



# Jus Corpus Law Journal

Open Access Law Journal – Copyright © 2021 – ISSN 2582-7820  
Editor-in-Chief – Prof. (Dr.) Rhishikesh Dave; Publisher – Ayush Pandey

This is an Open Access article distributed under the terms of the Creative Commons Attribution-Non-Commercial-Share Alike 4.0 International (CC-BY-NC-SA 4.0) License, which permits unrestricted non-commercial use, distribution, and reproduction in any medium, provided the original work is properly cited.

---

## Labour Laws and Migrant Workers during Covid-19

Anamika Gupta<sup>a</sup> Neelu Nandini Khare<sup>b</sup>

<sup>a</sup>Banasthali Vidyapith, Jaipur, India <sup>b</sup>Banasthali Vidyapith, Jaipur, India

Received 29 June 2021; Accepted 20 July 2021; Published 23 July 2021

---

*The Constitution of India envisages a compulsory norm for the employers and Government to make such policies that can generate employment for the vulnerable section of the society like workers. Ensuring the same, the Indian labor laws have been implemented with the purpose to provide benefits to workers in form of social security and welfare so that unemployment can be reduced, and the Indian economy can be developed. But, nowadays the issue of migrant labors became very significant in almost every growing nation across the world. Covid-19 pandemic has unfortunate consequences on both social and economic instruments due to which welfare of labors and workers i.e., the utmost priority of labor laws has resulted in the least. The authors in this paper have discussed the rights of migrant workers, violation of these rights during the covid-19 pandemic, the effect of a pandemic on the workers following it up with the steps taken by the government, International Labor Organization, and NGOs for the protection of the workers.*

**Keywords:** *migrant workers, covid-19, lockdown, international labor organization, labour law.*

---

### INTRODUCTION

The Constitution of India envisages a compulsory norm for the employers and Government to make such policies that can generate employment for the vulnerable section of the society like workers. Ensuring the same, the Indian labour laws have been implemented with the purpose to provide benefits to workers in form of social security and welfare so that unemployment

can be reduced, and the Indian economy can be developed. But, nowadays the issue of migrant labours became very significant in almost every growing nation across the world. Covid-19 pandemic has unfortunate consequences on both social and economic instruments due to which welfare of labours and workers i.e., the utmost priority of labour laws has resulted in the least.

The Government has provided certain guidelines of lockdown and of suspension of labour legislation which resulted in the least welfare of migrant workers as they were subjected to daily wages. This led to the termination of migrant workers from their jobs and have no proper assets for livelihood. Thus, started coming back to their homes on foot. This affected country's economy and labours situation has become worst. Around **33 percent of the workforce** was unemployed prior to this but now **39 million** workforces have become unemployed. This epidemic has a huge impact on all organisations including international, national, and governmental. Therefore, in this article, the authors will be discussing the impact of COVID-19 on migrant labours and suggestions which may assist in improving their conditions.

## **RIGHTS: A BOON TO LABOURS**

Now let's talk about the rights of labours that is the elementary rights of every labour enforced by statutes for all who are incapable to work immutably or for the time being. Human rights were first declared during the French revolution and constructed as a preamble to the Constitution of French, 1793 stating helping the public is a holy responsibility. Every citizen has the right to benefit program as per **Article 22** of the Universal Declaration of Human Rights<sup>1</sup>. **International Labour Organization** has also taken a necessary move towards rights of labours that is to strengthen their conditions of livelihood. The assurance of the minimal rights at place of working make labours able to ask for their portion in the wealth gained. These assurances may ensure the conversion of economic development into communal impartiality. Moreover, "International Covenant on Economic, Social and Cultural Rights of the United

---

<sup>1</sup> Universal Declaration of Human Rights, (adopted 10 December 1948 UNGA Res 217 A(III))

Nations” is an additional step for worker's social and cultural rights by which they are free to enjoy their communal, material, and societal progress.

**Indian Constitution**<sup>2</sup> envisages various articles concerning rights of labours such as Article 14 providing equality before the law, Article 15 protection against discrimination, Article 16 opportunity to work for all, Article 19 gives the right to form associations, and Article 23 make prohibition regarding forced labour while Article 24 denied that no child can work as labour before attaining the age of 14 years. Directive principles of state policy under the Constitution of India ensure suitable elements of livelihood as a matter of rights for all, equality in paying wages without discrimination, security against worker's exploitation, etc. With this, it is also the requirement for the state to provide equality in justice, education and to make working conditions for humans efficient and there must be an adequate quality of life for worker's participation in the workplace as provided through the 42nd amendment of Indian Constitution, 1976 and **National Rural Employment Guarantee Act**, 2005 has also been implemented trying to enforce the right to work. Part II of the Indian Constitution provides citizenship to every person of the country and denial of it may strap life and besides, every labour has a fundamental right to move independently from one place to another within the country's territory and such right cannot be declined to them.

## CONNOTATION OF MIGRANT WORKERS

A migrant worker has been engaged either by the employer or by the contractor at one place for employment which is situated at another place or is one who has been moved from one place to another within the territory for the cause of searching for work and livelihood in various sectors. But under labour laws, Migrant workers can be included only when they have been appointed by the entrepreneur means the migrant workers who migrate for their own are not included under the purview of labour laws.

Migrant workers generally pertain to the informal sector of labour force in India as they are not being assembled under any of the business associations, moreover, worker's quality is not

---

<sup>2</sup> Constitution of India

being secured either by trade unions or by the government. They do jobs at small undertakings as most of them are working as daily ventures at rickshaw pullers, domestic workers, etc. For their day-to-day survival and livelihood, they have to depend upon the daily root of wages as not getting wages as provided under the Minimum Wages Act. A survey recommends around 66 million inter-state migrant workers are there of which 32 percent are workers.

### LOCKDOWN AND MIGRANTS: OUT- TURN OF COVID 19

The phase of lockdown in India began on March 25, 2020. In this period apart from the activities relating to the manufacturing and providing of necessary items and amenities all the others were fully or partly delayed. The transport facilities for the passengers were stopped. Migrants have been seriously affected by the lockdown, among them, many of whom lost their source of livelihood due to industries being closed and were found standing outside their home city wanting to return.

According to the last census report 2011 census, there are around **42 million migrant workers** are present in India. The two most important states where the total share out-migration is highest are Uttar Pradesh and Bihar (Uttar Pradesh 24 percentage and Bihar 14 percentage).<sup>3</sup> In Indian cities, a million lives of migrant labourers have changed due to the unexpected shutdown of the businesses. Millions of migrant workers have been impacted by lockdown in India. **Loss of employment, deficiency of food supply, lack of social support**, and dread of unrevealed things are some of the vital causes due to which a large number of inhabitants are facing the problem. Due to the reasons like asking conveyance to return home, not being provided with permission to return, supply of standardized food, and against the guidelines given by the government stopping them from marching home, the migrants in a number of thousands protested across the country

---

<sup>3</sup> Chitranjali Negi, 'Human Rights Violation of migrant workers in India during Covid-19 pandemic' (*SSRN Papers*, 18 June 2020) <[https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3629773](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3629773)> accessed 19 June 2021

On 21st April 2020<sup>4</sup>, there was a report that a **12-year-old child died after walking over 62 Miles** from Telangana to her native village in Chhattisgarh's Bijapur district. She was 6 miles away from home. **More than 300 deaths** were reported till 5th May 2020, due to lockdown, for the reasons like police brutality, malnourishment, extreme tiredness roadway, and train accidents, suicides, and refusal of a medical facility. Mostly were among the marginalized migrants and labourers, among the reported deaths. **85 labourers** died while travelling home. On 8th May<sup>5</sup> 2020, **18 migrants** were killed by a freight train while resting on the tracks near Aurangabad in Maharashtra. On the 16th of May 2020, the death of around **25 migrant labourers** was reported, and several other workers got injured when a trailer carrying these workers collided with a stationary truck, which was also carrying migrants, of Uttar Pradesh.

• *Unfairness of Police against migrants*

On 26th March 2020, in Uttar Pradesh, one such video got viral depicting a class of young migrant labourers being compelled to hop down the main road with their heavy bags and luggage while they were coming to their home during lockdown period. **Arrested by the cops, who denied hearing their pleas, they were humiliated by being made to hop and crawl in this heat.**

On 28th March 2020, the news showed a number of migrants' labours in the capital of India which included all family members, packed their utensils, blankets, and pots into the rucksack, while some carrying the children on their shoulders as they gait along interstate highways going to their home. Some of them intended to walk thousands of miles. But as soon as they reached the Delhi border, many of them were **assaulted by the cops**. On 4th May 2020, another news showed that in Surat (Gujrat State) hundreds of migrant workers wanting to return their homes were caught by Police during a protest for arranging their journey to return their homes.

---

<sup>4</sup> *Ibid*

<sup>5</sup> *Ibid*

On 10th May 2020,<sup>6</sup> another news came forward where goods train crushed **16 migrant workers** to death when they were attempting to make their way to Aurangabad railway station Maharashtra State in the hope of catching a train that can take them to their homes in Madhya Pradesh State. At around 5:20 am an oncoming goods train ran over the workers who were tired of walking around sat down to rest and with time fell asleep. In order to avoid being thrashed by the police on the roads and with the knowledge that trains are not running late, they were walking along the railway track.

On 11th May 2020, Bengaluru Police personnel, at the KG Halli Police Station kicked and lathi charged a few migrant workers who requested the police to make arrangements for their return to home at Uttar Pradesh State. Similarly, on 17th May 2020, migrant labourers in an effort to walk towards the border of Uttar Pradesh were cane charged by the Haryana Police. The Migrant labourers were seen rushing back to the shelter.

In protection of their safety, many of them left their bags and conveyance (cycles) there at place and ran away. Migrants were warned not to move towards home in Uttar Pradesh State. The entry of migrant labourers on foot was prohibited by the state of Uttar Pradesh. They were not allowed to enter their native place. **“During the lockdown, the daily wage workers, such as vegetable and fruit vendors, milk sellers, auto-rickshaw and taxi drivers, and others delivering essential goods were mostly targeted by the Police”.**

## **LABOUR LEGISLATIONS: A MIGRANT WORKER’S RIGHTS**

The conditions of migrant workers however cannot be seen without focusing upon the labour laws during Covid-19. With regards to migrant workers during such a crisis, the Indian labour laws are seemed to be inadequate. These are the workers pertaining to both formal and informal divisions of the society to whom the Minimum Wages Act cannot be applied. The Central and State Government of India may make the legislations for such workers but resulted in no security and this resulted in such laws which have provided no security to migrant workers and therefore, such laws are not properly enforceable in India.

---

<sup>6</sup> *Ibid*

- *The Unorganized Workers' Social Security Act, 2008*

Such Act is implemented with the purpose to provide communal protection and enforcing National Security Social Scheme. This requires the central government under Section 3 to make such schemes which are associated with “life and disability, health and maternity benefits, old age protection and other benefits”. For taking advantage of prior discussed schemes, informal sector workers must be registered. They would be provided with a unique identification number by the District Administration but for this, have to give an application to them as per Section 10 of this Act.

So, this is a time taking procedure and hence during such pandemic, the government have to modify the same and authorize the district administration officers to check out such workers in nearby areas and provide the advantage of policies like “**Pradhan Mantri Garib Kalyan Yojna and Rashtriya Swasthya Bima Yojana**” which has the objective to give adequate health facilities to them.<sup>7</sup> Moreover, the people who belong below the poverty line have been provided with the cashless facility to get admitted to any hospital whether public or private. But many migrant labours are not able to take advantage of Public Distribution System as they move from one place to another and therefore, are not entitled to get the advantage of several policies implemented therein.

- *The Contract Labour (Regulation and Abolition) Act, 1970*

To develop the economic conditions of India, there was the need to engage the workers not only in the agricultural sector but in Industries also which resulted in the migration of workers from underdeveloped areas such as Uttar Pradesh, Bihar to developed industrial areas like Gujarat, Orissa, etc. This made the need high to secure the conditions of the workplace of labours and hence, several legislations have been implemented to secure them. The aforesaid act was enforced with an objective to ensure the security for the contract workers who are engaged in industries and other establishments.

---

<sup>7</sup> Rashtriya Swastha Bima Yojana (*India.gov.in, National portal of India*, 4 July 2016)  
<https://india.gov.in/spotlight/rashtriya-swasthya-bima-yojana#rsby1> accessed 19 June 2021

- *The Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979*

The above-discussed Act failed to remove the problems related to migrant workers and thus, this act came into force to handle inter-state migrant means those who have moved from one place to another for the search of work for whom no provision has been made in the prior Act. The Act requires for the contractors to provide equal wages for similar workers under Section 13, as per Section 14 requires to provide for displacement allowance, Section 15 mandates to give home travelling allowance for such workers, etc.

They also have the right to approach the nearby jurisdiction for an industrial dispute under **Industrial Disputes Act, 1947**. The act also provides that the entrepreneurs must provide unique registration identity and passbook to workers and labours must be provided with wages before the expiration of the second day since the day when they are being terminated from their employment due to any cause except weekly or other prescribed holidays.

## **VIOLATION OF LABOUR LAWS DURING COVID-19**

During Covid-19, states like Uttar Pradesh, Madhya Pradesh, Gujarat, etc. make amendments in labour laws that violate labour rights as it enhances hours of working of workers and even not paid for the same. Now, every worker can be required to work for 12 hours in a single day which is against the guidelines of ILO.<sup>8</sup> The labour laws fail to provide security and adequate resources to the migrant workers. **Article 21** provides for the right to livelihood, dignity, and liberty to every citizen but in such a pandemic, these rights are getting violated due to partial social-economic procedure as on 25 March 2020, the notice of complete lockdown was given only before 4 hours to the citizens which left migrant workers helpless.

The Labour legislations are getting violated as they are not being paid with their daily wages by the contractors despite the government guidelines not to cut wages. The state has the responsibility to protect their citizens but due to the suspension of labour laws during such a

---

<sup>8</sup> S Yadav & K R Priya, 'Migrant Workers and Covid-19: Listening to the Unheard Voices of Invisible India' (*sagepub journal*, 1 December 2020) <<https://journals.sagepub.com/doi/full/10.1177/2277436X20968984>> accessed 19 June 2021



crisis, the **Fundamental Rights of migrant workers** are getting violated as it enforces refusal of daily wages of the labours.

It also denied the migrant workers to form trade unions thus, this violates Article 19(1) (c). Further, Article 23 has also been violated due to the fact that the cancellation of certain labour legislation leads to the situation of forced migrant labours.

## **ROLE OF INTERNATIONAL LABOUR ORGANIZATION**

The international labour organization has also played an important role in the protection and social security of migrant labourers who have been greatly affected by this pandemic.

- **Inclusion of migrant labours in domestic income and policy retaliation by the government:** People feel the need to work while sick due to lack of proper wages which further enhances societal health risks of spread of the covid-19 pandemic. Therefore, the governments for their aimed density in their Covid-19 retaliation should consist continually and structurally migrant labours with proper focus on the necessities of women migrant labours, and the same consists the higher chance of brutality during the lockdown.
- **Increasing approach to the medical facility and communal security to migrant labours:** Integration of migrant workers into danger sharing appliances should be done, in sequence with inhabitants, to secure communal indemnity, collectivity, and unity in capitalizing. The advantages related to a health facility can be of great significance in order to secure migrant labours and their society.
- **Providing sufficient and reachable particulars:** Communication regarding effectiveness must be enhanced concerning the protection and wellbeing in the group and inside the working place, consisting amongst managers' and labours' establishment. ILO is supporting Migrant Worker Resource Centres in some countries has been assisted by ILO and with this, migrant workers and their groups have been provided with adequate information by the partners on the large scale of affairs

consisting legal help to such labours who are hurting from violation of rights of labours and workers, help related to covid-19 matters and several other help related to guidelines of Covid-19 consisting sanitation, masks, and social distancing.

- **To Certify uniform position of migrants:** It has been provided by the ILO that adequate steps have to be taken for visas' supplementation, for the renovation of residential and working permission letters which could donate to secure approach towards both basic necessities for such labours and can flow continuity in their major and appreciable donation at the workplace so that their position can be uninformed and uncertainty can be avoided.
- **To communicate the distinctive problem of migrant labours residing in societal or in industrial housing:** In situations where the migrant labours living in non-permanent houses, in migrant residential, in teaching centres, in internment centres, or in societal living areas, this all may consist of such migrant workers who came to such centers just prior to this pandemic of covid-19, and such workers who have been applied for residences, and for working permissions must be provided with the same.

In such areas as discussed, the workers have to share washrooms with others, they have not been provided with separate cooking facilities, which means overall their conditions are very miserable and in such residential areas, this is not possible for them to maintain social distancing and to secure them from infections of Covid-19, and, thus, it can be said that they have a high risk of getting infected from a nearby person. So, it would be the responsibility of both the Governments and owners of industrial areas, to provide separate essential items during the closure of the factories and industrial areas such as Washrooms, kitchens, etc. Moreover, ILO provided the guidelines related to isolation and quarantine of infected Migrant labours with adequate medical and sanitization facilities.

### **PIECEMEAL APPROACH OF THE GOVERNMENT**

The Government has acted as a pillar for migrant workers during the Covid-19 crisis as it has provided various short and long term policies for their protection.

*Short term policies:*

- The Central Government in the crisis of COVID-19 has provided food facilities like pulses, wheat, and other necessary items to migrant workers who have left far from their families during the duration of nationwide lockdown to secure their wellbeing.
- Besides, also emphasizes monetary support that is to provide extra wages to migrant workers for the period of three months under “**Pradhan Mantri Jan Dhan Yojna**” and those who reached to their residents but not working would be provided wages under “**Mahatma Gandhi National Rural Employment Guarantee Act**”.
- With this, the government ordered all shelters providing food to workers that they should not be shut down right away because due to lack of financial resources during COVID-19 it’s not possible for workers to carry their lives in the leased room.
- The Union Government directed all states to utilize “state disaster response fund” for assisting migrants who are travelling and the ministry of home affairs also authorized them to provide buses for migrants to travel.

*Long term policies:*

- The Government made such policies that ensure migrant workers’ registration and also issue universally valid **Shramik cards** to them without rendering on the fact whether they are engaged through the contractor or by themselves. Such cards help the workers for getting benefits provided by the Central government.
- The Government further makes attempts to eradicate the division of organized and unorganized working groups because labours engaged in unorganized groups are getting more exploited thus, the government gave priority to the unitary labour market.
- The government worked for decreasing migrant workers’ vulnerability by modifying labour laws by which such workers are now mingled with other informal group labours and with this also provides food and wage security.

- The **Ministry of Labour and Home Affairs** directed all the employers for equal treatment to labours during such a crisis and the **Ministry of Labour and Employment** asked all the employers not to terminate and reduce the wages of any worker and must be provided with an adequate amount of wages for their livelihood.
- Ministry of Labour and Employment implemented Occupational Safety, Health, and Working conditions code, 2020 according to which all labour gaining up to rs. 19,000 would be included under the said law who move from one place to another<sup>9</sup>.

### *Assistance to migrant workers:*

For the protection of migrant workers, the Finance minister of India has announced security in “Pradhan Mantri Garib Kalyan Yojna”. To make life easier for such labours, the Government ordered the utilization of the “**Building and Other Construction Workers Welfare Fund under the Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996**”.

State governments like Uttar Pradesh, Rajasthan have provided various funds to migrant workers for their livelihood during Covid-19. They have been provided with bus facilities also by the Uttar Pradesh government. From Chief Minister Relief Fund, the Bihar government also established **Disaster Relief Funds** for such workers. The government of Maharashtra formed various camps for them to provide them security and also lowers down the price of food. The government schools had been changed into relief homes for migrant labours by the Delhi government<sup>10</sup>. Thus, various steps have been taken by Government to protect migrant labours.

## **ROLE OF NON-GOVERNMENTAL ORGANIZATIONS**

Although it is generally the duty of the government to protect and secure migrant workers, if the Non- Governmental Organizations also played an important role and contributed to their

---

<sup>9</sup> Ashwini Kulkarni, ‘Five Things the Govt Needs to Do to Mitigate Rural and Migrant Distress’ (*The Wire* 26 May 2020) <<https://thewire.in/government/rural-workers-distress-covid-19>> accessed 20 June 2021

<sup>10</sup> A Upadhyay & S Pandey ‘Labour Laws and Migrant Workers during Covid-19’ (*SCC Online*, 15 April 2020) <<https://www.sconline.com/blog/post/2020/04/15/labour-laws-and-migrant-workers-during-covid-19/>> accessed 20 June 2021

protection, this needs to be appreciated. At the time of difficulties of Covid-19, NGOs came in front for helping and assisting migrant workers by providing them food, transport facilities as well as water supply, etc.

On March 30, during the crisis of COVID-19, Mr. Narendra Modi, the prime minister of India spoke with Non- governmental organizations through a video conference for helping them by granting funds, allocating essential necessities to the underprivileged, providing medical facilities, and also organized campaigns regarding maintenance of social distancing and other lockdown guidelines. Moreover, after a period of a week on around April 6, almost 85,000 NGOs, international organizations, etc. were asked to assist the poor and vulnerable section of society by allocation of basic necessities of life such as migrant workers to fight such crisis by NITI Aayog.

#### **FAILURES ON THE PART OF THE GOVERNMENT**

On 29th March 2020, it has been ordered by the government of various states to close down and seal the borders in order to check migrant labours from walking on foot around 63 miles to return to their native homes. However, other officials took certain measures in allocation of food, homes, and salaries to such workers, so that they can survive easily during such countrywide closure.

On 29th April 2020 government ordered migrant workers would be permissible to travel only after they had been screened and found asymptomatic. On 21st May 2020, around 40 Migrants trains (Shramik special trains) have lost their way and reached somewhere else rather than their destination. From 9<sup>th</sup> May to 29<sup>th</sup> 2020 around 80 people who lost their lives on Migrants/Shramik Special trains died of unknown causes, data from the Railway Protection Force of India revealed. The result is an unprecedented humanitarian disaster that millions of poor migrants are walking, cycling, dangerously hitchhiking home, sometimes over distances of more than 1200 Miles, often on empty stomachs. It was very unfortunate that many State Governments in India took fare from migrant labourers while sending them home in trains and buses.

Though the help of NGOs was taken they were not that useful as they did not have the financial support equivalent to the help and work it provides. As the government has sufficient revenue availability so the same is failed to provide security to the informal sector of the society as it has insufficient resources.

## **ROLE OF JUDICIARY ON MIGRANT ISSUES**

As the government of India somehow fails to fulfill their obligations towards the protection of migrant labours, so here Judiciary played an important role by reviewing their conditions that where they face inadequacy and vulnerability and for the same passed various orders.

- The **Supreme Court of India** on 26th may, 2020 observed that there are several problems related to migrant workers still exist so directed all state and central governments to give food, shelter, and transport facilities to them.
- On 28 May 2020, the Supreme Court ordered the states that to bring those migrant workers back to their homes whose job has been terminated due to lockdown.
- Judiciary also asked for welfare policies and job opportunities for migrant workers to the government.
- It has ordered both the governments to take the complaint back which has been made against those migrant workers who had come to their homes due to job loss, disease during the nationwide lockdown.
- A PIL has been filed under Article 21 of the Constitution of India seeking that minimum wages should be paid to the migrant workers during the lockdown. The Supreme Court regarding such a question is saying that migrant workers are provided with food and meals so is there any need to provide them wages.
- **The High Courts** also made an approach towards the protection of migrant workers as the High Court of Karnataka scolded Karnataka Government for taking travelling fares

from workers, further, Andhra Pradesh High Court also gave directions to arrange shelters for migrants.

- In “**Harsh Mander v. Union of India, 2020<sup>11</sup>**”, a PIL has been submitted in Indian Supreme Court ordering State and Central Government to provide minimum wages to all the migrant labours so that they can fulfill their basic necessities and make their survival easy.
- The apex court in “**Alakh Alok Srivastava v. Union of India, 2020<sup>12</sup>**”, ordered the government to provide basic elements and health facilities to all the migrant labours during the period of such crisis.

## CONCLUSION

The pandemic of Covid-19 has severely impacted people’s lives in every dimension. Each crisis has a severe impact on poor and underprivileged people. This pandemic has also impacted the workers who due to its consequences were forced to move back to their native places without any work and money at hand and bearing the impact of government steps. During this pandemic, various institutions, like the Central and State government, NGOs, International Labour organisations, and Courts, played role in supporting the migrant workers.

Even the conditions of migrant workers have become worst as they are not being provided with their basic rights such as the right to livelihood etc. The labour legislation whose objective is to fulfill the basic needs of the workers even failed at large in their protection as Labour legislations’ provisions are not being properly implemented during such crisis. Though there were steps taken some failures on their part can be seen.

There are some steps which can be taken for a better future like Uniform labour qualities in respect of unorganized zone labours, must be implemented in agronomic and citified part of India. To secure migrants in the informal sector by foreign labour qualities is important and

---

<sup>11</sup> *Harsh Mandar v Union of India* WP (Civil) Diary No (s) 10801/2020

<sup>12</sup> *Alakh Alok Srivastava v Union of India* 2020 SCC Online SC 345

there is also the requirement for distinct ministry for migrant issues, dealing with internal Indian immigrants. NGOs should be promoted for the implementation of various programs and policies for such labours so that migrant workers can participate in that in order to raise their voices, to secure them from being exploited and discriminated against. In the era of globalization, there is a need to argue significant particular of worker's quality and rights of migrant workers and aiming to acquire a proper structure for those areas where there is no proper functioning of labour legislation and worker's rights.