

Legislative Barriers to Female Participation in the Indian Workforce: A Historical Analysis of Factories Act, 1948 and the Occupational Safety, Health and Working Conditions Code, 2020

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ABSTRACT: Analysis on how legal frameworks in Indian labour laws have been discriminatory towards women in the Indian workforce. Currently, there is limited research on this discrimination propagated by labour laws due to most of the restrictions on women being framed as protectionist legislation. This protectionist mindset along with the paternalistic approach while framing labour laws in India are a few of the main reasons for the discrimination propagated by these laws. Since before Independence, legal frameworks have regularly discriminated against women. This discrimination has recently decreased with the Occupational Safety, Health and Working Conditions Code, 2020, being the most relevant example of this. This manifested with this code reversing the restriction on women from working during night hours, one which had existed for the 73 years after Independence before this law had passed. Incorporating evidence from other papers, this paper focuses on 2 Indian labour laws, namely the Factories Act, 1948 and the Occupational Safety, Health and Working Conditions Code, 2020, and shows how they have discriminated against women in the Indian workforce. It uses various concepts such as protective discrimination to understand how these laws have perpetuated discrimination against women. Subsequently further analyses on how certain discriminatory sections of acts such as Section 66 (1) (b) of the Factories Act, 1948, have been challenged successfully in a few states, showcasing the improving situation for female labour. A perusal on how these laws have impacted women, employers and society has been analysed.

KEYWORDS: protectionist mindset, discrimination, paternalist approach, female labour, gender bias, occupational safety, health and working conditions.

1. INTRODUCTION

The low levels of female participation in the Indian Workforce have been a concern for a long period of time. Many factors may be responsible for this plight, Bhalla and Kaur have argued that the primary factor may be due to the higher education of the spouse (male) when compared to females along with the emerging middle class. They have stated that discrimination against women in the workplace contributes to this level. Some researchers, like Bandyopadhyay (2024), have argued that it is not only cultural and social barriers but also restrictive labour laws that have contributed to low levels of female participation in the workforce. Singh (2024) has specifically stated that limitations on females working at night in various states as well as not having access to high paying jobs is one of the major restrictions put forward on women by these laws. He has stated that one of the major acts that contains such restrictions is the *Factories Act, 1948*. Such restrictions on women have existed since Independence with the idea of protecting women. These laws state that such restrictions were put in place due to safety concerns of women working at night and due to some jobs that involved working with hazardous materials.

Some of the labour laws post-independence that have impacted women's participation in the workforce are the:

- Factories Act, 1948;
- Equal Remuneration Act, 1976;
- Maternity Benefit Act, 1961 (later amended in 2017)
- Occupational Safety, Health and Working Conditions Code, 2020.

The Factories Act, 1948 was enacted with the purpose of ensuring the health and safety of workers (Mitchell, Mahy, et. al, 2014). The law also contains various requirements for factories regarding sanitation and cleanliness, while regulating working hours. Moreover, Section 66 (1)

(b) of this act prohibits women from working between the hours of 7 pm and 6 am. This has been a major barrier to female participation in the Indian workforce while limiting their option to earn overtime pay and rise up the ladder (Anand, Bomjan et al., 2022).

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Discrimination against women was further indirectly propagated by various other acts, despite their aim being to promote equality and provide benefits to female employees. The Equal Remuneration Act, 1976, states that it is an act “for the prevention of discrimination, on the ground of sex, against women in the matter of employment” (Equal Remuneration Act, 1976).

However, this indirectly propagated discrimination against women by not overruling existing legislative barriers, such as the Factories Act, 1948. The Maternity Benefit (Amendment) Act, 2017 also similarly didn't address *existing legal barriers*, while still having a groundbreaking impact by mandating the existence of creches in institutions that have more than 50 employees and extending the maternity leave from 12 weeks to 26 weeks for women with fewer than 2 children.

This paper has researched the fact that the labour laws in India have discriminated against women, especially by not allowing them to work at night. Additionally, it examines the impact that these two acts have had on various stakeholders.

Section 2 of this paper consists of a literature review with an aim to summarize existing research on the discriminatory nature of Indian labour laws against women. It uses various Indian labour laws and explains how the concept of positive discrimination impacted them. Section 3 and Section 4 focus on the Factories Act, 1948 and the OSH Code, 2020, respectively highlighting their nuances and discriminatory and sexist provisions. Section 5 explores the impact of both of these acts on three stakeholders - women, employers, and society. Post this, Section 6 suggests further changes to these acts and actions that should be taken to make these laws less discriminatory, while also acknowledging the steps taken by the government to reduce discrimination against women in the workforce. Section 7 summarizes the findings of the research.

2. LITERATURE REVIEW

There has not been much research on the impact of labour laws - especially the Factories Act, 1948 and OSH Code, 2020 - on women. Most of the existing research is on the health and safety provisions of the Factories Act, 1948 and the OSH Code, 2020 along with the progress and history of different labour laws in India. There is insufficient research on the existing lacuna in these specific acts, especially the *Factories Act, 1948*, with one such lacuna being creating “a good work-life balance for employees by offering flexible working hours, leave policies, and other strategies” (Dadwal and Kumari, 2023). This lacuna, has specifically had a negative impact on women due to most of the restrictions on working hours being placed on women. The law justifies this restriction on women with claims of ‘safety concerns for females’ at night. This restriction has also been justified on the concept of ‘protective discrimination.’ Protective discrimination is the concept according to which certain weakened and deprived groups, such as women, scheduled castes, and scheduled tribes, are given certain benefits or protections to promote equality. In this case, this law is justified on the basis of promoting equality by barring women's employment at night to ensure their safety. This is made clear, when “despite there being scientific evidence that shows night shifts are proven to be detrimental to health with changing sleep cycles, fatigue and gastrointestinal and cardiovascular diseases (James, et. al., 2017),” Section 66(1) (b) only disallows women from working at night, which is irrational as “*health effects of night shift cannot be categorised on the basis of gender*” (Center for Public Policy Research, 2023).

Since Independence, there has been a trend of labour laws discriminating against women and placing restrictions on them. Pandey (2024) argues that the progress on achieving gender equality in Indian labour laws has been a slow one. Legal provisions protecting women have increased recently with the passing of acts such as Equal Remuneration Act, 1976, which ensures that women receive the same pay as men for the same work; and Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, which protects women from workplace harassment by making sure that firms hold regular training sessions, create an internal committee to deal with internal harassment complaints, etc. However, some of these legal provisions have been regarded as restrictive. This is primarily due to belief that certain legal provisions such as women not being allowed to work at night under the Factories Act, 1948, promote and furthers existing stereotypes about women, while also limiting women from taking up jobs that require working through the night in factories, which can limit their growth in a job. Jain (2024) highlights that Chapter IV of the Factories Act, 1948, puts restrictions on women working near certain machinery such as cotton openers, lifting excessive weights, and cleaning certain machines. *The presence of these restrictions on women further propagates stereotypes that women are weak, while also discriminating against them.*

Recently, there has been a positive change to this trend with legal provisions “opening up better legal provisions for them [women]” (Jain, 2024). One such provision, which remedied a discriminatory section of the Factories Act, 1948 prohibiting women from working at night, is the Occupational Safety, Health and Working Conditions (OSH) Code, 2020. Chapter 10 of this code specifically states that “they [women] may also be employed, with their consent before 6

a.m. and beyond 7 p.m. subject to such conditions relating to safety, holidays and working hours” (OSH Code, 2020). However, despite this code reducing the amount of discrimination propagated by labour laws, it has received criticism on the ground that its wording is sexist. Elamaram Kareem, a Member of Parliament (MP) in the Rajya Sabha - one of the two houses of India's Parliament - criticised Section 43 of his Code, which referred to women being allowed to work at night, as being sexist (Jain, 2020). This was as Kareem believed that instead of making the safety of employees the employers duty, this act stated that “‘women shall be entitled

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to work' beyond normal day working hours," which indirectly portrayed that this was a privilege given to women.

The above studies have demonstrated and shed light on the discriminatory nature of Indian labour laws. At the same time, they have acknowledged the recent positive change in this trend as evidenced by the OSH Code, 2020. This paper utilises these studies, while also going beyond them and analysing the impact of the Factories Act, 1948 and the OSH Code, 2020 on various stakeholders while also providing the way forward on how to improve the Labour Laws for women in India.

3. FACTORIES ACT, 1948

The Factories Act, 1948, is an act that built on the Factories Act, 1934, which had built on several other preceding Factories Acts since 1881. The Factories Act was one of the first acts regulating labour in factories and it also focused on "humanizing the conditions of workers in factories" (Saini, 2009). Moreover, this act was passed to "safeguard the welfare of workers in factories" (Ajmera, 2024). This act consolidated previous labour laws relating to workers in factories, while also introducing various more provisions to protect workers in factories.

This act was later amended several times over the next few decades with the final two and major amendments taking place in 1987 and 2016. The amendments in 1987 were made as a result of the disastrous impact of the Bhopal Gas Tragedy, where over 50,000 people near a pesticide plant were exposed to a highly toxic gas. As a result of this tragedy, the amendments made in 1987 specifically "added a new chapter on Hazardous Industries" (Nagaraj and Raman, 2020). Moreover, this amendment also included "some of the Supreme Court pronouncements on industrial safety" in the aftermath of a gas leak in Delhi in 1986 (Nagaraj and Raman, 2020). Despite this amendment enhancing and creating various other provisions for the health and safety of workers in factories, it did not address the discriminatory nature of section 66(1) (b) which disallows the employment of women at night.

The period between the 1987 Amendment and the 2016 Amendment witnessed various challenges to section 66(1) (b) of this act. Most of these challenges were on the grounds that this section of the act was discriminatory and contributed to women not being able to secure certain jobs. All of these challenges took place at a state level, specifically in the states of Madras (now known as Tamil Nadu), Andhra Pradesh, Karnataka, and Gujarat. A similar challenge was also heard in Kerala, after the 2016 Amendment. *Vasantha R vs Union of India*, the case challenging section 66(1) (b) of the Factories Act, 1948, is taken as a landmark case in overturning laws that are paternalistic and discriminatory towards women. This case that took place in the Madras High Court, challenged this discriminatory section of the act on the basis that it violated foundational articles of the Indian Constitution. According to them the articles that this act violated were *Article 14*, the fundamental right to equality before the law; *Article 15*, prohibition of discrimination on ground of sex; and *Article 19(1)(g)*, the fundamental right to practice any profession or to carry on any occupation, trade, or business to all citizens (*Vasantha R. vs. Union of India (UOI)*, 2000). This brought to light how provisions of the constitution and laws originally considered protective were being used to discriminate against women.

The amendments made to the Factories Act, 1948, in 2016, however, did not continue the ruling of the Madras High Court, which had declared section 66(1)(b) of the Act unconstitutional for violating women's right to equality and employment. This meant that while Tamil Nadu removed restrictions on night work for women - other states continued to enforce Section 66(1)(b). In fact, the clause was upheld by courts in some states. For instance, the Andhra Pradesh High Court upheld the constitutionality of night work restrictions as protective measures in *Triveni KS and Others v. Union of India* (2002). In a similar vein, the Gujarat High Court upheld Section 66(1)(b) as a valid protection for women's safety and dignity in *Mahila Utkarsh Trust Through Its President v. Union of India Through Its Secretary* (2013). The court contended that until the state and employers provided sufficient security, transportation, and working conditions for women employed at night, such limitations could not be considered discriminatory. As a result, women are still prohibited from working nights in states like Andhra Pradesh and Gujarat unless special government announcements allow an exception.

4. OCCUPATIONAL SAFETY, HEALTH AND WORKING CONDITIONS CODE, 2020

The Occupational Safety, Health and Working (OSH) Conditions Code, 2020, is a code which integrated 13 pre-existing major labour laws into a single code with 143 provisions (Bhardwaj, 2024). This was done in order to simplify Indian labour law and make it easier to ensure compliance by establishments (Ramchandani, 2020). Some of the laws that this code integrated were *The Factories Act, 1948*; *The Mines Act, 1952*; *The Beedi and Cigar Workers (Conditions of Employment) Act, 1966*; *The Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979*; and *The Dock Workers (Safety, Health and Welfare) Act, 1986*. Most of the legal provisions under this code focus on "regulating the health and safety of workers" (Ramchandani, 2020). Moreover, this act creates a centralized data base for registration, which would previously be different for each of the pre-existing laws, to promote ease of doing business (Ramchandani, 2020).

This code was a revolutionary one in the sense that it brought about a positive change in the stance reflected by the Factories Act, 1948 regarding women labour at night. Section 43 of this code stated that "Women shall be entitled to be employed in all establishments for all types of work under this Code and they may also be employed, with their consent before 6 a.m. and beyond

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7 p.m” (OSH Code, 2020). However, despite this positive change, this code still continued to propagate discrimination against women indirectly as it stated that women could only work at night if conditions relating to safety, holidays and working hours that have been set by the government are observed by the employer, i.e. making it the employer’s duty to ensure women’s safety. Moreover, the use of the word ‘entitled’ also portrayed that being able to work at night is a privilege that has been given to women, when it should have been their right. Some other safety provisions, such as ensuring that there are a minimum of two women in a group of five and “engaging women supervisors is a proportion of one in every three supervisors,” have also furthered discrimination against women by causing a bias among employers towards women as the cost may increase in engaging women employees (Center for Public Policy Research, 2023). There were various other provisions in this code too that led to a similar bias among employers due to them needing to bear additional responsibilities in order to employ women to work during night hours. Another major criticism of this code has been regarding its implementation. The lack of implementation since 2020, due to various states taking longer than expected to finalise the draft rules for this code, has led to this code not having much impact (Haq, 2025). Moreover, there has been resistance from trade unions, which have led to states taking time to finalise these codes. These trade unions have resisted the implementation of these codes as they believe that “the Industrial Relations Code and OSH Code undermine workers' rights, especially by making it easier for companies to lay off workers and imposing stricter regulations on strikes” (Mittal, n.d.). This has further contributed to the beneficial provisions in this code not being implemented.

5. EFFECT OF THE FACTORIES ACT, 1948 ON OCCUPATIONAL SAFETY, HEALTH AND WORKING CONDITIONS CODE, 2020 AND ITS IMPACT ON ALL STAKEHOLDERS.

5.1 Impact of these acts on Women

Research has shown that both these acts have had a major impact on Women’s Employment in India. This is evident with India’s Female Labour Force Participation Rate (FLFPR) being the lowest among G20 countries, behind even Saudi Arabia and Turkey (Sathyan and Khongwir, 2025). ‘Women, who make up half of that pool [India’s rapidly growing young working age population], are largely absent from the workforce” with one factor for this being the legal barriers to women working in certain industries and during night hours. ‘Safety concerns’ established by these laws further prevent many women from applying for jobs, even when they are available. This has caused many women to enter the informal sector, where such laws are not applicable. However, the informal sector is characterised by even worse and poorer working conditions and lower pay.

These legal barriers have also affected the psyche and mental health of women too. A gendered work environment, especially in factories where there are various restrictions on women’s employment, contributes to women experiencing mental distress and low self esteem (Vindhya 2007). The law has further restricted the upward mobility of women and added to women’s low self esteem. Moreover, social inequalities and disadvantages faced by women are also one of the major reasons for mental health issues such as anxiety.

5.2 Impact on Employers

Both of these acts have focused on improving the standards for workplace health and safety conditions. The Factories Act, 1948 placed many duties on factory managers such as ensuring safe working conditions as well as sufficient ventilation and lighting, while also performing routine inspections (Simon, 2022). These duties did not place a burden on factory managers due to this being a part of their regular day to day job. Instead, it just established concrete guidelines that these managers had to follow to ensure workers’ safety. Due to rise in protections and restrictions on women for their safety, factory managers were also made to ensure that the factory has a creche facility if it employs more than 30 women (Simon, 2022). Other protections in addition to this such as women not being allowed to work at night, would lead to factories not employing a large number of women as they found the further implementation a burden.

The OSH Code, 2020 did not help with this issue. Instead it increased the burden on employers by adding various other safety precautions that employers needed to ensure were in place. The only positive part of this code was that it allowed women to work during night hours. This has led to a change in some states which have finalised the draft rules for this code. Maharashtra is one such state where the employment of women at the All Time Plastic factory ‘rose sharply last year, after the local government changed the law to allow women to work on the night shift’ (Goodman, 2024). Moreover, some factories have also explored other ways to ensure women’s safety such as the All Time Plastic Factory running buses that pick up and drop off women at their homes to alleviate safety concerns (Goodman, 2024).

5.3 Impact on Society

These acts have led to major changes in society’s perception of female labourers and workplace safety. The Factories Act, 1948’s focus on workplace safety led to society believing that it is an obligation of the factories to protect the well being of workers (Singh, n.d.). This obligation led to various changes in society such as improved working conditions and worker health, which led to an increase in worker productivity (Maggo, n.d.). However, at the same time this act led to a perception of women as weak and a group that requires protection. This was primarily due to the paternalistic and protectionist dimension of this act (Shampa, 2018).

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The OSH Code, 2020, brought about a positive change in this paternalistic and protectionist mindset regarding women's work in factories, especially during night hours. The major change in this act - allowing women to work in factories between the hours of 7pm and 6 am - was reflective of this change in mindset. However, it still allowed the states to increase or decrease restrictions on women working at night by using their legal powers (Bhuvana and Kaur, 2022). Moreover, this act's wording also showed that despite having decreased significantly since the Factories Act, 1948, society's paternalistic mindset towards female labour was still present.

6. CONCLUSION

The research done in this paper sheds light on how the Indian legal framework, specifically labour laws, have perpetuated discrimination against women since Independence. It specifically focused on the Factories Act, 1948's restriction on women being allowed to work during night hours, which was finally relaxed with the OSH Code, 2020. This paper studies both the acts' - The Factories Act, 1948 and the OSH Code, 2020 - features and highlights their impact on women, employers, as well as society. Moreover, it explores the concept of protective discrimination and paternalistic mindset towards female labour in Indian labour laws. The paper indicates the manner in which these laws have had a negative impact on female labour in India, restricting their upward mobility in the workplace and society.

REFERENCES

- 1) Ajmera, Stuti. 2024. "Historical Development of Labour Law in India." *International Journey of Law Management & Humanities* 7 (1): 664–72. <https://doi.org/10.1000/IJLMH.116759>.
- 2) Anand, Bhuvana, Baishali Bomjan, and Sarvnipun Kaur. 2022. "The Curious Case of Indian Working Women." *Mint*, March 8. <https://www.livemint.com/politics/policy/the-curious-case-of-indian-working-women-11646677021016.html>.
- 3) Anand, Bhuvana, and Sarvnipun Kaur. 2022. "State of Discrimination (2022)." *Prosperiti*, March. <https://prosperiti.org.in/state-of-discrimination-2/>.
- 4) Bandyopadhyay, Orchie. n.d. "Equal Opportunities for Female Workers: Why India Is Making Slow Progress." *British Safety Council India*. Accessed July 5, 2025. <https://www.britsafe.in/safety-management-news/2024/equal-opportunities-for-female-workers-why-india-is-making-slow-progress>.
- 5) Bhalla, Surjit S, and Ravinder Kaur. n.d. *Labour Force Participation of Women in India: Some Facts, Some Queries*. <https://eprints.lse.ac.uk/38367/1/ARCWP40-BhallaKaur.pdf>.
- 6) Bhardwaj, Nandini. 2024. "Key Features of the OSH Code, 2020: India's HR Laws." *India Briefing News*, February 21. <https://www.india-briefing.com/news/the-occupational-safety-health-working-conditions-osh-code-2020-a-primer-31265.html>.
- 7) Dev, Shampa. 2018. "Gender Justice in India: A Feminist Jurisprudential Perspective." *Tattva-Journal of Philosophy* 10 (1): 69–88. <https://doi.org/10.12726/tjp.19.5>.
- 8) "Easing the Legal Barriers for Employment of Women in Factories in Kerala." 2023. *Center for Public Policy Research*, January. <https://www.cpvr.in/wp-content/uploads/2023/03/Easing-the-Legal-Barriers-for-Employment-of-Women-in-Factories-in-Kerala-5.pdf>.
- 9) Goodman, Peter S. 2024. "Women in India Face a Jobs Crisis. Are Factories the Solution?" *Business. The New York Times (India)*, July 3. <https://www.nytimes.com/2024/07/03/business/india-economy-women-jobs.html>.
- 10) Haq, Zia. 2025. "Centre Likely to Roll out Labour Codes by Early next Financial Year." *Hindustan Times*, January 22. <https://www.hindustantimes.com/india-news/centre-likely-to-roll-out-labour-codes-by-early-next-financial-year-101737484824656.html>.
- 11) Jain, Chirayu. 2020. "Labour Codes 2020 from Building Workers Point-of-View." *SSRN Electronic Journal*, ahead of print. <https://doi.org/10.2139/ssrn.3742170>.
- 12) Jain, Mukta. 2024. "Women and Labour Law's in India." *International Journal of Advanced Multidisciplinary Research* 11 (7): 8. <https://doi.org/10.22192/ijamr>.
- 13) Kumari, Sandeep, and Dr Lalit Dadwal. n.d. "An Outlook of the Occupational Safety, Health and Working Conditions Code, 2020: A Critical Appraisal of the Factories Act, 1948." *International Journal of Law Management & Humanities* 6 (4): 253–63. <https://doi.org/10.1000/IJLMH.115305>.
- 14) Maggo, Arpit. n.d. "Provisions Regarding Welfare of Workers in Factories: A Brief Study." *Vivekananda School of Law and Legal Studies Delhi*. Accessed August 9, 2025. <https://www.scribd.com/document/526825989/Arpit407-labour2>.
- 15) "Mahila Utkarsh Trust Thro Its President vs Union Of India Thro Secretary on 13 December, 2013." n.d. Accessed July 30, 2025. <https://indiankanoon.org/doc/78049057/>.
- 16) Mitchell, Richard, Petra Mahy, and Peter Gahan. 2014. "The Evolution of Labour Law in India: An Overview and Commentary on Regulatory Objectives and Development." *Asian Journal of Law and Society* 1 (2): 413–53.

Legislative Barriers to Female Participation in the Indian Workforce: A Historical Analysis of Factories Act, 1948 and the Occupational Safety, Health and Working Conditions Code, 2020

<https://doi.org/10.1017/als.2014.8>.

- 17) Mittal, Nidhi. n.d. "India's New Labor Codes Enactment Status and Delayed Implementation." India Briefing. Accessed August 5, 2025.
<https://www.india-briefing.com/doing-business-guide/india/human-resources-and-payroll/india-new-labor-codes>.
- 18) Nagaraj, Vijay K, and Nithya V Raman. 2020. "Are We Prepared for Another Bhopal?" Aatma Ram Sanatan Dharm College.
<https://arsdccollege.ac.in/wp-content/uploads/2020/04/Are-we-prepared-for-another-Bhopal-converted.pdf>.
- 19) Nazki, Bilal, and E Dharma Rao. n.d. "Triveni K.S. And Ors. vs Union Of India (Uoi) And Ors. on 2 November, 2001." Accessed July 3, 2025. <https://indiankanoon.org/doc/432677/>.
- 20) Pandey, Navodita. 2024. "GENDER JUSTICE AND INDIAN LABOUR LAWS:" The Amikus Qria, July 14. <https://theamikusqria.com/gender-justice-and-indian-labour-laws/>.
- 21) Ramchandani, Pooja. 2020. "Employment Law - Occupational Safety, Health and Working Conditions Code, 2020." Shardul Amarchand Mangaldas, November. <https://www.amsshardul.com/wp-content/uploads/2020/11/Alert-Employment-Law-The-Occupational-Safety-Health-and-Working-Conditions-Code-2020-1.pdf>.
- 22) Saini, Debi S. 2009. "Labour Law in India: Structure and Working." In *The Changing Face of People Management in India*, edited by P Budhwar and J Bhatnagar. Routledge.
- 23) Sathyan, Devayani, and Veronica Dudgeon Maia Khongwir. 2025. "Indian Women's Labour Participation Decades Away from Matching G20 Peers, Economists Say: Reuters Poll." *Society & Equity*. Reuters, July 22.
<https://www.reuters.com/sustainability/society-equity/indian-womens-labour-participation-decades-away-matching-g20-peers-economists-2025-07-22/>.
- 24) Simon, Mathew Sinu. 2022. "A Study on Factories Act, 1948." *International Journal of Innovative Research in Engineering and Management (IJIREM)* 9 (1): 26–31.
- 25) Singh, Abhishek. n.d. "Laws That Limit Women's Employment in India." *India Development Review*. Accessed July 5, 2025. <https://idronline.org/article/gender/laws-that-limit-womens-employment-in-india/>.
- 26) Singh, Meera. n.d. "Impact of Health & Safety Provisions under Factories Act, 1948 for Protection of Labour Rights in Real Estate Industry of Pune." *Studylib.Net*. Accessed August 9, 2025.
<https://studylib.net/doc/8647446/impact-of-health-and-safety-provisions-under-factories-act-...>
- 27) Singh, Stuti Paul. 2024. "Are Laws Around Working Hours Impacting Women's Contribution To The Paid Economy?" *Feminism in India*, December 2. <https://feminisminindia.com/2024/12/02/are-laws-around-working-hours-impacting-womens-contribution-to-the-paid-economy/>.
- 28) "STANDING COMMITTEE ON LABOUR, 4TH REPORT – THE OCCUPATIONAL SAFETY, HEALTH AND WORKING CONDITIONS CODE 2019." 2020. LOK SABHA SECRETARIAT NEW DELHI, February 11.
https://eparlib.nic.in/bitstream/123456789/788208/1/17_Labour_4.pdf#search=null%20Departmentally%20Related%20Standing%20Committees%20Committee%20on%20Labour,%20Textiles%20and%20Skill%20Development%2017%202020%20Fourth%20Report%20on%20The%20Occupational%20Safety,%20Health%20and%20Working%20Conditions%20Code,%202019%20pertaining%20to%20the%20Ministry%20of%20Labour%20and%20Employment.
- 29) "THE FACTORIES ACT, 1948." n.d. Ministry of Labour and Employment, Government of India.
https://labour.gov.in/sites/default/files/factories_act_1948.pdf.
- 30) "The Factories (Amendment) Bill, 2016." n.d. Ministry of Labour and Employment, Government of India.
http://currentlabourreports.com/Uploads/amendment/ab_2016-8-16--7-58-39-282_factories_act-bill.pdf.
- 31) "The Factories (Amendment) Act, 1987." 1987. Government of India, June 23.
<https://www.indiacode.nic.in/repealedfileopen?filename=A1987-20.pdf>.
- 32) Vasantha R. vs. Union of India (UOI) and Ors., High Court of Madras (2000).
https://clpr.org.in/wp-content/uploads/2024/12/2.-Vasantha_R_vs_Union_of_India_UOI_and_Ors_08122000_t000551COM302315.pdf.
- 33) Vindhya, U. 2007. "Quality of Women's Lives in India: Some Findings from Two Decades of Psychological Research on Gender." *Feminism & Psychology* 17 (3): 337–56. <https://doi.org/10.1177/0959353507079088>.



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