

Impact of 18th Constitutional Amendment on Labour Laws Applicable on Brick Kiln Industry

Bisharat Ali Lanjwani, Aslam Pervez Memon, Kiran Sami

Abstract

Pakistan's labour laws are derived from laws inherited from colonial period when India and Pakistani were united. After independence, the law regarding labour, have continued to evolve through ongoing experiments to address socioeconomic conditions, industrial development, population and labour explosion, union growth, literacy levels, and government commitments to development and social welfare labour issues. Achieving the above objectives, the successive governments have used a series of labour policies to address the demands of labour class. Being the signatory of International Labour Organization (ILO), Pakistan has been making laws to match the demands of “Core Conventions”. Before the 18th Amendment, Labour was included as “subject matter” in the concurrent which meant that the federal and provincial governments were responsible for the legislation and implementation of the law but now it is the responsibility of provincial government to make laws and implement on the labour market. This article discusses the repercussions of 18th Constitutional Amendments on the “subject matter” of labour legislation and it’s implications for labour class. This article is based on both primary and secondary sources. Primary sources are based on in-depth interviews of lawyers practicing labour issues, labour activists and labourers experiencing labour issues. In this article, descriptive methodology has been applied to reach the conclusions.

Keywords: Labour, Worker, Constitution, Amendment, Labour Laws, Labour Rights

Introduction

Pakistan's total labour force is about 75.15 Millions, of which the agricultural sector accounts for 47%, manufacturing and mining for 10.50%, and other industries accounting for 42.50%. (World Bank, 2019) It is estimated that around 150,000 to 200,000 families work in approximately in brick kilns industry of Pakistan. (Iqbal, M. J. 2006)



The workers of Pakistan are protected primarily by articles in their Constitution, the country has adopted more than seventy legislations on labour rights and almost ninety labour laws after the independence from Great Britain. Pakistan as a member of ILO is responsible to implement these labour laws and rights. Pakistan labour law arose in the British Independence System in 1947, after the separation from India, General Ayyub Khan replaced the Labor Disputes Act (IDA) of 1947 with the Labor Disputes Act of 1959, which expanded several more labour laws, and the Labour Union Act of 1968 was also passed during his presidency. After the fall of Ayyub Khan, General Yahya Khan admitted that under the previous administration the workers did not receive a “fair deal” (Umar, Abdullah. 2012). Therefore, he adopted the Ordinance on Industrial Relations of 1969.

In 19972, Prime Minister Zulfikar Ali Bhutto adopted its Labor law, the silent features of this law was

- (1) The dismissal order of each employee must be in written form and handed over to the employee;
- (2) Labour courts were bound to make decisions on any labour issue within 30 days of application.
- (3) National Industrial Relations Commission (NIRC) was established.

Prime Minister Zulfikar Ali Bhutto also enacted the Service Tribunal Act of 1973, which requires civil servants and government employee to claim removal from job to the Pakistan High Court. When General Zia ulHaq seized the office, he banned all trade unions and ignores all labour laws. However, the government of Benazir Bhutto and Nawaz Sharif from 1989 to 1999 has not passed any law on labour issues.

Later, General Musharraf amended the 1969 IRO by the Industrial Relations Ordinance of 2002, and also passed the Removal from Services Ordinances of 2000, this law offers the power to the government to remove and dismiss any civil servants from his job and work without any information and reason.

In August 2008, Mr. Asif Ali Zardari was elected as 11th President after the resignation of General Musharraf. Soon his government passed the Industrial Relations Act (IRA) in 2008, this Law cancelled the 2002 IRO of General Pervez Musharraf. The important features of this law are that it reinstated the labour court for speedy decisions on labour issues and also reject the Musharraf’s employee removal law of 2002, which previously permitted the central government to remove or suspend any employee or labour from the job without any information or reason which also amended the 1973 Service Services Act. The law was dismissed when the government adopted the Eighteenth constitutional amendment during April 2010, until April 2010, the amendment was adopted to give more power to the provincial government that they would be more effective. It cancelled the Concurrent list allowed the provincial government to pass their own laws on labour issues, this also made the central government powerless to approve the law on labour issues, later, the Federal Ministry of Labour and Manpower was dissolved officially. Following the adoption of the Eighteenth Amendment, all four

provinces adopted projects of their own labour relations. The provinces currently have exclusive power to enact laws on labour issues.

The Punjab Industrial Relations Act (PIRA) was passed in 2010. Which is a little bit different from the Federal Industrial Relations Act of 2008. Article 3 (i) limits the right to unionize to employees working in establishments with fewer than 50 employees. Second, it abolishes the NIRC and does not provide a provincial replacement in doing so; the 2010 PIRA removed the authority that applies the minimum wage and conducts workplace inspections. Finally, it reduced the scope of the 2010 PIRA by excluding employees working in educational establishments or emergency services, to the exclusion of those with a commercial vocation.

The Sindh Labor Relations Act (SIRA) 2011 also differs from the IRA 2008 in some respects. One of the positive changes was the inclusion of people in the security and fire services in the petroleum and oil fields. Sindh government followed the paths of Punjab and banned site inspections.

The KPK Industrial Relations Act (KIRA) was approved during 2010, the NIRC was cancelled, but there were no provincial replacements, which prevented the implementation of minimum wages and prohibited inspections of employer sites.

The Labor Relations Law of Baluchistan Province was passed in 2010, which is nothing different from the federal IRA of 2008.

The amendment influences fundamental laws including labour legislation and its implementation, however, the labour provisions in the federal concurrent list are as follows:

- (1). Employee Benefits; working conditions of labour, employer's liability and compensation for accidents at the workplace, including health insurance for disabled persons, pensions for old age workers;
- (2). Trade unions, labour disputes;
- (3). Set up and conduct job exchanges, employment information offices and training bureaus.
- (4). Regulate workers and safety in factories, brick Kiln, mines and petroleum sites; insurance in case of unemployment, when concurrent list abolished, laws on these subjects is now in the responsibility of provinces.

The 18th constitutional amendment grants power to each province for legislation on labour issues. Provinces are now responsible for amending, legislating and implementing the labour laws.

Labour legislation in Sindh Province after 18th Amendment

1. The Sindh Industrial Relationship Act 2013.
2. The Sindh Payment of Wages Act 2015.
3. The Sindh Factories Act 2015.
4. The Sindh Terms & Conditions of Employment Act 2015.
5. The Sindh Workers Compensation Act of 2015.

6. The Sindh Companies Profits (Workers Participation) Act 2015.
7. The Sindh Bonded Labour (Abolition) Act 2015.
8. The Sindh Prohibition of Employment of Children Act 2015.
9. The Sindh Occupational Safety and Health Act of 2015.
10. The Sindh Home Base Workers Act 2015.

Labour legislation of Punjab Assembly after 18th amendment

1. The Punjab Prohibition of Child Labour at Brick Kilns Act 2016
2. The Bonded Labour System (Abolition) Act, 2018
3. The Protection Against Harassment Of Women at the Workplace Act, 2010
4. The Punjab Domestic Workers Act 2019
5. The Punjab Workers Welfare Fund Act 2019
6. The Workers Children (Education) Ordinance, 2012

Labour Legislation of Balochistan Assembly after 18th amendment

1. The Balochistan Bonded Labour System (Abolition) Act
2. The Balochistan Companies Profits (Workers Participation) Act
3. The Balochistan Employee's Cost of Living (Relief) Act
4. The Balochistan Employment Of Children Act,
5. The Balochistan Provincial Employees' Social Security Ordinance
6. The Balochistan The Industrial Statistics Act
7. The Balochistan The Minimum Wages Ordinance
8. The Balochistan The Workers Welfare Fund Ordinance
9. The Balochistan Workers Children (Education) Ordinance

Labour Legislation of Khyber Pakhtunkhwa Assembly after 18th amendment

1. The Khyber Pakhtunkhwa Industrial Relations Act, 2010
2. The Khyber Pakhtunkhwa Factories Act, 2013
3. The Khyber Pakhtunkhwa Worker's Compensation Act, 2013
4. The Khyber Pakhtunkhwa Minimum Wages Act, 2013
5. The Khyber Pakhtunkhwa Industrial & Commercial Employment Act, 2013
6. The Khyber Pakhtunkhwa Industrial Statistics Act, 2013
7. The Khyber Pakhtunkhwa Bonded Labour System (Abolition) Act, 2015
8. The Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015.

Labour Rights in the Constitution:

- The Constitution of Pakistan provides for various fundamental rights, including some provisions of labour rights in Part 2: Fundamental Rights and Policy Principles.
- Article 11 of the constitution prohibits all forms of slavery, forced labour and child labour.

- Article 17 regulates the use of trade union rights and the establishment of trade unions.
- Article 18 it is forbidden for a citizen to join a profession or legal profession and to do business in a trade or legal business;
- Article 25 provides for equal rights before the law and prohibits prejudice against sex.
- Article 37 (e) provides for ensuring the working environment of justice and humanity, ensuring that children and women are not engaged in employment, which is not suitable for their age or gender, and that women have access to maternity care. (Constitution of Pakistan, 1973)

Labour Legislation:

Pakistan's labour laws are derived from laws inherited from colonial period when India and the Pakistani subcontinent split. The law continues to evolve through ongoing experiments to address socioeconomic conditions, industrial development, population and labour explosion, union growth, literacy levels, and government commitment to development and social welfare (Abbas Hayat. 2020)

Achieving the above objectives, the government has used a series of labour policies to reflect the transfer of democratic governments from martial law. Before the 18th Amendment, Labor was considered a "subject matter" which meant that the federal and provincial governments were responsible for the legislation and implementation of the law but now it is the responsibility of provincial government to make laws and implement on the labour market. Pakistan's total labour force is about 75.15 Millions, of which the agricultural sector accounts for 47%, manufacturing and mining for 10.50%, and other industries accounting for 42.50%. (World Bank, 2019) It is estimated that around 150,000 to 200,000 families work in approximately in brick kilns industry of Pakistan. (Iqbal, M. J. 2006)

Contract of Employment

Article 18 of the Constitution gives every citizen the right to engage in the trade union (Javaid, D., 2020), the Industrial and Business Employment (Standing Orders) of 1968 signing the labour agreement with the company owner. This rule applies to all companies that have 20 or more workers in the country, and provide job security. For workers elsewhere, domestic workers, farm workers or temporary workers employed by contractors, labour contracts are usually not in writing and may be enforced by a court based on oral evidence or previous practice.

The mandatory content of each labour contract (if specified in writing) is limited to the main terms and conditions of employment, namely the nature and duration of the appointment, the allowance of pay and other benefits, and the terms and conditions of appointment.

Termination of the Contract

Unless there is misconduct, the service of permanent workers shall not be terminated in any other way, unless the employer or the employee chooses to withdraw from the service and provides a month's notice or replaces his salary. One month's salary is based on the average salary of the last three months. Workers in other departments are not entitled to pay wages instead of notices. Any form of termination of service must be recorded in writing and explain the reasons for such behaviour.

If the worker feels aggrieved because of the dismissal order, it can be dealt according to Labor law. The employer passes him or her in writing through the store manager or union within three months of the cause of the lawsuit. The termination form has been described as deleted, downsized, dismissed or dismissed from service.

To prevent various forms of power exercise, victimized or unfair workers laws, the court has been given the power to review and intervene to determine whether there is a violation of the principles of justice and whether the employer has legitimate behaviour or omission.

Working Hours:

Under the Factories Law of 1934, an adult worker is allowed to work 9 hours a day and 48 hours in a week, similarly, under 18 years workers are not allowed to work more than 7 hours a day and 42 hours in a week (Mughal, J. R. D., & Ahmad, M., 2011). The labour law applies to formal and non-formal industries where workers are more than ten. However, the Provincial governments have the power to extend this law to five workers, In case of seasonal factories, such as brick kiln industry, cotton pressing, sugar mill etc., the workers are not allowed to work more than 10 hours a day or 50 hours a week, however, is a technical reason, a worker may work 56 hours in a week.

According to Shops and Establishments Law 1969, the labour who work in a shop is limited to work 48 hours a week or 7 hours a day, the law is implemented for whole Pakistan. Article 22/B of the 1923 Mining Act also specifies weekly working hours for labours at 8 hours a day or 48 hours a week (Shams, K., & Kadow, A., 2019). Article 22-C further restricts the work done underground for not more than 8 hours. In the factory, the working time of all category of labour must be pasted in notice board in the local language, the factory law further states that employees are not required to work continuously for more than six hours unless has had an hour for rest. However, it is essential to reduce working time during Ramadan.

Paid Leave:

According to the Factories Act of 1934, any worker who has worked in a factory for twelve consecutive months may take fourteen consecutive days off during the subsequent twelve-month period. If an employee does not use all of the public holidays due to him within such a period of twelve months, all public holidays not used by him or she will be added to the months in the following a period of twelve public holidays.

It is believed that despite a business interruption during these twelve months that was caused by illness, accident or authorized leave, an employee has worked for a total of three months at ninety days without interruption, either by a boycott, strike or lockdown that is not illegal strike or by temporary unemployment periods, which do not exceed 30 days in total; And approved leave does not include weekly leave, allowed under section 35 which occurs at the end or beginning of the holiday season.

Maternity Leave and Maternity Protection:

The constitution of Pakistan in article 37, provides a motherhood benefit for women who work in any factory or the company (Sarwar, F., & Abbasi, A. S., 2013), there are two types of maternity law, one is federal government law and other is provincial government law, The Maternity Allowance Ordinance of 1958 stipulates that a woman can take up to six weeks of prenatal and postnatal leave after completing four months of employment or waiting, during which she is paid a salary based on her last salary. The regulation applies to all factories and companies in which women are employed. It also limits the woman's dismissal during her motherhood leave. Similarly, Mining Production Act 1941 also applies to women working in Pakistan's mines.

Other Leave Entitlements:

The factories act provide every employee 14 days of annual leave and 10-day casual leave with full pay and a further 16 days medical or sick leave at half-pay, casual leave is granted in the urgent personal matter or sudden illness, it may be obtained in an advance application but sometime it may be grant without advance information. In most cases, causal leave is approved but for the Sick leave, he/she may prove a medical certificate. The administrative of the company or management of factory cannot refuse the leave request when the medical certificate presented.

There is also a law in which employees enjoy the public holiday as announced by the government with full pay. However, if an employee has to work on a public holiday, an additional leave of one day will be granted with full pay. According to agreements with the collective bargaining system, special leave is granted up to two months for the Hajj, Umra, Ziarat and other religious pilgrimages.

Minimum Age and Protection of Young Workers:

The constitution of Pakistan prohibited all type of work for the children under 14 years, according to article 11 (3), no any child is hiring in any factory or mine, the constitution also stated that the government must make policy in the favor of children, government protect the child from hazardous work, provide free education and eradicate illiteracy and facilitate children to enjoy childhood.

The Factories Act of 1934 allows children under the age of 14 and 18 in case of medical fitness, for this it is mandatory under section 52 of the act, he/she provided a medical certificate from a certified doctor but the workload of a child in a factory is

limited to five hours a day and no child is allowed to work between 7 pm to 6 am (Siddiqua, R., 2004). It is also mandatory that factories must display the work time in notice board for the children, management must have maintained a register in which all child worker's name and registered, and it is also the responsibility of factory management that they must provide work to children according to their nature and body structure.

Pay Issues:

When a worker did his job, he is eligible for wages, upon completion of the job responsibility, the owner must pay remuneration payable to the worker, The Wage Payments Act 1936 provides for wage payments to various categories of labours. It applies to employees whose monthly salary does not above Rs. 3,000 used by factories, railroads, sugar mills and other non-formal industries the significant purpose is to control the salaries paid to various categories of factory workers. However, three months after announcing the employer's intention to do so, the provincial government may extend the law to other categories of workers. The law stipulates that if the number of workers working in factories and railways is less than 1,000, wages must be paid within a week after the end of the wage period.

In other cases, the payment period to the employee is 10 days. Unless otherwise stated in the decree, workers' wages cannot be deducted by means other than accidents, such as fines, breach of contract, and costs of damage or destruction to the factory. The company owner is accountable for paying all salaries paid to the employee. Similarly, any a contractor who employs workers in the industry is responsible for paying salaries to the employees they employ. The person responsible for paying the salary must specify that the pay period does not exceed 30 days and must be paid within one within a week after the pay period expires. If you hire 1,000 or more employees, you must be paid within 10 days. Remuneration for paid employees must be paid no later than the second business day after the dismissal.

Freedom of Association:

Article 17 of the Pakistan constitution guarantees the right to form an association or trade union to every citizen, which is required by law in the interests of Pakistan's sovereignty or integrity, public order or ethics. Is subject to reasonable restrictions. Pursuant to Article 3 of IRO 2002, workers and employers in any institution or industry have the right, under the law, to create and join associations of their choice.

Both trade and employers' organizations have the right to form and join associations and confederations, and any such organization, federation or confederation has the right to become a member of international organizations and confederations of workers' and employers' organizations.

Registration of Trade Union:

Trade unions are to be registered under the IRO. These unions registered with the Provincial Registrar of a trade union, in case the company is registered nationwide, then

the trade union will be registered with federal Registrar as mentioned in Industrial Relations ordinance 2012. After the registration of trade union, the labour will get various benefits. Unions in Pakistan are typically factory-wide and their affiliation depends on the size of their factory.

A trade union once established, the members have the legal right to formulate their own rule and regulations.

Collective Bargaining and Agreements:

In order to determine the role of union representatives in factory disputes and to be represented on the management of industry, commission, the board of directors and committees, the law provides a right to appoint a representative of the labour union as a collective bargaining agent (CBA), which is elected by secret ballot and is a member of a registered labour union. The CBA is entitled to be held by the employer or employer or any issue related to the employment or non-employment, terms of a contract, rights provided in law, any award or any settlement.

Any collective decision about factory or labour's rights such as wages, working time, holidays and wages during holidays, job promotions, sick pay, pension and retirement etc. are decided with the consultation of a collective bargaining agent.

Conciliation:

If both parties fail to find a solution, the management or CBA can serve the other party with a notice of mediation within 15 days and send a copy to mediator and labour court. If the dispute is resolved at a mediator or tripartite mediator committee, the report and settlement are sent to the provincial or federal government.

Arbitration:

In case of failure of negotiation, the negotiator has the power to forward their issue to third party arbitrator, if both parties agree, they jointly inform the arbitrator in writing, the arbitrator makes his decision within one month, his/her decision will be final and valid for two years.

The Labor Court:

The national labour law authorized the power to labours, owners and CBA to apply to the labour court to implement of the labour law or any right guaranteed in the constitution or other labour law of the country. it the responsibility of the provincial government to build the labour court, each labour court has its own geographical jurisdiction, each labour court has one Presiding officer appointed by the Provincial government, The Labor Court ruled that the industrial/labour dispute, which has been brought before it; court decide the matter relating to the implementation of labour law or right of labour referred before it. In dealing with the offence, the Labor Court followed the procedure as closely as possible under the Criminal Procedure Code, 1898. For the purpose of judging and determining

any dispute, the Labor Court was considered a Civil Court and had the same jurisdiction as was vested in the Court under the Code Civil Procedure, 1908 (Act V of 1908) includes the enforcement of attendance and examination under oath, the issuance of documents and material objects, and the issuance of commissions for the examination of witnesses or documents. The decision of Court is made in writing and presented in open Court with two copies then presented to the Provincial Government. After it, the government published it in the official gazette within one month's period. There is also labour appellate tribunal (high court) for appellees against the labour court decision, the high court may review or change the labour court decision on the bases of evidence and law availability.

Implications of 18th Amendments

By means of Eighteenth Constitutional Amendment the Concurrent Legislative list was abolished and Federal Government had lost the power to legislate regarding Labour Welfare and Trade Unions, which subject devolved upon the provinces.

In the Indian jurisdiction, Trade Unions and Industrial Labour Disputes are mentioned at Sr. No. 22 of the List-III of the Seventh Schedule of the Constitution of India, which forms the joint domain of both the State Governments and Union Territory of India as well as the Central Government of India under those subjects (Ramaswamy, M., 1956), therefore, the Trade Unions Act 1926 has been promulgated by the Parliament to deal with the matter relating to registration of trade unions and trade disputes etc., whereas, in view of the Eighteenth Constitutional Amendment, Federal Legislature is not empowered to legislate for the nationwide trade unions, except for if need be, recourse to procedure laid down in Article 144(1) of the Constitution, which provides that one or more Provincial Assemblies may by resolutions empower Parliament to regulate any matter not enumerated in the Federal Legislative List in the Fourth Schedule, though an Act, which may be amended by the Assembly of that Province.

An Ordinance to consolidate and rationalize the law relating to formation of trade unions, and improvement of relations between employers and workmen in the Islamabad Capital Territory and in trans-provincial establishments and industry was promulgated whose preamble describes that Islamic Republic of Pakistan has ratified ILO Convention 87 on Freedom of Association and Convention No. 98 on Right to Organize and Collective Bargaining;

Conclusion

The 18th Constitutional Amendment has made provinces responsible to resolve all above discussed issues of labour class. This has provided an opportunity to the provinces to work on building an atmosphere suitable for working people in their respective provinces.

Provincial Assemblies need deliberations to introduce comprehensive inclusion of provisions around ILO conventions C-100 and C-111 so that sex based discrimination related to remuneration and employment can be addressed;

Provincial Assemblies need to amend the maternity laws to bring them in-line with international standards and deliberations should take place to extend the maternity leave from 12 weeks to at least 24 weeks;

In order to fully comply CEDAW's Article 11, Provincial Government must introduce comprehensive reforms around provisions of day care centers, separate washrooms, nursing breaks and flexible timings for women workers as well as extension in the duration of maternity.

This Contradiction from the law should be removed and law should be made compliant with international standard of minimum age of employment of children and domestic laws on Prohibition of employment of children.

Sectors which are more laborious and contain harsh working conditions need to be focused more by the government. For example; the brick kiln sector is usually unorganized, covering most of the rural labour force and a large part of the urban labour force. It includes activities carried out by small and family businesses partly or wholly through family work. The sector is characterized by low income, unstable and informal employment, and lack of legislation or union protection. Workers in the unorganized sector are scattered. Research shows that most women work 50-55 hours per week, and nearly 53% of them work hard to achieve work-life balance. The reason behind this fight is that they are being challenged by organizational requirements rather than family commitments.

Today's workers bear many competing responsibilities, such as work, children, housework, volunteering, and caring for the elderly of spouses and parents, which puts pressure on individuals, families, and the communities they live in. Female workers have dual responsibilities for family and work. Women's situation in the sector can be attributed to multiple reasons, namely sexism, poverty, lack of basic knowledge, ignorance of the government, and insufficient laws to prevent them.

References

- Iqbal, M. J. (2006). *Bonded Labor in the Brick Kiln Industry of Pakistan*. The Lahore Journal of Economics, 11(1), 99–119. doi: 10.35536/lje.2006.v11.i1.a6
- Umer, Abdullah. (2012, March 18). *Labour laws before and after 18th Amendment*, Retrieved from <https://nation.com.pk/18-Mar-2012/186072>
- The Constitution of Islamic Republic of Pakistan 1973.
- World Bank Report (2019). Retrieved from <https://data.worldbank.org/indicator/SL.TLF.TOTL.IN?end=2019&locations=PK&start=1990&view=map>
- Hayat Abbas, *Labour rights in Pakistan* <https://www.thenews.com.pk/print/672372-labour-rights-in-pakistan> retrieved on 12.09.2020.
- Iqbal, M. J. (2006). *Bonded Labor in the Brick Kiln Industry of Pakistan*. The Lahore Journal of Economics, 11(1), 99–119. doi: 10.35536/lje.2006.v11.i1.a6
- ILO. (The Industrial and Commercial Employment (Standing Orders) Ordinance, 1968) Retrieved from <https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/86160/97030/F-114188043/PAK86160%202010.pdf>
- Rehman, Nabeel. *Employment, Labour Laws and Regulation 2020*. <https://iclg.com/practice-areas/employment-and-labour-laws-and-regulations/pakistan>
- Javaid, D. (2020). ILO Conventions and Gender Dimensions of Labour Laws in Pakistan. *South Asian Studies*, 30(1).
- Mughal, J. R. D., & Ahmad, M. (2011). Employee Rights and Prevalent Statutes. Available at SSRN 1906729.
- Shams, K., & Kadow, A. (2019). The relationship between subjective well-being and work–life balance among labourers in Pakistan. *Journal of Family and Economic Issues*, 40(4), 681-690.
- Sarwar, F., & Abbasi, A. S. (2013). An in-depth analysis of women’s labor force participation in Pakistan. *Middle-East Journal of Scientific Research*, 15(2), 208-215.
- Siddiqua, R. (2004). Laws Relating to Child Labour in Bangladesh and Their Shortcomings. *Labour (Journal of the Bangladesh Institute of Labour Studies)*, 7 (1).
- Ramaswamy, M. (1956). Constitutional Developments in India 1600-1955. *Stanford Law Review*, 326-387.