



# **COMPARATIVE STUDY OF THE NEW INDIAN LABOR CODE WITH THE LABOR CODES OF BRITAIN AND AMERICA**

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## **ABSTRACT**

The new labor rules in India are compared to the current labor laws in the US and the UK in the present research report. The Code on Wages, the Code on Social Security, the Industrial Relations Code, and the Occupational Safety, Health, and Working Conditions Code are the four comprehensive labor regulations that India recently combined from 29 central labor laws. The goals of this structural change are to guarantee worker welfare, encourage ease of doing business, and improve labor market flexibility. The paper examines the intent, scope, and practical implications of these reforms and evaluates them against labour frameworks in the US and UK, which are characterized by decentralized enforcement (US) and robust social protection mechanisms (UK). Key areas of comparison include wage protection, social security, industrial dispute resolution, working conditions, and collective bargaining rights. The study reveals both convergences and divergences in policy orientation India's labour codes strive for a balance between employer flexibility and employee protection, yet concerns remain about enforcement and informal sector inclusion. The research highlights best practices and challenges, offering insights into how India's labour reforms align with global standards and what lessons can be drawn from Anglo-American labour systems for effective and inclusive labour governance.

*Keyword:* India, Labour Code, United States, United Kingdom, labour laws, social security, workers' rights, employment contracts, industrial relations.

## **INTRODUCTION**

### **India's Labour Law**

The body of laws and rules that control how employers, workers, trade unions, and the government interact is referred to as labor law in India. "Labour law in India refers to the body of constitutional principles and statutory regulations designed to secure social and economic justice for workers, as articulated in Articles 38 to 43A of the Indian

Constitution” (India Const. art. 38–43A). Rooted in both colonial and post-independence legal developments, Indian labour law has evolved to balance industrial growth with worker protection. The Constitution of India enshrines the right to livelihood and dignity through Directive Principles of State Policy, such as Article 38 (promoting welfare of the people), Article 39 (ensuring adequate livelihood), and Article 43 (securing a living wage and humane conditions of work), which have guided the development of labour jurisprudence (India Const. art. 38, 39, 43). Traditionally, Indian labour law was fragmented into over 40 central and 100 state legislations addressing diverse issues like wages, working conditions, industrial relations, and social security. This fragmented system created compliance challenges and regulatory uncertainty. In response, the Indian government initiated a landmark reform by codifying these laws into four comprehensive labour codes in 2019–2020, aiming to streamline regulations and align them with contemporary labour market needs (Sankaran, 112). Labour law in India is not merely a regulatory framework it is a tool of social justice aimed at reducing inequality, ensuring fair treatment, and promoting industrial harmony in one of the world’s largest labour markets

## OBJECTIVE

The primary objective of this research paper is to critically examine the recent transformation of India’s labour legislation through the enactment of four consolidated labour codes and to compare these reforms with the established labour law systems of the United States and the United Kingdom. This comparative approach serves several key purposes:

- To Understand the Rationale Behind the New Labour Codes in India: Examining the socioeconomic and political reasons behind the codification of 29 central labor laws into four unified codes the Code on Wages, the Industrial Relations Code, the Code on Social Security, and the Occupational Safety, Health, and Working Conditions Code is one of the main goals. In a quickly globalizing economy, the study aims to investigate how these reforms are meant to facilitate business dealings, boost formal employment, and protect workers’ rights.
- To Assess the Legal and Structural Shifts in Indian Labour Law: This objective focuses on analysing the legal transitions and simplifications introduced by the new codes, including their scope, applicability, and potential impact on labour-management relations. In contrast to previous fragmented labor regulations, the research seeks to identify areas of continuity and change, as well as how these impact workers in both the official and informal sectors.
- To Conduct a Comparative Legal Analysis with the US and UK Labour Systems: Another core objective is to contextualize India’s labour reforms within a global framework by comparing them with labour regulations in the United States and the United Kingdom. While the US labour law is characterized by a decentralized,

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contract-based system with limited social security mandates, the UK has a more protective and social welfare-oriented model. This comparison will help highlight strengths, weaknesses, and ideological underpinnings of the Indian model vis-à-vis Western approaches.

- To Evaluate the Impact on Workers' Rights and Employer Flexibility: The research aims to assess whether the new codes achieve a balanced approach between worker welfare and employer flexibility. This includes analysis of provisions related to wage security, collective bargaining, contract labour, gig economy workers, dispute resolution mechanisms, and occupational health and safety standards. The paper aims to propose India can adopt from the practices of the US and UK

### **METHODOLOGY**

This research paper adopts a comparative legal analysis methodology, supported by doctrinal research and policy analysis frameworks. The study involves a close examination of the four new labour codes enacted in India—the Wage Code, Social Security Code, Industrial Relations Code, and Occupational Safety, Health, and Working Conditions Code- through a review of statutory texts, parliamentary debates, and government reports. These codes are systematically compared with labour laws and practices in the United States (such as the Fair Labour Standards Act, National Labour Relations Act) and the United Kingdom (including the Employment Rights Act, Trade Union and Labour Relations Act), focusing on key areas such as wage protection, social security, industrial relations, and occupational safety. The research utilizes secondary sources like peer-reviewed journals, legal commentaries, ILO conventions, and reports by think tanks to contextualize legislative intent and policy impact. Additionally, the study employs interpretative and critical analysis to assess how these laws reflect differing legal traditions, economic ideologies, and worker-employer power dynamics.

### **LITERATURE REVIEW**

- Kohler, Thomas C. “Models of Worker Participation: The United States and Europe” *Comparative Labor Law Journal*, vol. 15, no. 1, 1993, pp. 123–138-mentions about labor participation in the management of the workplace in US to bring long term established practices and peaceful relations between employer and employees.
- Pierson, Paul. *Dismantling the Welfare State? Reagan, Thatcher and the Politics of Retrenchment*. Cambridge University Press, 1994 contributes delightfully on the topic retrenchment and how it affects the social justice keeping the politics over and above the labor laws.
- Rubery, Jill, and Damian Grimshaw. *The Organisation of Employment: An International Perspective*. Palgrave Macmillan, 2003- In this book, apparat from industrial relations and labour economics, disciplines like organizational

behaviour, sociology, politics and international business are also covered to demonstrate the variety of ways in which work can be organized internationally.

- Sankaran, Kamala, and Richard Mitchell. "Introduction: Reconciling Labour Flexibility with Social Protection." *International Journal of Comparative Labour Law and Industrial Relations*, vol. 24, no. 2, 2008, pp. 1–20. Highlights the importance of flexibility in the labour code so as to keep the workers' protection as of paramount importance.
- Mathew, Babu. "Indian Labour Law Reform: Shifting Sands." *Economic and Political Weekly*, vol. 52, no. 25, 2017- is one of the earliest papers which gave a review over the bills which were presented in the Indian Parliament regarding Changes in Labor laws.
- Mehrotra, Santosh. "Labour Law Reforms in India: Dealing a Blow to Job Security." *Indian Journal of Labour Economics*, vol. 63, no. 1, 2020, pp. 115–123.- discussed the negative impact which may be created because of the new labour reforms in India. It didn't only highlight the bright and positive impact but also discussed the nuisance which the new summarized laws may create.
- Srivastava, M. "Understanding the Code on Wages, 2019: An Analytical Overview." *Journal of Labour Law*, vol. 4, no. 2, 2021, pp. 80–90- is among the first papers published on the new labour code highlighting the summary of the same.
- Narayan, Aditi. *Occupational Safety in the Indian Informal Sector: Legal and Policy Perspectives*. Sage Publications, 2022 deals with health issues, accidents, insurance and other related aspects of workers in informal sector highlighting the importance of labour code not just in formal sector but also in informal fields.

## INDIA'S HISTORY OF LABOUR LAW

The history of labour law in India is deeply intertwined with the country's colonial past, nationalist movements, and post-independence socio-economic reforms. The earliest labour law, the Factories Act of 1881, was introduced to regulate working hours and conditions in textile mills, particularly in response to criticism from the British Parliament regarding the exploitation of Indian workers (Sarkar 45). Subsequent laws, such as the Mines Act of 1901, Trade Disputes Act of 1929, and the Payment of Wages Act of 1936, gradually expanded the scope of regulation and introduced state intervention in industrial relations. However, these laws were more protective of colonial capital than of worker welfare. With the rise of Indian nationalist movements and trade unions in the early 20th century, labour legislation began to reflect demands for justice and equity. After independence in 1947, the Indian Constitution laid a transformative foundation for labour rights through the Directive Principles of State Policy. Post-independence, several comprehensive acts such as the Industrial Disputes Act of 1947 and the Minimum Wages Act of 1948 marked a shift toward worker-centric policies. Over the decades, this fragmented framework grew complex, prompting the recent consolidation of 29 central laws into four Labour Codes (Sankaran 112).

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The need for amendments in Indian labour law arose from the country's shifting economic structure, the rise of informal employment, and the challenges of industrial stagnation under rigid and outdated legal frameworks. At independence in 1947, India inherited a colonial labour regime primarily designed to maintain control and suppress labour unrest rather than promote worker welfare. As the economy evolved—from state-led industrialization to liberalization in 1991 and further to globalization—the rigid, complex, and overlapping labour laws created compliance burdens for employers and left many workers, especially in the informal sector, outside the legal safety net. The Second National Commission on Labour (2002) emphasized the need to simplify and consolidate labour laws to ensure flexibility for employers while safeguarding workers' rights (GoI, Report of the Second NCL, 2002). Recognizing these structural inefficiencies, the Government of India embarked on a major overhaul of the labour law regime, culminating in the codification of 29 central laws into four labour codes between 2019 and 2020-

- Code on Wages, 2019
  - Consolidates four wage-related laws, i.e., Payment of Wages Act 1936, Minimum Wages Act 1948, Payment of Bonus Act 1965 and Equal Remuneration Act 1976.
  - Establishes a statutory floor wage by Central Government under Section 9. - Introduces gender-neutral equal remuneration provisions.
- Industrial Relations Code, 2020
  - Defines industrial disputes and conditions for lawful strikes under Section 62.
  - Empowers states to exempt establishments under Section 99. - Fixed-term employment introduced under Section 2(o).
- Social Security Code, 2020
  - Covers unorganized, gig, and platform workers under Section 2(85) for the first time in the Indian History.
  - Introduces the National Social Security Board (Section 6).
  - Rationalizes multiple existing laws including EPF and ESI Acts.
- Occupational Safety, Health and Working Conditions Code, 2020 - Covers all establishments employing 10 or more workers (Section 1(6)).
  - Safety Committees and Health Officers made mandatory. - Enables digital registration and licensing.

**LABOUR LAW IN THE UNITED STATES**

Labour law in the United States is a complex body of federal and state statutes, administrative regulations, and judicial decisions that govern the relationship between employers, employees, and labour unions. Unlike countries with centralized labour codes, the U.S. system is fragmented and largely decentralized, reflecting its constitutional division of powers. At the federal level, the foundation of American labour law is laid by

landmark legislations such as the National Labour Relations Act (NLRA) of 1935, also known as the Wagner Act, which grants employees the right “to self-organization, to form, join, or assist labour organizations, to bargain collectively and to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection” (29 U.S.C. §157). The NLRA also established the National Labour Relations Board (NLRB) to oversee union elections and resolve unfair labour practice disputes.

The Occupational Safety and Health Act (OSHA) of 1970 mandates safe working conditions, while the Employee Retirement Income Security Act (ERISA) of 1974 regulates employer-sponsored retirement and health benefit plans. The Civil Rights Act of 1964 (Title VII) prohibits employment discrimination based on race, color, religion, sex, or national origin.

The history of labour law in the United States traces the evolution of workers’ rights from minimal protections in the early industrial era to a more structured regulatory framework in the 20th century. In the 19th century, The first significant labour legislation, the Contract Labour Law of 1885 (Foran Act), banned the importation of foreign labour under contract, marking an early recognition of exploitative labour practices. However, it was during the Great Depression that U.S. labour law underwent foundational changes. The National Labour Relations Act of 1935 (Wagner Act) became a landmark law that granted workers the right to unionize, engage in collective bargaining, and participate in concerted activities (29 U.S.C. §157). This was followed by the Fair Labour Standards Act (FLSA) of 1938, which introduced federal minimum wage, overtime pay, and restrictions on child labour. Subsequent decades saw the introduction of Title VII of the Civil Rights Act (1964) to combat workplace discrimination and the Occupational Safety and Health Act (OSHA) of 1970 to ensure workplace safety. Over time, labour law in the U.S. responded to economic shifts, civil rights movements, and globalization, though the decline in union membership and rise of gig and contract labour in recent decades have posed new challenges to traditional regulatory frameworks (Weil 2014).

In summary, U.S. labour law is characterized by strong protections for unionization and collective bargaining in theory, but limited enforcement mechanisms and weak universal social protections in practice, especially when compared to European or welfare-based models.

## LABOUR LAW IN THE UNITED KINGDOM

Labour law in the United Kingdom is a dynamic and evolving body of legislation, case law, and European Union derived norms that governs the rights and duties of employers, employees, and trade unions. It is rooted in the principle of protecting workers while maintaining economic flexibility. Unlike codified systems like in continental Europe or recent reforms in India, UK labour law developed incrementally through common law and statute. The legal framework includes laws on employment contracts, minimum wages, working hours, health and safety, dismissal procedures, and equality in the workplace.

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According to the UK's Employment Rights Act 1996, a contract of employment is defined as "a contract of service or apprenticeship, whether express or implied, and (if it is express) whether oral or in writing" (Section 230(2), Employment Rights Act 1996). This statute is one of the cornerstones of modern employment protection in Britain.

Historically, British labour law began evolving during the Industrial Revolution, when exploitative conditions led to early regulations such as the Factory Acts (beginning in 1802), which limited working hours and introduced basic workplace safety. The Trade Union Act 1871 legalized trade unions, and the Trade Disputes Act 1906 protected them from tort liabilities during industrial action. In the 20th century, post-World War II consensus saw expanded worker protections and public welfare mechanisms. A major shift occurred when the UK joined the European Economic Community (EEC) in 1973, leading to the incorporation of many EU labour directives, especially on working time, anti-discrimination, and health and safety (Barnard 2012). Notable legislation includes the National Minimum Wage Act 1998, the Working Time Regulations 1998, and the Equality Act 2010, which consolidated anti-discrimination laws across nine protected characteristics.

In sum, UK labour law reflects a liberal market economy approach, balancing worker protections with employer flexibility, and continues to adapt amid post-Brexit regulatory changes and the challenges of the gig economy.

## **COMPARATIVE ANALYSIS OF NEW LABOUR CODES IN INDIA WITH U.S. AND U.K. LABOUR LAWS**

The reformation of India's labour laws through the enactment of the four new labour codes and it reflects a major shift toward simplification, consolidation, and flexibility in regulatory compliance. However, these structural changes must be examined in the broader context of global labour jurisprudence. When compared with labour systems in the United States and the United Kingdom, India's approach reflects a unique hybrid of state-led formalism and employer flexibility, falling somewhere between the libertarian capitalist model of the U.S. and the rights-based, welfare-centric framework of the U.K.

- **Codification vs. Regulatory Fragmentation**  
A defining feature of India's new labour codes is the move toward codification. Twenty-nine central labour laws, previously scattered across industries and regions, are now compressed into four codes. This contrasts starkly with the fragmented regulatory environment in the U.S., where labour laws vary significantly across federal, state, and municipal jurisdictions. Federal statutes such as the Fair Labour Standards Act (FLSA), Occupational Safety and Health Act (OSHA), and National Labour Relations Act (NLRA) set foundational standards, but enforcement and implementation often depend on state-level laws and judicial interpretations. As David Weil explains, "the fissured workplace has resulted in significant regulatory evasion, undermining worker rights under the

guise of decentralization” (Weil 23).

In the U.K., codification is also present, particularly through consolidated acts such as the Employment Rights Act 1996, but British labour law maintains a more unified structure despite being shaped by a mix of common law, statutory law, and EU-derived regulations. The Working Time Regulations 1998, Equality Act 2010, and National Minimum Wage Act 1998 form a core of integrated labour protections. By contrast, India’s new codes seek to simplify compliance through uniform definitions, centralized rule-making, and common registers, licenses, and returns, enhancing administrative ease (Ministry of Labour and Employment).

- **Flexibility in Hiring and Termination**

India’s Industrial Relations Code (2020) introduces significant flexibility for employers. Most notably, it raises the threshold for prior government approval for layoffs, retrenchments, and closures from 100 to 300 employees (Section 77). This brings Indian law closer to U.S. standards, where at-will employment allows termination of employment by either party without notice, barring discriminatory grounds (Bodie 1089). In the U.S., the Worker Adjustment and Retraining Notification (WARN) Act only requires notice for mass layoffs in firms with 100 or more full-time employees, with no central role for federal approval. In contrast, the U.K. ensures stronger safeguards for workers facing termination. Under the Employment Rights Act 1996, employees who have completed two years of service can claim protection from unfair dismissal, and any redundancy process must involve statutory consultation if more than 20 workers are affected. Employers must demonstrate a fair reason for dismissal and follow due process, including notice periods and severance pay (Employment Rights Act 1996, sec. 94–98). Thus, while India’s new framework enhances employer flexibility like the U.S., it lacks the due process guarantees provided under U.K. law.

- **Unionization and Collective Bargaining**

The Industrial Relations Code in India, while attempting to streamline procedures for trade union recognition, imposes several limitations on strike action. Section 62 mandates that workers in essential services must give 60 days’ prior notice before striking, a provision that critics argue curtails the right to collective action (Ramaswamy 26). The threshold for registering a trade union is also increased, requiring either 10% of workers or 100 members, whichever is higher, which could inhibit union formation in small establishments.

In the U.S., the National Labour Relations Act (1935) formally protects the right of workers to “self-organization, to form, join, or assist labour organizations” (29 U.S.C. §157). However, in practice, union density in the private sector has declined to under 7%, due to employer resistance, weak enforcement by the National Labour Relations Board, and the absence of mandatory recognition or bargaining obligations (Kaufman 246). Moreover, right-to-work laws in 27 states allow employees to avoid union membership even in unionized workplaces, weakening collective solidarity.

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In contrast, the U.K. has a statutory union recognition process through the Trade Union and Labour Relations (Consolidation) Act 1992, and union membership remains relatively strong in public sectors. However, anti-strike laws passed during the Thatcher era, including mandatory ballots and notice periods, have limited the scope of industrial action. Nonetheless, collective bargaining coverage in the U.K. remains more robust than in either the U.S. or India, particularly due to the institutional mechanisms in place.

- **Wage Protection and Minimum Standards**  
India's Code on Wages (2019) introduces a universal definition of wages, applicable across all laws, and empowers the central government to fix floor wages based on regional differences. The law retains the principle of "equal remuneration for equal work" and aims to extend wage protection to the unorganized sector (Code on Wages, sec. 6). This move is comparable to the federal minimum wage in the U.S., currently at \$7.25 per hour under the FLSA, although many states and cities have enacted higher minimums. However, the U.S. lacks a concept of national floor wages adjusted by living conditions, and wage theft remains a persistent problem, especially in agriculture, hospitality, and informal sectors (Bernhardt et al. 28). The U.K.'s National Minimum Wage Act 1998 and National Living Wage policy go further by adjusting minimum wages annually based on recommendations by the Low Pay Commission, ensuring better alignment with inflation and cost of living. Thus, while India's floor wage policy is a progressive step, its implementation and enforcement challenges in the informal sector pose hurdles. The U.K. presents a model for institutionalized and evidence-based wage fixing, which India could emulate.
- **Gig Economy and Informal Work Regulation**  
India's Code on Social Security (2020) is pioneering in including gig workers and platform workers in the definition of eligible beneficiaries for social protection schemes. Section 2(35) of the Code defines a gig worker as "a person who performs work outside of a traditional employer-employee relationship." This inclusion reflects the changing structure of India's labour market, where informal and digital work dominate. By contrast, the U.S. approach to gig work remains ambiguous and contested. The Department of Labour's guidance on independent contractor classification has shifted with political changes. California's AB5 law attempted to reclassify gig workers as employees, but Proposition 22, passed in 2020, allowed companies like Uber and Lyft to treat drivers as independent contractors, exempting them from core benefits (Rosenblat 153). In the U.K., legal jurisprudence has provided more clarity. In *Uber BV v. Aslam* [2021], the Supreme Court ruled that Uber drivers are "workers" under British law, entitling them to minimum wage and holiday pay. The ruling stated, "Drivers are in a position of subordination and dependency in relation to Uber such that they have little or no ability to improve

their economic position” (*Uber v. Aslam* [2021] UKSC 5). India's legal recognition of platform workers mirrors this UK jurisprudence, although it still lacks a contributory or benefit-delivery framework.

## CONCLUSION

The evolution of labour law in India has reached a critical juncture with the introduction of the four new labour codes, aiming to simplify, modernize, and unify the country's previously fragmented and outdated labour legislation. These codes the Code on Wages, the Industrial Relations Code, the Social Security Code, and the Occupational Safety, Health and Working Conditions Code—represent a significant policy shift toward promoting ease of doing business, attracting foreign investment, and addressing the demands of a rapidly changing labour market. However, a comparative analysis with labour laws in the United States and the United Kingdom reveals both the strengths and deficiencies of this reform. One of the central findings of this study is that India's new labour codes emphasize labour market flexibility, following a trajectory closer to the United States' model, where “employment-at-will” and minimal statutory protections enable businesses to respond swiftly to market changes. The United States, while offering a highly deregulated environment, suffers from weakened collective bargaining institutions, exclusion of gig and informal workers from key protections, and heavy reliance on private arbitration (Bodie 1100; Kaufman 248). Similarly, India's codes allow fixed-term employment and raise the retrenchment threshold, making it easier for employers to hire and fire. However, without sufficient social safety nets or clear grievance mechanisms, such flexibility may come at the cost of job security and dignity of labour (Bhattacharjee 19). In contrast, the United Kingdom provides a balanced legal framework that upholds both flexibility and worker security. With codified laws such as the Employment Rights Act 1996, robust tribunal systems, and universal social benefits including the National Health Service and National Insurance contributions, the U.K. ensures that even temporary, part-time, and gig workers receive core protections. Landmark judgments like *Uber BV v. Aslam* (2021) have extended rights to gig workers, affirming minimum wage and leave entitlements—an area where both India and the U.S. are still evolving. The U.K.'s focus on dispute resolution, occupational safety, and mandatory conciliation through bodies like ACAS sets an example for procedural fairness and accessibility (Collins et al. 319).

India's recognition of gig and informal sector workers under the Social Security Code, 2020 is a noteworthy advancement. This move acknowledges the reality of India's workforce, where over 90% are employed informally. However, the code largely offers enabling provisions without enforceable guarantees, and its success will depend on the actual rollout of welfare schemes, data collection, and inter-state coordination (Ministry of Labour and Employment). In contrast, both the U.S. and U.K. have struggled with classifying gig workers, though the U.K. has made more decisive legal strides in this regard. In terms of occupational health and safety, India's OSH Code consolidates

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numerous laws but lacks the enforcement infrastructure and inspection strength of the U.K.'s Health and Safety Executive or even the U.S.'s OSHA. Moreover, the dilution of penalties and broad discretion granted to governments could weaken workplace safety standards over time (Ramaswamy 26). The need for an independent, transparent enforcement mechanism remains a key concern in India's implementation process.

Another important dimension is dispute resolution. While India has introduced industrial tribunals and timelines for adjudication, the abolition of labour courts and over-centralization may burden existing tribunals and delay justice. Comparatively, the U.K.'s Employment Tribunals and the U.S. NLRB (despite its shortcomings) provide more institutionally grounded frameworks, albeit with their own limitations in terms of access and neutrality. This comparative study demonstrates that while India's new labour codes reflect an ambitious effort to modernize outdated statutes, the transition must be approached cautiously and inclusively. The success of these codes will ultimately depend on transparent rule-making, robust implementation, worker awareness, and institutional capacity. Furthermore, insights from the U.S. and U.K. models suggest that a hybrid approach—combining employer flexibility with guaranteed worker protection—is the most sustainable path forward.

Thus, this research concludes that labour reform in India is a necessary and timely intervention, but its true impact will only be realized through rights-based execution, inclusive policymaking, and continuous review in light of comparative global experiences. Bridging the gap between legislative intent and field-level practice remains the greatest challenge and opportunity for India in the coming decade.

### REFERENCE

- [1] Barnard, Catherine. *EU Employment Law*. 4th ed., Oxford University Press, 2012.
- [2] Bernhardt, Annette, et al. *Broken Laws, Unprotected Workers: Violations of Employment and Labour Laws in America's Cities*. Center for Urban Economic Development, 2009.
- [3] Bodie, Matthew T. "Employment at Will, Employee Rights, and Future Directions." *Northwestern University Law Review*, vol. 93, no. 4, 1999, pp. 1081–1133.
- [4] Bhattacharjee, Debashish. "Labour Law Reforms and the Informal Workforce in India." *Indian Journal of Labour Economics*, vol. 63, no. 1, 2020, pp. 1–21.
- [5] Collins, Hugh, Keith Ewing, and Aileen McColgan. *Labour Law*. 2nd ed., Cambridge University Press, 2012.
- [6] Civil Rights Act of 1964, Title VII. U.S. Equal Employment Opportunity Commission. <https://www.eeoc.gov/statutes/title-vii-civil-rights-act-1964>
- [7] Code on Social Security 2020. Ministry of Labour and Employment, Government of India, <https://labour.gov.in/social-security-code>. Accessed 16 June 2025
- [8] Deakin, Simon, and Gillian Morris. *Labour Law*. Hart Publishing, 2012.
- [9] Employment Rights Act 1996. UK Government Legislation. <https://www.legislation.gov.uk/ukpga/1996/18/section/230>
- [10] Equality Act 2010. UK Government Legislation. <https://www.legislation.gov.uk/ukpga/2010/15/contents>

- [11] Fair Labour Standards Act (FLSA), 29 U.S. Code Chapter 8. United States Government Publishing Office.
- [12] Government of India. Report of the Second National Commission on Labour. Ministry of Labour and Employment, 2002.
- [13] India. The Constitution of India. Government of India, Ministry of Law and Justice, 1950.
- [14] India. Report of the Second National Commission on Labour. Ministry of Labour, Government of India, 2002. [https://labour.gov.in/sites/default/files/2nd%20National%20Commission%20on%20Labour%20Report.p df](https://labour.gov.in/sites/default/files/2nd%20National%20Commission%20on%20Labour%20Report.pdf)
- [15] India. The Code on Wages, 2019; The Industrial Relations Code, 2020; The Code on Social Security, 2020; The Occupational Safety, Health and Working Conditions Code, 2020. Government of India, Ministry of Labour and Employment.
- [16] Kaufman, Bruce E. “The Future of U.S. Unions from the Perspective of the Industrial Relations School.” *Labour Studies Journal*, vol. 33, no. 1, 2008, pp. 5–30.
- [17] National Labour Relations Act (NLRA), 29 U.S. Code § 157. United States Government Publishing Office. <https://www.law.cornell.edu/uscode/text/29/157>
- [18] National Minimum Wage Act 1998. UK Government Legislation. <https://www.legislation.gov.uk/ukpga/1998/39/contents>
- [19] Occupational Safety and Health Act of 1970, 29 U.S. Code Chapter 15. <https://www.osha.gov/laws-regs/oshact/toc>
- [20] Retained EU Law (Revocation and Reform) Act 2023. UK Government Legislation. <https://www.legislation.gov.uk/ukpga/2023/28/contents/enacted>
- [21] Ramaswamy, R. “Labour Law Reforms in India: An Analysis of the Four New Codes.” *Economic and Political Weekly*, vol. 56, no. 52, 2021, pp. 24–28.
- [22] Rosenblat, Alex. *Uberland: How Algorithms Are Rewriting the Rules of Work*. University of California Press, 2018.
- [23] Sankaran, Kamala. *Labour Law Reforms: Beyond the Myths*. *Economic and Political Weekly*, vol. 55, no. 37, 2020, pp. 112–118.
- [24] Sarkar, Aditya. *Trouble at the Mill: Factory Law and the Emergence of Labour Question in Late Nineteenth-Century Bombay*. Oxford University Press, 2018.
- [25] Weil, David. *The Fissured Workplace: Why Work Became So Bad for So Many and What Can Be Done to Improve It*. Harvard University Press, 2014.