

**Rule specific comments on the Code on Wages (Central) Rules as on July 7th 2020**

SI No.	Chapter Rule/Page No	Change Proposed	Reasons
	Page no-50 Chapter-II Rule-3(1)	<ol style="list-style-type: none"> <li>1. Consumption units to be increased to 5-6 members for tea garden workers</li> <li>2. Calorific Value of 2700 to be reconsidered(increased) specially for women</li> <li>3. Expenditure on higher education to be considered</li> <li>4. Consideration to be also made about the women workers' cost of unpaid domestic care work</li> <li>5. Woman in the household to be considered 1 consumption unit</li> </ol>	<p>Standard size of a family is considered to be 4 members, but inside a tea garden normally a family unit consists of 5 to 6 members</p> <ol style="list-style-type: none"> <li>1. Tea garden women have a history of severe anaemia</li> <li>2. The rule only gives emphasis to education expenditure for children</li> </ol>
	Page no-50 Chapter-II Rule-3(1)	Provision for Transport/Mobile/Internet to be included	Rising cost of such services
	Page no-50 Chapter-II Rule-3(1)	Provision for children education, medical requirement, recreation and expenditure on contingencies to be increased (from current 25%)	With classes online in current COVID19 times the cost has increased.
	Page no-50 Chapter-II Rule-3(1)	Clothing requirement to be increased to 100 (from 66) especially for the colder districts of the country	Clothing needs of a worker is subject to the climatic conditions of the geographical region wherein the worker (in question) is placed.
	Page no-50 Chapter-II Rule-3(1)	Consumption units in a family to be increased to 5-6	<ol style="list-style-type: none"> <li>1. This is needed to account for other dependents like elderly, sick etc. in a household that couldn't work</li> <li>2. In the Food Security Act, we consider 5 members in general family size</li> </ol>
	Page no-50 Chapter-II Rule-3(1)	Calorific Value of 2700 to be considered in accordance of the norms for the food category based on Dr. W.B. Aykroyd's formula for an adequate and balanced diet	<p>This is to ensure that a balanced diet is achieved within the identified calories.</p> <p>20% less calorific requirement for women and 40% less for children is not acceptable, since women, growing and</p>

		Women, growing children and adolescents' requirements of calories should be calculated as equal to male adults.	adolescents require as much food as adult men. Actually growing and adolescent children's needs may be more. Also more needs to be factored in for pregnant and lactating mothers.
	Page no-50 Chapter-II Rule-3(1)	ICMR's definition of a healthy diet (of an adult, growing and adolescent children or lactating/ pregnant mothers) to be added while defining the minimum wage	Even in the context of COVID, the diet should include components of Zinc, Vitamin C, Protein and Calcium
	Page no-50 Chapter-II Rule-3(1)	Method of prescribing Housing rent expenditure allowance (10 per cent of food and clothing expenditure) to be reconsidered.	<ol style="list-style-type: none"> <li>1. 10 percent consideration is not adequate for providing a rented accommodation let alone a decent and hygienic one</li> <li>2. Rents are usually calculated per the market rate in a given area.</li> <li>2. Ceiling of 10 percent of food/clothing cost might not cover it for all region and worker (e.g. migrant worker in a city)</li> </ol>
	Page no-50 Chapter-II Rule-3(1)	The long term health risks, e.g. for sanitation workers, are not taken into account in the provisions of minimum wage.	<ol style="list-style-type: none"> <li>1. Expenditure for children education, medical requirement, recreation and expenditure on contingencies constituting 25 percent of minimum wage is not enough</li> <li>2. Long term health effects cannot be included in "contingencies"</li> </ol>
		<p>Quantification is "as may be prescribed" hence found in rules, and not in the acts.</p> <p>The phrase "as may be prescribed" is problematic. This might be addressed at rules level. Changes to be made at the main parent Act (Code on Wages Act 2019) by incorporating rule 3 and 11 with suitable modifications</p>	<ol style="list-style-type: none"> <li>1. Violates the cardinal principle of administrative law</li> <li>2. This process of Quantification opens doors for managements to challenge wage fixation on grounds of excessive Delegated Legislation.</li> <li>3. Decent wage cannot be guaranteed to workers (in a timely manner)</li> </ol>
	Page no-50 Chapter-II Rule-3(1)	Maternity/Paternity expenditures are not taken into	<ol style="list-style-type: none"> <li>1. All aspects of a household's</li> </ol>

		account in the provisions of minimum wage.	expenditure should be considered
	Page no-51 Chapter-II Rule-3(2)	Minimum wage should be calculated as per 30 days (instead of current 26 days)	1. Weekly offs are a right of all workers and need to be paid for
	Page no-50 Chapter-II Rule-3(2)	Methodology to calculate Minimum Wage using alternative basis (other than per hour basis) e.g. per piece basis, etc., to be specified.	1. In most of the informal sector, the workers are not paid as per number of working hours, they are usually paid as per piece rate
	Chapter-II Rule-3	Adolescents of more than 14 years (and less than 18 years) to be considered separately and explicitly for specifying minimum/floor wages	1. Such a worker might end up working in some factory setup/farm and might be forced to work with wages below minimum wage
	Page no-53 Chapter-III Rule-12	“as it thinks necessary” to be replaced by “mandatorily” in the Manner of consultation of Central Government with State Governments	1. Advices from states will enable capturing of regional factors within each state while fixing floor wage
	Page no-51 Chapter-II Rule-4(2)	Tea workers to be categorized as semi-skilled workers	1. Categorization of tea workers has always remained as unskilled labourers, but the industry being highly labour intensive, the workers should receive a revision in their skill- there should be a scope to upgrade their skill
	Chapter II Rule-5	<ol style="list-style-type: none"> <li>1. Revision in Minimum Wages to be made mandatory for revision in every 5 years</li> <li>2. Word “Endeavour” to be deleted from the “Time Interval for revision of dearness allowance. <b>Endeavour shall be made so that the cost of living allowance and the cash value of the concession in respect of essential commodities at concession rate shall be computed once before 1st April and then before 1st October in every year to revise the dearness allowance payable to the</b></li> </ol>	<ol style="list-style-type: none"> <li>1. Only DA revision is mentioned in every six months, without specifying that the appropriate Government shall be liable to revise the Minimum Wage. In this case, the revision in Minimum Wage may not happen for even 5 years or more as it is currently happening in Assam</li> <li>2. ‘Shall will denote’ mandatory revisions</li> </ol>

		employees on the minimum wages”	
1.	<p><b>Rule 3 Manner of calculating the minimum rate of wages.</b></p> <p>–</p> <p><i>(1) for the purposes of sub-section (5) of section 6, the minimum rate of wages shall be fixed on the <u>day</u> basis keeping in view the following criteria*, namely:- .....</i></p> <p><i>(2) when the rate of wages for a day is fixed, then, such amount shall be divided by eight for fixing the rate of wages for an hour and multiplied by twenty six for fixing the rate of wages for a month and in such division and multiplication the factors of one-half and more than one-half shall be rounded as next figure and the factors less than one-half shall be ignored.</i></p>	<p><b><u>Justification</u></b></p> <p>In practice, minimum rate of wages are first arrived at on a <u>monthly basis</u> by various advisory boards (even by the 7<sup>th</sup> Central Pay Commission), Subsequently, <u>monthly wages are divided by 26 days, to arrive at daily wage rate.</u></p> <p><b><u>Suggestion</u></b></p> <p>In view of the above following suggestions may be considered –</p> <p>In Rule 3 (1), <u>the word ‘day’ may be replaced by the word ‘month’</u></p> <p><u>Rule 3 (2) may be reworded as follows to accommodate changes in Rule 3(1):</u></p> <p><i>when the rate of wages for a month is fixed, then, such amount shall be divided by twenty six for fixing the rate of wages for a day and the rate of wages so fixed for a day shall be divided by eight for fixing the rate of wages for an hour and in such division the factors of one-half and more than one-half shall be rounded as next figure and the factors less than one-half shall be ignored.</i></p>	<p><b>Rule 3 Manner of calculating the minimum rate of wages. –</b></p> <p><i>(1) for the purposes of sub-section (5) of section 6, the minimum rate of wages shall be fixed on the <u>day</u> basis keeping in view the following criteria*, namely:- .....</i></p> <p><i>(2) when the rate of wages for a day is fixed, then, such amount shall be divided by eight for fixing the rate of wages for an hour and multiplied by twenty six for fixing the rate of wages for a month and in such division and multiplication the factors of one-half and more than one-half shall be rounded as next figure and the factors less than one-half shall be ignored.</i></p>
2.	Rule 4(2)	The technical Committee to include representatives from Trade Unions, Gender Specialist/s working on labour rights and also from the Employer’s side	<p>1. No mention of Trade Union Representatives as it forms the main bridge between the workers and the management in Tea Gardens.</p> <p>(i) Chief Labour Commissioner (Central) - Chairperson;</p> <p>(ii) Joint Secretary to the Government of India in the Ministry of Labour and Employment dealing with the wages - Member;</p> <p>(iii) A representative from the Ministry of Skill Development and Entrepreneurship, Government of India,</p>

			<p>dealing with skill development - Member;</p> <p>(iv) Director General of Employment, Government of India, Ministry of Labour and Employment - Member;</p> <p>(v) Two technical experts in wage determination as nominated by the Central Government -Members; and</p> <p>(vi) the Deputy Secretary to the Government of India, in the Ministry of Labour&amp; Employment, dealing with the wages - Member Secretary.</p> <p>(vii) The presence of gender specialists/ women's rights specialists will ensure that women's concerns are adequately taken on board</p>
	Page no-51 Chapter-II Rule-4(2)*	The advisory board need to include representation from labour organisations ( <i>shram sangathan</i> ), gender specialist working on labour rights as well	1. To ensure voices of all stakeholders are heard and considered.
	Page no-51 Chapter-II Rule-4(2)	Representation of trade unions, CSOs, Education Expert and health and nutrition officer in the formation of technical committee to be included	1. To ensure voices of all stakeholders are heard and considered.
	Page no-51 Chapter-II Rule-4(2)	Representation of women in the formation of technical committee to be included  30-50% of the technical committee members should be women	1. To ensure voices of all stakeholders are heard and considered.
	Addition of a proviso in Rule 3 for rounding off the minimum rate of wages to nearest whole number	<u>Suggestion</u> It is proposed that a new provision may be added into Rule 3 stating that minimum rate of wages so fixed by appropriate government shall be rounded off to nearest whole number for ease of dissemination.	
	Rule 6	Normal Working hours to be limited to 8 hours including 1 hour of rest	It has been specified that the normal working hours are 8 +1 hour of rest. In this case, the rule will fail to adhere to the ILO specification of the normal working hours as 8 including the rest period.

	Page no-51 Chapter-II Rule 6(2)	The working day which could be up to 12 hours (including period of rest) to be reduced.	<ol style="list-style-type: none"> <li>1. The current 12 hour period compromise the safety of the worker living away from his place of work</li> <li>2. Commute time should be considered and should not fall in the pre-dawn or post-dusk period of a day</li> <li>3. 12 hour working day is especially discriminatory for women especially when their unpaid care work of cooking, cleaning, child rearing and social reproduction does not decrease. Such discriminatory practices can force women to leave the workforce</li> </ol>
	Page no-53 Chapter-III Rule 11(4)	The Floor wage (and minimum wage) to be mandatorily reviewed and revised every year or 2 years.	<ol style="list-style-type: none"> <li>1. Current provision of “interval not exceeding five years” might result in a worst case scenario of revision happening after 5 years.</li> <li>2. Frequently changing economic conditions has to be considered</li> </ol>
	Miscellaneous	<p><b><u>Addition of a new Rule on online Grievance Redressal and Claim Settlement Mechanism</u></b></p>	<p><b><u>Justification</u></b> The draft wage rule, does not provide any mechanism for grievance redressal which is important for claim settlement</p> <p><b><u>Suggestion</u></b> <u>The Economic Survey, 2018-2019 provided following recommendations relating to grievance redressal which may be inserted into the wage rule with appropriate modification –</u></p> <p><i>There should be an easy to remember toll-free number for anybody to register his grievance on non-payments of the statutory minimum wages. This number should be given wide publicity to make people aware of this avenue for grievance redressal. Swift</i></p>

			<p><i>action should be taken against the offenders and this action should be flashed on the dashboard without going into specific details. The impression of action being taken would act as a deterrent to employers to flout the statute.</i></p>
		<p><b>58. Inspection scheme.-</b></p> <p><i>(1) For the purposes of the Code and these rules, there shall be formulated an inspection scheme by the Chief Labour Commissioner (Central) with the approval of the Central Government.</i></p> <p><i>(2) In the inspection scheme referred to in sub-rule (1), apart from other structural facts, a number shall be specified in the scheme for each Inspector-cum-Facilitator and establishment.</i></p> <p>As effective and efficient labour inspection system is critical for achieving compliance, <b>the wage rule must provide the detail of the inspection scheme, which not only be tied to a web-based scheme but also include other options such as complaint-based inspections, planned surprise and risk-based inspections so that non-compliance is detected through these wide range of measures especially in the informal economy.</b></p>	<p><b><u>Justification</u></b></p> <p>Poor enforcement and low level of compliance is one of the major constraint towards achievement of redistributive outcome of the wage code in terms of addressing working poverty and inequality. While the Wage Code, 2019 has ushered many reforms, the section on inspection scheme has been left to future notification, which is a step backward.</p>
	Page no-52 Chapter-II Rule 7	<p>The weekly day of rest shouldn't be mandatory and to be paid for, if not availed.</p> <p>We are saying that workers need to be paid for 30 days, need to get a weekly day off and that day off should be paid for. The worker can decide to work elsewhere on that day to earn more (not to be included in the document) but that will be up to the worker.</p>	<ol style="list-style-type: none"> <li>1. Wages calculated at 26 days per month makes the mandatory "day of rest" a forced unpaid day</li> <li>2. With minimum wage at such low level, a worker would like to not avail the day of rest but would rather work on those days and earn</li> </ol>

	Rule 7 (4)	Grievance redressal should be further defined and timeline should be provided for redressal	This would ensure effective redressal process
	Rule 7 (5)	This rule needs to be stated in a more simpler terms.	This rule is not comprehensible in its current form
	Rule 19	Deduction should not be more than 30% of monthly wage	
	Chapter V	In bonus, there should be share of worker especially in context of sugarcane field	
	Rule 28	The one third representation of women in the advisory board to be increased to 50 percent.	Advisory board for minimum wages and the committee for increasing employment opportunities for women are merged into a single board, with one third being women, representing a reduction from the 50 percent stipulated under the ERA.
	Rule 28	The one third representation of women in the advisory board (stated in the Act) to be mentioned at the 4 constituents' level a-d.	It may lead to under-representation of women in some categories
	Rule 28	Qualifications needed to become the chairperson of the advisory board to be listed.	Needed to ensure competency and proper functioning of the board.
	Rule 28	Timeline for the constitution of the board to be explicitly mentioned.	To ensure that the key decisions are taken in a timely manner.
	Rule 33	The need of one-third attendance in the Quorum to be qualified with the one-third representation of women as well as from all 4 categories.	It may lead to under-representation of relevant stakeholders in key decision making
	Rule 33	In the postponed meeting the type of decisions that could be taken without the one-third majority need clarity.	<ol style="list-style-type: none"> <li>1. All decisions should not be taken in the absence of key stakeholders.</li> <li>2. It may lead to deciding on the key issues with under-representation.</li> </ol>
	Rule 36	Minutes of meetings of the advisory board to be published on the public domain.	This will increase transparency
	Rule 50	Designated authority should be at panchayat level and block level	To ensure better implementation at the ground level by increasing granularity at different levels of administration.
	Page no-58 Chapter-VIII Rule 51	<ol style="list-style-type: none"> <li>1. Proper records to be maintained containing each employee details.</li> </ol>	This will increase transparency



		2. There should be a mechanism through which workers should be informed about these records	
	Page no-58 Chapter-VIII Rule 52	For labour (e.g. marginal women SHG workers, informal sector workers etc.) there should be provision of giving wage slip in hard copy	A labour might not have the means to access the wage slip electronically.
	Page no-58 Chapter-VIII Rule 53	1. In addition to the trade union, there should be inclusion of Civil Society Organizations as well. 2. There should be proper timeline for redressal	For effective and timely redressal of grievances.
	Rule 55	It should be placed in wage payment section, instead of miscellaneous	It is an important clause and should be considered a primary rule and not miscellaneous.
	Miscellaneous	There should be proper definition of employer. For home based worker, contract workers, domestic worker and unorganized sector, there should be definition of employee.	Only the code defines these but not categorically.
	Page 59 Form I	PAN of the employee to be included as well	With the change in fiscal architecture/policy, push towards direct transfer of benefits etc. it would be good to include this.
	Page 59 Form I Page 63 Form V	1. Gender column to be included which includes male, female and other/transgender 2. Father's name / spouse name column to incorporate equality.	This is to remain inclusive of all genders in the rules
	Page 72 onwards	Gender stereotyping to be removed (e.g. use of terms such as calf boy, Beater Women etc. should be avoided). Instead of boy/woman write 'person'	Work done in such categories is not performed by only one or the other gender workers. All sexes can and actually do work in all categories

\* The act mentions advisory board as follows

#### CHAPTER V ADVISORY BOARD

42. (1) The Central Government shall constitute the Central Advisory Board which shall consist of persons to be nominated by the Central Government— (a) representing employers; (b) representing employees which shall be equal in number of the members specified in clause (a); (c) independent persons, not exceeding one-third of the total

members of the Board; and (d) five representatives of such State Governments as may be nominated by the Central Government.

(2) One-third of the members referred to in sub-section (1) shall be women and a member specified in clause (c) of the said sub-section shall be appointed by the Central Government as the Chairperson of the Board.

### **Overall comments on the Draft Code on Wages Rules 2020**

- Workers need to be paid for all seven days of the week (30 days of the month) and the weekly day off should be a paid holiday.
- There's an in-built systematic exclusion of the Marginal women workers. Home based workers, domestic workers, apprentices, workers in private households, guest faculties are alienated from the definition of workers.
- Majority of marginal workers are without job contracts and will not fall under the ambit of this code. There is no specific clause in the code securing the labour rights of such workers.
- In the context of Tea plantation workers (especially in Assam and Bengal), owing to insufficient legally prescribed wages (also non-payment), household units are forced to engage into alternative sources of livelihood (e.g. for 3-4 days a week). It is not clear how will the rules be applied in such cases.
- Timely payment of wages, responsibility of payment of minimum bonus, Technical Committee for working Journalist, Inspection scheme shouldn't be under the Miscellaneous but under the primary section.
- How will the implementation of the Act be monitored – that is not covered fully in the Rules.
- The draft rule is silent on the appointment of Inspector cum Facilitators and their powers. The Code mentions that "The appropriate Government may, by notification, appoint Inspector-cum Facilitators". The appointment should be done mandatorily.

### **Recommendations related to Code on Wages Act 2019**

- Two of the most important Acts – Minimum wages and Equal Remuneration Act – that protected/promoted women's rights have been repealed on the one hand, while on the other hand are not incorporated fully in the current wage code.
- Self-certification of compliance by the employers and web based inspection schemes should not be allowed.
- Under Payment of Bonus Act, method of computation of bonus was written into the law. When merged into code of wages the principle of this share of wages will be defined by the executive. The method of computation of bonus should be prescribed. Also, "executive" in respect to the law is not clearly defined
- Floor wage needs to be set as per a scientific method (e.g. Rangarajan's report) which would allow a worker getting such a wage to cross the poverty line. Also, amendment of parent act to lay down norms of quantification of MW and FW is needed.
- Code of Wage Act is not clear on some respects (e.g. "conditions of services" lists the coverage of it in Equal Remuneration act but Code of wage act simply uses the term without specifying what "conditions of services" cover). So, the act has to clearly

list all underlying definitions for all term used to remove any ambiguity in its implementation.

- Floor wage need to be set in such a way that it does not bring down the existing market rate, if set too low.
- Insurance of the worker is not covered in the employment contract by default, to deal with accident, death etc. Need to include insurance for both registered as well as unregistered workers.
- Similarly, chapter VI 45 of the code states that “The appropriate Government may, by notification, appoint one or more authorities, not below the rank of a Gazetted Officer, to hear and determine the claims which arises under the provisions of this Code”. The appointment should be done mandatorily.
- Interstate Migrant Workers Act should also be integrated with the Wage Code Rules as most agricultural labourers are mostly migrant labour.

## Annexure I

### Feedback on Gender Discrimination in draft Rules of the Code of Wage Bill

**Overall context:** The rules do not take cognizance of the fact that women's participation in the workplace has been reducing since the 1980s. While this would warrant specific measures to increase workplace participation, the rules not only neglect doing this but also let go of the special measure introduced for women in the earlier labour laws. For example, two of the most important Acts – Minimum wages and Equal Remuneration Act, 1976 – that protected/promoted women's rights have been repealed on the one hand, while on the other hand their pro-women provisions are not incorporated fully in the current wage code.

**Patriarchal and gender discriminatory drafting of the rules:** A general overview of the rules demonstrates that they are drafted in a typical patriarchal setting which considers that workers are all male and women constitute wives and mothers of workers. For example, the pronoun 'he' and 'his' is used universally in the document for a worker. This should be changed to 'she/ he' or person. This framing also excludes the transgender community completely from the definition of workers. There is no place in the wage slip and Form VI, to write the Sex/Gender of the person. Among the representation of the Central Advisory Board and other committees, there is also a need for a gender specialist who may be able to bring in the nuances of both women's conditions and transpersons in the deliberations and provisions which is absent as of now.

The language is specifically stereotyping and exclusionary of women. For example most of the cattle work is done by women but the workers are described in categories such as 'calfman', 'boatman' etc. Categories for women such as 'bellwoman' and 'beaterwoman' are also highly restrictive. These categories need to be changed to persons, indications any gender can do the work.

None of the work generally done by women finds a mention in the 600+ skills listed under the rules. The rules also ignore the fact that women are unlikely to get the opportunities to become semi-skilled or skilled or highly skilled workers, e.g. highly skilled workers are those who have *intensive technical or professional training or practical occupational experience for a considerable period*. Thus the drafting of the rules in their foundation itself are exclusionary of women's interests. The need is to incentivize building skills among women and making adequate provisions for skilling of women.

The standard family for calculation of minimum wages is considered a spouse and two children, which reflects the two child norm. While having more than two children is often neither in the hands of the poor or poor women, their needs and rights, when they are born are denied by rules such as these. While India's fertility is almost at the replacement level, such norms continue to discriminate against poor families which have more than two children. These rules also do not take cognizance of elderly parents or differently abled dependents who are often part of the same family. There is also no mention of the 'Female Headed Household' while determining the minimum wages. This flawed concept of family is used in calculating the minimum wages for the worker.

**Minimum wages:** Calculation of minimum wages using 26 workdays in a month and the rest-days being unpaid days is discriminatory for informal sector workers. The recommendation is to consider a 30 days work month where 4 rest days, one per week will be paid leave. The provision of 6 continuous days of work before availing of rest day is also discriminatory for workers, especially women workers, the most marginalized and workers on piece rate, who

are unlikely to get continuous days of work. Hence calculating minimum wages per day with inclusion of paid weekly holidays is ethical and just. There's no clarity on how the wages of 'women workers in agriculture' or workers working on piece rate will be determined in the current rules document.

Floor or minimum wages do not cover all workers (e.g. *Anganwari, Asha etc.*) on virtue of them being treated as volunteers and not employees. The definition of workers should include such scheme based workers. Evasions of minimum wages or conditions of work by allowing workers to be categorised as volunteers or apprentices should not be allowed. Also, home based workers and platform workers (e.g. *contractors for Swiggy, Zomato etc.*) are out of the ambit of this act. Floor wage should be applicable to such workers as well.

**Blind to work conditions of informal sector workers:** The rules are generally blind to the work conditions of informal sector workers in general and women in the informal sector in particular. For example we know that 90% of the women workers are in the informal sector. Women's work is mostly as domestic workers, other home based work, as part of SHGs, as scheme based workers and apprentices apart from other forms of work. The private home forms an important site of work for women, but this is excluded from the definition of workplaces. It totally leaves out all private households and hence apprentices, domestic/homebased workers are denied the "worker" status. E.g. *Beedi* workers, *Sumangali* workers in textile industries

At the same time the definition of an employer is restricted to an industry set up and is not adequate to cover the employment of SHG run enterprises, domestic workers and other home based workers.

Terms such as 'conditions of work' are not defined. Therefore, it is difficult to understand or monitor minimum acceptable conditions of work. At the same time the concept of virtual or on-line inspection of work conditions or self-certification will not be acceptable or possible in these precarious workplaces where violations of workers' rights are more the norm than the exception. Physical inspection will be required. In fact, if inspectors are also women then many problems regarding facilities for women such as toilets, creches etc will be easier to identify.

**Inadequate contractual arrangements:** 70 percent of the urban women workforce employed in regular jobs do not have a formal written job contract. This essentially implies that the provisions of the new code on Wages vis-à-vis Minimum Wages Act and Equal Remuneration Act will not be applicable to these 70 percent of the urban women workforce who are engaged in regular jobs. Workers in irregular employment such as guest faculties at colleges or universities also do not come under the purview of such contracts. Written contracts and electronic payslips to be produced by workers is impossible for this category of workers. Hence the employer must be mandated to provide hard copies of pay slips.

## Annexure II

### List of person/organisation who had provided recommendations

S. No.	Name of Person	Name of Organisation
1)	Ajay Sharma	Amaltash
2)	Anjani Dixit	Rastriya Kishan Majdoor Sangathan; Lakhimpur Kheri
3)	Asim Rais	Astitwa
4)	Binod Sinha	Oxfam India
5)	Dr. Gurmukh Singh Pawah	Progressive Sugarcane Farmer
6)	Dr. Sanjay Kumar	Professor; Lakhimpur YD College
7)	Manish Singh	Consultant- Sugarcane Farming; Solidaridad Netherlands
8)	Mithilesh Kumari	Woman Farmer
9)	Nand Kishor Singh	Oxfam India
10)	Prem Anand	Oxfam India
11)	Sanjeev Kumar	Bharat Udai Education Society
12)	Suman	Child Rights Activist
13)	Farmers from field	
14)		PAJHRA
15)		NAZDEEK
16)		All Adivasi Student Association of Assam
17)		All Women Adivasi Association of Assam
18)		Ghana Chetna Samaj
19)		Nawa Bihan Samaj
20)	Prof. Ishita Mukhopadhyay	Department of Economics, University of Kolkata
21)	Prof. Ritu Dewan	Vice President, Indian Society of Labour Economics and Visiting Professor at Institute for Human Development
22)	Dr. Sona Mitra	Initiative for What Works to Advance Women and Girls in the Economy (IWWAGE)
23)	Prof. Vibhuti Patel	Former Professor at the Tata Institute of Social Sciences
24)	Bishakha Bhanja	National Alliance of Women's Organisation
25)	Rushda	National Federation Indian Women
26)	Bhoomika	Cividep
27)	Divita	Representing Women's organisation
28)	Indwin E Joel	Representing Women's organisation
29)	Dr. Nandita Mondol	Centre for Labour Studies, Tata Institute of Social Sciences
30)	Julie Thekkudan	Oxfam International
31)	Dr. Manasi Mahanty	Rayagada College
32)	Meenakshi Krishnan	Representing Women's organisation
33)	Nisha	Representing Women's organisation
34)	Parilata Mohapatra	National Alliance of Women's Organisation
35)	Rakhi Sehgal	Labour Activist
36)	Udita Chatterjee	Feminist Policy Collective
37)	Roshan Ara	Representing Women's organisation
38)	Sandhya Drew	Senior Lecturer at City, University London
39)	Sanjay Rai	Aim Trust

40)	Dr. Veena Shatrughan	Former Deputy Director, National Institute of Nutrition
41)	Vidya Rajput	Transcommunity of Chhattisgarh
42)	Dr. Swarnamayee Tripathi	Utkal University
43)	Anand	Oxfam India
44)	Ranjana Das	Oxfam India
45)	Sushmita	Oxfam India
46)	Rukmini	Oxfam India
47)	Ileena Roy	Oxfam India
48)	Amita Pitre	Oxfam India
49)	Rajini Menon	Oxfam India
50)	Anushree Jairath	Oxfam India
51)	Urmimala Sengupta	Oxfam India
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55)	Pankaj Shwetabh	ActionAid, Patna
56)	Ganga Ram Paikra	Chaupal
57)	Dr. Manjeet Kaur Bal	Samarth
58)	Namita Mishra	UNDP
59)	Saroj Mahaptra	Pradan
60)	Kuntal Mukharjee	Pradan
61)	Devidas Nimje	Samarthan
62)	Rajnish Gupta	Agrocrat
63)	Neeraja Kudremoti	Aspirational District Program
64)	Shrish Kalyani	Aspirational District Program
65)	Sangeeta Sahu	Right to Food
66)	Vinaysheel	We the People
67)	Merunnisha Warsi	Independent Practitioner
68)	Prakash	Oxfam India
69)	Vijendra	Oxfam India
70)	Sandip	Oxfam India
71)	Namit Agarwal	World Benchmarking Alliance
72)	Daniel Edwin	OpenSpace
73)	Sebati Singh	IDA org
74)	Manohari Doss	ISM - WDRC
75)	George Pulikuthiyil	Jananeethi