

**INTERNATIONAL JOURNAL OF LAW**  
**MANAGEMENT & HUMANITIES**

**[ISSN 2581-5369]**

---

**Volume 5 | Issue 3**

---

**2022**

© 2022 *International Journal of Law Management & Humanities*

Follow this and additional works at: <https://www.ijlmh.com/>

Under the aegis of VidhiAagaz – Inking Your Brain (<https://www.vidhiaagaz.com/>)

---

This article is brought to you for “free” and “open access” by the International Journal of Law Management & Humanities at VidhiAagaz. It has been accepted for inclusion in the International Journal of Law Management & Humanities after due review.

In case of **any suggestion or complaint**, please contact [Gyan@vidhiaagaz.com](mailto:Gyan@vidhiaagaz.com).

---

**To submit your Manuscript** for Publication at the **International Journal of Law Management & Humanities**, kindly email your Manuscript at [submission@ijlmh.com](mailto:submission@ijlmh.com).

---

# An Abstract Thought on Health and Safety Provisions under the Factories Act, 1948

---

SANDEEP KUMARI<sup>1</sup> AND DR. LALIT DADWAL<sup>2</sup>

## ABSTRACT

*India is advancing to the road of industrialisation. Economic growth is a fundamental requirement for the development of a country. A country's economic growth depends upon industrial progress and an industry cannot progress without its workforce. Therefore, an industry needs to take care of health and safety of its workforce, so that they can work efficiently to contribute effectively to the industrial progress. This can only be possible by proper legislation. In India, codified legislation for the same has come a long way with the enactment of the Factories Act, 1948 which entails the provisions on these matters. When it comes to health and safety of the workmen, these issues can be said to be one of the major reasons for debate today in terms of their legislative strength and execution, as worker's welfare is paramount consideration in smooth running and progress of any industrial system. The present research paper aims to critically evaluate the health and safety provisions provided in this legislation and examine their scope and framework by looking into their effective implementation in the factories.*

**Keywords:** Factories Act, Health, Safety, Workers

## I. INTRODUCTION

*“Our motto is to work for peace based on social justice. Our mandate is to improve the condition, health and safety of workers, and our mission is universal.”*

*- David A. Morse*

The enormous expansion in employment that has taken place is largely due to rapid development of industrial structure. Industrial and social progress of our country has been a series of labour legislation which govern the industrial establishments in regard to their setting up, health, safety, welfare, service conditions, social security and other matters arising out of the employer and employee's relationship.

The beginning of labour legislation lies in the factory legislation. The rapid industrialisation and urbanisation without any planning resulted in insanitary and crowded living. The quest of

---

<sup>1</sup> Author is a Research Scholar at Department of Law, Himachal Pradesh University, Shimla, India.

<sup>2</sup> Author is a Professor at Himachal Pradesh university, Shimla, India.

making quick profits, unmindful of its social consequences caused the hours of work to be excessive, even the children of tender age are required to work more than 12 hours in a day. All these necessitated passing of the Factories Act, 1948 aiming at protecting human beings from being subject to unduly long hours of bodily strain or manual labour. The act provides that workers should work in a healthy and hygienic environment at the workplace, specially where the manufacturing process is carried on and the precautions should be taken for their health and safety.

### **Applicability of the Act and Some Important Definitions**

The Act extends to whole of India and is applicable on every factory which has been defined under section 2 (m) of the Act.

A **“Factory”** means any premises including the precincts thereof— whereon ten or more workers are working, or were working on any day of the preceding twelve months, and in any part of which a manufacturing process is being carried on with the aid of power, or is ordinarily so carried on, or Whereon twenty or more workers are working, or were working on any day of the preceding twelve months, and in any part of which a manufacturing process is being carried on without the aid of power, or is ordinarily so carried on, But does not include a mine subject to the operation of the Mines Act, 1952, a mobile unit belonging to the armed forces of the Union, a railway running shed or a hotel, restaurant or eating place.

**“manufacturing process”** is defined under section 2 (k) under the Act which means any process for—(i) making, altering, repairing, ornamenting, finishing, packing, oiling, washing, cleaning, breaking up, demolishing, or otherwise treating or adapting any article or substance with a view to its use, sale, transport, delivery or disposal; or (ii) pumping oil, water, sewage or any other substance; or (iii) generating, transforming or transmitting power; or (iv) composing types for printing, printing by letter press, lithography, photogravure or other similar process or book binding; or (v) constructing, reconstructing, repairing, refitting, finishing or breaking up ships or vessels; or (vi) preserving or storing any article in cold storage;

**“worker”** as defined under section 2 (l) means a person employed, directly or by or through any agency including a contractor with or without the knowledge of the principal employer, whether for remuneration or not, in any manufacturing process, or in cleaning any part of the machinery or premises used for a manufacturing process, or in any other kind of work incidental to, or connected with, the manufacturing process, or the subject of the manufacturing process but does not include any member of the armed forces of the Union.

### **Administration of the Act**

The Factory Act, 1948 is administered by the Ministry of Labour and Employment in India through its Directorate General Factory Advice Service & Labour Institutes (DGFASLI) and by the State Governments through their factory inspectorates. DGFASLI advises the Central and State Governments on administration of the Factories Act and coordinating the factory inspection services in the States.

## **II. NEED FOR HEALTH AND SAFETY MEASURES**

Health and Safety measures result in improving the conditions under which workers are employed to work. It improves not only their physical efficiency, but also provides protection to their life and limbs. Facilities and amenities as may be provided in the establishment to enable the workers employed therein to perform their work in healthy, congenial surroundings and to provide them with amenities beneficial to their good health and high morale. Inadequacy of health and safety measures in factories may lead to increase in the number of health issues and accidents. Unhygienic environment, carelessness, ignorance, inadequate facilities and lack of proper skills and training, and improper supervision have also contributed to occupational diseases and accidents, and consequent there is need for these measures. Other factors giving rise to the need for health and safety measures are:

- rapid industrialization with its complexities in the manufacturing process and its layout;
- lack of health and safety consciousness on the part of both workers and management;
- lack of resources for implementation
- expansion or modifications in existing factories;
- setting up of new industries involving hazards not known earlier;
- inadequate realisation of the financial implications of accidents.

The same was propounded in a more emphasized manner in the case of *Bhikusa Kshatriya v. Union of India*, (1963) wherein it was stated that the Act: "Is enacted primarily with the object of protecting workers employed in factories against industrial and occupational hazards. The Act requires that the workers should work in healthy and sanitary conditions and for that purpose, it provides that precautions should be taken for the safety of workers and prevention of accidents. The Factories Act undoubtedly imposes numerous restrictions upon the employers to secure to the workers' adequate safeguards for their health and physical well-being. But the imposition of such restrictions is not and cannot be regarded, in the context of the modern

outlook on industrial relations, as unreasonable.”

### **III. STATUTORY PROVISIONS FOR HEALTH OF THE FACTORY WORKERS**

To take care of health of the workers in factories, the State Government is empowered to make the rules for the same and Chapter III the Factories Act, 1948 contained provisions regarding these under sections 11 to 20 which are stated as hereunder:

#### **Cleanliness of the factory premises: (Section11)**

In a factory all workroom floors and benches, as well as stairways, hallways must be kept clean and free of effluvia from any drain, privy, or other source of nuisance and shall be cleaned at least once in every week by washing, using disinfectant or by some other effective method. Effective means of drainage shall be provided, where a floor is liable to become wet in the course of any manufacturing process.

At least once in a period of five years all the wall inside and partitions, all ceilings or tops of rooms and all outer walls, sides and tops of passages and staircases shall

- a) Be painted or varnished, and repainted and at least once in a period of 14 months revarnished where they are painted or varnished and be cleaned by such methods as may be prescribed by the Government.
- b) Where painting or varnishing is not required, at least once in every period of 14 months that shall be kept white washed or colour washed.

#### **Disposal of Wastes and Effluents: (Section12)**

For the disposal of wastes and effluents arising out of manufacturing process in the factories effective arrangement shall be made.

#### **Ventilation and Temperature: (Section13)**

Effective and proper provisions shall be made and adopted for adequate ventilation and temperature in every work room of the factories. Wall and roofs of workroom shall be made of such material so as to maintain the adequate temperature. It will ensure the workers reasonable conditions to work with comfort and prevent any adverse effect on their health.

The state government shall prescribe the standards of adequate ventilation and reasonable temperature for any factory or part thereof and chief Inspector may give directions in writing to the occupier in case of excessive temperature than that is required.

#### **Dust and Fume: (Section14)**

In every factory, where due to manufacturing process, dust or fume or other impurity arise

which is likely to be affect the health of workers, adequate measures to be adopted to prevent its inhalation, and accumulation in any workroom. To avoid this exhaust appliances would be installed near the point of origin of the dust, fumes, or other impurity and that shall be enclosed properly.

**Artificial humidification: (Section15)**

For artificially increasing humidity in air in respect of factories, where it is required, Rules may be made by the State Government for Prescribing standard of humidification, Regulating the methods used for artificially increasing the humidity of the air, directing prescribed tests for determining the humidity of the air to be correctly carried out and recorded, and Prescribing methods to be adopted for securing adequate ventilation and cooling of the air and the work rooms.

**Overcrowding: (Section16)**

No room in any factory shall be overcrowded to such an extent which becomes injurious to the health of the workers employed therein. There should be 14.2 cubic meters of space for every worker employed therein. The Chief Inspector of factories by order in writing shall fix the maximum member of workers to be employed in each room in the factory and the same shall be fixed in every workroom. The Chief Inspector of factories may by order in writing grant exemption in this regard.

**Lighting: (Section17)**

The Factories Act provides for sufficient and suitable lighting, natural or artificial where workers are working or passing through. Provision of cleaning of inner and outer surface is provided for all glazed windows and skylights used for the lighting of the workrooms. In every factory, effective provision shall be made for the prevention of

- a) glare, either directly from a source of light or by reflection from a smooth or polished surface;
- b) the formation of shadows to such an extent as to cause eyestrain or the risk of accident to any worker.

**Drinking Water: (Section18)**

In every factory, effective arrangement shall be made at suitable places for sufficient supply of wholesome drinking water. Such places shall be legibly marked 'Drinking Water' in a language understood by a majority of the workers employed in the factory. In case of factories employing more than 250 workers, provisions shall be made for cooling drinking water during hot weather

by effective means, and for its distribution.

### **Latrines and Urinals: (Section 19)**

The Factories Act requires that provision should be made for –

- a) Sufficient latrine and urinal accommodation conveniently situated and accessible to workers while they are in the factory;
- b) Separate enclosed accommodation for male and female workers;
- c) Such accommodation being adequately lighted and ventilated;
- d) All such accommodation being maintained in a clean and sanitary condition;
- e) Sweepers being employed to clean latrines, urinals and washing places.
- f) Floors and walls and the sanitary pans of latrines and urinals shall be thoroughly washed and cleaned at least once in every seven days with suitable detergents or disinfectants or with both.

### **Spittoons: (Section 20)**

Adequate number of spittoons must be provided in every factory and maintained in clean and hygienic condition. No person shall be allowed to spit within the premises of a factory except in the spittoons. A notice containing this provision and the penalty for its violation shall be prominently displayed at suitable places in the factory premises.

## **IV. STATUTORY PROVISIONS FOR SAFETY OF THE WORKMEN**

Section 21 to 41 of Chapter IV of the Factories Act, 1948 contains the provisions relating to the safety of workers and rulemaking power for the same has been given to State Government. These provisions are mentioned hereunder: -

### **Fencing of Machinery: (Section 21)**

Every moving and dangerous part of machinery shall be securely fenced. Safeguards of substantial construction must be raised and constantly maintained and kept in position while any part of machinery are in motion or in use.

It was held in *Carroll v. Andrew Barely and Sons Ltd.* (1950) that the duties under Sec 21 is not only confined to shutting off the employee from danger, but includes shutting in the machinery so that it cannot fly out and strike the workmen if it breaks.

### **Work on or near Machinery in Motion: (Section 22)**

In any factory, where it is required to examine the machinery in motion, such examination shall

be carried out only by specially trained adult male workers. Such workers shall wear tight fitting clothes and their names shall be recorded in the register prescribed in that connection. No woman or young person shall be allowed to clean, lubricate or adjust any part of a prime mover or transmission machinery, while the machinery is in motion.<sup>15</sup>

### **Employment of Young Persons on Dangerous Machines: (Section 23)**

The Factories Act forbids the employment of young persons on certain types of dangerous machines. Before working on dangerous machine every young person should be properly instructed and trained. They should work under the proper supervision of experienced person.

### **Striking Gear and Devices for cutting off Power: (Section 24)**

In every factory suitable striking gear or other efficient mechanical appliances shall be provided and maintained, and used to move driving belts to and from fast and loose pulleys which form part of transmission machinery. Such gear or appliances shall be so constructed, placed and maintained as to prevent the belt from creeping back on to the fast pulley. Driving belts when not in use, shall not be allowed to rest or ride upon shafting in motion. In every workroom of the factory suitable devices for cutting off power in emergencies from running machinery shall be provided and maintained.

### **Self-acting Machine: (Section 25)**

No traversing part of a self-acting machine in any factory, and no material carried thereon shall, if the space over which it runs, is a space cover which any person is liable to pass, whether in the course of his employment or otherwise, be allowed to run on its outward or inward traverse within a distance of forty-five centimeters from any fixed structure which is not a part of the machine. This is for protection of the workers from injury by self-acting machines. The chief inspector is empowered to grant the exemptions under this act.

### **Casing of New Machinery: (Section 26)**

Every set screw, bolt or key on any revolving shaft, spindle, wheel, or pinion shall be encased or effectively guarded so as to avoid danger in all machinery driven by power.

### **Prohibition of Employment of Women and Children near Cotton openers: (Section 27)**

No women or child shall be employed in any part of a factory for pressing cotton in which a cotton-opener is at work.

### **Hoists and Lifts: (Section 28)**

In all factory hoists and lifts shall be of good mechanical construction, sound material, of

adequate strength and sufficiently protected by an enclosure fitted with gates having interlocking system and efficient devices to open the gate when needed. They shall be properly maintained, and shall be thoroughly examined by a competent person at least once in period of every six months. A register shall be kept containing the prescribed particulars of each such examination. The maximum safe working load shall be plainly marked on every hoist or lift, and no load greater than such load shall be carried thereon.

Where in the hoists and lifts used for carrying persons, the cage is supported by rope or chain, there shall be at least two ropes or chains separately connected with the cage to balance weight, shall be capable of carrying the whole weight of the cage together with its maximum load.

Efficient devices shall be provided and maintained capable of supporting the cage together with its maximum load in the event of breakage of the rope, chain or attachments to prevent the cage from overrunning.

#### **Lifting Machines, Chains, Ropes and Lifting Tackles: (Section 29)**

‘Lifting machine’ means any crane, crab, winch, teagle, pulley block, gin wheel, and runway. ‘Lifting tackle’ means chain slings, rope slings, hooks, shackles and swivels which are used for raising and lowering the persons, goods, or material. That shall be of good construction, sound material, adequate strength, free from defect, properly maintained and thoroughly examined by a competent person at least once in every period of twelve months to ensure the safety of the workmen.

No lifting machine and chain, rope, or lifting tackle shall be overloaded beyond the safe working load which shall be plainly marked on it. Any person while working on or near the wheel track of a travelling crane in any place where he would be liable to be struck by the crane, effective measures shall be taken to ensure that the crane does not approach within six meters of that place.

#### **Revolving Machinery: (Section 30)**

During the process of grinding effective measures shall be taken in every factory to ensure that the safe working peripheral speed of every revolving vessel, cage, basket, flywheel, pulley disc or similar appliance driven by power shall not exceed than the limit as notified. Notice regarding speed shall affixed in every workroom where this type of work is carried on.

#### **Pressure Plant: (Section 31)**

In any factory where machinery is used in a manufacturing process is operated at a pressure above atmospheric pressure, effective measures shall be taken to ensure that the safe working

pressure of such part shall not exceed than the limit prescribed.

### **Floors, Stairs, and Means of Access: (Section 32)**

All floors, steps, stairs and passages shall be of sound construction and properly maintained in a factory and where it is necessary to ensure the safety, steps, stairs, and passages shall be provided with substantial hand rails. Measures should be taken for safe means of access at every place or while working at heights at which any person is at any time required to work.<sup>25</sup>

It was held in *Davies v. Havill and Aircraft Co. Ltd.* (1950) that no breach of statutory duty imposed under this section is occasioned if an injury is caused by accumulation of rain water in little depression in the concrete of the passage

### **Pits, Sumps, openings in floor etc.: (Section 33)**

To prevent danger in every part of factory every fixed vessel, sump, tank etc. which may be a source of danger, shall be either securely covered or securely fenced.

### **Excessive Weights: (Section 34)**

No person employed in any factory shall be compelled to lift, carry or move any load so heavy as to be likely to cause him an injury.

### **Protection of Eyes: (Section 35)**

Manufacturing process which involves the risk of injury to the eyes from particles thrown off in the course of the process or risk to the eyes by reason of exposure to excessive lights, effective screens, in that case suitable goggles shall be provided for the protection of eyes of the persons employed thereon.

In *Finch v. Telegraph Construction and Maintenance Co. Ltd.* (1949) it was held that hanging of goggles in the office room is not enough, but the workers must be informed of their whereabouts, only then the requirements of Sec 35 can be said to have been complied with.

### **Precautions regarding the use of portable electric light: (Section 36A)**

In order to avoid the casualty at workplace there is a provision for prohibitions of electric light or any other electric appliance of voltage exceeding twenty-four volts for use in chamber, tank, pit, pipe and confined space. If the use of any portable electric light and electric appliances exceeding twenty-four volts is allowed then it is necessary safety precautions should be taken properly.

### **Explosive or inflammable dust, gas, etc.: (Section 37)**

In order to avoid the accident by explosion proper and effective measures to be adopted to stop

those chances of explosions which are likely to occur where any manufacturing process produces dust fumes, gas, or vapour of such character.

**Precautions in case of fire: (Section 38)**

All the practicable measures shall be taken to avoid outbreak of fire and its spread from both internally and externally. In every factory there should be proper arrangement of fire extinguishing and also firefighting training program should be conducted there. All sign should be clearly marked at proper places so that at the time of casualty worker can easily handle the situation.

**Power to require specifications of defective parts or tests of stability: (Section 39)**

To avoid accidents due to defects in the machinery or plants and dangerous building, the Inspector is empowered to order in writing to the occupier or manager of the factory to furnish such drawings, specification and other particular may be necessary to decide whether such building, ways, machinery or plant can be used for safety.

**(xix) Safety of Building and Machinery and maintenance of building: (Section 40 &40A)**

In case it appears that any building, machinery or plant in a factory is in such a condition that it is dangerous to human life or safety, the manager of the factory may be served an order specifying measures to be adopted as prescribed and to avoid its use until it is repaired.

**Safety Officers: (Section 40-B)**

This section has been inserted in the Factories Act in the year 1976 which says that in any manufacturing process or operation which involves any risk to bodily injury, poisoning, or occupational disease, or any health hazards at work place where one thousand or more workers are employed, the State Government can appoint one or more safety officer by notification in Official Gazette. The duties, qualification and condition of his service may be prescribed by the State Government.

**Safety committee: (Section 41-A)**

Section 41G of the Amendment Act 1976 provides that the occupier shall, in every factory where a hazardous process takes place and employing more than 250 employees should set up a Safety Committee. This safety will comprise 6 persons consisting an equal number of representatives of workers and management. It is mainly formed to promote co-operation between the workers and the management in maintaining safety and perfect health at work. The committee shall meet once in 3 months under the leadership of a senior official nominated by the occupier and a manager who represents the management.

## **V. A CRITICAL APPRAISAL**

Indian workers are generally considered to be less efficient as compared to workers in other countries. Such a statement does not reflect any inherent deficiency on the part of the workers. It is stated to be due to long hours of work, low wages, and poor living conditions. Health and safety measures provided in some of the factories especially small and medium scale factories are also of poor standard. These may be stated as the basic reason for the inefficiency of workers in India.

Climatic factors, illiteracy, low standard of living may also adversely affect the efficiency of the workers, but the poor working conditions happen to be the main reasons for that. Working environment in the factory is not conducive to increase the efficiency of worker. Under unhealthy surroundings, we cannot expect workers to put in hard and sustained work. There are a number of such provisions designed to make sure a factory is a conducive workplace. However, the implementation is equally and absolutely essential in order to make sure that basic standards of a workplace are maintained and conditions are not inhumane.

Safety measures as listed above partly prevent workers from being exposed to the risk of accidents, and protection against dust and fumes and inflammable gases, etc. These are partly welfare in nature e.g., preventing employment of young persons on dangerous machines. Other safety measures also not so helpful to reduce the strain from working under difficult conditions.

Health, Safety and Welfare measures which are provided in the Factories Act, 1948, are considered to be minimum in terms of adequacy. Provisions are made but such are required to be implemented effectively. In addition to implementing these provisions as provided in the Factories Act, there is also need for providing training in safety to workers, and installing proper safety equipment in the factories. Employers should take the initiative in providing training in safety to employees. Workers' unions should take interest in the promotion of their health, safety and welfare. Periodic training courses in accident prevention can be organized. Welfare should become a habit with employers and the workers alike.

Certain responsibility for the proper implementation of these regulations should be assigned to the personnel. As an employee, your most important responsibilities are to take reasonable care of your own health and safety.

To make workers aware about the various social security benefits. They should be provided proper classes about the benefits of that schemes and to make them know about the procedure to implement those schemes in case of any accident or leave.

Avoid wearing loose clothing or jewellery while handling machinery if at all possible.

If a worker has long hair or wears a headscarf, it should be tucked out in proper way otherwise it could get caught in machinery.

To take reasonable precautions to ensure that what a person does or does not do in the course of his or her employment should not endanger other people, including co-workers and members of the public.

To work together with the employer, ensuring that employees receive enough training and are aware of and adhere to the company's health and safety regulations.

In case a worker suffers continuously as a result of doing his/her job any injuries, strains or illnesses, he has to inform his employer and the employer may need to change the way he/she works.

To inform the employer if something happens that might affect the ability of the workers to work e.g., becoming pregnant or suffering from an injury. It is the responsibility of the employer in case of any injuries, strains or illnesses to take care of health and safety of the workers, he may need to give a break to the worker while they find a solution to the problem, but a worker will be paid for this.

If the worker has taken medication that makes him/her drowsy during driving or operating machinery, then they should temporarily be moved to another job.

## **VI. CONCLUSION**

The welfare measures which include health and safety measures help in increasing the productivity of the organization as well as enhance the morale and motivation of the employees, which gives a positive impact on the efficiency level of the organization. There is a close relationship between safety measures and the efficiency of workers i.e., if the proper welfare measures are taken then the productivity of the employees will increase and ultimately the profit of the organization will increase. Efficiency results in increasing the average output per worker. It is reflected in increased productivity. These measures are concerned not only with the physical efficiency, and safety of the workers, but also his general well-being. It would be helpful in improving the conditions under which workers are employed to work. It provides protection to their life and limbs. Inadequate provisions of safety measures in factories may lead to an increase in the number of accidents. Human failures due to carelessness, ignorance, inadequate skill and improper supervision have also contributed to accidents and the consequent need for such measures. It is not only the responsibility of the employer but as well as

of workers to contribute for the effective implementation of the provisions of this Act.

\*\*\*\*\*

**VII. REFERENCES**

- H.L. KUMAR, PRACTICAL GUIDE TO FACTORIES ACT 1-2 (18<sup>th</sup> ed. 2018).
- MEENU PAUL, LABOUR AND INDUSTRIAL LAWS 290-292 (9<sup>th</sup> ed. 2015)
- M.J. MATHEW, INDUSTRIAL AND LABOUR LAWS 60-61 (1<sup>ST</sup> ed. 2019).
- S. YADAV, (LABOUR AND INDUSTRIAL LAWS 543-547 (2<sup>th</sup> ed. 2019)
- S.N. MISHRA, (2021) LABOUR AND INDUSTRIAL LAWS 831 to 834 (20<sup>th</sup> ed. 2021)
- V.G. GOSWAMI, LABOUR AND INDUSTRIAL LAWS (10<sup>th</sup> ed. 2015)
- Apoorva Neral, Welfare measures under the factories act: A Critical Appraisal (May 26, 2022, 04:50 PM) <https://rjhssonline.com/HTMLPaper.aspx?Journal=Research>
- Jashan Merchant, A CRITICAL STUDY OF HEALTH AND SAFETY PROVISIONS OF THE FACTORIES ACT,1948 (June 9, 2022, 19:28 PM) <https://www.lawaudience.com/a-critical-study-of-health-and-safety-provisions-of-the-factories-act-1948/>
- Samarth Singla, SAFETY MEASURES FOR EMPLOYEES UNDER FACTORIES ACT: A CRITICAL ANALYSIS (May 28, 2022, 05:30 PM) <https://thelawbrigade.com/wp-content/uploads/2019/05/Samarth-Singla-2.pdf>
- The Factories Act,1948, No. 63 of 1948, Acts of Parliament, 2018 (India)

\*\*\*\*\*