
SLAVERY AND FORCED LABOUR

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INTRODUCTION

Forced labour is refers to situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities. Slavery is the severe exploitation of other people for personal or commercial gain. Slavery is all around us, but often just out of sight. People can become entrapped making our clothes, serving our food, picking our crops, working in factories, or working in houses as cooks, cleaners or nannies.

Forced labour is any work or service which people are forced to do against their will, under threat of punishment. Almost all slavery practices contain some element of forced labour.

Forced or compulsory labour is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. It affects millions of men, women and children around the world. It is most often found in industries with a lot of workers and little regulation. These include:

- Agriculture and fishing
- Domestic work
- Construction, mining, quarrying and brick kilns
- Manufacturing, processing and packaging
- Prostitution and sexual exploitation
- Market trading and illegal activities

Forced labour is the most common element of modern slavery. It is the most extreme form of people exploitation. Although many people associate forced labour and slavery with physical

violence, in fact the ways used to force people to work are more insidious and ingrained in some cultures.

Forced labour often affects the most vulnerable and excluded groups, for example commonly discriminated Dalits in India. Women and girls are more at risk than boys and men, and children make up a quarter of people in forced labour. Migrant workers are targeted because they often don't speak the language, have few friends, have limited rights and depend on their employers. Forced labour happens in the context of poverty, lack of sustainable jobs and education, as well as a weak rule of law, corruption and an economy dependent on cheap labour.

According to the ILO's Forced Labour Convention, forced or compulsory labour is all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. Forced labour can include forced sexual services. Forced labour in the United States can include sex trafficking and/or labour trafficking since both utilize forced or compulsory labour under threat, fraud or coercion. Most often though, U.S. activists reference forced labour when speaking about labour trafficking since sex trafficking is a separately defined crime.

Slavery has evolved and manifested itself in different ways throughout history. Today some traditional forms of slavery still persist in their earlier forms, while others have been transformed into new ones. The UN human rights bodies have documented the persistence of old forms of slavery that are embedded in traditional beliefs and customs. These forms of slavery are the result of long-standing discrimination against the most vulnerable groups in societies, such as those regarded as being of low caste, tribal minorities and indigenous peoples.

Alongside traditional forms of forced labour, such as bonded labour and debt bondage there now exist more contemporary forms of forced labour, such as migrant workers, who have been trafficked for economic exploitation of every kind in the world economy: work in domestic servitude, the construction industry, the food and garment industry, the agricultural sector and in forced prostitution.

Forced Labour In India:

Forced labour and human trafficking for labour exploitation are pervasive issues in India. Forced labour and debt bondage are common practice across the primary, secondary and tertiary economic sectors in India, with widely reported cases in a significant number of

industries, including brick kilns, carpet weaving, embroidery, textile and garment manufacturing, mining, manual scavenging, and agriculture.

Some Bangladeshi and Nepali migrants are also subjected to forced labour in India through recruitment fraud and debt bondage.

Indian workers also migrate for work abroad, primarily to the Gulf, Europe and North America. These workers often pay exorbitant recruitment fees, and are particularly vulnerable to a wide range of exploitative labour practices, including contract substitution, withholding of documents, non-payment or withholding of wages, and exhausting working hours; and are often subjected to varying degrees of deception and coercion. In some cases, this exploitation amounts to human trafficking for labour exploitation, forced labour or slavery.

India's 2011 census reports there are 8.2 million child laborers in the 5-14-year-old age group. Civil society organizations have reported that figure to be much higher, and have reiterated the presence of trafficked children and children in forced labour in India's garment sector, working across all supply chains in cotton fields, mills, factories, and home-based operations. The Global March Against Child Labour estimates that 100,000 children work for more than 14 hours a day in the illegal sweatshops in and around Delhi. A study by the India Committee of the Netherlands suggests that almost half a million children- the majority of them girls from Dalit (low caste) and Adivasi (tribal) families- work on cotton-seed farms. Despite these high figures, a number of national legal frameworks surrounding human trafficking and forced child labour have been put in place in India since independence. Article 24 of the Constitution prohibits employment of children under 14 in factories, mines, and other hazardous employment. The Child Labour (Prohibition and Regulation) Act enacted in

1986 and amended in 2016, aims to regulate the engagement of children in certain "hazardous" occupations including handling of toxic or inflammable substances or explosives, mining, and other hazardous processes.

Forced labour is the most common element of modern slavery. It is the most extreme form of people exploitation. Although many people associate forced labour and slavery with physical violence, in fact the ways used to force people to work are more insidious and ingrained in some cultures. Forced labour often affects the most vulnerable and excluded groups, for example commonly discriminated Dalits in India. Women and girls are more at risk than boys and men, and children make up a quarter of people in forced labour.

Migrant workers are targeted because they often don't speak the language, have few friends, have limited rights and depend on their employers. Forced labour happens in the context of poverty, lack of sustainable jobs and education, as well as a weak rule of law, corruption and an economy dependent on cheap labour.

LEGISLATIVE PROVISIONS:

As to protect from slavery and forced labour, the required legislative provisions regarding these are –

1. Article 4 of the Universal Declaration of Human Rights (UDHR) protects your right not to be held in slavery or servitude, or made to do forced labour. It protects your right not to be held in slavery or servitude, or made to do forced labour. Servitude is similar to slavery - you might live on the person's premises, work for them and be unable to leave, but they don't own you.
2. Slavery is when someone actually owns you like a piece of property.
3. Servitude is similar to slavery - you might live on the person's premises, work for them and be unable to leave, but they don't own you.
4. Forced labour means you are forced to do work that you have not agreed to, under the threat of punishment.
5. The right to be protected against slavery and servitude is absolute, which means it can never be restricted. The right relating to forced labour is also absolute. However, it does not apply to work that:
6. You have to do as part of a prison or community sentence
7. The government requires you to do in a state of emergency, such as after a natural or man-made disaster, and is part of normal civic obligations, like jury service.

Article 4: Prohibition of slavery and forced labour-

1. No one shall be held in slavery or servitude.
2. No one shall be required to perform forced or compulsory labour.
3. For the purpose of this Article the term 'forced or compulsory labour' shall not include:
 - any work required to be done in the ordinary course of detention imposed according to the provisions of Article 5 of this Convention or during conditional release from such detention

- any service of a military character or, in case of conscientious objectors in countries where they are recognised, service exacted instead of compulsory military service
- any service exacted in case of an emergency or calamity threatening the life or well-being of the community, or
- any work or service which forms part of normal civic obligations.

Case: Siliadin v France (2005)

A 15-year-old girl was brought to France from Togo by ‘Mrs D’, who paid for her journey but then confiscated her passport. It was agreed that the girl would work for Mrs D until she had paid back her air fare, but after a few months she was ‘lent’ to another couple. They forced her to work 15 hours a day, seven days a week with no pay, no holidays, no identity documents and without authorisation of her immigration status. The girl wore second-hand clothes and did not have her own room. The authorities intervened when made aware of the situation, but slavery and servitude were not a specific criminal offence in France at that time. The European Court of Human Rights held that the girl had been kept in servitude and that France had breached its positive obligations under the prohibition of slavery and forced labour. This was because French law had not given the girl specific and effective protection.

“No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.” In northern Uganda, the LRA (Lord’s Resistance Army) guerrillas have kidnapped 20,000 children over the past twenty years and forced them into service as soldiers or sexual slaves for the army.

In Guinea-Bissau, children as young as five are trafficked out of the country to work in cotton fields in southern Senegal or as beggars in the capital city. In Ghana, children five to fourteen are tricked with false promises of education and future into dangerous, unpaid jobs in the fishing industry.

In Asia, Japan is the major destination country for trafficked women, especially women coming from the Philippines and Thailand. UNICEF estimates 60,000 child prostitutes in the Philippines.

The US State Department estimates 600,000 to 820,000 men, women and children are trafficked across international borders each year, half of whom are minors, including record

numbers of women and girls fleeing from Iraq. In nearly all countries, including Canada, the US and the UK, deportation or harassment are the usual governmental responses, with no assistance services for the victims.

In the Dominican Republic, the operations of a trafficking ring led to the death by asphyxiation of 25 Haitian migrant workers. In 2007, two civilians and two military officers received lenient prison sentences for their part in the operation.

In Somalia in 2007, more than 1,400 displaced Somalis and Ethiopian nationals died at sea in trafficking operations.

ARTICLE 5 — NO TORTURE

“No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.”

In 2008, US authorities continued to hold 270 prisoners in Guantánamo Bay, Cuba, without charge or trial, subjecting them to “water-boarding,” torture that simulates drowning. Former-President George W. Bush authorized the CIA to continue secret detention and interrogation, despite its violation of international law.

In Darfur, violence, atrocities and abduction are rampant and outside aid all but cut off. Women in particular are the victims of unrestrained assault, with more than 200 rapes in the vicinity of a displaced persons camp in one five-week period, with no effort by authorities to punish the perpetrators.

In the Democratic Republic of the Congo, acts of torture and ill treatment are routinely committed by government security services and armed groups, including sustained beatings, stabbings and rapes of those in custody. Detainees are held incommunicado, sometimes in secret detention sites. In 2007, the Republican Guard (presidential guard) and Special Services police division in Kinshasa arbitrarily detained and tortured numerous individuals laddled as critics of the government.

In many countries, forced labour is prohibited by constitutional provisions or principles. In some countries where the constitution is directly enforceable, this may be sufficient protection, particularly if there is no recent tradition of practices resembling forced labour. However, in others it may well be necessary to adopt a legislative prohibition of forced labour. The

respective provisions may take the form of a general prohibition with or without a specific definition of forced labour.

JUDICIAL PROVISIONS:

What is Force? What Article 23 prohibits is 'forced labour' – that is labour or service which a person is forced to provide – and the 'force' that would make such labour or service 'forced labour' may arise in several ways. It may be physical force that can compel a person to provide labour or service to another, or it may be force exerted through a legal provision, such as a provision for imprisonment or fine in case the employee fails to provide labour or service. It may even be compulsion arising from hunger and poverty, want and destitution. Any factor that deprives a person of a choice of alternatives and compels him to adopt one particular course of action may properly be regarded as 'force', and if labour or service is compelled as a result of such 'force', it would be 'forced labour'. Where a person is suffering from hunger or starvation, when he has no resources at all to fight disease or to feed his wife and children, or even to hide their nakedness, where utter, grinding poverty has broken his back and reduced him to a state of helplessness and despair, and where no other employment is available to alleviate the rigour of his poverty, he would have no choice but to accept any work that comes his way, FORCED LABOUR IN SOUTH ASIA 5 43 even if the remuneration offered to him is less than the minimum wage. He would be in no position to bargain with the employer; he would have to accept what is offered to him. In doing so he would be acting not as a free agent with a choice between alternatives but under the compulsion of economic circumstances, and the labour or service provided by him would be clearly 'forced labour'.

There is no reason why the word 'forced' should be read in a narrow and restricted manner so as to be confined only to physical or legal 'force', particularly when the national charter, a state's fundamental document, has promised to build a new socialist republic in which there will be socio-economic justice for all, and in which everyone will have the right to work, to education and to adequate means of livelihood.

Case:

People's Union for Democratic Rights v. Union of India, A.I.R. 1982 S.C. 1473

Facts of the case:

People's Union for Democratic Rights, also known as the Asiad Games Case, was brought by means of a letter addressed to Justice Bhagwati of the Supreme Court of India. The letter, sent by a public interest organization and based on an investigation by three social scientists, alleged violations of labour laws by the Union of India, the Delhi Development Authority and the Delhi Administration, based on their employment of workers on construction projects for the Asian Games. The letter was then treated as a writ petition for enforcement of a constitutional right – principally Article 23, which prohibited forced labour. The respondents and the petitioner both submitted affidavits and the petition was argued on the basis of these affidavits. The principal allegation was that the contractors paid wages to jamadars – crew bosses – who deducted a commission and then paid the actual workers less than the legal minimum wage of 9.25 rupees per day. The issue before the Supreme Court was whether the forced labour provision of Article 23 was applicable to a situation of workers being paid less than the minimum wage.

Legal Analysis:

First, the Court referred to ILO Convention 29, the European Convention on Human Rights and the ICCPR, and noted that Article 23 “is in the same strain and it enacts a prohibition against forced labour in whatever form it may be found”. Citing two US peonage cases – *Bailey v. Alabama* and *Pollock v. Williams* – the Court held that Article 23 was intended to strike “at every form of forced labour even if it has its origin in a contract voluntarily entered into by the person obligated to provide labour or service”. The Court then devoted most of its analysis to an examination of what is meant by the term ‘force’ in ‘forced labour’.

Issues of the case:

- 1) Is ‘economic constraint’ alone a ‘menace of any penalty’? Or must there be some exacerbation of the economic situation by the employer in order to come within the ILO definition of forced labour?
- 2) In a case involving *Sénégal*, a tripartite committee set up to examine an allegation under Article 24 of the ILO Constitution stated that although “economic constraints may in practice be such as to be conducive to forced labour”, there was no violation if the government “could not be held responsible for having created or exacerbated economic constraints, nor for having exploited them by offering people who had no other options employment on terms that would not normally be acceptable”.⁸⁹ Why does the Committee impose a requirement that the perpetrator play some role in exploiting an existing economic situation?

Judgment:

After considering and rejecting objections to the writ petition, the Court, by order dated 11 May 1982, directed that the minimum wage – or a higher wage if applicable – should be paid by the contractors to the workmen directly, without the intervention of the jamadars, and that the jamadars were not entitled to deduct or recover any amount from the minimum wage as commission. By the same order, the Court appointed three ombudsmen and charged them with making periodic inspections of the worksites to determine whether the labour laws were being carried out, and whether the workers were receiving the benefits and wages due to them. The Supreme Court of India's conclusion – that work performed for less than the minimum wage is forced labour – has in general not been accepted by the ILO. (It may no longer even be accepted, in absolute terms, by India. One government report indicated that not all cases of payment of wages below the minimum wage could be brought under the Bonded Labour System (Abolition) Act.84) The Committee of Experts has rejected the proposition that economic constraints that pressure a worker to accept low or underpaid work could, taken alone, come within the scope of the Convention. Thus, in response to an allegation from unions in Ireland that unemployed workers were coerced into accepting low-paying and unsuitable work in the government's Employment Action Plan, the Committee stated: The problems of unemployment and scarcity of work in anything but low-level positions, which mean that persons perform work they may not wish to do in order to maintain themselves, do not usually qualify for consideration under the Convention. In considering an Article 24 representation alleging non-compliance by Portugal with the Abolition of Forced Labour Convention, the Committee stated that, "the risk of not finding another job because of the general climate of rising unemployment cannot, in itself, be treated as the threat of a penalty designed to force a worker to remain in the service of his employer". However, echoes of the Supreme Court's reasoning may be found in other statements by the ILO. If a situation of economic constraint exists and the government exploits that situation by offering very low wages, then it could "to some extent become answerable for a situation that it did not create." When a trade union in Chile argued that the government had violated the Forced Labour Convention by paying workers enrolled in its official employment programmes less than the minimum wage, the Committee raised doubts concerning the "voluntary nature" of the programmes. The Committee noted that it would be reasonable to conclude that persons enrolled in these government programs were "driven to this by the lack of any better alternative, in order to obtain some income, however modest".

Case:**Bandhua Mukti Morcha v. Union of India, A.I.R. 1984 SC 820****Facts of the case:**

The NGO Bandhua Mukti Morcha (Bonded Labour Liberation Front) addressed a letter to Justice Bhagwati alleging that there were large numbers of workers in the stone quarries of Haryana who were bonded labourers, in violation of the Bonded Labour System (Abolition) Act, and that in addition to being held in bondage they were working in inhumane conditions. The Court treated the letter as a writ petition and appointed two lawyers as commissioners to visit the stone quarries and to interview the workers named in the petition. The commission found that the workers were not allowed to leave the quarries, had no clean water to drink, were living in huts made of straw, and had no blankets or even mats on which to sleep. Most of the workers interviewed stated that they “got very little by way of wages from the mine lessees or owners of stone crushers since they had to purchase explosives with their own moneys and they had to incur other expenses”. Other workers stated that they were “forcibly kept by the contractor and they were not allowed to move out of their place and they were bonded labourers”. In order to evade the rehabilitation requirements for bonded labourers imposed on states by the Bonded Labour System (Abolition) Act, the State of Haryana argued that although the workers might be providing ‘forced labour’, they were not bonded labourers within the meaning of the Act.

Legal Analysis:

The Court first noted that the Act was “enacted with a view to giving effect to Article 23 of the Constitution which prohibits traffic in human beings and begar and other similar forms of forced labour”. The Court found self-evident the proposition that “bonded labour is a form of forced labour”. The Act itself authorized district magistrates to inquire whether “any bonded labour system or any other form of forced labour is being enforced” in their jurisdiction. Although the “thrust of the Act was against the continuance of any form of forced labour”, the Court realized that it would be extremely onerous if every labourer had to prove that he had received an advance or other economic consideration from his employer. The labourer was likely to be illiterate and to have no documentary evidence of such an advance, and the employer was likely to deny ever having made the advance. The Court further observed that the report of the commissioners had stated that some workers were not allowed to leave the

quarries and were being forcibly kept there by the contractors. In addition, Bandhua Mukti Morcha had filed a large number of affidavits from workers stating that they were under heavy debts and were not permitted to leave without settling their accounts. Despite this evidence, the Court declined to make a finding that the workers whose names were given in the commission's report or in the petition were actually forced or bonded labourers. Instead, it appointed a labour expert to conduct an inquiry and, if necessary, release those workers who were found to be bonded labourers.

Issues of the Case:

- 1) Does the Court's decision mean that all forced labour is bonded labour? What about other factors that might make labour unwilling or involuntary?
- 2) Does the Court's decision mean that anytime a worker owes a debt to an employer, it is a situation of forced labour?
- 3) The Court emphasizes an objective fact – the existence of a debt – and assumes that the labour rendered to pay off the debt is forced labour. Does this comport with the ILO definition of forced labour? How might the facts of this case look if analyzed under Convention 29?
- 4) Because of the assumed poverty and illiteracy of the workers, the Court creates a rebuttable legal presumption in their favour. In other words, the Court recognizes that the workers and employers do not stand on an equal footing in the world outside the courtroom, and attempts to compensate for this disparity within the confines of the legal case. Do you consider this an appropriate role for the judiciary? Can you think of other examples?
- 5) Consider how Professor Srivastava describes bonded labour in India: "Bonded labour relationships are not purely economic contracts, even though employees may enter into them voluntarily because of economic necessity. Once employees enter into these relationships, they are characterized by multiple asymmetries and high exit costs, which were not a part of the contract, as understood by the employee, at the outset." Is work voluntary if the worker enters into the contract under deceptive conditions?

Judgment:

Because bonded labourers who are identified and freed but not rehabilitated would be at risk of "slid[ing] back once again into serfdom even in the absence of any coercion", the Court

concluded its opinion with a list of 21 directives to be undertaken by the State of Haryana and the Central Government in order to ensure the release, rehabilitation and compensation of bonded labourers. The Court did not treat the writ petition as disposed of by its judgment and the matter was left open for further monitoring. In later stages of proceedings, the Court appointed labour experts to assess the implementation of its directives. In a 1991 judgment, however, the Court noted that its power to “regulate such matters has inherent limitation”. “These are not schemes which could be conveniently monitored by a Court – much less the apex court.”

The Court directed the State of Haryana to “ensure” that the workers continue “to work in improved conditions of service and facilities and such of them who want to go back to their native areas be treated as released from bondage”.

APPRAISAL AND SUGGESTIONS:

The elimination of forced or compulsory labour in countries in which it has been found to occur in one form or another, requires a combination of efforts, including legislative prohibition, the regulation of certain activities that may lend themselves to being used to impose forced labour and measures by governments and civil society to combat the practice.

This Chapter reviews the implications for governments of the obligation to eliminate forced labour pursuant to the ILO Declaration of 1998, both with regards legislation to prohibit forced labour in general, as well as legislation aimed specifically at prohibiting or regulating certain kinds of labour or practices, that often entail, or could lead to forms of forced labour, including:

1. bonded labour;
2. trafficking in persons and migrant workers and the exploitation of the workers concerned;
3. commercial sexual exploitation, which is typically nonvoluntary; and
4. domestic work involving elements of coercion.

It also contains guidance on how to ensure that training and apprenticeship programmes do not develop into situations of forced labour, as this may be a risk in some contexts.

It should be noted in this regard that Convention No. 29 defines forced labour in the following terms:

For the purposes of this Convention the term "forced or compulsory labour" shall mean all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (Article 2, paragraph 1).

The Convention nevertheless excludes from this definition several forms of forced labour which were recognized at the time as normal obligations in a variety of countries. These are:

- Any work or service exacted in virtue of compulsory military service laws for work of a purely military character;
- Any work or service which forms part of the normal civic obligations of citizens of a fully self-governing country;
- Any work or service exacted from any person as a consequence of a conviction in a court of law, provided that the said work or service is carried out under the supervision and control of a public authority and that the said person is not hired to or placed at the disposal of private individuals, companies or associations;
- Any work or service exacted in cases of emergency, that is to say, in the event of war or of a calamity or threatened calamity, such as fire, flood, famine, earthquake, violent epidemic or epizootic diseases, invasion by animal, insect or vegetable pests, and in general any circumstance that would endanger the existence or the well-being of the whole or part of the population;
- Minor communal services of a kind which, being performed by the members of the community in the direct interest of the said community, can therefore be considered as normal civic obligations incumbent upon the members of the community, provided that the members of the community or their direct representatives shall have the right to be consulted in regard to the need for such services (Article 2, paragraph 2).

Experience has shown that, in formulating proposals for legislative provisions to eliminate forced or compulsory labour, the following should be considered:

- An assessment of the kinds of practices in the country that might lend themselves to abuse resulting in forced labour;
- existing constitutional principles that provide protection and the extent to which legislative implementation would increase their effectiveness, having regard to the problems met in the country;

- Whether there is a need for legislative prohibition or regulation of certain forms of labour or practices that do not themselves amount to forced labour, but which lend themselves to use by those seeking to exploit workers through compulsory labour;
- The need to back legislative prohibition or regulation by adequate penalties.

The Abolition of Forced Labour Convention No. 105 adopted by the ILO in 1957 primarily concerns forced labour imposed by state authorities. It prohibits specifically the use of forced labour:

as punishment for the expression of political views,

- for the purposes of economic development,
- as a means of labour discipline,
- as a punishment for participation in strikes,
- as a means of racial, religious or other discrimination.

It is an offence under the Migration Act 1958 to employ a person, or refer a person for work, in contravention of their visa conditions. The Act covers aggravated offences where a person is being exploited (as defined in the Criminal Code).

The Commonwealth Procurement Rules (CPRs), issued under the Financial Management and Accountability Act 1997, articulate the Government's procurement policy. The CPRs require that agencies must not seek to benefit from supplier practices that may be dishonest, unethical or unsafe (paragraph 6.7). This obliges agencies not to contract with suppliers known to engage in exploitative labour practices, such as slavery or human trafficking, or who subcontract to suppliers who engage in such practices.

When recruiting staff through a third-party agency, public officials should be aware of the practices of the companies selected, in particular their practices regarding migrant labour, and only use reputable recruitment and employment agencies.

ANNEXURE - I

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