

POLICY BRIEF

RECOMMENDATIONS FOR EASING BARRIERS FOR WOMEN IN FACTORIES IN KERALA



1. Executive Summary

The Factories Act of 1948 and the corresponding Kerala Factories Rules 1957 regulated and protected the rights of factory workers and stipulated the safety requirements to be adhered to by every factory while engaging in hazardous activities. With the enactment of Central Labour Codes 2020, Occupational Safety, Health and Working conditions Code 2020 (OSH Code) superseded the Factories Act 1948. Labour being a subject in the concurrent list of Schedule VII of the Indian Constitution, to bring the Code to effective enforcement, the Kerala government recently drafted Rules under the OSH Code. The 1948 Act and the 1957 Rules had restricted the opportunities for women working in factories. Women were restricted from working during night shifts [7 PM to 6 AM] and in activities categorised as “dangerous” by the State Rules.

With the OSH Code and the Kerala Draft OSH Rules 2021 coming into force, certain empowering amendments have been brought out, but certain limitations continue to exist. This policy brief addresses those limitations of Draft Rules 2021 [DR 2021] recently published by the Kerala government.

2. Background

According to World Bank data, the female labour force participation of India is 19% which is too low compared to the world average of 46% in 2021. The lack of economic participation of women is prominent in the industrial or manufacturing sector compared to the service and agriculture sector. The manufacturing sector of India contributes 17% of GDP and hardly employs 10.9% of women in the sector [PLFS 2019-2020], where most of the women are engaged in unskilled or semiskilled informal jobs that are low paying in character. The labour laws restricting women’s opportunities is one of the reasons for the low female participation in factory jobs in India.

The Factories Act of 1948 and Kerala Factories Rules of 1957 had restricted women from working during night hours and in dangerous and hazardous conditions. The protective nature of the law affected women’s opportunities and her freedom of choice. Thus lifting of these gender based discriminations is essential to bring more women into factory floors.

Many High Courts in India had given landmark judgements highlighting the restrictive nature of the factories laws that hindered the economic opportunities of women and their right to choose their profession.

The Madras High Court in the case of *R Vasantha v Union of India* [2001] and Kerala High Court in *Treasa Josfine v State of Kerala* [2021] held that “*it is the duty of the government or the authority to take appropriate measures to see that women can carry out her job and related responsibilities at all hours safely and conveniently. There is no reason to deny a woman to apply for a position which she is qualified to citing reasons of being a woman and she is not allowed to work during night hours.*”

The Court observed that while some sectors like fish curing facilities and sea food processing are exempted from the night shift restrictions of women, restricting all other sectors for women is discriminatory.

The Convention on the Elimination of All Forms of Discrimination Against Women to which Government of India was a party also states that discrimination against women violates the principles of equality of rights and respect to human dignity, is an obstacle to the participation on equal terms with men in the political, social, economic and cultural life of their country

With the change in perspective regarding women working in factories with the Madras High Court judgement, many states had introduced relaxations in the night shift hours to enable women to get more opportunities in the manufacturing sector.

The OSH Code 2020 lifted the night shift ban, but with conditions to be laid down by the State

government on employers to fulfil for employing women at night. Even though DR 2021, allowing women to work in night shifts is a welcome step, the conditions laid down on the employer to employ women opens up newer challenges and require corrective measures.

Further the restrictions to work in “dangerous” operations in factories still exists in the Draft Rules (DR) 2021 published by the Kerala state government. The Schedules of the DR 2021 that define and categorise the “dangerous” operations that are carried out in various factories, have restricted women from working in over 13 manufacturing activities. With an expanding chemical and petrochemical industrial base in Kerala, this restriction will act as a barrier for women in finding employment in those factories.

In the context, we analyse the recent DR 2021 brought out by Kerala government and suggest changes to be incorporated to open up more opportunities for women to enter into the workforce of Kerala factories.

3. Statement of the Problem

Women not being allowed to work in factories during night hours are crippling the opportunities for women in the manufacturing sector, especially in those factories that work in 2 or 3 shifts a day. From our interactions with the employees of factories in Kerala, it was observed that factories that operate in three shifts, the restrictive nature of law towards women hamper their opportunities for day shift jobs as well. Though Section 43 of the OSH Code and corresponding Rule 44 of the DR 2021, lifts the night ban, certain conditions are to be followed by the employers for employing women in establishments including factories. The employer is expected to provide transportation, accommodation, to recruit a minimum number of women in the proportion of two out of five in a group to be women, for night shifts to be allowed. These conditions require corrective action as they pose certain implementation challenges.

Section 44 of the OSH Code empowers the State government, in case of factories, to require the employer to provide adequate safeguards for employing women in dangerous operations. In compliance with the OSH Code, the DR 2021 restricts only pregnant women from working in those factories and lays down certain safety provisions to be complied with, while engaging women in “dangerous” operations. But the Schedules of the DR 2021 that define and categorise the “dangerous” operations that are carried out in various factories, have restricted women from working in over 13 manufacturing activities. The restrictions impact women’s employment in one or multiple activities associated with: electrolytic plating, manufacture and repair of electric accumulators, glass manufacturing, manufacture and treatment of lead, petrol gas, printing press, pottery, cashew nut processing, solvent extraction, manufacture or manipulation of manganese, manufacture or manipulation of dangerous pesticides, coir and fibre factories, graphite powdering, etc. The restrictions are reducing the opportunities for women as well as her individual freedom to choose her profession by putting up the argument of vulnerability of women by the society as well as reflected in the law. Moreover, it will act as a hindrance to achieve the SDG Goal 4 - gender equality in an already gender-stereotyped labour market by reinforcing the inequalities. The gender mainstreaming policy of the Kerala government towards achieving gender equality will go in vain, if the bottlenecks in the legislations are not done away with. Being a state hailed for high levels of women literacy, education and health, the goal of gender equality is a far away dream without economic equality for women in Kerala.

4. Policy Options and Trade-offs

- *In this part, the “Existing Provisions” details the provisions of DR 2021 that require changes in accordance with the Central Labour Code.*
- *The “Discussion” part analyzes the background and possible effects of the provisions and how a change in law can better help implementation.*
- *The “Suggestions” are recommended changes in the DR 2021.*

I. Restriction on women to work in “dangerous activities” under Schedules of Draft Rules 2021

Existing provisions

Rule 45 of the Draft Rules 2021 states that

- “(1) No pregnant woman shall be allowed to work in a factory involved in dangerous operation, where she is likely to be exposed to hazardous substances which are carcinogenic for herself and teratogenic (for foetus).
- (2) Proper dress code shall be maintained for the women workers working in dangerous operation.
- (3) No women workers shall be employed in the dangerous operation against the maternity benefit provisions under the Social Security Code 2020.
- (4) All the measures as mentioned in the provisions related to dangerous operation shall be complied with.
- (5) Women shall be well trained on their job, shall be rendered knowledge about the hazardous properties of the substances being handled, stored, manufactured, hazardous present at their workplace, and measure to overcome with that.
- (6) Women employed shall be provided with all the necessary personnel protective equipment at the workplaces, they are deployed.
- (7) Women shall be trained and made aware about the means of escape in the events of fire, leakage, spillage hazardous substances.
- (8) Pregnant women worker shall be deployed for work only in locations where other women worker/workers are working.”

Discussion

The OSH Code 2020, under Section 44, enables the appropriate Governments to lift the restrictions on the employment of women in activities considered dangerous for their health and safety, in an establishment or class of establishments or in any particular hazardous or dangerous processes, due to the operation carried out therein. But, the provision prescribes the requirement of the employer to provide adequate safeguards prior to the employment of women for such operation. In the case of “factory” the appropriate government shall be the state government as per Section 2(d)(ii) of OSH Code.

In compliance with Section 44 of the OSH Code, the DR 2021 in Rule 45 has allowed women except pregnant women to work in all “factories” in the State, rather than establishments. This implies that Rule 45 that provides for safeguards to be followed by employers while engaging women workers in dangerous operations applies only to “factory” as defined under Section 2(w) of OSH Code and not to other establishments.

An analysis of the Schedules to the DR 2021 under the Code reveals that the many of the previously restricted activities in those factories categorised as dangerous are continued. A comparative study of 1957 Rules with DR 2021 draws the following observations.

DR 2021	1957 Rules
Restricts women in 13 dangerous operations and specifically restricts pregnant women from 7 categories.	Restricts women and young person from working in 17 dangerous categories.
Two new restricted categories such as Manufacturing activity wherein noise levels are higher than prescribed levels and, Those factories engaging in the chrome process.	Women were not restricted in manufacturing activity wherein noise levels are higher than prescribed levels.

Hence the total restrictive categories for women have increased in number with very few exceptions that are applicable only to pregnant women.

With the advancement of technology, factories and manufacturing processes are far more mechanised than they were in the late 1950s. The Third Industrial Revolution used electronics and information technology to automate production and now with the 4th industrial era, with artificial intelligence and internet of things, the safety and security of many industrial processes has improved. There are newer safety equipment and automated machinery processes thus avoiding many of the arduous jobs on the factory floor. An example is the replacement of the chemical dyes used in stencilling and dyeing of mats in coir factories by water based dyes that are less harmful. However, the DR 2021 still restricts women from working in the process.

In refineries in Kerala, women are generally not allowed to work in factory floors due to the night shift restrictions and are banned from work in hazardous environments. Out of the total workforce, hardly 20% constitute women in such factories and are working as administrative or managerial staff.

While a 65 year old law is replaced by a new one, the law must align with the progressive times and give women the right to choose their work or profession , without barriers.

With an expanding industrial sector in Kerala, more employment opportunities will be created in the near future. Industrial sectors like chemicals, refined petroleum products, rubber and plastic products, are growing in size and constitute 18.82 percent of Kerala's employment share. The expansion in the above said sectors along with skilling initiatives of Government of Kerala can increase the ratio of employment of women in factories, if the restrictions are removed.

In this background, the Kerala government has to relook into the classification under the Schedules limiting the scope of women employment in the manufacturing sector. The prohibition of women in dangerous activities has to be studied through expert panel discussions and stakeholder interactions to understand the impact and effect of those activities on human health in general and women in particular. The government can bring in a rational classification based on an intelligible differential with minimum restrictions on the prohibited activities under the Rules, thus providing women with more freedom of choice to work as well as boosting the manufacturing sector. Hence DR 2021 must be amended by lifting of the gender based restrictions in engaging in dangerous activities in factories.

OSH Code legislations, rather than restricting the economic opportunities of an individual, must place standards to have safe workplaces. Thus with the changing times, gender sensitive approach and gender mainstreaming into policy is essential to reduce the gender inequalities in the legislations.

Suggestions

1. The restrictions on the dangerous activities can be limited to pregnant and lactating women adolescents rather than restricting women as a whole in the following schedules.

Part A	Schedule II
	Schedule III
	Schedule VII
	Schedule X
	Schedule XI
	Schedule XII
	Schedule XVI
	Schedule XVIII
	Schedule XXI

	Schedule XXIII
	Schedule XXIV
	Schedule XXXVI
Part B	Schedule I

- The hiring notification must mention the harm and risks associated with the job. Thus, only willing applicants, regardless of gender, shall apply for the job. An informed consent must be obtained by the employer from the employee at the time of appointment. As Rule 45 applies only to women, the same may be amended as follows

A sub clause to be added in Rule 45 of DR 2021 as follows.

“No women worker shall be employed in hazardous processes or dangerous operation, without informing her prior to the date of appointment, as regards the hazardous or dangerous nature of the job and risks involved”

- The DR 2021 must define the word “young person” in Section 2 containing definitions rather than in the Form XX - “Certificate of fitness for Adolescent”.

“Young person means a child (who has completed 14 years and not completed 15 years) or an adolescent (who has completed 15 years and not completed 18 years of age).”

II. Night Shift for Women

Consent of women to be employed during night shifts.

Existing Provision : The OSH Code 2020 and the DR 2021, Rule 44 (a) mandates the consent of women to employ her in night shifts in a factory.

Discussion

First, the rules do not specify the way in which consent has to be taken. Further, there isn't any clarity as to the authority to take the decision regarding the mode in which consent has to be obtained.

The consent provision has given the right to choose or not to choose to work in night shifts to the women employee. While the provision empowered women with a right to choose, it may affect her job prospects considering it is non-gender neutral in nature. If a woman denies her consent to work during night shifts, it can act as a reason for the employer to choose a man instead, thus penalising the woman. Further, if the women employee revokes her consent to work in night shifts, it can affect the promotions and access to upskilling, etc. Empirical evidence from study conducted by CPPR shows that the present restriction on night shifts for women and their resultant unavailability has inadvertently accorded men to be considered for promotions.

Second, in every employment contract, either verbal or written, the employee should be informed about the employee's role and the shifts' timing. The contract should be an outcome of negotiations between the employer and the employee where the terms and conditions are mutually agreed depending on the circumstances.

Third, there are other laws that stipulate consent as a prerequisite for engaging women in night shifts. Section 20 of Kerala Shops and Commercial Establishments Amendment Act, 2018 states that the employer has to obtain the consent of the women before employing her in night shifts. However there is no consent form stipulated under the Act, thus providing the flexibility to the employee and employer to determine the same.

Since consent is a mandatory provision under the OSH Code for allowing women in night shifts, it cannot be made optional by the State Rules.

Suggestions

1. The consent provision can be included in the appointment letter to be issued by the employer as per Rule 7 of DR 2021, subject to revisions on the basis of annual medical examination report given by Factory Medical Officer, to be facilitated by occupier of the factory under Rule 6 of DR 2021.
2. The consent provision must be gender neutral and must be applicable to all employees irrespective of gender, thus avoiding penalising women if they opt out of night shifts.
3. In every employment contract, either verbal or written, the employee should be informed about the employee's role and the shifts' timing. The contract should be an outcome of negotiations between the employer and the employee where the terms and conditions are mutually agreed depending on the circumstances.

The appointment letter can include the following clauses,

Rule 7 should include the following in the form of appointment letter -

"The employer may engage the employee in night shifts, whenever required and shall provide adequate transportation facilities during night shifts".

"The employer shall revise the terms and conditions of employment based on the report of the annual medical examination given by the Factory medical officer."

Rule 44 (1)(a) may be amended as "the consent of the employee shall be taken at the time of appointment".

III. Transportation Facilities

Existing Provision : Rule 44 (c) of Kerala draft OSH Code Rules mandates the employer to provide transportation to women employees to pick-up and drop such employees to the doorstep of their residence, if they are to be employed in night shifts.

Discussion

First, many factories where there are substantial numbers of women in their workforce, provide transportation even during day shifts. However, the transportation facilities are provided till common points and not till their doorstep as the employers find it difficult as some houses lack road access.

Second, in some cases, women prefer to use their own vehicles and some are dropped by their relatives. The Rule lacks clarity as to the choice of the usage of own vehicles by women for transportation.

Suggestions

Rule 44(c) may be amended as follows -

"adequate transportation facilities shall be provided to women employee to pick-up and drop such employee".

Provided that an establishment may avail common transportation facility of the private entity or provided by non-Governmental organisation or by any other organisation or group of establishments or employees may pool their resources for setting up of common transportation in the manner as they may agree for such purpose.

IV. Prevention of Sexual Harrassment

Existing Provision

There are elaborate provisions for preventing sexual harrassment of women at work place in the Rule 44 from subclause (h) to (o), along with Rule 44 (g) stipulating compliance with the Sexual Harrassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 (Central Act 14 of 2013), as applicable to the establishments.

Discussion

The elaborative mention of sexual harrassment provisions are not required in the Rules as there is a specific law and procedures to ensure the prevention of such incidents. The compliance of Sexual Harrassment of Women at Workplace (Prevention , Prohibition and Redressal) Act 2013 is more than enough, as it provides of internal complaints committee and the procedures and measures to be followed while acts of sexual harrassment take place in an establishments. The formation of internal complaints committees under the Rules separately results in duplication of the institutional mechanisms.

Suggestions

1. Rule 44 (g) can be retained as it mandates compliance with Sexual Harrassment of Women at Workplace (Prevention , Prohibition and Redressal) Act 2013.
2. Rule 44(h) to (o) shall be deleted as the provisions are duplicating whatever is already provided in the Sexual Harrassment of Women at Workplace (Prevention , Prohibition and Redressal) Act 2013.

V. Minimum number of women to be engaged in night shifts

Existing Provision

The Rule 44 (q) requires that “the women workers are employed in a batch not less than five and the total of the women workers employed in a night shift shall not be less than two”.

Discussion

The provision lacks clarity as to what is the minimum number of women required for engaging women in night shifts. The ambiguity pertains to whether the ratio suggested is out of total women workers or workers as a whole.

The intention of the provision is to have enough women on the factory floor during night for a large number of men employees; the ratio of two- fifths is impractical. It implies that there are 2 women in a batch of five workers, i.e. 40% of total workers in every factory floor are women. The factories in different sectors, due to varied nature of the work, differ in the number of women being employed. To achieve such a higher proportion of women during night shifts , irrespective of the type of factory, would be difficult. Moreover, this will affect the opportunities of other women who are willing to work at night , but not given an option due to lack of enough numbers as prescribed by law.

Hence a smaller number may be prescribed as the minimum number of women to engage in night shifts.

A similar provision in Kerala Shops and Establishments Amendment Act 2018, Section 20 reads as -

*“Provided that an employer may employ women employees between 9 P. M. and 6 A. M.. after obtaining the consent of such women employees and ensuring that no female employee is employed between those hours other than **in groups consisting of at least five employees having a minimum of two female employees** and adequate protection of their dignity, honour and safety, protection from sexual harassment and facility for transportation from the shop or establishment to the doorstep of their residence.”*

The implementation of the above-said law can be a case study for understanding the difficulties faced by employers in engaging women in night shifts.

A minimum of three or 1/4th of total workers, whichever is higher, can be a better minimum threshold. In a factory where there are 10-12 workers, a minimum of three women have to be there to engage them in night shifts.

Suggestions

Rule 44 (q) may be amended as follows “the women workers shall be engaged in such a way that a minimum number of three or 1/4th of the total number of workers, whichever is higher, engaged in night shifts shall be women”.

VI. Sufficient Women’s Security

Existing Provision

Rule 44 (r) mandates the employer to provide sufficient women security at the entry and exit points of the factory.

Discussion

The Rule is unclear as to what the word “sufficient” intends in the context of the security of women. It is unclear as to whether it is suggestive to have women security guards or other security systems in place. A clarity in these provisions would result in better compliance, than leaving it to the discretion of the employer.

Suggestions

Rule 44 (r) may be amended as “Sufficient women security personnel and CCTV surveillance shall be provided during the night shift at the entry as well as exit points”.

VII. Accommodation

Existing Provision

The Rule 44 (s) stipulates that separate dormitory accommodation shall be provided for women workers after the working hours in the night shift if required.

Discussion

The question that arises is as to who is the authority to decide on the requirement of an accommodation. Can the women employee ask for the accommodation, and the employer shall provide it when requested? The law is ambiguous on this aspect, which may lead to a lack of compliance.

According to the Schedules of the Draft Rules 2021, accommodation is required to be maintained by employers in factories where hazardous activities are carried out. The same provision need not be repeated in the Rule.

Suggestions

The Rule may be removed as it lacks clarity and may lead to an increase in the compliance cost of the employer.

VIII. Women Supervisors

Existing Provision

Rule 44 (v) states that during night shift not less than 1/3rd-of strength of the supervisors or shift-in-charge or foreman or other supervisory staff shall be women wherever applicable.

Discussion

The word “wherever applicable” creates confusion. It states that during the night shift not less than 1/3rd-of strength of the supervisors or shift-in-charge or foreman or other supervisory staff shall be women wherever applicable. It implies that if a factory has a minimum of three supervisors, one of them shall be a woman. Thus it is not clear as to what will be the minimum number of women supervisors, if there are less than three supervisors.

In factories in Kerala, the actual number of women supervisors in factories other than the textile and food processing sector will be too low. In that case, having 1/3rd women supervisors for engaging women in night shifts is a distant reality. It adds to the burden of the employer to engage women in the workforce and thus end up preferring men over women.

As the Code does not specify the minimum number of supervisors to be there for a given number of workers, it is difficult to maintain the ratio of 1/3rd that is mentioned in the Rule. This being a practically difficult rule to be implemented, it is better to have it repealed.

Suggestions

Rule 44(v) shall be removed.

IX. Grievance Day

Existing Provision

The Rule 44 (w) states that “the women workers who work in night shifts and regular shifts shall have **a monthly meeting** through their representatives with the employer **once in eight weeks** as grievance day and the employer shall try to comply with all just and reasonable grievances.”

Discussion

The provision lacks clarity as to whether the meeting to be conducted is monthly or once in 8 weeks. A separate grievance redressal mechanism for women workers is not required as it unnecessarily adds to the institutional mechanism. The general grievances can be addressed in a grievance redressal meeting common to all genders on a monthly basis. Section 4 of the Industrial Relations Code mandates for every establishment where 20 or more are employed to have one or more Grievance Redressal Committees for resolution of disputes arising out of individual grievances.

The complaints on harassment of women can be represented to the Internal Complaints Committee constituted under the Sexual Harassment of Women at Workplace [Prevention, Prohibition and Redressal] Act 2013.

Suggestions

The Rule 44 (w) may be removed.

X. State Occupational Safety and Health Advisory Board

Existing provision : Chapter II , Rule 12 contains the composition of the State Occupational Safety and Health Advisory Board and states that -

“(1) *The Board Constituted under subsection (1) of section 17 of the Code shall consist of -*

- a. Secretary, Labour and Skills Department - Chairperson;*
- b. Labour Commissioner, Member - ex officio;*
- c. Director of Factories and Boilers, Member ex officio;*

- d. Chairman, State Pollution Control Board, Member - ex officio;*
- e. Director of Health Services, Member - ex officio;*
- f. Chief Inspector of Plantations, Member - ex officio;*
- g. Five representatives of employers;*
- h. Five representatives of employees;*
- i. A representative of professional body associated with matter for which rules and policies been framed -member;*
- j. Five eminent persons connected with field of occupational safety, health or from reputed establishments or research institutions - member;*
- k. Additional Labour Commissioner (enforcement) - Member - ex-officio;*
- l. Joint Director of Factories and Boilers, Member Secretary- ex officio;"*

Discussion:

The State Occupational Safety and Health Advisory Board is constituted under Section 17 (1) of the Code to advise the State Government on such matters arising out of the administration of the Code. Though employees and employers are represented in the Board, no women representation is mandated under the provision. As the Code applies to all genders and has special provisions for women, women employees and employers must be represented equally in the Board as well as technical and advisory committees constituted under Section 17(3) constituted by the state government.

Also the technical and advisory committees that shall be constituted under Section 17 (3) by State notification must be given definite powers and functions. These committees must ensure that the changes in safety technology and mechanisms are timely incorporated in the Rules and more safer factories are provided for the workforce. Timely updates of safety protocols and safety equipment can attract more workforce into the manufacturing sector.

Suggestions

Rule 12 must include a sub-clause "the Board constituted under Section 17(1) shall contain adequate representation of women from employers and employees in their composition."

Rule 12 must include another sub clause " the Technical Committee and advisory committee constituted must meet atleast once in 6 months to advise the Board to revise the safety guidelines and restricted activities under Schedules "

5. Conclusion

Being a state far ahead in women's health and education indicators, achieving gender equality in employment and the labour market should not remain a distant dream. The Kerala Draft Rules 2021, to be in consonance with OSH Code 2020, should allow women to work in all factories in the state without any restrictions. Each person who is qualified to be employed in a factory job must be given the opportunity to apply for the job based on informed consent on the effects and risks of engaging in the job.

The lifting of the night ban by placing responsibilities on the employer may not result in increased women's participation in factory jobs. There must be incentives provided to the employer for employing more women, thus offsetting the additional costs incurred by the employer to comply with the conditions under the Draft Rules 2021.

Though the social stigmas relating to women working in factory jobs may not disappear sooner, a law without gender discrimination can at least enable a change in the future. With more than half the population being women, Kerala must utilise its human capital to its optimum level by giving equal opportunities to all individuals irrespective of gender. The State must move away from excess intervention that denies individual rights and choices and rather act as a facilitator and a responsible regulator to ensure that the environment is conducive without discrimination.

1. <https://indiankanoon.org/doc/715470/>

2. [https://indiankanoon.org/doc/34704603/#:~:text=Treasa%20Josfine%20vs%20State%20Of%20Kerala%20on%209%20April%2C%202021&text=%22\(i\)%20Issue%20a%20writ,same%20as%20illegal%20and%20unconstitutional.](https://indiankanoon.org/doc/34704603/#:~:text=Treasa%20Josfine%20vs%20State%20Of%20Kerala%20on%209%20April%2C%202021&text=%22(i)%20Issue%20a%20writ,same%20as%20illegal%20and%20unconstitutional.)

3. https://prsindia.org/files/bills_acts/bills_states/kerala/2018/Bill%20163%20of%202018%20Kerala.pdf



Centre for Public Policy Research

First Floor, Mandoli House,
New Link Road (Opp Kochi Metro Pillar No. 821)
Elamkulam, Kochi, Kerala, India - 682020

Phone: 091 484 4043895
Email: research@cppr.in | Web: www.cppr.in