

## Chapter 1: INTRODUCTION

The Trade Unions are associations or groups formed by persons from similar fields that work towards the unified interests of the members. They aid union members with problems of unfair wages, suitable working environment, duration of work and welfares. They represent a group of workers and are a link between the organisation and its workers. The whole purpose of Trade Unions is to address the complaints and grievances of the workers. The Trade Unions put forth their demands before the organisation as a collective unit representing the workers. The history of Trade Union movements can be understood by way of three main stages. The first stage was from the ending of the 19<sup>th</sup> century to the World War I. The second stage was from the end of the World War I to India's Independence. The last stage was from early days of Pre Independence to Post Independence. This stage is significant as it marked the rise of real modern Unionism. The Labour movements in this stage were organised and consistent.

After the World War I, the International Labour Organisation was formed, and this gave more inspiration to Indian leaders of labour movement and they formed various Trade Unions (such as the All India Trade Union Congress) in India for the welfare of the workers.<sup>1</sup> The journey of union movements in India is a long one. There have been a lot of challenges in the Labour movements, however, with constant efforts of the pioneers of the labour movement.

The Trade Unionism emerged strongly and grew remarkably. The Unions were formed for almost all working sectors such as railways, factories, banking, various industries etc. However, many Unions were not inclusive of women. There is a deep rooted patriarchy that exists in the world, and so women have been facing challenges since the beginning of time, and hence, women centric trade unions were needed to be established.

The need for females to stand up for their rights was realised in the 20<sup>th</sup> century, and it led to formation of female run Trade Unions. The other Trade Unions did not ever restrict the membership to women; however, to bring about an impact, separate movement focusing on female was imperative. The women came together for additional grievances such as inequality in payment of wages because of their gender, gender politics in the organisation,

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<sup>1</sup> Pritom Saikia, A History of Trade Unions in India, StateCraft. <https://www.statecraft.co.in/article/a-history-of-trade-unions-https://www.statecraft.co.in/article/a-history-of-trade-unions-in-india>

and less female representation.<sup>2</sup> The paper will further talk about the participation of females in Trade unions and female led unions. Women in trade unions are important for voicing rights of the female workforce and to take a stance against female discrimination.

## **RESEARCH QUESTIONS**

- How did female participation in Unions begin?
- What is the need for female participation in Labour Union Movements?
- Has the female participation been significant?

## **RESEARCH METHODOLOGY**

The research methodology adopted for this project is Doctrinal Research. The researcher has relied on secondary sources of data such as books, articles, case laws, legislations, news reports etc.

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<sup>2</sup> Indrani Mazumdar, Rights of Women as Workers: Issues and Questions, Centre for Women's Development Studies, 2014.

## **Chapter 2: LITERATURE REVIEW**

Women Workers and the Trade Unions, the author talks about the situation of female workforce and their working conditions. The book documents stories of various women workers from the 1800s till present date. The book provides insights into the struggles faced by female workers, such as gaining recognition, organising unions, gaining significance among male trade unions (Sarah Boston, 2015). The exclusion of women from the Male established Trade Unions defeated the purpose of Trade Unionism. It becomes essential to learn about female trade unions in order to understand feminism and history of female workforce and their conditions.

The Most difficult revolution: Women and Trade Unions; the authors of this book talk about how women in trade unions have revolutionised the concept of Trade Unions. The book explains why women are needed in Trade Unions. It addresses the issue of gender discrimination in workplace, how women would receive unequal pay compared to their male counterparts, and how their opinions were not taken into account, and how their recognition was low. The book talks about how women in unions are effective channels for economic and social participation of female and male workers. The unions help the women in finding a voice and expressing it freely (Alice Hanson Cook, Val R. Lorwin, Arlene K, 2019).

Women in Trade Unions in India; this article talks about how women face occupational segregation in the Unions which are not female led. The article talks about why female participation is required. The article speaks about how female led unions bring about a social change and how it reshapes the meaning of trade unions. There needs to be more and more female representation to achieve development and growth (C. Ratnam, HC Jain, 2002).

Women and Trade Unions in the Workplace: this article talks about how women were viewed in the trade unions and how their presence was construed back in the 1980s. It talks about how women are viewed with an approach of familial ideology and prior domestic commitment, which leads to their voices getting neglected (Nicola Charles, 1983).

Gender politics in trade unions; the representation of women between exclusion and inclusion; this article as the title suggests speaks about the gender politics that exist in trade unions. It is quite often that women members of trade unions are neglected and their representation is not paid heed to. Despite, the increasing labour force, there is not consistent representation and inclusion of female members of the unions; females rarely or sometimes do not at all get positions of authority (Sue Ledwith, 2012). This is why it all comes back to the need for more and more female participation in unions.

### **Chapter 3: WOMEN IN TRADE UNIONS IN INDIA**

Since the rise of the Trade Union movement, there was a need for female participation and women run trade unions. This is so because women were reportedly not fairly treated in the Trade unions as it were male dominated. Women not only had to suffer discrimination at the workplace but also in the trade unions, as they were not properly represented, their voices were unheard, they were taken lightly and women were not able to advocate their rights even in the trade union. This totally defeats the whole aim of Trade unions. Thus, more women participation helps in shaping the real meaning of unions. It leads to social and economic development.

Female centric unions can help addressing the gender discrimination at workplace, which is quite frequent at workplaces. Sometimes, women are also hesitant in being a part of Trade union because of lack of representation. This again shows why female participation needs to increase. Comparing with early years and present date, there has definitely been a rise and increase in women in trade unions, however, the significance is still low.

The history of women in trade unions dates back to 1900s when a respectable lady named Ansuya Sarabhai (also called Ansuya ben) pioneered the woman labour movement in India. Ansuya Sarabhai believed in social equality, and she started working with marginalised sections of the community, in order to bring about a social change. She gained the impetus to get into the labour movement, when she realised the horrible and inhumane working conditions of workers of a nearby mill. Soon, the mill workers sought her help for their devastating working conditions.

Ansuya Sarabhai started a protest along with workers against the mill owner and was successful in getting the wages increased and better work conditions. This moment onwards, the labour movement with a woman leader gained more and more recognition. Her trade union movement was also supported by Gandhiji. In 1920, she established Ahmedabad Textile Labour Association (Majoor Mahajan Sangh), by which she pioneered the women's labour movement.<sup>3</sup>

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<sup>3</sup> The Indian Express, Who is Ansuya Sarabhai?, November 11, 2017.

### **Ahmedabad Textile Labour Association**

Textile Labour Association is one of the oldest trade unions. The Textile Labour Association works for the welfare and rights of the workers in the textile industry. It works for fair payment of wages, decent healthy working conditions, and equality of all workers. In 1917-18, the textile industry faced confrontation from its workers for the time and the workers approached Ansuya Sarabhai to help them become a stronger voice. She along with some help from Gandhiji formed the Textile Labour Association. Initially, the association had to face a lot of challenges as the mill owners put up an equal fight. They countered the protests by the workers.

However, the mill owners were surprised when they realised the strength and consistency of the association, and eventually gave in. The Association was built on Gandhian ideologies. The Gandhian ideology of labour and industrial relations includes reconciliation and solving disputes amicably rather than with aggressive mob protests and so. The ideology was belief in arbitration for settling disputes. In this way, both sides were made to realise that they are not independent of each other and are interdependent. The Textile Association led various successful strikes, which were able to increase wages, better conditions, decent working hours etc.<sup>4</sup> Currently, this association is not as active as it used to be when it was established.

### **Self-Employed Women's Association (SEWA)**

Another inspiring pioneer in female trade unionism is leader Ela Bhatt. Ela Bhatt founded the Self-Employed Women's Association (SEWA) in Ahmedabad. SEWA was formed out of the Textile Labour Association founded by Ansuya Sarabhai. SEWA was started from a woman wing of the Textile association which was for embroidery, sewing, knitting, etc classes of woman for female relatives of mill workers. SEWA registered itself as a trade union in 1972. It grew very well from 1972 as it got tremendous membership and significance. It is an organisation for self-employed, poor women workers, who earn living through their own labour and hard work. They are women belonging mainly to unorganised sectors that work quite a lot but are often not recognised. It is both an organisation and a movement working for the welfare of women. It gives impetus to home grown workers.

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<sup>4</sup> Sujata Patel, "Class Conflict and Workers' Movement in Ahmedabad Textile Industry, 1918-23." *Economic and Political Weekly*, vol. 19, no. 20/21, 1984, pp. 853-864.

The main purpose of this organisation is to organise women workers for full term employment and to make women self-reliant. It works even for literacy of women. The SEWA organisation has grown to include 130 cooperatives, 181 rural producer groups, and numerous social security organizations within its structure. Established as an enrolled worker's organization in Gujarat, SEWA at first worked in metropolitan territories.

Since the 1980s it has been effectively spreading to rural territories and outside the state of Gujarat. Its enrolment has been quickly developing since 2000, from 318,000 individuals to 1.75 million of every 2012. As of now, a larger part of its individuals (66 percent) begin from provincial zones. SEWA now works in 12 states, 50 cities and 700 towns in the nation. Individuals are coordinated into assorted structures, including a worker's guild (with rural and metropolitan branches), 130 cooperatives, 181 makers' gatherings, various assistance associations, organizations, collusions, alliances and self-help gatherings (SHGs).

SEWA's key exercises comprise of getting sorted out independently employed ladies to advance their aggregate quality, participation and administration at the grassroots level through associations, cooperatives, maker gatherings and organizations; encouraging their admittance to government backed retirement and social insurance through social help associations; pushing better social assurance also, work guidelines for them at the large scale level; and building their ability through formal schooling and expert preparing.<sup>5</sup> Similar to most organisations, SEWA too faced many challenges and initially, had small victories only.

However, with the constant efforts and consistency towards their goals, it became very popular and recognised. Many people are helped through this organisation and it is actually doing great work. It is the most relevant example of what woman participation in trade unions can achieve.

### **Chhattisgarh Mines Shramik Sangh (CMSS)**

Chhattisgarh Mines Shramik Sangh is a trade union for mine workers. This Trade Union has remarkable female participation and representation in its union. The involvement of women in CMSS activities has been a main feature of the Union. The workforce has around 50%

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<sup>5</sup> Self-employed Worker's Association, India, International Labour Organisation.  
[https://www.ilo.org/wcmsp5/groups/public/---ed\\_emp/---emp\\_policy/documents/publication/wcms\\_234890.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_policy/documents/publication/wcms_234890.pdf)

female workers. Women have participated in major strikes and events of the Union. The first strike of the Union in 1977 was female led.

Women are also made office-bearers, thus, giving them positions of authority as well. Owing to the female participation, there has not been discrimination against women by mine owners. Women representing this union led an anti-alcohol campaign, they represented a victim of sexual harassment, through their achievements they were able to secure maternity benefits for the mine workers. More so, they frequently organise events for upliftment of women workers and their welfare. This also goes on to prove the fruitfulness of efficient and adequate participation of females in a Union. Unions reach great heights when there is adequate female recognition.<sup>6</sup>

### **Rajnandangaon Kapda Mazdoor Sangh (RKMS)**

Rajnandangaon Kapda Mazdoor Sangh is a textile worker's union with women participation in it. The participation of females started when a female mill worker fainted due to unhealthy working conditions and fellow workers started a protest against the mill owners. This led to women participating in the Union activities. The unique aspect is that in the union protests and dharna, not only the female workers but also the female relatives of these workers join. Thus, it increases the number of people in protests. The credit for this goes to the female members. The number of female members of union is less because the female workforce itself is very low.<sup>7</sup>

As a result of the female participation and female led unions, women grow to be very self-reliant, self-aware, socially aware, gain strength to voice their opinions and realise their rights. They become more and more confident individuals. This imbibes the concept of equality of men and women in people and even in those who do not recognise the equality of men and women. Another inspiring reason that suggests why women should participate in trade unions is the woman leader; Amarjeet Kaur, who is the General Secretary of the All India Trade Union Congress, one of the biggest trade unions in the country.

Women like Amarjeet Kaur are an inspiration as they prove that women in unions can achieve great heights. She believes that women need to participate in unions and bring about

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<sup>6</sup> Ilina Sen, "Women's Participation in Trade Union Struggles", Economic and Political Weekly, vol. 22, no. 27, 1987, pp. 1067-1069.

<sup>7</sup> Id.6

a change. She said that men still have a mental block for letting women become union leaders, and she mentions that this mentality needs to change, and for that women need to have the strength to voice their opinions. She aims of a gender equal world.<sup>8</sup>

Women need unions and even unions need women, as they are both interdependent. Women are often made a part of unions because of women having the enthusiasm of holding activities and events such as study groups, campaigns and protests etc. They introduce innovative ideas for the unions, they are good at promoting sisterhood with fellow union women, making alliances etc. They are good at developing community and society through their unionism. Women hold the line of future scope for unions because of their outreach strategies and confidence.<sup>9</sup>

Women in trade unions has risen since the earlier times, however, the significance and the impact has been low. It is true that women workers, who are a part of a union, get better pay and working conditions than non-members. It is also true that globally, women's participation and activism with respect to unions is increasing. However, it still remains very much male-dominated aspect. Women rarely get to reach the leadership positions, they are next to invisible when it comes to decision making. They are absent in the key bargaining processes. Now until, women assume greater leadership roles and are part of bargaining process, their activism and participation does not impact much.

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<sup>8</sup> Amarjeet Kaur: The Trade Unionist who broke Gender barriers, <https://www.labourfile.com/section-detail.php?aid=580>

<sup>9</sup> Sue Ledwith, Fiona Colgan, "*Unions Need Women Women Need Unions*", International Union Rights, vol. 8, no. 1, 2001, pp. 3–5.

## Chapter 4: Comparative Study with the United States

Women have made major strides by entering the Labour market in the USA. Their entry into paid employment has contributed to America's prosperity. Despite this, women still remain underpaid and underrepresented in many sectors; there still exists gender disparity and gaps in the working conditions of women. The gaps are not as big as earlier times, however, they still exist.

During the early 20<sup>th</sup> century, most women of America did not work outside their homes, and those who worked were basically young. In that period, only 20% women were actual workers. In the middle of the 20<sup>th</sup> century, women's participation in working force and economy increased.<sup>10</sup> With the increase in the women in workforce, there was an obvious need for Labour unions for the rights of the workers.

Women did become a part of the trade unions but it still remained so that they did not get the opportunity to take on leadership positions.<sup>11</sup> Such groups that were discriminated against such as women and other minorities, they started to form their own unions.

With the efforts of the labour unions higher pays, better working hours, safer working environments, health welfares, and support for workers who have retired or been incapacitated. Labour unions were also contributory in ending the run through of child labour. They have exercised a far-reaching influence on American life, comprising the political, cultural and economic fabric of the country.<sup>12</sup>

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<sup>10</sup> Janet L. Yellen, *History of women's work and wages and how it has created success for us all*, May 2020. <https://www.brookings.edu/essay/the-history-of-womens-work-and-wages-and-how-it-has-created-success-for-us-all/>

<sup>11</sup> Editors at History.com, *Labor Movement*, October 29, 2009. <https://www.history.com/topics/19th-century/labor>

<sup>12</sup> AFLCIO, *A Brief History of Labor, Race, and Solidarity*, <https://racial-justice.aflcio.org/blog/est-aliquid-se-ipsam-flagitiosum-etiamsi-nulla>

## **Women's Trade Union League (WTUL)**

Women's Trade Union League was the first national association committed to organising women workers. It was established in 1903. The organisation for its funding depended on its own member's resources and some very bare minimum amount from the American Labor Organisation (AFL) and a few other large labour organisations.

The WTUL gained great success in uniting women from all working sectors for working towards better working situation. This organisation came into existence after the AFL refused to include women in their higher positions. The organization had a solid activist plan, working to offer working women with educational prospects while also struggling to improve working situations. In the garment industry strikes of 1909–11, WTUL members paraded along with striking workers and assisted in setting up funds for strike. Some of the richer members shunned the clothing manufacturers who rejected to settle down with strikers.<sup>13</sup>

The WTUL can be looked at as an example of response to problems of feminism and gender discrimination. It was the women's branch of labour movement that worked to rise above the male-dominated work force. The membership and the goals of the union represent the relationship between industrialisation and strong womanhood and empowerment for women. Most working women were drawn towards this league because it was the only organisation that worked for improved conditions of women and secondly, it was the sole organisation that let women be members and participate in union movements.

The novel part of this league was that it displayed the unification of working women and privileged women, who joined the organisation as they sympathised with the working class and wanted to help in whichever way they could.<sup>14</sup>

The initial stages were challenging as many women were hesitant of voicing their needs and demands. They feared that there would be repercussions of their strikes. They did not want to get associated to any organisation and did not want to go against the employers. So unifying them was a task. However, soon they realised that they need to take a stand for themselves because of the discrimination against women in work places.

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<sup>13</sup> The Editors of *Encyclopaedia Britannica*, Women's Trade Union League. <https://www.britannica.com/topic/Womens-Trade-Union-League>

<sup>14</sup> Jacoby, Robin Miller, *The Women's Trade Union League and American Feminism*, *Feminist Studies*, vol. 3, no. 1/2, 1975, pp. 126–140.

Present situation is that, the weakness of the growth of the women in trade unions continues to a serious issue. Many women worker are still unorganised. Even in organised sectors, or sectors where women predominate, there is lack of representation and union leadership.<sup>15</sup>

### **Woman's Christian Temperance Union (WCTU)**

Woman's Christian Temperance Union (WCTU) it was founded in 1873 in Ohio. It was an organisation that was made solely for women and its social reforms. Although the main aim was of social reform, it also included the aim of labour reforms for women. The union worked mainly for women and their empowerment.<sup>16</sup> Hence, it was also one of the oldest organisations that worked for women and their improvement. It became one of the chief and most significant women's associations of the 19th century by growing its outreach to campaign for labour laws, suffrage and prison reform.<sup>17</sup>

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<sup>15</sup> Susan Amsterdam, *The National Women's Trade Union League*, Social Service Review, vol. 56, no. 2, 1982, pp. 259–272.

<sup>16</sup> Erin M. Masson, *The Women's Christian T s Christian Temperance Union 1874-1898: Combating Domestic Violence*, William & Mary Journal of Race, Gender, and Social Justice, Vol.3, April 1997.

<sup>17</sup> Editors at History.com, *Woman's Christian Temperance Union*, March 23, 2010.

<https://www.history.com/topics/womens-history/womans-christian-temperance-union>

## Chapter 5: CASE LAWS

- **The Textile Labour Association (Ahmedabad) v. The Ahmedabad Mill Owner's Association**<sup>18</sup>: In 1961, the Textile Labour Association, Ahmedabad, gave a notice to employers demanding paid privilege, sick and casual leave for the textile workers. The Mill owners denied the demands. The union filed a case after the failed reconciliation attempt. The Ahmedabad Mill Owner's Association denied the demand on some legal grounds. The lower court passed an order in favour of the textile workers. Thereafter, the mill owners filed a Writ Petition in the High Court of Gujarat which again was decided against them. Later, the Ahmedabad Mill Owner's Association filed a special leave before the Supreme Court of India. A huge number of arguments were made from both the sides. The Textile workers contended that they needed leaves for better mental and physical health as well as for works other than employment work. Mill owners argued that existing leaves were enough for the workers, additional leaves would affect the production, and there was incapacity to bear the financial expenses of the paid leaves. The Supreme Court decided in favour of workmen under the provisions of Indian Factories Act, 1948<sup>19</sup>, that is for privilege leave and for casual and sick leave under the provisions of Employees' State Insurance Act, 1948<sup>20</sup>, explaining that there is necessity for leaves for the workers to take a break from the strenuous working conditions.
- **Self-Employed Women's Association & Ors. v. Municipal Corporation of Ahmedabad & Ors.**<sup>21</sup> : In this case, the Municipal Corporation was not allowing women members of the association to sell vegetables in a certain area, and the vendors were seeking license to be vegetable vendors, however, after a meeting and the court proceedings, under the civil misc. petition, the court directed the Municipal Corporation of Ahmedabad to grant temporary licenses. However, when the harassment by police officials and municipal officers did not stop, a Writ petition was filed. According to a Writ Petition filed in the Supreme Court. The Supreme Court

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<sup>18</sup> The Textile Labour Association (Ahmedabad) v. The Ahmedabad Mill Owner's Association, Gujarat High Court, September 3, 1973.

<sup>19</sup> Indian Factories Act, 1948.

<sup>20</sup> Employees' State Insurance Act, 1948.

<sup>21</sup> Self-Employed Women's Association & Ors. v. Municipal Corporation of Ahmedabad & Ors., Civil Miscellaneous Petition no. 32061 of 1986 in Writ Petition no. 89 of 1982, December 17, 1986.

had directed the Ahmedabad Municipal Corporation not to intervene in the rights of the vegetable vendors in their functioning and earning their livelihood by selling vegetables in Manekchowk area and ordered the Ahmedabad Municipal corporation to issue proper vending licences to the vegetable vendors who are members of the Association. The Police Commissioner was also restrained from meddling with the vending activities of these vegetable sellers in Manekchowk and trials were also restrained till the Ahmedabad Municipal Corporation provides them alternative sites.

## **Chapter 6: FINDINGS, CONCLUSION AND SUGGESTIONS.**

The research findings have been that firstly, in my opinion, the hypothesis that there has been a rise in women in trade unions, however, the significance and impact has been low holds true because as established above the female participation and women led unions have increased by a lot but they are still not as impactful and significant like they should be. The significance can be achieved through the way of women in leadership roles as then they can increase their outreach and have a far-reaching impact.

Secondly, the reasons for low significance could be attributed to certain barriers such as male-dominant approach of the trade unions as well as workplaces, the response of men when it comes to encouraging women, insensitivity for the needs of women workers, women's fear of association with a union, women's lack of awareness about unions and its functioning, duty towards family obligations, lack of confidence, and women working in informal sectors that is already difficult to unify and organise etc. Further, the impact is low because the recognition of the increase in participation goes unnoticed and under recorded. Forming unions and focusing on their needs or to have representatives in the unions are not the problem of the women themselves. Concerns like long-lasting employment, job security and removal are much essential for the women. Consequently they are not part of the unions because they accept as true that they have their male counterparts fighting for these demands.

Further, it is found that sometimes women members also get educated because some of the unions such as SEWA help in women becoming literate. The unions carry out many self-improvement and awareness activities. Thus, it is understood that women gain a lot of knowledge through this engagement with unions.

The Trade unions having women participation pave the way for self-aware and confident women, and so, there is a need for women participation for their own welfare. Moreover, as seen in the case of the Women's Trade Union League of the United States and its impact of feminism movement. It helps in establishing the concept of gender equality and stop gender discrimination. Women can make use of these platforms to realise their rights and strengths. Organisations such as SEWA provide employment opportunities and train them to become efficient employees for a full term employment. They even look after the health of the members and carry out health camps etc.

I would like to conclude by saying that women in trade unions really do bring about a change in a lot of areas, one of them being social change. It empowers women and provides them with a sense of accomplishment. The fact that women's working conditions improve through this, it is proof of why women should participate in unions and labour movements. Women's participation began as a result of gender discrimination also and it has proved to eradicate discrimination to a large extent and women have become self-sufficient.

Women like Ansuya Sarabhai, Ela Bhatt, Amarjeet Kaur and many such women are an inspiration to all working women. They go onto show the strength of women and their determination to achieve greatness. Currently also, despite low impact, some of the old unions are quite active and still work towards the improvement and rights of women and their growth has been remarkable.

According to the comparative study done with the trade union in the United States, it is evident that the labour situation and specifically of women is quite similar to our country. Even in the US, women had to struggle because of gender discrimination at workplace as well as in trade unions. There too women had to strive through the male-dominated aspects. The American working women too became self-reliant and protested against unfair treatment by the employees.

In fact the first national association, the Women's Trade Union League was formed as a result of the American Labour Association denying membership to women workers. The one point of difference between the Indian and American Trade Union, is that in the American Trade Union, even privileged women joined the unions to support the working class and give them an encouragement to stand up for themselves, going against unfair work conditions and become confident in putting forth their demands to their employees.

### **Suggestions**

The few suggestions and recommendations for trade unions and female participation are first and foremost, that women should realise their strength and not get hesitant in going against the unfair treatment by employers. The trade unions should devise plans for equal employment, and formulate training strategies to make sure that they are not unintentionally unfair and that they display the diversity of their membership with the objective of gender equality. They should bring out ideas for equality within the unions.

Further, unions could do regular surveys to check whether the members face any discrimination within the organisation. There should be transparency in recommending women to review and decision-making positions, supporting women by activities for training, self-development, or the sharing of family responsibilities, inclusion of women in negotiations and collective bargaining processes, form a committee within unions to ensure there is no gender disparity, there should be gender awareness talks etc.

When the above given suggestions will be put in practice, it could possibly increase the significance of trade unions and woman participation. The future scope of women in trade unions can definitely improve if certain suggestions are adopted and people realise the importance of women in trade unions. In future, the trade unions should focus on increasing its female membership, expand their functioning to remote areas, and strengthen their structure and functioning, and promoting more livelihoods.

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- The Textile Labour Association (Ahmedabad) v. The Ahmedabad Mill Owner's Association, Gujarat High Court, September 3, 1973.
- Self-Employed Women's Association & Ors. v. Municipal Corporation of Ahmedabad & Ors., Civil Miscellaneous Petition no. 32061 of 1986 in Writ Petition no. 89 of 1982, December 17, 1986.