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## **A Critical Appraisal on Right to Work with Special reference to Women Street Vendors in Guwahati**

**\*Mr. Saptarishi Prasad Sharma**

Research Scholar, National Law University and Judicial Academy (NLUJA), Assam

Assistant Professor, NEF Law College,

Email: [saptarishi22@nluassam.ac.in](mailto:saptarishi22@nluassam.ac.in)

**\*\*Dr. Thangzakhup Tombing**

Assistant Professor, National Law University and Judicial Academy (NLUJA), Assam,

Email: [t.tombing@nluassam.ac.in](mailto:t.tombing@nluassam.ac.in)

### **Abstract**

*Right to work as a facet of Right to livelihood under Article 21 of the Constitution of India offers a significant progression in optimizing the socio-economic fabric of the Indian society. Drawing its genesis from the Olga Tellis Case (1985), this right has impacted a broad swath of the demographic categories of which women street vendors form an integral part. This holds true for the women street vendors of the Guwahati city in Assam. The positional geography of the city makes it convenient for the women street vendors to become a part of the informal labour market. However, many a times, there exist situations which causes impediments for the women street vendors in the city resulting in their subsequent withdrawal from the informal markets. These causes are not only in multitude but also inter-related to each other leading to a fall in the women employment statistics. Though several schemes have been provided but the ineffective implementation of the same has caused several hurdles in protecting these women and eventually impacting their right to work. This research article henceforth tries to analyse the concept of right to work in relation to the women street vendors in Guwahati and delve upon the remedial measures taken up in safeguarding their rights.*

**Keywords-** *Right to work, women street vendors, Guwahati, impediments, informal labour markets*

### **Research Objectives:**

1. To understand the concept of 'Right to Work' under the Indian jurisprudence
2. To provide an overview on the women street vendors in Guwahati
3. To analyse 'Right to Work' in context of the women street vendors in Guwahati
4. To ascertain the available remedies available to the women street in Guwahati to protect their write to work.

## Research Methodology

The researcher has opted for mostly doctrinal research for writing this article and has laid complete emphasis on secondary sources like books, journal as well as research papers and articles relating to the topics. However, some part of the article has been taken from the researcher's own research which he had carried out as a part of this PhD research work.

### I. Introduction:

*“For the women working in an informal sector economy, it demands a radical re-thinking of the policy framework which goes beyond inclusion to real recognition, right-based protection, and socio-economic justice.”<sup>1</sup>*

The *Constitution of India* could be well accredited as the *Grund norm* or the superior law from which all other laws derive its validity from. The first page of the same i.e. *the Preamble* well embodies all the value system which India as a country stands for. Amongst the principles are that of *Justice* and *Equality* which in the words of *George H Sabine*<sup>2</sup> are ‘*prima facie requirement*’ for the existence and well-being of a society besides the other requirements. The same concept had also been reiterated way back by the famous jurist *Immanuel Kant* who commented that justice alone is a ‘*regulatory principle*.<sup>3</sup>’ It needs to yield equal results for all its people to make it functional and only then the society would move ahead in an ‘accepted direction,’ Deriving the words from the Preamble to the Constitution itself, justice and equality both have been accentuated for a broader perspective rather than giving it an one tone meaning. The framers of the Constitution have included the concept of ‘economic’ as well as ‘social’ justice along with that of equality of ‘status’ and ‘opportunity’ to convey what India is all about and the contribution of the judiciary in this regard through the idea of ‘Right to Work’ encapsulates the perfect amalgamation of what the framers intended with those wordings.

From a bird's view, this right to work seems to directly correlate to the economic aspect of the country since it can contribute substantially in the country's economy and revenue growth. However, a microscopic view of the same show that it operates in several levels of human life. The fact that right to work is complementary and supplementary to the idea of right to livelihood as held in the *Olga Tellis and Ors v. Bombay Municipal Corporations and Ors*<sup>4</sup> and again reiterated in the several other cases like *DK Yadav v. JMA Industries*<sup>5</sup>, *M.J. Sivani v. State of Karnataka and Ors*<sup>6</sup> etc or that it encompasses the concept of right to just and favourable working conditions as held in *Bandhua Mukti Morcha v. Union of India*<sup>7</sup> showcases the deep layers in which this right perpetuates and also operates. As a matter of fact, it therefore would not be wrong to accept and give credit to the multifaceted attribute of this right courtesy its diverse dimensions beneath its shadow.

To exhaustively comprehend the notion of right to work, a nuanced dissection of India's urban economic framework is imperative. The urban economy in India is mostly driven

<sup>1</sup> Dikshita Phukan and Moitrayee Ghosh, The Challenges of Women Street Vendors in Urban Spaces of Guwahati, 7 *International Journal for Multidisciplinary Research* (2025), available at: <https://www.ijfmr.com/papers/2025/3/43811.pdf> (last visited on March 8, 2026).

<sup>2</sup> George H Sabine, “Justice and Equality” *LXVII Ethics: An International Journal of Social, Political and Legal Philosophy*, (1956), available at: [https://www.jstor.org/stable/2378995?searchText=&searchUri=&ab\\_segments=&searchKey=&refreqid=fastly-default%3A0f571f0b8caa69abff25a4d457930fb2&initiator=recommender&seq=1](https://www.jstor.org/stable/2378995?searchText=&searchUri=&ab_segments=&searchKey=&refreqid=fastly-default%3A0f571f0b8caa69abff25a4d457930fb2&initiator=recommender&seq=1) (last visited on March 3, 2026).

<sup>3</sup> *Ibid.*

<sup>4</sup> 1985 SCC (3) 545

<sup>5</sup> 1993 SCR (3) 930

<sup>6</sup> AIR 1995 SC 1770

<sup>7</sup> AIR 1984 SC 802

by the wheels of both formal as well as the informal activities in various sectors. One of the most prominent fields in this context would be that of the street vending activities across the length and breadth of the nation in which both male as well as female street vendors have equal roles to play. As quoted by the *Ministry of Urban Development and Poverty Alleviation*, almost 63% of the country's GDP comes from these street vendors.<sup>8</sup> Furthermore, according to the Periodic Labour Force Survey, in 2017-18 there were around 11.9 million street vendors in the country, of whom around 1.2 million were women.<sup>9</sup>

A glance at the definition of street vendors as per the *National Policy on Urban Street Vendors* shows that it include “a person who offers goods or services for sale to the public without having a permanently built structure but with a temporary static structure or mobile stall (or head-load).” The definition encompasses both male as well as female street vendors who carry out the vending activities in three ways mainly- weekly/daily markets which may be permanent or temporary in nature, through mobile vending carts and other vehicles like bicycles or by carrying out the vending activities by foot.

An analogous situation is seen and observed in almost all the north-eastern states including that of Assam where the informal sector specially that of street vendors have been prevalent in almost every nook and corner. Nestled centrally within the state, the capital city of *Guwahati* has its own distinct narrative. Situated on the banks of the mighty river *Brahmaputra*, street vendors contribute an indispensable population in the city owing to the feasible communication access. Amongst the informal street vendors in *Guwahati*, women street vendors have an intrinsic role to play. Many of these women vendors are from diverse communities like *Rabha*, *Dimasa*, *Karbi* to name a few and vend in various spots in the *Guwahati* markets like *Fancy Bazar*, *Panbazar*, *Beltola*, *Ganeshguri* etc. to name a few. These women street vendors hold a vulnerable position at the nexus of ‘*informality, class and gender*.’<sup>10</sup> Most of them vend out of need rather than choice. Long hours of tiring vending work coupled with the precarious working conditions on the streets discourage these women from practising their ‘right to work’ efficiently. Though these women make their best efforts in upholding their positions in the streets yet there are numerous such stances that serve to mute the unspoken plight and anguish of these women.

## II. Deciphering Right to Work

The concept of working and earning have been known to the Indian civilisation since eternity. The trilogy principle of ‘*Varna, Karma and Dharma*’ ruled the socio-economic conditions as well as status of all the people in ancient India. Since the entire society was stratified into the *Varna* system, each *Varna* had to perform certain *Karma* or acts which was regarded as their ultimate *Dharma* or religion. Those who rebelled to this established ideology were severely punished either by the kings or were subjected to religious sanctions. This laid the initial foundationally basis for the development of the right to work in India.

Slowly with the advent and exposure to the international human rights ideas and principles, the concept of right to work was found to be expressed in various human rights instruments namely the Universal Declaration of Human Rights (UDHR), 1948 where it has been specifically provided that human beings have the absolute right to work and to get just and favourable conditions of work. The aforesaid provision, also directed the States to protect

<sup>8</sup> V. Vishnu and S Kashim Naseer, “Street Vendors in India Urban Space: Livelihood and Government Initiatives” 6 *International Journal for Multidisciplinary Research*, (2024) available at: <https://www.ijfmr.com/papers/2024/6/32649.pdf> (last visited on March 11, 2026).

<sup>9</sup> *Ibid.*

<sup>10</sup> *Supra* note 3 at 1

its people from unemployment.<sup>11</sup> Similar rights and obligations were also found in the International Covenant on Economic, Social and Culture Rights (ICESCR), 1966 that bestowed upon the people their own prerogative of not only working but also choosing the type of work they aspire to do.<sup>12</sup>

These principles slowly but steadily cropped in to the Indian soil by motivating and inspiring our framers of the Constitution of India to incorporate similar rights within its ambit. However, the framers had to strike a balance between the tenets of ‘need’ and ‘want.’ The financial conditions post-independence was quite wobbly and uncertain. The economy was just recovering and rebounding from years of entrenched poverty. Hence explicitly including Right to Work in the Part III (Fundamental Rights) would usher in unnecessary expectations from the government which could have eventually culminated into unfulfilled promises. But the importance of the concept could not be waved away by the framers themselves, hence the same was incorporated in the Part IV of the Constitution under Article 41. Part IV of the Constitution containing the various Directive Principles of State Policies (DPSP) could be described in the words of *Granville Austin*, “principles which set forth the humanitarian precepts that were and are the aims of the Indian social revolution.”<sup>13</sup> In other words, these principles could be regarded as guiding light for the government to make India a welfare state. This was further reiterated by the Indian judiciary who case after case announced the correlation of DPSP with the Fundamental Rights highlighting its complementary nature.

With regards to Right to Work, the situation is alike. The substantive context of Article 41 was enlivened by the dynamic exegesis of Article 21 (Right to Life) through the case of *Olga Tellis and Ors v. Bombay Municipal Corporations and Ors* where the Apex court held that right to work forms an inalienable domain of right to life as enshrined under Article 21.<sup>14</sup> Similarly, the other facet of right to work i.e. just and favourable working conditions or giving a basic income for a standard of living was also incorporated via Article 42 and 43 respectively that gave a further push in strengthening this basic human right.

### III. Women Street Vendors in Guwahati- An Overview

The state of Assam had its own share of history which subsequently resulted in the multi-lingual, racial, religious, cultural and ethnic society. The same is reflected in the population of the capital city of *Guwahati* which is still one of the main commercial hubs of the entire state where all sorts of economy exist in coherence. Amongst the same, street vending activities also exist parallelly where both male and female vendors take part. Most of these female vendors travel miles from places like Bijoynagar, Palashbari, Sonapur<sup>15</sup> etc. to vend their products because their meagre earnings and their inherent economic conditions do not allow them a decent living condition in *Guwahati* city. The women vendors must come out quite early to reach the market mostly before 8 am since late arrival would cause inconvenience of ‘space’ and in unloading their goods since the markets would be filled by other vendors and many customers.

<sup>11</sup> The Universal Declaration of Human Rights, 1948, art. 23

<sup>12</sup> International Covenant on Economic, Social and Culture Rights, 1966, art.6

<sup>13</sup> Devadutta Mukherjee, “Judicial Implementation of Directive Principles Of State Policy: Critical Perspectives” 1.1 *International Journal of Law and Public Policy* 14 (2014), available at: [https://docs.manupatra.in/newsline/articles/Upload/8CEA8CDA-BCBD-4D03-B8EF-8C3E8FFD21E4.1-b\\_Constitution.pdf](https://docs.manupatra.in/newsline/articles/Upload/8CEA8CDA-BCBD-4D03-B8EF-8C3E8FFD21E4.1-b_Constitution.pdf) (last visited on March 8,2026).

<sup>14</sup> *J. Aswartha Narayana v. The State of Andhra Pradesh*, WP .9279 OF 2019.

<sup>15</sup> Nur Nasima Begum, An Analytic Study Of Socio-Economic Condition Of Women Street Vendors With Special Reference of Guwahati City, Assam, 13 *Dogo Rangsang Research Journal* (2023), available at: [https://journal-dogorangsang.in/no\\_1\\_Online\\_23/19.4\\_may.pdf](https://journal-dogorangsang.in/no_1_Online_23/19.4_may.pdf) (last visited on March 8,2026).

While in many cases, the women vendors are the sole bread earners and take up vending to sustain their entire family, for some, the reason for taking up street vending activity is complete defiance to age old patriarchal traditions involving only male vendors. Moreover, the women vendors have also been burdened with the dual responsibility of balancing their household chores and their families. Hence it would not be wrong to comment that street vending as an activity for the women community is an ‘*intersection of empowerment, vulnerability and the art of balancing*’ courtesy their constant thrust with economic expectation and societal conditioning.

These women sell two kinds of products- one which the indigenously produce and the second which they procure from other vendors and resale them. In a study conducted upon the women street vendors in Guwahati, it was found that almost 85% of these women vendors procure the products other sources while only 15% sell their home grown or self-cultivated products<sup>16</sup>. The fact that very less capital and no formal education or training is required to start the vending activities is what encourages these women to be a part of the street vending ecosystem. In this regard, it must be noticeably mentioned that in *Guwahati*, the residents also have played a pivotal role in uplifting these women community. Most of the *Guwahatians* prefer to purchase the organic and fresh vegetable and other commodities like *polu* (silkworms), *xamuk* (snails), rice beer etc. which they would not have otherwise got else and even if they get it, the cost becomes very high. Though there may be fluctuation in the prices during festive seasons or during holidays yet the street vendors keep the prices relatively very low as compared to established markets which ushers in a plethora of residents to purchase the same.

Yet on a daily scenario these women street vendors in Guwahati are subjected to various problems in some way or the other which causes varied inconvenience to them in carrying out their vending activities ranging from health hazards, infrastructural deficiencies to licensing issues. Language sometimes becomes a communication barrier between the vendors with the customers as well as other vendors which could eventually result in physical altercation. Gender based harassment could also be understood as another problem where the women street vendors in Guwahati are impacted harassed not only by the male vendors but also by authorities. Though some of the issues faced have correlation as well as similarity with that of male street vendors, yet the degree or the magnitude of the problems faced by the women street vendors is much more.<sup>17</sup>

#### **IV. Juxtaposition of Right to Work and Women Street Vendors in Guwahati**

For a long time since the independence and enactment of constitution, the economy of the country was driven by the male population. Though ‘Right to Work’ as a fundamental right had developed yet it did not possibly touch majority of the women population in general leave aside the women street vendors. The reason that could be attributed was not because the women did not want to work or that they did not aspire but because they were not given the opportunity to work and those who were working also were in an environment that was not favourable enough for them to continue further.

<sup>16</sup> Kughatoli V Aye and Barnali Sarma, “Street vending and urban public space: A study of street vendors in Beltola Market, Guwahati” 6 *International Journal of Health Sciences* (2022), available at: <https://doi.org/10.53730/ijhs.v6nS8.9667> (last visited on March 6, 2026).

<sup>17</sup> Saptarishi Prasad Sharma, “Women Street Vendors In India: Investigating The Intersection Of Vulnerability And Empowerment” 6 *Indian Journal of Law and Legal Research* (2024), available at: [https://3fdef50c-add3-4615-a675-a91741bcb5c0.usrfiles.com/ugd/3fdef5\\_eb886c0725f34520a3d14a2dc936c290.pdf](https://3fdef50c-add3-4615-a675-a91741bcb5c0.usrfiles.com/ugd/3fdef5_eb886c0725f34520a3d14a2dc936c290.pdf) (last visited on March 1,2026).

This social inequality led to the passing of a very important report in 1971 title ‘*Towards Equality*’ by the *Committee on the Status of Women in India (CSWI)* established by the Department of Social Welfare under the aegis of the UN General Assembly. The report not only highlighted the problem of lack of employment but also set forth a list of action points which could promote the financial and economic resilience of the women community. The report had a substantial impact to the extent that it convinced the government to include a chapter ‘women and development’ in the *Sixth Five Year Plan (1980-1985)* marking a significant shift in the outdated concept of gender specific right to work ideology.

This was further accelerated by the submission of the *Shram Sakti* report by National Commission on Self Employed Women and Women in the Informal Sector which elaborately talked about the contribution and problems of the marginalized self-employed women including the women street vendors in both urban and rural setup. The report for the first time talked about giving separate recognition to women workers by enlarging the definition of vendors and taking notice of their presence during data collection. The report had rippled effect to the working conditions in North East also where the women community started to participated in the labour market in different capacities profusely.<sup>18</sup> Moreover the growth of the street vendors in every nook and corner of the country eventually led to the Parliament passing then Street Vendors (Protection of Livelihood and Regulation of Street Vending) Act 2014 for regulating the marketing system of the street vendors. As per Section 36(2) of the Act, the Assam Street Vendors (Protection of Livelihood and Regulation of Street Vending) Rules 2016 and the Assam Street Vendors (Protection of Livelihood and Regulation of Street Vending) Scheme 2020 were passed to regulate the vending situation in Assam eventually upholding the ‘Right to Work’ for all the vendors.

However, the Act as well as the Rules and Scheme were not gender friendly and were not catering enough to the needs and demand of the women street vendors in Guwahati for several reasons which in turn impaired their right to work holistically:

- Even though the women vendors were paying almost Rs 100-150 daily to the Guwahati Municipal Corporation (GMC), yet there has been always dearth of enough ‘space’ for carrying out the vending activities.
- Lack of infrastructure and basic toilet and hygiene facilities have accelerated the matter to such an extent that many of the women street vendors have perennially fallen ill like breathing issue, deafness and reproductive problems leading to frequent miscarriages. The fact that they must sit for such long hours in unhygienic places could be found to be another probable reason for such health deteriorating. In a study at the *Uzanbazar* market, it was found that many a times the women street vendors develop close associations with nearby restaurants or residents for availing the toilet facilities in lieu of which she either must give money or some part of her products.
- Many a times, the women vendors in Guwahati have been subjected to violence not only from their male counter parts and officials but also by the eunuchs (*hizras*) while they are travelling from their hometowns to their place of vending in different places like in Sonapur or Jalukbari areas. They not only harass but also extort money from these women.
- The role of police and other government officials are also crucial in this regard. They harass the women street vendors and take away their goods upon not getting the demanded money. They collect ‘*hafta*’ or ‘side money’ from them in the pretext of allowing them to vend. Ironically many a times, women police officials also take part in this act which has been frequently observed in market areas like Fancy Bazar.

<sup>18</sup> National Human Rights Commission, “Know your Rights: Right to Work”, (2011) available at: <https://ihrc.in/wp-content/uploads/2024/07/KYR-Work-English.pdf> (last visited on March 6,2026).

- Moreover, it also becomes difficult for the vendors to take loans or financial assistance from any bank or credit institutions owing to the lack of documents or lack of constant income source.

## V. Remedial Measures and Protection

As discussed above, since the women street vendors are often subjected to varied issues that has caused detrimental impact to their working capabilities, several ways have been devised as observed to curb this menace. Some of these are:

- **Judicial Intervention:**

In order to protect the street vendors from eviction and other harassment in Guwahati, the Greater Guwahati Hawkers Association filed a petition in Gauhati High Court in 1996. Accordingly, the honourable High court directed the state government and Guwahati Municipal Corporation to stop all eviction related activities. Similarly, The SS Road Hawkers Association (Guwahati) lodged a Public Interest Litigation (PIL) in 2010 to draw attention of the High Court to the GMC's failure in implementing the well-meaning provisions of the National Policy for Urban Street Vendors, 2009.<sup>19</sup> Subsequently, in the case of *Street Vendors Associations and Ors v. The State of Assam and Ors*<sup>20</sup>, the Gauhati High Court strictly instructed the GMC to conduct the street vendors survey and allocate them vending zones including the women street vendors. Again, in the recent case of *Nipon Dholua v. State of Assam*,<sup>21</sup> the Gauhati High Court strictly questioned about the measures taken up by the GMC in the past relating to the development of all the street vendors in the city.

- **Role Of NGOs and Solidarity Groups:**

Groups like SEWA or WEIGO have come into picture for providing relief to the kinds of atrocities suffered by these women vendors. Moreover, other notable groups like *the Assam Street Vendors Associations* along with its ally *Society for Social Transformation and Environment Protection* (sSTEP), have been working relentless for these women street vendors by providing them health checkups, giving them training, helping them in understanding finance etc. Similarly, *Greater Guwahati Street Vendors Association* (GGSVA) and *Greater Guwahati Women Vegetable Vendors Association* (GGWVVA) are another two leading organizations who are working for the interest of the women street vendors in Guwahati.<sup>22</sup>

- **Government Schemes:**

Certain government schemes also play a role to in helping these people. *The National Urban Livelihood Mission* under its component of 'Support to Urban Street Vendors' have been assisting all the vendor including the women street vendors in varied genres like financial inclusivity, social security assistance etc. Another two very prominent schemes in this regard are the *Prime Minister Street Vendor's Atma Nirbhar Nidhi* (PM SVANidhi) Scheme and the *Deendayal Antyodaya Yojana - National Rural Livelihood Mission* (DAY-NRLM) that have significantly helped the women street vendors in getting loans as well as getting employment opportunities.

- **Infrastructural Development**

Furthermore it has been seen that the government under the *Assam Ministry of Housing and Urban Affairs* have build a new market complex near the *Beltola market* in Guwahati providing relief to the growing infrastructural complaints by the street

<sup>19</sup> Manoj Kumar Das, "Role of NGOs and Street Vendors' Union in Safeguarding Street Vending Activities in Urban Areas of Assam," 10 *International Journal of Humanities & Social Science Studies* (2024), available at: <https://www.ijhsss.com/files/13.-manoj-das.pdf> (last visited on March 7, 2026).

<sup>20</sup> WP(C)/5042/2014

<sup>21</sup> PIL/15/2021

<sup>22</sup> *Ibid.* 21

vendors specially the women.<sup>23</sup> Similar type of new wholesale market complex has also been announced near the *National Highway 37* to suffice to the needs.

## Conclusion:

Right to work should not be demanded but as a special right need to be made accessible to all including the women street vendors that contribute significantly in the informal economy. These women work relentlessly to gain the somewhat stable financial independency. However, due to unprecedented problems and issues, they cannot flourish as desired or as they are capable of. The situation is analogous to that of state of Assam and more precisely in Guwahati where the maximum vending activities take place. Though the government, NGOs as well as the judiciary have been trying the best to welcome a new wave of change, yet unless all the stakeholders like the GMC or the police authorities mend their working ways, the journey would be much longer and thornier. Hence, as the need of the hour, all the stakeholders need to be vigilant enough and collaborative with each other so that the women street vendors in Guwahati are not only deprived of their basic right to work but are encouraged to also contribute more significantly of the Assam and eventually for the country.

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<sup>23</sup> Tathagata Bhattacharjee, "Beltola Daily Market Complex inaugurated" *The Times of India*, February 25,2026