

# RIGHT TO SAFE WORK PLACE: INDIAN LEGAL REGIME

SOUMYA DWIVEDI\*

India has constantly striven to reinforce occupational health and safety by implementing and regularly amending laws in consultation with workers unions, employees and employers' organisation. The main objective of these regulations is to provide a statutory framework so as to create suitable control systems on compliance, enforcement and incentives.<sup>1</sup> There are sixteen laws related to working hours, conditions at work and employment in India, and two out of them are the main acts which contain the legal provisions for the protection to health and safety of workers - The Factories Act, 1948 and The Mines Act, 1952. In India, occupational health is regulated jointly by the Labour Ministry, and the Health and Family Welfare Ministry of the Government of India. The Directorate General of Mines Safety and the Directorate General Factory Advisory Services and Labour Institutes assist these ministries in technical aspects of occupational health and safety in mines, ports and factories.

Article 42 of the Constitution of India states that the State is required to endeavour to make provisions for securing just and humane conditions of work and maternity relief. The Ministry of Labour and Employment drafted a National Policy on Safety, Health and Environment at Workplace to regulate commercial activities so as to ensure that a safe and healthy working condition is available for everyone at their respective workplace. This policy aims to give a statutory framework to Occupational Safety and Health by providing financial and non-financial incentives for improvement of health and safety standards at workplace.<sup>2</sup> The policy also aims to promote better collection and usage of data from workplace to promote a safer work environment for employees.<sup>3</sup>

The responsibilities of employers stretch beyond the sole issue of just and fair compensation and extend to ending discrimination of all kinds at the work place and ensuring a physically safe and healthy workplace. This paper traces the statutory framework of the country which bestows right to a safe workplace for all employees under which different statutes and provisions have been provided.

---

\* Soumya Dwivedi, Lawyer, Kolkata.

<sup>1</sup> Jayati Ghosh, 'The "Right to Work" and Recent Legislation in India', (2006) 34 Social Scientists 92.

<sup>2</sup> Gurumurthy Ramachandran & Panneer Sigamani, 'Occupational Health and Safety in India: The Need for Reform', (2014) 49 Economic and Political Weekly 26.

<sup>3</sup> The Occupational Safety, Health and Working Conditions Code, 2020, s 20.

Further, the paper traces the constitutional right of employees to safety to workplace. Lastly, this paper concludes with an analysis of provisions which ensure safety of women at workplace.

## I. EXISTING STATUTORY FRAMEWORK

The Factories Act, 1948<sup>4</sup> was enacted with the primary focus of protecting workmen employed in factories against industrial and occupational hazards. The Act serves to empower workers across factories and docks in India and is one of the foremost legislations to further national policies in India with regards to safety and health in the workplace. The Factories Act addresses a gamut of problems associated with workplaces in the country some of which are safety and health standards, efficiency and well-being of workers at the workplace. This Act is applicable to any factory using power and employing ten or more workers<sup>5</sup> or twenty or more workers in case the factory does not use power.<sup>6</sup> This Act provides a gamut of safety measures to safeguard the interests and safety of workers in factories. The Act recognises the impact that overcrowding can have on the efficiency and morale of the workforce and recognises that no room in any factory should be overcrowded to an extent injurious to the health of the employee<sup>7</sup> and therefore prescribes the minimum dimension of workrooms in a factory.<sup>8</sup> The Act also provides for basic amenities of suitable and sufficient lighting,<sup>9</sup> drinking water arrangements<sup>10</sup> and sufficient latrine and urinal accommodation to be provided to the workers of a factory.<sup>11</sup> The Act further prevents factory owners and managers from allowing workers to operate dangerous machinery without the requisite training, skills and knowledge.<sup>12</sup> The Act also contains safety guidelines to be followed like fencing of the machinery,<sup>13</sup> casing of new machinery<sup>14</sup> and steps to be observed by workers while working on or near machinery in motion.<sup>15</sup> The Act further provides that a factory is to take all practicable measures to prevent an outbreak or spread of fire by ensuring the availability of necessary equipment and facilities for extinguishing fire<sup>16</sup> and ensuring safe means of escape for all persons in the event of a fire.<sup>17</sup> These regulations are further buttressed by building and

---

<sup>4</sup> The Factories Act 1948.

<sup>5</sup> The Factories Act 1948, s 2(i).

<sup>6</sup> The Factories Act 1948, s 2(ii).

<sup>7</sup> The Factories Act 1948, s 16(1).

<sup>8</sup> The Factories Act 1948, s 16(2).

<sup>9</sup> The Factories Act 1948, s 17.

<sup>10</sup> The Factories Act 1948, s 18.

<sup>11</sup> The Factories Act 1948, s 19.

<sup>12</sup> The Factories Act 1948, s 23.

<sup>13</sup> The Factories Act 1948, s 21.

<sup>14</sup> The Factories Act 1948, s 26.

<sup>15</sup> The Factories Act 1948, s 22.

<sup>16</sup> The Factories Act 1948, s 38(i)(b).

<sup>17</sup> The Factories Act 1948, s 38(i)(a).

fire rules, regulations and norms issued by respective State Governments. Labour Inspectors have been empowered by this Act to serve an order upon the occupier or manager of a factory specifying measures to be taken if any part of the factory appears to be in a state of disrepair.<sup>18</sup> The Act also puts a positive duty on the employers to disclose all information regarding dangers and health hazards arising from the exposure to substances or taking part in any process which can be detrimental to the workers employed in the factory.<sup>19</sup> The workers further have a positive right to be a part of a Safety Committee which shall be constituted by the management and shall have equal number of representatives of workers and management to promote co-operation between them.<sup>20</sup>

The Industrial Employment (Standing Orders) Act, 1946 (IESO Act) applies to every industrial establishment wherein 100 or more workmen are employed and requires employers in industrial establishments to formally define conditions of employment under them and submit a draft standing order certifying authority for future certification purposes. The IESO Act requires every employer in an industrial establishment to clearly define and publish standing orders with respect to the conditions of employment/service rules and to make them known to the workmen employed by it.<sup>21</sup> This Act goes a long way in upholding the safety of tenure of workmen and ensures that no arbitrary actions are taken by the management.

The Shops and Commercial Establishments Acts of respective states generally contain provisions relating to the registration of an establishment, working hours, overtime, leaves, minimum age for working and working conditions for employees with a special emphasis laid through guidelines on working conditions for women employees. The provisions of The Shop and Establishments Acts also apply to white-collar and blue-collar employees and has within its ambits a varied collection of commercial establishments.

The Mines Act, 1952<sup>22</sup> aims to secure safety and welfare of workers working in mines. The Mines Act 1952 applies to mines of all mineral extraction sites within the country (except the State of Sikkim) including offshore mines within the limits of territorial water. One of the most significant obligations under this Act is the formation of safety committees in every mine site which has more than 100 persons employed in it.<sup>23</sup> This Act prohibits employment of labourers who have not completed 18 years of age, in any mining operation.<sup>24</sup>

---

<sup>18</sup> The Factories Act 1948, s 40A.

<sup>19</sup> The Factories Act 1948, s 41B.

<sup>20</sup> The Factories Act 1948, s 41G.

<sup>21</sup> The Industrial Employment (Standing Orders) Act 1946.

<sup>22</sup> The Mines Act 1952.

<sup>23</sup> The Mines Rules 1955, s 29T.

<sup>24</sup> The Mines Act 1952, s 40.

The Maternity Benefit Act, 1961 is yet another piece of legislation that seeks to protect the rights of pregnant women by ensuring a safe working space for the women and also the child. While the Act is a beneficial piece of legislation seeking to confer benefits and leaves with pay for the mother, the jurisprudence developed so far has enabled benefits to be accorded to the child as well. In fact, various organisations have transcended beyond the law and enshrined paternity benefits as well in the form of leaves and others. These ensure safety, dignity and respect for the woman at the workplace that entitles the assurance of the woman of not losing the job once she gets pregnant. The infamous case of *Air India vs. Nargesh Mirza*<sup>25</sup> is noteworthy in this regard and the horrors remedied through that decision is being hailed through this piece of legislation as well.

## II. CONSTITUTIONAL LAW PERSPECTIVE

Article 21 of the Indian Constitution bestows upon the Indian citizens the right to live with human dignity and free of exploitation. However, Article 21 derives its breath from the Directive Principles of State Policy and also Article 42 of the Indian Constitution which enjoins the Government to create just and humane conditions of work and maternity relief. In *Bandhua Mukti Morcha v Union of India*,<sup>26</sup> the Supreme Court held that ensuring safety at workplace was one of the minimum requirements which needed to be accorded to workers to enable a person to live with human dignity. The Supreme Court had ruled in *Francis Coralie Mullin v UT of Delhi*<sup>27</sup> that it is the right of everyone in this country to live with human dignity and free from exploitation and this right is enshrined in Article 21 of the Indian Constitution.

In *Consumer Education & Research Centre v Union of India*,<sup>28</sup> in response to a Public Interest Litigation filed for the enforcement of the fundamental right of workers of the asbestos industry, the Supreme Court observed that the workmen were getting affected by asbestosis and becoming prone to lung cancer and related ailments. The Apex Court held that the employer was obliged to provide protective measures to workmen and such right was rooted in Article 21 read with Articles 39(3), 41 and 43 of the Constitution as right to health and medical care, to protect the health of a worker during and post retirement, was a fundamental right.<sup>29</sup> The Supreme Court held that the right to health of a worker was an integral facet of meaningful right to life without which a worker would be doomed to lead a life of misery.<sup>30</sup> This decision was handed down by a three member bench of the Supreme Court and was a step in the right direction as it imposed a

<sup>25</sup> *Air India v Nargesh Meerza* (1981) 4 SCC 335 : AIR 1981 SC 1829.

<sup>26</sup> *Bandhua Mukti Morcha v Union of India* (1984) 3 SCC 161.

<sup>27</sup> *Francis Coralie Mullin v UT of Delhi* (1981) 1 SCC 608.

<sup>28</sup> *Consumer Education & Research Centre v Union of India* (1995) 3 SCC 42.

<sup>29</sup> *ibid.* at 24

<sup>30</sup> *ibid.*

positive duty on both public and private enterprise to promote the health, vigour and strength of workers as basic essentials of right to life.<sup>31</sup>

In *Kirolskar Brothers Ltd v ESI Corpn*<sup>32</sup> a three-judge bench of the Supreme Court recognised the fact that facilities of health and medical care generate devotion and dedication among the workers to give their best. The Apex Court concluded that health is a state of complete physical, mental and social well-being and a right to health was a fundamental human right of a worker.<sup>33</sup> The importance of this judgement in terms of reading mental health into the definition of health cannot be underscored especially when India is in the midst of deteriorating mental health epidemic. It is estimated that in India, the economic loss, due to mental health conditions between 2012 and 2030 is \$1.03 trillion dollars.<sup>34</sup>

### III. SAFETY OF WOMEN AT WORKPLACE

Despite being one of the fastest growing economies in the world, India has one of the lowest female labour force participation rates in the world and the factors contributing to the same are numerous.<sup>35</sup> As per Census 2011, the total number of female workers in India is 149.8 million.<sup>36</sup> Many working women face sexual harassment at workplace on a daily basis which creates a hostile environment for them and further discourages women from continuing in their jobs or even joining a job in the first place. Workplace sexual harassment is a form of gender discrimination which violates a woman's fundamental right to equality, right against discrimination and right to life guaranteed under Articles 14, 15 and 21 of the Constitution of India. Sexual Harassment at workplace is also a violation of right to practice any profession or carry on any occupation, trade or business which includes a right to a safe environment free of sexual harassment.<sup>37</sup> The Supreme Court on several occasions held that gender equality is enshrined under

<sup>31</sup> *ibid.*

<sup>32</sup> *Kirolskar Bros Ltd v ESI Corpn* (1996) 2 SCC 682.

<sup>33</sup> *ibid.* at 8

<sup>34</sup> Neerja Birla, 'Mental Health May Hurt India to Tune of \$1.03 Trillion; Here's a Dose for Cos', The Economic Times (10 September 2019) <<https://economictimes.indiatimes.com/magazines/panache/mental-health-may-hurt-india-to-tune-of-1-03-trillion-heres-a-dose-for-cos/article-show/71045027.cms?from=mdr>> accessed 15 July 2022.

<sup>35</sup> 'India: Unsafe Workspace has Resulted in Lower Female Workforce Participation' (Business & Human Rights Resource Centre, 7 January 2019) <<https://www.business-humanrights.org/en/latest-news/india-unsafe-workspace-has-resulted-in-lower-female-workforce-participation/>> accessed 15 July 2022.

<sup>36</sup> Anuradha Mascarenhas, 'Muslim Participation Lowest Among Women in Workforce: Report', The Indian Express (3 April 2016) <<https://indianexpress.com/article/cities/pune/muslim-participation-lowest-among-women-in-workforce-report/>> accessed 15 July 2022.

<sup>37</sup> S Senthilal, 'Harassment, a Violation of Fundamental Right', The Hindu (4 May 2018) <<https://www.thehindu.com/news/cities/puducherry/harassment-a-violation-of-fundamental-right/article23764778.ece>> accessed 16 July 2022.

Article 14 of the Constitution of India.<sup>38</sup> Therefore, a woman has a fundamental right to a safe workplace and this right has also developed through several case laws. Further, when the victim is compelled to avoid places at work because of the presence of the perpetrator, her freedom of movement is restricted.<sup>39</sup>

The Supreme Court has held that sexual harassment at work violates women's fundamental right to equality, their right to live with dignity and practice any profession.<sup>40</sup> Each incident of sexual harassment at the place of work results in the violation of the fundamental right to gender equality and the right to life and liberty.<sup>41</sup>

There are various provisions in different legislations which aim to create a safe working environment for women in factories. The Factories Act, 1948 states that no woman shall be required or allowed to work in any factory except between the hours of 6 a.m. and 7 p.m. unless a State Government notification increases such time limit to 10 p.m.<sup>42</sup> In case of such exemptions, the factory owners/managers are mandated to form separate rules to uphold the protection of women at workplace. The Mines Act, 1952 prohibits the employment of woman in any part of a mine which is below ground.<sup>43</sup> No woman may also be employed in a mine above ground except between 6 a.m. and 7 p.m. The Shop & Establishments Acts of different states contain provisions to prevent the employment of women at night time. Some states mandate the establishments to provide adequate security and transport facility to the women workers of night shift<sup>44</sup> while others enjoin establishments working night shifts to formulate a separate policy to ensure safety of women at the workplace.<sup>45</sup>

The roots of the law on workplace sexual harassment lie in the Supreme Court's judgement delivered in *Vishaka v State of Rajasthan*<sup>46</sup> where the apex court framed certain guidelines (famously known as the Vishakha Guidelines) and issued directions upon the Union of India to enact an appropriate law for combating workplace sexual harassment. In what was a radical judgement then, the Supreme Court held that the logical consequence of incidence of sexual harassment at work place is the violation of a woman's fundamental right to business under Article 19(1)(g) of the Constitution. Further, the Supreme Court held

<sup>38</sup> Githa Hariharan v RBI (1999) 2 SCC 228.

<sup>39</sup> Indira Jaisingh, Sexual Harassment at Work Place, (2nd edn, Universal Law Publishing 2014) 62.

<sup>40</sup> 'Sexual Harassment at Workplace Violates Women's Fundamental Rights: Supreme Court', Scroll. in (11 March 2020) <<https://scroll.in/latest/955827/sexual-harassment-at-workplace-violates-womens-fundamental-rights-supreme-court#:~:text=The%20Supreme%20Court%20has%20said,Live%20Law%20reported%20on%20Wednesday>> accessed 16 July 2022.

<sup>41</sup> Apparel Export Promotion Council v A.K. Chopra (1999) 1 SCC 759.

<sup>42</sup> The Factories Act 1948, s 66(1)(b).

<sup>43</sup> The Mines Act 1952, s 46.

<sup>44</sup> The Punjab Shops and Commercial Establishments Act 1958.

<sup>45</sup> Haryana Retail Policy-2017, para 8.8.

<sup>46</sup> Vishaka v State of Rajasthan (1997) 6 SCC 241.

that sexual harassment at workplace violated the right to life and concomitant right to dignity. In *U.S. Verma, Principal, Delhi Public School Society v National Commission for Women*,<sup>47</sup> the Delhi High Court reiterated the need for special legislation under Article 15(3) of Constitution of India for the purpose of prevention of sexual harassment at workplace. In *Medha Kotwal Lele v Union of India*, the Supreme Court noted that the Vishakha Guidelines were not being properly applied in states and held that in case of a non-compliance or non-adherence of the Vishakha Guidelines, the aggrieved persons could approach the High Court to invoke their rights.<sup>48</sup>

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013<sup>49</sup> was enacted keeping in mind a woman's right to a safe and equitable working environment. This Act has been enacted to prevent and protect women against workplace sexual harassment and ensure effective redressal of complaints of sexual harassment. Alongside the enactment, the erstwhile and general law- the Indian Penal Code (IPC) 1860 would be applicable so far as the provisions and new provisions of law brought in through amendments are concerned. Sections 354 and 509 have been heavily interpreted in a catena of cases and the in-depth interpretation in the *Rupan Deol Bajaj*<sup>50</sup> decision on what would constitute outrage of modesty (also construed as sexual harassment) that goes beyond any designation or post that the accused might hold would be aptly applicable even though these provisions are circumstance-neutral. Section 354A that specifically deals with sexual harassment would be applicable if the offence takes place within the realm of a working space. Additionally, Section 354B-D would be equally applicable when committed within the workplace or extended beyond the workplace. Herein, there is importance of the Information and Technology (IT) Act 2000 that too has the potential of ensuring safe workplace for the women. In fact, the provisions of voyeurism and stalking under the IPC are to be read with the provisions of the IT Act considering the digital revolution and virtual world that embarks upon us. Under Chapter XI, most importantly, sections 67 and 72 on publishing of obscene materials and breach of privacy respectively, can directly be read with the provisions of sections 354C and 354D of IPC alongwith section 3 and section 2(n) of the POSH Act, that in totality determines the safety of the women at workplace. Furthermore, if the definition of workplace is perused in the POSH Act, applicability to all kinds of work has been mentioned therein including domestic work, and such rights have also been recognised by the Apex Court in the *Delhi Domestic Working Women's Forum v Union*

<sup>47</sup> *U.S. Verma v National Commission for Women* 2009 SCC OnLine Del 3200 : (2009) 163 DLT 557.

<sup>48</sup> *Medha Kotwal Lele (IV) v Union of India* (2009) 16 SCC 624.

<sup>49</sup> 'Prevention of Sexual Harassment at Workplace (POSH)' (Nishith Desai Associates, December 2020) <[https://www.nishithdesai.com/fileadmin/user\\_upload/pdfs/Research%20Papers/Prevention\\_of\\_Sexual\\_Harassment\\_at\\_Workplace.pdf](https://www.nishithdesai.com/fileadmin/user_upload/pdfs/Research%20Papers/Prevention_of_Sexual_Harassment_at_Workplace.pdf)> accessed 16 July 2022).

<sup>50</sup> *Rupan Deol Bajaj v Kanwar Pal Singh Gill* (1995) 6 SCC 194.

of *India* case.<sup>51</sup> Within that realm, the applicability to contractual labour is found wherein applicability of the Unorganised Workers' Social Security Act 2008 can be appreciated in the form of protection against sexual harassment at workplace as a matter of dignity and right despite being an unorganised sector worker. In that case, it would necessarily mean that safety at workplaces would constitute the mines and factories, as discussed above, where children below the age of 18 years are legally eligible to work under certain specified circumstances (whose legality is questionable, but is out of scope of the present article). So, when those workplaces involve the labour of the children and the children are employees therein the relevance of the Protection of Children against Sexual Offences Act (POCSO) 2013 is immense. So, the provisions of the POCSO Act on sexual assault, penetrative sexual assault, sexual harassment and other provisions would be equally applicable to protect the children from unsafe working spaces. So, alongside the POSH Act, the POCSO Act would be applicable for workspaces that include and incorporate the children in the labour or workforce. Interestingly, since this legislation is gender neutral with regard to the victim and the perpetrator, this legislation has greater reach and applicability that tends to protect children irrespective of their gender and hence children below the age of 18 years who work in the factories of the mines as allowed by the laws are in that sense protected and entitled to have safe working spaces.

The POSH Act enjoins every employer employing more than 10 employees to constitute a committee that will be known as the Internal Complaints Committee and shall be presided over by a woman. Two of the most salient features of the Act are the expansive definitions that it provides for what constitutes sexual harassment<sup>52</sup> and what can be considered as workplace.<sup>53</sup> In the modern day and age, an employee's work is not limited to merely going to the office. It often involves travelling with colleagues for conference or meetings to different places or even inter-state for work. The Act covers any untoward behaviour experienced by an employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey. Further, the Act provides for the constitution of a Local Complaints Committee to receive complaints from establishments where the Internal Complaints Committee has either not been constituted<sup>54</sup> or are ineffective to a point where while they have been notified, they are not operational or their existence is not known to the stakeholders concerned. Failure to constitute an Internal Complaints Committee can lead to an imposition of a fine under this Act. Some

<sup>51</sup> Delhi Domestic Working Women's Forum v Union of India (1995) 1 SCC 14.

<sup>52</sup> The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, s 2(n).

<sup>53</sup> The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, s 2(o).

<sup>54</sup> The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, ch III.

states have mandated the registration of the IC with the department of women and child development of the respective State governments.<sup>55</sup>

Another interesting development that has transpired from one of the High Courts of the country is such that it broadens the horizon and applicability of the POSH Act. While the Preamble of the Act mentions very clearly that the Act is victim centric where the presumption is of victimisation of a woman, the Preamble is silent about the perpetrator.

*‘An Act to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.’<sup>56</sup>*

In other words, the Act is perpetrator neutral and the Justice Sabyasachi Bhattacharya in 2021 adjudicated a case against the Vivekananda College<sup>57</sup> upholding this neutrality of perpetration so far as the gender is concerned and ruled that sexual harassment of a woman can be committed by a woman as well. This historic decision is indeed a trailblazer in this field whereby several aggrieved women would promptly get justice.

Furthermore, it has been observed that for several professions, despite the clear applicability of POSH Act to that sector, due to unawareness or lack of clarity on how to effectuate the same, the POSH Act remains virtually ineffective. A classic example of this is the performing arts domain in India. Until recently and until the #Metoo movement, the dark realities of the otherwise grandeurs of the performing artists laid dormant. Post this movement, there has been a surge of cases being reported- though not before the police, but one can see it being reported in the media.<sup>58</sup> It is being covered rigorously with great seriousness, unlike a few years back and one can witness the sheer helplessness that the artists display. At this juncture, several issues arise- survivors being settled abroad, no access to the ICC proceedings, gullible at the hands of the lawyers, lack of understanding of the laws and no idea of the procedure to be followed. Due to lack of and/or knowledge or bad implementation of the laws added with lack of guidelines specific to different professions make the law toothless at many instances. Therefore, despite the safe workplace guidelines of Vishakha and the POSH Act

<sup>55</sup> ‘Sexual Harassment Committee Registration Mandatory in Select Indian States’ (Nishith Desai Associates, 16 July 2019) <<https://www.nishithdesai.com/generateHTML/4478/4>> accessed 17 July 2022.

<sup>56</sup> The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, Preamble.

<sup>57</sup> ‘Same-Gender Sexual Harassment Complaints Maintainable Under POSH Act: Calcutta High Court’, Live Law ( 14 January 2021) <<https://www.livelaw.in/top-stories/same-gender-sexual-harassment-complaints-maintainable-posh-act-calcutta-high-court-168397>> accessed 17 July 2022.

<sup>58</sup> Anna North, ‘Study: More People Reported Sex Crimes Around the World in the Wake of Me Too’ Vox (11 December 2019) <<https://www.vox.com/2019/12/11/21003592/me-too-movement-sexual-assault-crimes-reporting>> accessed 17 July 2022.

exist, the effectiveness of those is many a times deemed questionable. In order to cater to this vacuum thus, the active participation of the civil society or the class of people facing such issues becomes quintessential. An example of this is the unmute help<sup>59</sup> initiative which is a performers' guide to speaking up aimed at guiding performing artists to learn the law, empower the artists, implement the requisite legal framework and provide legal awareness, counselling, aid and assistance for survivors and victims in distress free of cost.

---

<sup>59</sup> Sneha Bhura, 'Press 'Unmute' for Help on Safeguarding Rights of Artists' *The Week* (13 August 2021) <<https://www.theweek.in/leisure/society/2021/08/13/press-unmute-for-help-on-safeguarding-rights-of-artists.html>> accessed 17 July 2022.