement efficiency with deterrence. At the same time, it requires careful examination of how consistently and effectively criminal provisions are invoked in cases involving serious labour-related harm.²⁵

This section establishes the legal framework necessary for the subsequent analysis, which examines how these provisions function in practice and whether the distinction between regulatory and criminal responses adequately reflects the nature of labour exploitation.

6. The Enforcement Gap: Why Criminal Law Often Remains Limited in Labour Violations

The Labour Codes provide a structured framework for addressing violations relating to wages, safety, and working conditions. Alongside this, the general criminal law—particularly the Bharatiya Nyaya Sanhita, 2023 recognizes offences such as negligent conduct causing harm and unlawful compulsory labour. However, the way enforcement mechanisms are designed and applied determines whether a particular violation is treated as a regulatory issue or escalates into a criminal matter. This section examines that distinction through the institutional design of enforcement and its practical operation.

6.1 Inspector-cum-Facilitator Model

A central feature of the Labour Codes is the introduction of the Inspector-cum-Facilitator model, which replaces the earlier system of purely supervisory inspection. As clarified in official policy explanations, this model is intended to promote transparency, reduce

²⁴ Industrial Relations Code, 2020, No. 35, § 91 (India).

²⁵ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 103 (India).

arbitrariness, and encourage compliance through guidance and facilitation.²⁶

In operational terms, this model functions through a graduated approach:²⁷

- Initial detection of a violation (for example, absence of prescribed safety equipment) followed by inspection and issuance of directions for compliance
- Opportunity provided to the employer to rectify the violation within a stipulated period²⁸
- Escalation to penal consequences generally considered in cases of non-compliance, repetition, or serious harm

Illustrative

In reported cases of construction-site accidents, including incidents involving falls from height, the immediate response by labour authorities typically involves:

- inspection of the site,
- assessment of compliance with safety standards,
- and initiation of compensation or penalty proceedings under the relevant code.

Criminal prosecution, where it arises, is usually initiated separately and depends on further evaluation of negligence or culpability, rather than forming the primary response at the outset.

This demonstrates that the enforcement model is structured to priorities corrective compliance before punitive action, while retaining the possibility of escalation²⁹.

6.2 Limited Use of Criminal Prosecution

The Labour Codes incorporate penal provisions; however, their structure reflects a graded system of enforcement. Key features include:

²⁶ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 34 (India).

²⁷ India, Ministry of Labour & Employment, Annual Report 2024–2025, at 82 (2025).

²⁸ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 35(1)(a) (India).

²⁹ Social Jurist, A Civil Rights Group v. Government of NCT of Delhi, W.P. (C) No. 888 of 2024 (Del. HC Apr. 29, 2024).

- **Monetary penalties** as the primary response for a range of violations
- **Compounding offences**, allowing certain contraventions to be resolved without full criminal proceedings³⁰
- **Imprisonment provisions**, generally applicable in cases of:
 - serious violations, or
 - repeated non-compliance

This structure indicates that labour law distinguishes between:

- routine or first-time non-compliance, and
- violations involving significant harm or persistent default

Illustrative Examples:

- **Wage-related violation:**³¹

A daily wage worker who has not been paid may approach the designated authority under the Code on Wages. The authority may:

 - order payment of dues,
 - impose a penalty on the employer,
without initiating criminal prosecution in the first instance.
- **Workplace safety incident:**

In cases of industrial accidents (such as factory fires or equipment-related injuries), the initial response often includes:

 - inquiry by labour authorities,
 - compensation proceedings,

³⁰ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 89 (India).

³¹ Code on Wages, 2019, No. 29, § 54(1) (India).

- regulatory penalties.
- Criminal proceedings under general law may follow if there is clear evidence of negligent or culpable conduct, but such proceedings are not automatically triggered in every case³².

These examples indicate that criminal law is available but functions as a secondary mechanism, invoked under specific conditions.

6.3 Structural Factors Affecting Enforcement

Beyond statutory design, certain structural features influence how labour violations are addressed:

- **Nature of Employment Relationships**
 - A significant proportion of workers are engaged through contractors or informal arrangements
 - This can complicate the identification of the legally responsible entity³³
- **Access to Legal Processes**
 - Administrative remedies (such as wage recovery) are often faster and more accessible
 - Criminal proceedings require:
 - formal complaints,
 - investigation,
 - evidentiary support
- **Mobility of Workforce**
 - Migrant and temporary workers may change locations frequently

³² State of Gujarat v. Kansara Manilal Bhikhalal, (1964) 7 SCR 656 (India).

³³ India, Ministry of Statistics & Programme Implementation, National Statistical Office, Periodic Labour Force Survey (PLFS) Annual Report 2024–2025, at 112 (2025).

- This affects **continuity of proceedings and availability of evidence**

Illustrative Example:

A migrant worker injured at a worksite may:

- receive immediate compensation through labour authorities,
- but may not pursue criminal proceedings if:
 - employment was informal, or
 - The worker relocates after the incident.

These factors do not negate the existence of legal remedies; rather, they shape the practical pathway through which those remedies are accessed.

Core Insight

The enforcement framework under the Labour Codes reflects a sequenced approach:

- **First stage:** compliance and rectification
- **Second stage:** administrative penalties
- **Third stage:** criminal prosecution, where conditions justify escalation

Accordingly, labour violations are initially treated within a regulatory framework, with criminal law operating in defined and limited circumstances.

This leads to a precise conclusion: The central issue is not the absence of criminal law provisions, but the conditions under which they are invoked within the enforcement structure.

Understanding this distinction is essential for evaluating how effectively the legal system responds to labour-related harm, particularly where violations extend beyond non-compliance and raise questions of accountability under criminal law.³⁴

³⁴ India, Ministry of Labour & Employment, Report of the Working Group on Migration, available at

7. Case-Based Thematic Analysis

The interaction between labour law and criminal law becomes clearer when examined through **actual patterns of incidents reported in India**. Rather than treating labour violations in abstract terms, this section analyses three recurring situations—workplace deaths, wage non-payment, and gig work conditions—using **available data and documented instances**. The aim is to show how the law responds in practice, without making broad or unsupported claims³⁵.

7.1 Workplace Deaths: Safety Violations and Criminal Negligence

Workplace accidents in India are not isolated occurrences. Available data indicates that industrial accidents continue to result in significant loss of life each year. For example, recent compiled data shows that over 400 workers were killed and more than 850 seriously injured in at least 240 industrial accidents in 2024 across sectors such as manufacturing, mining, and energy.

Government-linked data from the Directorate General Factory Advice Service & Labour Institutes DGFASLI³⁶ further indicates that on average, around three workers die every day in registered factories due to workplace accidents.

In such cases, the legal response generally proceeds in stages:

- **Immediate response**
 - site inspection by labour authorities
 - identification of safety violations
 - initiation of compensation mechanisms
- **Regulatory action**
 - penalties under safety provisions of labour law

<https://labour.gov.in> (last visited Feb. 21, 2026).

³⁵ IndustriALL Global Union, Industrial Accidents in India: 2024 Summary, available at <https://www.industriall-union.org> (last visited Feb. 21, 2026).

³⁶ India, Ministry of Labour & Employment, Directorate General Factory Advice Service & Labour Institutes (DGFASLI), Standard Reference Note 2024, at 14–18 (2024).

- **Possible criminal action**

- invoked under Bharatiya Nyaya Sanhita, 2023 where there is evidence of negligent conduct leading to death or injury

Practical Example:

In incidents such as factory explosions or construction collapses (which have been reported across states like Maharashtra, Delhi, and Andhra Pradesh), investigations often reveal:

- absence of safety compliance (for example, improper storage of chemicals or lack of protective equipment),
- followed by administrative action and compensation.³⁷

Criminal liability is considered where negligence is clearly established, but it requires separate investigation and proof and therefore is not automatically applied in every case.

Specific Insight:

The data shows that workplace deaths occur with measurable frequency, yet the legal pathway often begins with regulatory enforcement, with criminal law applied only when evidentiary thresholds are met.

7.2 Wage Theft: Non-Payment and Delayed Payment

Non-payment or delayed payment of wages remains one of the most common labour disputes, particularly among daily wages and informal workers. The Code on Wages, 2019³⁸ provides a legal mechanism for:

- recovery of unpaid wages,
- imposition of penalties on employers,³⁹
- adjudication through designated authorities.

³⁷ Bharatiya Nyaya Sanhita, 2023, § 287 (India).

³⁸ Code on Wages, 2019, No. 29, § 45 (India).

³⁹ Code on Wages, 2019, No. 29, § 53 (India).

Practical Example:

A worker employed on a short-term construction project may:

- complete assigned work,
- not receive wages,
- approach the labour authority for recovery.

In such cases:

- the authority typically orders payment of wages,
- may impose a monetary penalty,
- and resolves the matter administratively.

Criminal law is generally not invoked unless:

- there is repeated violation, or
- the conduct meets the threshold of a criminal offence under general law.

The legal system clearly recognises wage rights, but the mode of enforcement is primarily compensatory and regulatory⁴⁰, rather than criminal. This raises a specific legal question—whether repeated or intentional non-payment should remain within this framework or require a different classification.

7.3 Gig Worker Exploitation: Control without Clear Liability

The growth of platform-based work has been formally recognized under the Social Security Code, 2020⁴¹, which provides welfare schemes for gig and platform workers. According to official policy reports, the gig workforce is expanding rapidly, reflecting changes in the structure of employment.

⁴⁰ Bharatiya Nyaya Sanhita, 2023, § 316, No. 45, Acts of Parliament, 2023 (India).

⁴¹ Code on Social Security, 2020, § 2(35) (India).

Practical Example:

A delivery worker engaged through a digital platform may:

- receive work assignments through an application,
- be subject to performance ratings and time-based incentives,⁴²
- experience reduction in earnings or suspension of access based on algorithmic decisions.

If an incident occurs, for example:

- a road accident during delivery, or
- sudden loss of income due to deactivation—

the available legal response includes:

- possible access to welfare schemes (subject to implementation), but does not clearly establish:
- traditional employer liability, or
- criminal responsibility linked to working conditions shaped by platform systems.

The law recognizes gig workers for social security purposes, but the structure of responsibility differs from standard employment relationships⁴³. This affects how issues of accountability including potential criminal liability are approached.

Across these three situations, the legal framework provides both regulatory mechanisms and criminal provisions. However, the data and examples indicate a consistent pattern:

- workplace harm is first addressed through inspection, compensation, and penalties,

⁴² India, NITI Aayog, *India's Booming Gig and Platform Economy: Perspectives and Recommendations on the Future of Work*, at 22–25 (2022).

⁴³ Code on Social Security, 2020, No. 36, § 114 (India).

- Criminal law is applied selectively and conditionally, depending on evidence and legal thresholds.

The same factual situation—such as a worker’s death or economic harm—may lead to different legal outcomes depending on how it is classified and pursued.

This analysis does not suggest absence of law. Instead, it highlights a structured prioritization within the legal system, where regulatory enforcement is the primary response, and criminal law operates in defined circumstances. Understanding this distinction is essential for evaluating how effectively labour violations are addressed within the broader legal framework.

8. Doctrinal Challenges in Criminal Liability

8.1 Mens Rea and Strict Liability in Labour Violations

A central question in determining criminal liability for labour violations is whether the law should require proof of intention or negligence (*mens rea*), or whether liability should arise simply from the breach of a statutory duty. Under the Bharatiya Nyaya Sanhita, 2023, most offences such as causing death by negligence or endangering human life require a clear demonstration of fault, either in the form of knowledge, intention, or rash and negligent conduct⁴⁴. This reflects a long-standing principle of criminal jurisprudence that punishment should follow culpability⁴⁵.

Labour legislation, however, operates partly on a different logic. The Labour Codes impose specific statutory obligations, such as payment of wages within a prescribed time and maintenance of safe working conditions. In many instances, liability arises from the fact of non-compliance itself, without requiring detailed inquiry into the mental state of the employer⁴⁶. This approach is closer to a strict or regulatory liability model, where the emphasis is on ensuring adherence to minimum standards rather than establishing subjective fault⁴⁷.

The tension becomes evident in situations where a violation leads to serious harm. For example, if a worker is injured due to the absence of safety equipment, the Labour Codes allow for penalties based on non-compliance. At the same time, criminal law requires proof that the

⁴⁴ Bharatiya Nyaya Sanhita, 2023, No. 45, § 106 (India).

⁴⁵ State of Gujarat v. Kansara Manilal Bhikhalal, AIR 1964 SC 1893 (India).

⁴⁶ Code on Wages, 2019, No. 29, § 54 (India).

⁴⁷ State of Maharashtra v. Mayer Hans George, AIR 1965 SC 722 (India).

injury resulted from negligent or reckless conduct⁴⁸. The legal question is therefore not abstract but practical: should the failure to comply with safety norms be sufficient to attract criminal liability, or should prosecution depend on proving negligence in each case? The current framework does not fully resolve this distinction, and its application depends on how enforcement authorities and courts interpret the facts of each case.

8.2 Corporate Criminal Liability in Labour Law

Labour violations typically occur within organisational settings, which makes the question of responsibility more complex. The law recognises that a company, as a legal entity, can be held liable for offences. At the same time, it also provides that individuals who are in charge of and responsible for the conduct of business such as directors, managers, or supervisors may be held accountable under certain conditions⁴⁹.

The Labour Codes adopt this dual structure of liability. Where a company fails to comply with statutory obligations, liability may extend both to the organisation and to those individuals who had control over the relevant operations⁵⁰. However, the attribution of individual liability is not automatic. It generally depends on whether the person concerned had knowledge of the violation or failed to exercise due diligence to prevent it.⁵¹

This creates a practical difficulty in enforcement. In large organisations, decision-making is often distributed across multiple levels. For instance, in a workplace accident involving unsafe machinery, it may be necessary to determine whether responsibility lies with the company, with a site manager responsible for day-to-day operations, or with higher-level management responsible for policy decisions. Establishing this chain of responsibilities requires careful factual analysis and is not always straightforward⁵². As a result, while the legal framework provides corporate and individual liability, its application depends on how clearly responsibility can be identified in each case⁵³.

8.3 Regulatory and Penal Approaches to Labour Enforcement

The Labour Codes reflect a broader shift toward a regulatory model of enforcement, where the

⁴⁸ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 82 (India).

⁴⁹ Standard Chartered Bank v. Directorate of Enforcement, AIR 2005 SC 2622 (India).

⁵⁰ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 98 (India).

⁵¹ Aneeta Hada v. Godfather Travels & Tours Pvt. Ltd., (2012) 5 SCC 661 (India).

⁵² Iridium India Telecom Ltd. v. Motorola Inc., (2005) 2 SCC 145 (India).

⁵³ Industrial Relations Code, 2020, No. 35, § 90 (India).

primary objective is to secure compliance rather than to impose immediate criminal sanctions. This is evident in the use of monetary penalties, the availability of compounding for certain offences, and the graded structure of punishment that distinguishes between first-time and repeated violations⁵⁴.

This approach is grounded in the policy objective of simplifying compliance and reducing procedural complexity. It allows many violations, particularly those involving non-payment of wages or minor breaches of statutory requirements to be resolved through administrative mechanisms⁵⁵. At the same time, the framework retains penal provisions for more serious or repeated contraventions.

The doctrinal challenge lies in determining the appropriate boundary between these two approaches. While regulatory mechanisms are effective in addressing routine non-compliance, questions arise when violations result in significant harm, such as serious injury or persistent exploitation. In such situations, reliance solely on penalties may not adequately reflect the gravity of the conduct⁵⁶. Conversely, treating every violation as a criminal offence may not be consistent with the objective of a balanced and workable enforcement system.

The issue, therefore, is not whether labour law should be regulatory or penal, but how the law defines the point at which regulatory enforcement should give way to criminal accountability. A clear articulation of this threshold is necessary to ensure consistency in application and to align enforcement practices with both statutory objectives and broader principles of justice.

9. Critical Analysis: The Silence of Criminal Law

9.1 A Visible Harm, A Measured Response

A worker dies after falling from an unsafe construction site, or a labourer is not paid for work already completed. These situations are not hypothetical; they are repeatedly documented in administrative records, labour department reports, and judicial proceedings⁵⁷. The Labour Codes recognise such concerns by laying down standards relating to wages, safety, and working conditions. However, the key issue is not whether the law acknowledges these harms,

⁵⁴ Industrial Relations Code, 2020, § 89 (India).

⁵⁵ India, Parliament, Standing Comm. on Labour, Report No. 11, Occupational Safety, Health and Working Conditions Code, 2019, 17th Lok Sabha, Ministry of Labour & Employment, at 35 (2020).

⁵⁶ People's Union for Democratic Rights v. Union of India, (1982) 3 SCC 235 (India).

⁵⁷ India, Ministry of Labour & Employment, Annual Report 2023–2024, at 115 (2024).

but how it responds when violations occur.

The present framework reflects a structured approach in which most violations are initially addressed through inspection, compliance directions, and monetary penalties. This does not indicate absence of legal protection. Rather, it shows that the law treats many violations as matters requiring correction and administrative resolution, at least in the first instance. The question that follows is whether this approach sufficiently captures situations where the consequences of non-compliance are serious, such as injury, loss of livelihood, or death⁵⁸.

9.2 The Central Role of Compliance in the Labour Codes

The Labour Codes are designed to simplify regulation and promote uniformity. One of the ways in which this is achieved is through an enforcement structure that emphasizes compliance over immediate penal action. Provisions relating to penalties, compounding of offences, and the inspector-cum-facilitator model collectively indicate that the system is intended to:

- encourage adherence to statutory standards⁵⁹,
- reduce procedural complexity⁶⁰, and
- allowing rectification of violations without prolonged litigation⁶¹.

This approach has practical advantages. It enables quicker resolution of disputes, particularly in matters such as wage recovery or minor non-compliance. It also reduces the burden on enforcement authorities and courts. At the same time, it shapes the way violations are classified. When the primary response is regulatory, the movement toward criminal law depends on additional conditions, rather than following automatically from the violation itself⁶².

9.3 The Point of Tension: Serious Harm and Limited Penal Consequences

The distinction between regulatory and criminal responses becomes more significant in cases involving substantial harm. For example, where unsafe working conditions result in injury or death, or where wages are repeatedly withheld, the legal framework provides for both

⁵⁸ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 96 (India).

⁵⁹ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 35 (India).

⁶⁰ Code on Wages, 2019, No. 29, § 56 (India).

⁶¹ Occupational Safety, Health and Working Conditions Code, 2020, No. 37, § 34 (India).

⁶² India, Ministry of Labour & Employment, Draft Code on Wages (Central) Rules, 2020.

regulatory action under labour law and criminal liability under the Bharatiya Nyaya Sanhita, 2023⁶³.

However, in practice, the initial response is often shaped by the regulatory structure of the Labour Codes. Authorities typically begin with:

- inspection of the violation,
- assessment of compliance,
- and imposition of penalties or compensation⁶⁴.

Criminal proceedings may follow, but they require:

- separate evaluation of evidence,
- identification of negligence or culpability,
- and procedural steps under criminal law⁶⁵.

This creates a situation in which the same factual event may lead to different legal outcomes depending on how it is pursued. The law does not prevent criminal action, but it does not treat it as the default response in every case of violation⁶⁶.

9.4 Reconsidering the Balance between Regulation and Accountability

The current framework reflects a shift toward a compliance-oriented model of labour governance. This shift is grounded in identifiable policy objectives, including simplification of law and improved ease of compliance⁶⁷. At the same time, it raises a limited and specific concern: whether the balance between regulatory efficiency and criminal accountability is clearly defined in cases involving serious harm.

This is not a question of replacing one model with another. Regulatory mechanisms remain

⁶³ Bharatiya Nyaya Sanhita, 2023, § 125 (India) (act endangering life or personal safety of others).

⁶⁴ Code on Wages, 2019, § 53 (India).

⁶⁵ *Swaraj Abhiyan v. Union of India*, (2016) 7 SCC 498 (India).

⁶⁶ Industrial Relations Code, 2020, § 91 (India).

⁶⁷ INDIA CONST. art. 39, cl. e.

necessary for addressing routine non-compliance. However, where violations affect life, safety, or basic economic security, the law must ensure that the transition from regulatory enforcement to criminal accountability is clear, consistent, and proportionate. The issue is not that exploitation is unrecognized, but that the pathway from recognizing harm to establishing criminal liability is not always direct⁶⁸.

In this sense, the “silence” of criminal law is not absolute. It is conditional, shaped by how violations are classified and pursued within the existing framework. A careful articulation of this boundary is essential to ensure that the objectives of labour reform protection, fairness, and accountability are realized in practice⁶⁹.

10. Comparative and Policy Perspective

10.1 Wage Theft and Criminal Law in Comparative Context

In comparative legal discussions, wage theft has increasingly been examined not only as a regulatory violation but also as a form of economic harm with potential criminal implications. Empirical studies from the United States, based on official labour and survey data, indicate that millions of workers are affected by minimum wage violations each year⁷⁰, with estimated annual losses running into billions of dollars. Despite this scale, enforcement data shows that criminal prosecutions for wage-related offences remain extremely limited, even where statutory provisions allow such action⁷¹. This has led to policy debates at both federal and state levels, with some jurisdictions introducing stricter penalties and, in certain cases, recognizing repeated or willful wage violations as criminal offences.

The comparative position is therefore not one of uniform criminalisation. Instead, it reflects a gradual and selective shift, where criminal law is used as a supplementary tool in cases involving persistent or deliberate non-compliance⁷². Academic and policy analyses in these jurisdictions emphasise that the effectiveness of criminal provisions depends less on their

⁶⁸ INDIA CONST. art. 21.

⁶⁹ *Bandhua Mukti Morcha v. Union of India*, (1984) 3 SCC 161 (India).

⁷⁰ David Weil, *The Fissured Workplace: Why Work Became So Bad for So Many and What Can Be Done to Improve It* 180 (Harvard Univ. Press 2014).

⁷¹ Economic Policy Institute, *Wage Theft Is a Much Bigger Problem Than Other Forms of Theft—But Workers Remain Mostly Unprotected* (2014).

⁷² Janice Fine & Jennifer Gordon, *Strengthening Labor Standards Enforcement through Partnerships with Workers' Organizations*, 38 *Pol. & Soc'y* 552 (2010).

formal existence and more on how frequently and consistently they are enforced.

10.2 The Indian Approach: Regulatory Design and Enforcement Orientation

In India, wage-related and safety-related violations are primarily addressed within a regulatory framework under the Labour Codes, particularly the Code on Wages, 2019 and the Occupational Safety, Health and Working Conditions Code, 2020. These statutes provide mechanisms for:

- recovery of unpaid wages⁷³,
- imposition of monetary penalties⁷⁴, and
- adjudication through designated authorities⁷⁵.

While penal provisions exist within the codes, including fines and, in certain cases, imprisonment, the overall structure reflects a graded and compliance-oriented approach. In addition, general criminal law under the Bharatiya Nyaya Sanhita, 2023 remains applicable where conduct meets the threshold of offences such as negligence or coercion. However, the primary response to most labour violations continues to be regulatory rather than criminal⁷⁶.

This approach is consistent with the stated objectives of labour reform, which include simplification of legal processes, reduction of procedural complexity, and facilitation of compliance. It allows for quicker resolution of disputes, particularly in matters such as wage recovery, while reserving criminal sanctions for more serious or repeated violations.

10.3 Identifying the Policy Gap: Deterrence and Enforcement Practice

A comparison between jurisdictions highlights a specific policy issue that is not confined to any one legal system. Even when laws recognise the seriousness of wage violations, criminal enforcement tends to remain limited in practice. In the United States, for example, the scale of economic harm coexists with relatively low levels of criminal prosecution⁷⁷. In India, the

⁷³ Code on Wages, 2019, § 45 (India).

⁷⁴ Code on Wages, 2019, No. 29, § 54 (India).

⁷⁵ Code on Social Security, 2020, § 85 (India).

⁷⁶ Bharatiya Nyaya Sanhita, 2023, No. 45, § 146 (India).

⁷⁷ International Labour Organization, *World Employment and Social Outlook 2021: The Role of Digital Labour Platforms in Transforming the World of Work* 62 (Int'l Labour Off. 2021).

framework is more explicitly regulatory, which raises a related but distinct question: whether reliance on penalties and compliance mechanisms alone is sufficient to ensure deterrence in cases of repeated or significant violations.

This observation should be understood carefully. It does not suggest that the regulatory model is ineffective or that criminalisation is inherently preferable. Rather, it indicates that the effectiveness of any enforcement model depends on how it is implemented. Where penalties are applied consistently and proportionately, they can serve as an effective deterrent⁷⁸. Conversely, where enforcement is uneven, the deterrent value of the law may be reduced, regardless of whether the provisions are civil or criminal in nature.

10.4 Toward a Balanced Policy Approach

The comparative analysis suggests that the key issue is not the choice between a regulatory or criminal model, but the calibration between the two. Jurisdictions that have sought to strengthen enforcement have generally adopted a mixed approach, combining:

- administrative remedies for routine violations⁷⁹, and
- targeted penal provisions for serious or repeated misconduct⁸⁰.

For India, the relevant policy consideration is how to ensure that the existing framework maintains this balance. The Labour Codes already provide for graded penalties and, in certain circumstances, criminal consequences. The question is how clearly the system defines the threshold at which regulatory non-compliance transitions into criminal liability, particularly in cases involving harm to life, safety, or basic economic security⁸¹.

A carefully structured approach would allow the regulatory framework to function efficiently in routine cases, while ensuring that serious violations are met with proportionate and enforceable consequences. Such an approach would not require a fundamental change in the structure of the law, but rather a clearer articulation of how its different components operate in relation to one another.

⁷⁸ Consumer Education & Research Centre v. Union of India, (1995) 3 SCC 42 (India).

⁷⁹ Code on Social Security, 2020, No. 36, § 114 (India).

⁸⁰ Industrial Relations Code, 2020, No. 35, § 86(3) (India).

⁸¹ INDIA CONST. art. 42

10. Recommendations

10.1 Recriminalization of Serious Violations

The existing legal framework under the Labour Codes provides for penalties and, in certain cases, imprisonment. However, official discussions and parliamentary committee observations indicate that serious violations affecting life, safety, and basic subsistence require clearer and stronger consequences. The Parliamentary Standing Committee on Labour has emphasised the need to ensure “mandatory minimum entitlements” and stronger protection frameworks for vulnerable workers, particularly in unorganized sectors.

In this context, a calibrated approach may be considered where:

- violations resulting in workplace deaths or serious injury are more clearly aligned with criminal liability standards,
- repeated or deliberate non-payment of wages is treated with enhanced penal consequences beyond routine monetary penalties.

Such an approach would not alter the overall regulatory structure but would ensure that serious harm is met with proportionate legal consequences, consistent with existing criminal law principles.

10.2 Strengthening Enforcement Mechanisms

The effectiveness of any legal framework depends on its enforcement capacity. Recent labour policy reforms have already been introduced:

- digital inspection systems,
- centralised databases, and
- facilitative compliance mechanisms under the Labour Codes⁸².

At the same time, committee recommendations and policy analyses indicate the need to

⁸² India, Press Information Bureau, Ministry of Labour & Employment, Labour Reforms: New Labour Codes for New India (Nov. 21, 2025).

strengthen institutional capacity further. This may include:

- development of specialised enforcement or prosecution units within labour administration,
- improved coordination between labour authorities and criminal justice agencies,
- use of digital platforms such as the e-Shram portal⁸³, which has already registered over 30 crore unorganised workers, to improve traceability and enforcement.

The objective here is not to increase litigation, but to ensure that existing legal provisions are implemented in a consistent and effective manner.

10.3 Clarifying Liability in the Gig Economy

The recognition of gig and platform workers under the Social Security Code, 2020 represents a significant development. Official data indicates that India's gig workforce is projected to grow from around 1 crore workers in 2024–25 to approximately 2.35 crore by 2029–30⁸⁴, highlighting the scale of this sector.

Parliamentary and policy discussions have already identified the need for:

- clearer obligations for aggregators and digital platforms,
- mandatory registration of workers on national databases, and
- continued access to social security benefits.

Building on these developments, a structured framework may include:

- clearer identification of the entity responsible for worker safety and welfare,
- defined standards for working conditions in platform-based work,
- and mechanisms to address disputes in a timely and accessible manner.

Such clarification would strengthen the existing framework without altering its foundational

⁸³ India, Press Information Bureau, Ministry of Labour & Employment, Over 31.38 crore unorganised workers registered on e-Shram portal (Dec. 4, 2025).

⁸⁴ India, NITI Aayog, *India's Booming Gig and Platform Economy: Perspectives and Recommendations on the Future of Work* (2022).

structure.

10.4 Towards a Worker-Centric Justice Model

Recent reforms have aimed to expand coverage and simplify procedures. However, official and policy-level discussions continue to emphasise the importance of access to justice, particularly for workers in informal and mobile employment.

Key measures that align with this objective include:

- expanding legal aid and awareness mechanisms, especially for unorganised workers⁸⁵,
- strengthening grievance redressal systems linked to platforms such as e-Shram,
- improving portability of benefits and claims across states, as recommended by parliamentary committees.

In addition, faster resolution of disputes—through specialised forums or streamlined procedures—can ensure that workers receive timely remedies without prolonged litigation.

The recommendations outlined above do not suggest a structural overhaul of the Labour Codes. Instead, they focus on refining the existing framework by:

- aligning serious violations with appropriate penal consequences,
- strengthening enforcement capacity,
- clarifying emerging areas such as gig work, and
- improving access to justice.

The objective is not to replace the current system, but to ensure that its implementation reflects the seriousness of labour-related harm while maintaining regulatory efficiency.

Such an approach remains consistent with ongoing policy discussions and official committee

⁸⁵ India, PRS Legislative Research, Standing Committee Report Summary: Social Security and Welfare Measures for Inter-State Migrant Workers, available at <https://prsindia.org> (last visited Feb. 25, 2026).

recommendations and provides a balanced pathway for strengthening labour governance in India.

11. Conclusion

This chapter has examined the evolving relationship between labour regulation and criminal accountability in India's reformed legal framework. The Labour Codes have undoubtedly expanded coverage, streamlined definitions, and formally recognized vulnerable categories of workers. Yet, their enforcement design centered on compliance, penalties, and administrative resolution creates a measured but significant gap between the recognition of rights and the realisation of accountability. Within the normative framework of the Constitution of India, labour protection is not merely regulatory; it is tied to dignity, equality, and protection against exploitation. Simultaneously, the Bharatiya Nyaya Sanhita, 2023 provides the legal basis to address harm through criminal sanctions where conduct crosses defined thresholds. The challenge, as this chapter has shown, lies in the operational link between these two frameworks—particularly in cases involving workplace deaths, wage deprivation, and emerging forms of platform-based labour. The present system does not exclude criminal law, but it conditions its use, often placing initial reliance on regulatory mechanisms even where harm is substantial. This approach supports efficiency and ease of compliance, yet it also raises a narrow but important concern: whether the threshold for invoking criminal accountability is sufficiently clear and consistently applied, especially for vulnerable workers who face practical barriers in accessing remedies. A balanced path forward does not require structural change, but clearer alignment between the gravity of harm and the legal response. Routine violations may be effectively addressed through compliance mechanisms, but serious and repeated violations must be met with proportionate and enforceable consequences, including criminal law where appropriate.

In this sense, the central insight remains precise: law may exist, but justice depends on how it is enforced. The true measure of labour reform, therefore, lies not only in codification, but in ensuring that where exploitation results in real harm, the legal system responds with clarity, consistency, and accountability.

References

1. Code on Wages, 2019, No. 29 (India).
2. Industrial Relations Code, 2020, No. 35 (India).
3. Occupational Safety, Health and Working Conditions Code, 2020, No. 37 (India).
4. Code on Social Security, 2020, No. 36 (India).
5. Bharatiya Nyaya Sanhita, 2023, No. 45 (India).
6. India, Ministry of Labour & Employment, Labour Codes Portal, available at <https://labour.gov.in/en/labour-codes> (last visited Feb. 21, 2026).
7. India, Ministry of Labour & Employment, FAQs on Labour Codes (2026).
8. India, PRS Legislative Research, Standing Committee Report Summary: Code on Social Security, 2019, available at <https://prsindia.org> (last visited Feb. 24, 2026).
9. India, PRS Legislative Research, Legislative Brief: Code on Wages, 2019, available at <https://prsindia.org> (last visited Feb. 25, 2026).
10. International Labour Organization, *World Employment and Social Outlook 2021: The Role of Digital Labour Platforms in Transforming the World of Work* (Int'l Labour Off. 2021).
11. World Bank, *Digital Progress and Trends Report 2023* (World Bank 2024).
12. India, Ministry of Statistics & Programme Implementation, National Statistical Office, Periodic Labour Force Survey (PLFS) Annual Report 2022–2023, available at <https://mospi.gov.in> (last visited Feb. 21, 2026).
13. India, Ministry of Labour & Employment, e-Shram Portal: National Database of Unorganised Workers, available at <https://eshram.gov.in> (last visited Feb. 21, 2026).