

**GLOBALISATION AND ITS IMPLICATION ON LAW RELATING TO WOMEN
AND THEIR WORK-LIFE BALANCE**

Dr. N. Dasharath¹

Sujatha V. Durgekar²

INTRODUCTION

Indian women have been revered in the Indian society giving them the form of Goddesses. In all the Hindu scriptures, she is revered and worshiped as an all-empowering force. The Ramayana and the Mahabharata, both the stories were woven around the women only. But from time immemorial, she has been confined to domestic work. Work and life are interrelated. It is impossible to live a life without work. Every human being has to work to earn his bread. Indian society has been a patriarchal society where man is the bread earner of the family. In this patriarchal society a woman has always been subordinate to men. Even the term “Women” is not independent of the word “Men”. Ever since ages, women were considered to be the weaker section of society and her role was limited to domestic work at home.

However, the modern civilization and globalization has set in considerable changes in the society especially with regard to the entry of women in work force by providing them with ample opportunities. This has also resulted in violation of the international as well as national laws prescribing eight hours of work, which has been discussed below, in order to achieve the global target thereby conflicting work and family life. The main causes for conflict in work-life balance being gender discrimination, work area ethics and various policies and family culture, despite the ‘Equal Remuneration Act’, various provisions of Constitution, Factories Act etc. This has been substantiated by the International Labour Organisation’s Wage Report and the World Economic Forum’s Global Gender Gap Reports. “The Strategy for New India@75” document has also suggested inflexibility in hours of work and absence of part-time works as causes for imbalance in work and family life.

¹ Professor and Chairman, Dean & Faculty of Law, University Law College and Department of Studies in Law, Bangalore University

² Research Scholar, University Law College and Department of Studies in Law, Bangalore University

THE INTERNATIONAL LAWS EMPOWERING WOMEN

The movement to realise the women electoral rights was started in 1848 and gradually, it became a mass movement. In the late nineteenth century, women in the United States sought equal rights, opportunities and liberty for women. The Brandeis³ case was the first eye opener for the international community with respect to the hours of work of Women. The famous case of Brandeis brief became a landmark case which took place in the United States legal history. The Supreme Court, in this case, upheld the law of the state of Oregon which restricted the working hours of women in factories and laundries.

Women in India realised the importance of the right to vote in the early nineteenth century which was granted subsequently. In the year 1945, to maintain peace and security, friendly relations and promote human rights and equal rights internationally, the United Nations Organisation was established. The year 1975, the International year of women, the first 'World Conference on women' was held in Mexico by the United Nations to focus only on women's issues. Subsequently, in the very next year, there were discussions on policies and issues that impact women such as equality in pay, promotion of equal rights and opportunities for women around the world. The United Nation assented to the 'Convention on the Elimination of All Forms of Discrimination Against Women' in 1979, which ensured abolition of all practices of discrimination against women. Article 1 of the Treaty defines discrimination against women as "Any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field"⁴. Then again in 1995, during the fourth world conference on women in Beijing, "The Beijing Declaration and the Platform for Action", was adopted by 189 countries for 'women empowerment and gender equality'⁵.

³ Muller v. Oregon, 1908 US SC, www.encyclopedia.com/politics/encyclopedias-almanacs-transcripts-and-maps/brandeis-brief.

⁴ Sylvanna M. Falcon, *Convention on the Elimination of All Forms of Discrimination Against Women*, (December 12, 2020), <https://www.britannica.com/event/Convention-on-the-Elimination-of-All-Forms-of-Discrimination-Against-Women>.

⁵ *World Conferences on Women*, UNWOMEN, (Dec. 10, 2020), <http://www.unwomen.org/en/how-we-work/intergovernmental-support/world-conferences-on-women>.

In addition, there are various conventions of International Labour Organisation (ILO) for women providing gender equality. One of the ILO Conventions, Convention No. 100 of 1951, provides for equal pay for men and women workers for equal work. This is to make sure that there is no discrimination in the society on the grounds of gender with respect to the determination of basic or minimum wage and other emoluments in cash or kind by employer to worker in employment. The Convention No. 111 of 1958, for Discrimination (Employment and Occupation) excludes discrimination on the basis of race, colour, religion, gender, etc. which deprives equality of opportunity in occupation and employment and behaviour in employment. In the Convention no. 156, 1981 of workers with family responsibilities includes men and women workers. It also includes workers with children, elders who need their care and such responsibilities restrict them from participating in economic activity. The problems of workers with additional responsibilities of family and others are wider issues and in the modern context necessary to be considered in the national policies for implementation. Convention No. 183 of 2000 for maternity protection ensures safe work for pregnant ladies, maternity leave of 14 weeks, to protect the health of child and mother, six weeks compulsory leave after child birth. Prenatal leave can be extended and woman can return to same position after maternity leave. There can be no termination from employment on the grounds of pregnancy.

Convention No. 175 of 1994 on Part-time work, defines part time work as hours of work less than normal hours of work. It also promises same protection for the part time workers similar to that of full-time workers such as right to organise and bargain collectively, to form unions, safety and health of workers, no discrimination in employment and occupations, social security, paid leave, maternity protection etc. This helps women to continue their work despite family responsibilities. Home Work Convention No. 177, 1996, also gives an opportunity to work from home for remuneration with equal treatment like other workers. Home workers also have the right to join unions, safety, health, social security, training etc. Convention No. 89 of 1948, Night Work for women (Revised) is not applicable to manager and health and welfare services but only to those engaged in manual work. There is no provision for night work for women in public or private industrial undertakings except in family undertaking. Convention No. 171 of 1990, the Night Work Convention, 1990, provides for night work which is not less than 7 consecutive hours. This includes the work done from the midnight to early morning of 5 a.m. This limit on night work for workers needs to be determined by competent authority after consulting the representative

organisations of employers and employees and workers or by collective agreements. It is necessary to take specific measures for night workers to protect their health, assist them to meet their family and social responsibilities, maternity protection, free health assessment, alternate work for prenatal and postnatal workers.⁶ In India the night work for women has not been followed except for the women in IT and ITES sectors. However, “The Occupational Safety, Health and Working Conditions Code, 2020, provides for night shifts for women. Women can be employed in all establishments for work between 7 p.m. and 6 a.m. with their consent. The employer has to follow safety measures, working hours and working conditions as prescribed by the appropriate government while employing women on night shifts”⁷. The government notification for IT and ITES companies exempting these employees from the application of Industrial Employment (standing Orders) Act 1946⁸ which was again extended for another five years from the date of publication of the notification in the official gazette, also mandates formation of grievance and internal committees to prevent, prohibit and redress sexual harassment to ensure adequate measures for their protection.

EMPOWERMENT OF WOMEN AT THE NATIONAL LEVEL

After the Constitution of India came into force, equal rights were granted to both men and women under various provisions such as Article 14 dealing with equality before law and all are equal in the eyes of law. Under Article 15(3) of the Indian Constitution there can be special provisions for only women and children. Under 73 and 74th Constitutional Amendment Act, 1992, constitutional status was granted to Panchayati Raj Institutions and Urban local bodies. And also, as per article 243D (2) of the Constitution of India, there are one third number of total seats reserved for SC&ST women in the Panchayats. The Constitution 108th amendment bill, 2008, prescribes one-third reservation of all seats for women in the Lok Sabha and State Legislative Assemblies. Under the Directive Principles of State Policy, Article 39(d) of the Constitution of India provides for equal pay for equal work. In pursuance of Convention No. 100, 1951, the Equal Remuneration Act, 1976 was brought into force. The Equal Remuneration Act, 1976 proposes for equal pay for equal work for both

⁶ILO,NORMLEX,https://www.ilo.org/dyn/normlex/en/f&p=NORMLEX/PUB:12100:0::NO::P12100_INSTRUMENT_ID:312316 (Dec. 12, 2020).

⁷ The Occupational Safety, Health and Working Conditions Code, 2020, S. 43, No. 37, Act of Parliament, 2020 (India).

⁸ Government of Karnataka, Labour Department, LD 194 LET 2016 (Notified on May 25, 2019).

men and women. It prohibits discrimination against women workers at the time of recruitment, promotion, training etc. Article 42 of the Constitution of India, stipulates for just and humane conditions of work and maternity relief. The Maternity Benefit Act, 1961 provides for full paid absence from work. It also provides for a twelve weeks leave in which not more than six weeks of maternity benefit before delivery can be availed. Maternity Benefit Amendment Act, 2017 increased paid maternity leave to 26 weeks from 12 weeks out of which not more than eight weeks maternity leave before delivery can be availed and work from home options in applicable cases. Even for women adopting baby a below 3 months, maternity leave of 12 weeks is provided. Article 43 of the Indian Constitution provides for a living wage and conditions of work ensuring decent standard of life. Various labour legislations such as Factories Act, 1948, Mines Act, 1952 etc. provide for specific provisions for safety and welfare of women and also restrict working hours to 8 hours or 9 hours in a day.

GLOBALISATION AND WOMEN

The whole of mankind, irrespective of religion, race, creed or gender, do have the right to participate and pursue in material well-being and their spiritual development with their fundamental freedom and dignity, to achieve economic security and equal opportunity as provided under the ILO Declaration of Philadelphia, 1944⁹. The International Labour Organisation's first Convention No. 1, 1919, on working hours limits the working hours to eight hours in a day. Subsequently, many other conventions related to working time came into force. However, globalisation induced competitive scenario led to long working hours to meet the global market requirements. Because of the extended responsibility, the quality and life balance also were affected. A focus on improvement in working hours can facilitate compatibility between work life and family life. Long working hours, night shift, lead to conflicts in happy family life. Women prefer part-time work as they can devote more time to family responsibilities. The International Labour Organisation's 'workers with family responsibilities' Convention No. 156, 1981, provides for equal opportunity and equal treatment for both men and women and it aims to enable persons with family responsibilities in employment to exercise their right without being discriminated and without any conflict

⁹ ILO, *Gender Equality and Non-Discrimination*, www.ilo.org/legacy/english/inwork/cb-policy-guide/declarationofPhiladelphia/944.pdf (Dec. 12, 2020).

between their employment and responsibilities and also to cater to the needs of workers having family responsibilities by providing child care, family services and facilities.

Globalisation opened up the trade barriers between various countries. It brought in the global production and market culture and practice but seemingly left behind the advanced work culture with the focus on quality work-life balance. It increased competition and the entry of women in work force. The production and sales target gained more importance than the health and the well-being of the workers. This also resulted in change in working conditions, especially, increased working hours to meet production targets for the day or for the year. There were drastic changes in working hours of workers. The standard 9-5 jobs were compromised by different working schedules. Cost reduction, long working hours, shift work and night work are a few important aspects of globalization. Though, as discussed above, there are umpteen number of legislations in favour of women for their empowerment, we find women struggling to manage home and office with multifarious responsibilities. As women are burdened with more responsibilities, it has taken a toll on their career. Therefore, there is a gap in their salary when compared to that of men. Equal Remuneration Act, 1976, was enacted with an objective to pay equally for the same kind of work without any discrimination. Even though this Act has been passed, the economic participation, opportunities, educational attainment, health and survival and political empowerment remain a distant dream. According to the wage report of the International Labour Organisation, the gender remuneration gap is very high in India by International Standards, though it has decreased from 48% in 1993-94 to 34% in 2011-12. The gender wage gap is there among casual, regular, urban and rural workers. The average remuneration of casual rural female workers is the lowest in India. Low pay and wage inequality remain a serious challenge to India's path to achieving decent working conditions and inclusive growth for women¹⁰. As per the World Economic Forum, Global Gender Gap Report 2018, India has occupied 142nd position out of 149 countries¹¹.

¹⁰ILO, *India Wage Report: Wage Policies for decent work & Inclusive growth*, https://www.ilo.org/wcmsp5/groups/public/asiaa/ro-bangkok/sro-new-delhi/documents/publication/wcms_638305.pdf.

¹¹*India ranks 108th in WEF gender gap index 2018*, The Economic Times, https://economictimes.indiatimes.com/news/economy/indicators/india_ranks_108th-in-wef-gendergap-index-2018/articleshow/67145220.cms/

WOMEN AND WORK-LIFE BALANCE

The balance between time allocated to work and other aspects of life i.e., work-life balance includes family and social life of the worker. The various factors affecting work-life balance are excessive work load which forces them to work long hours without rest. As a result, they are unable to manage the responsibilities at home. Because of which their mental well-being as well as their physical well-being may be affected by stress and anxiety which will hamper their performance both at home and office leading to work-life imbalance. In France, 35-hour week legislation was introduced under the reduction of weekly hours of work recommendation, 1962, (No. 116) with an objective to improve work-life balance did prove to be effective. Even part time work promotes better work- life balance. As per a Japanese study in 2010, there has been job stress, shift work and long working hours which has resulted in a poor work-life conflict and physical as well as mental well-being.

There are various kinds of work arrangements which can bring in work-life balance in the life of women. Flexible work schedule can bring in harmonious family environment at home. Flexible working and part-time working arrangements such as extended lunch breaks to enable care of elderly relatives, variable hours to enable staff to complete school pick up and a gradual change in hours to facilitate the return to full time working for parents of young children¹². Workers' friendly working hours can result in quality of production and increased output as there will be work-life balance in their lives. Work sharing among workers can reduce the load on them and thereby reduce stress. However, there are cases where there is a need, during emergency, for production of essentials due to high demand resulting in increase in working hours. This can be achieved with increased number of shifts to meet the requirements. The case mentioned below showcases it.

In the case of Pfizer (P) Ltd. Bombay v, The Workmen¹³, the appellant company was manufacturing lifesaving drugs at its factory. The factory had multiple shifts with different timings and the machinery installed in the factory was not completely used. There was insufficient production. As a result, the appellant could not meet the demand for its products. Therefore, it decided to have three shifts to increase production and quality of a particular

¹² Andukari Raj Shravanthi et.al., *Work-Life Balance of women in India*, International Journal of Research in Management Sciences, 1, (2013) , http://www.researchgate.net/publication/266374097_Work_Life_Balance_of_Women_in_India.

¹³ AIR 1963 SC 1103

drug P.A.S. The appellant issued notice to the respondents to introduce three shifts to increase production.

Conciliation efforts failed and the matter was referred to Industrial Tribunal. The Tribunal gave its award against the appellant. The Tribunal held that the three shifts was inconvenient to the workers. The workers will be compelled to work at night and better quality of products will not be produced. The Tribunal also held that production of the drug known as P.A.S. did not require continuous working in three shifts. But the Tribunal reduced the number of holidays from 27 to 10.

The Indian Supreme Court held that the appellant be allowed to introduce three shifts in the factory. The process of manufacture of the drug P.A.S. was continuous and as it took 20 hours, three shifts were inevitable. In order to improve the quality and avoid rejection of the products, it was important that the shifts system should have three shifts. By introducing three shifts, both quality and quantity will improve. Three shifts were also allowed for Pharmaceutical Departments which produced ointment, injections, other pharmaceutical products, packing, filling, washing, tablet and capsules three shifts were allowed. The objection of the workers that three shifts would involve work at night and hence was not desirable was rejected. Another objection that the introduction of three shifts would involve the beginning of the work at 7-20 a.m. which was an unduly early hour for work, was also rejected. The honourable court rejected the contention of the appellant that the standing orders stipulated more than one shift, it was entirely in the discretion of the management to carry out changes without the due diligence by industrial adjudication. While allowing the introduction of three shifts, the court considered the importance and necessity of more production of the drug and the court was influenced by the existence of emergency in the country. The Supreme Court increased the number of paid holidays annually from 10 to 16 and reduced the number of public holidays to 16 every year. Both appeals were allowed.

Another consequence of long working hour is suicides of workers. Suicides due to pressure of work are increasing all over the world. Recent studies in the United States, Australia, Japan, South Korea, China, India and Taiwan have shown an increase in suicides due to deterioration in working conditions. A lot of changes have taken place due to globalisation which has changed their working patterns. Earlier, there were strong trade unions in industries to demand their rights and working conditions. But now, there exists the job insecurity, heavy work load, etc. In Foxconn Technology Group in China, eighteen migrant

workers who were of the age between 17 and 25 attempted suicide at one of Foxconn's main factories in 2010. Fourteen of them died. They were working on assembly lines manufacturing electronic gadgets for multinational companies such as Dell, Sony, Apple etc. One of the women suicide survivors of Foxconn, a seventeen-year-old girl, Tian Yu, said that she was forced to work 12 hour shifts without meals to work overtime and had only one day off every second week. Subsequently, Apple published a set of standards for treatment of workers. In a documentary 'Apple's Broken Promises' by BBC, it was shown that exhausted workers were asleep on 12 hour shifts and workers pressurized by managers at new supplier, Pegatron Shanghai, latest iPhone assemblers. Apple states that it monitors its supplier's practices with its annual supplier responsibility reports. However, the labour rights activists and researchers continue to allege that the workers in Apple's supply chains are abused¹⁴.

JUDICIARY ON GENDER EQUALITY

CASE 1

Vishaka & Others v. State of Rajasthan¹⁵, is a landmark case on prevention of sexual harassment at work place. A social worker was gang raped in a village in Rajasthan. The writ petition was filed by certain social activists and NGOs as a class action for securing the true principle of gender equality and to protect women from sexual harassment in all work places through a defined process. Also, for ensuring the protection of the fundamental rights of working women under articles 14, 19 and 21 of the Indian Constitution.

The Supreme Court issued certain guidelines to govern the behaviour of employers and others at work place. Gender equality includes protection from sexual harassment which is a universally recognised basic human right. In the absence of specific law to protect women from sexual harassment at workplace, the Supreme Court issued the following guidelines:

- 1) It is the duty of the employer or other responsible persons to prevent acts of sexual harassment and provide procedures to resolve, prosecute such activities.
- 2) Express prohibition of sexual harassment at workplace by notification, circular.
- 3) Rules of public sector include prohibitions and penalties against the offenders.

¹⁴Sarah Waters and Jenny Chan, *Workplace Suicides are rising and globalisation is to blame*, NEWSWEEK (Dec 14,2020), <https://www.newsweek.com/workplace=suicides-are-rising-and-ceos-are-blame-490941>.

¹⁵ (1997) 6 SCC 241

- 4) Standing orders under Industrial Employment Standing Orders Act, 1946 to include prohibition of sexual harassment at workplace.
- 5) Proper working conditions, work leisure, health and hygiene to be provided and there should not be any hostile environment to women.
- 6) Complaints for such acts under Indian Penal Code.
- 7) Complaint mechanism to be provided.¹⁶

Subsequently, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 came into force.

CASE 2

Mackinnon Mackenzie & Co. Ltd. v. Audrey D'Costa & Another¹⁷ On an application by the respondent under section 7 of the Equal Remuneration Act, 1976 before the authority on the ground that the total wages of confidential lady stenographers were less than the male stenographers in the general pool who were performing the same duties and it amounted to gender discrimination under the Act. The authority held that the respondent was not entitled to the relief as she was not paid at rates less favourable than those paid to male stenographers. On appeal, the appellate authority held that there was discrimination between male and female stenographers and the respondent was entitled to reliefs. The petitioner petitioned under article 226 of the Constitution of India challenging the order of the Appellate Authority. The Supreme Court upheld the order of the Appellate Authority and the matter was remitted back to the Appellate Authority, the Deputy Commissioner of Labour (Enforcement), under the Equal Remuneration Act, 1976 for computing the amount payable to the respondent.

FACTORS AFFECTING BALANCE OF WORK AND FAMILY

The India Strategy@75 report of Niti Aayog¹⁸ indicates that the female Labour Force Participation Rate (LFPR) has reduced from 23.7 (26.7% in rural areas and 16.2% in urban

¹⁶ <https://indiankanoon.org/doc/1031794>.

¹⁷(1987) 2 SCC 469

¹⁸NITI AAYOG, *Strategy for New India@75*, http://niti.gov.in/sites/default/files/2019-01/Strategy_for_New_India_0.pdf

areas) more so in the rural areas where it has gone down from 49% to 26.7%. Because of which she needs to balance between her professional commitment and the domestic responsibility. At times, it is challenging and most of them opt out of the professional role to manage the domestic chores. This fact has weakened the cause of women independence in India. To manage both the roles, an effective balance is essential between the professional and personal domestic responsibilities. Balancing to have an effective equilibrium between the personal and the professional commitment is what is dealt as the subject of 'work- life balance'. There are three factors which generally affect the work- life balance. One is the gender discrimination, work area ethics and policies and the family culture. When these three different areas are not complementing with each other in its performance, there is a conflict to disturb the work-life balance leading to high stress. To march ahead in this highly competitive world and more so the Indian demographic scene, it is needed to demonstrate the reduction of excessive work hours for women and increasing the time spent at home with their family.

In the present shrinking world, the work stress due to the lack of balance has led to the high levels of stress among women. A few Indian Corporates have identified this challenge and have undertaken many measures to balance the work-life but many remain blind to this fact in the race to achieve higher and higher targets for profit maximization. The globalization did bring the employment opportunities but it has taken away the happiness from the dining hall of our families. In the present-day, women is employed in many Corporates, more so in the Information Technology and Information Technology Enabled Services. In both these sectors, the working hours framework has been a challenge for the job seeking employees. They have to keep working in silence because if they raise issues they may be sacked by their bosses. Though there are many safeguards for the women working in Factories the same has been compromised in the Information Technology and Information Technology Enabled Services Sector. These companies have been exempted from the purview of the labour laws vide the Karnataka Government notification LD 53 LET 2013 dated January 25, 2014.

In an empirical analysis of call centre employees carried out to examine the intricate relationship between the structure and the employees, to withstand long hours of work, it was observed to undergo certain transformations in the characteristics. The study also revealed the

cultural transformation of urban Indian Labour into a global proletariat. In the participant observation conducted at International Tech Park, Bangalore, it was found that 53 per cent. workers worked in nine hours' shift while 29 per cent worked in eight hours' shift and 3 per cent were working in 10-12 hours shifts with a break of one hour. The schedule is same for sweatshop labourers who worked for MNC ancillary factories on the outskirts of Bangalore city. Sometimes, they had to work for 15 hours due to the shortage of staff. It was also observed that when call flow is high, group leaders do not let them take breaks.¹⁹ The shift working hours of the women working for Information Technology Enabled Services has seriously affected their work-life balance. And also, the project related works in the Information Technology organisation has also life-threatening challenges for women to work alone during holidays and off -work time. This has exposed women to mental stress and also physical threat also. Even though some companies have taken precautions, overall, the issues remain still a challenge without any positive commitment from the management of many companies. The law also has been compromised by giving exemption by the policy makers in the pretext of employment generation.

Research shows that flexible work arrangements allow individuals to integrate work and family responsibilities in time and space and are instrumental in achieving a healthy work and family balance. The presence of large number of women in their workforce and their drive for careers have resulted in increasing attention to work and family balance issue.²⁰

GOVERNMENT'S INITIATIVE TO EMPOWER WOMEN

The NITI Aayog (National Institution for Transforming India), is the Indian Government's think tank to provide advice on specialized subjects for innovation and entrepreneurial support to the Government of India, It has drafted a document for the purpose titled, 'The Strategy for New India@75²¹' which states that the women employment needs to be increased. It also advised on the increased Maternity Benefit Leave under the new Maternity Benefit (Amendment) Act, 2017, and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and redressal) Act, 2013, which have empowered and ensured the balance of the work stress at the working place. It redresses inequalities on gender bias. The

¹⁹ Divya C. McMillin, *Outsourcing Identities: Call Centres and Cultural Transformation in India*, 41, Economic and Political Weekly, 235-241, (2006).

²⁰ Reimara Valk & Vasanthi Srinivasan, *Work-Family Balance of Indian Women in Software Profession: A Qualitative Study*, (Dec 12), www.sciencedirect.com/science/article/S0970389610000832.

²¹ NITI AAYOG, https://niti.gov.in/writereaddata/files/Strategy_for_New_India (Dec. 12, 2020).

document also states that in the provision of the 'Swacch Bharat' mission compulsory toilets for women at work place and educational institutions needs to be initiated and their working conditions needs to be improved. It also covers the gender issues in the workplace, by committing to create and strengthen the institutional and structural barriers to enhance the female working environment and participation. The document further concludes by identifying the constraints as the inflexibility in working hours, lack of availability of creches, safety etc. The absence of opportunities for part-time work has also been identified as a factor affecting the work- life balance.²²

CONCLUSION AND SUGGESTIONS

Every worker gets pressurized by long working hours without rest and breaks. It takes a toll on their health. Especially, women have more stress and anxiety due to dual role played by them. Worker friendly non-standard work arrangement can reduce conflicts between work and family and reduce stress leading to a harmonious family life.

Three broad types of work life balance strategies have been created to help employees balance their work and non-work lives. Flexible work options, specialised leave policies and dependent care benefits. The flexible work options have become once again a topic of importance in the COVID-19 situation where companies and the employees have taken up work from home policies as the thing of the present and future. Flexitime, Job Sharing, Home telecommuting, Work-at-Home Programs, Part-time Work, Shorter work days for parents, Bereavement of Leave, Paid Maternity Leave, Paid leave to care for sick family members, Paternity Leave.²³ should be looked into as the options for balance in the changing environment of work culture more so for the working women.

Flexibility in work schedule options help women perform better and can ensure good health. There should be appropriate laws to protect women from working excessively long hours and unsocial working hours. There should be gap between the actual hours of work and preferred hours of work for women. The exemption of the Industrial Employment (Standing Orders) Act, 1946, for Information Technology and Information Technology Enabled Services should be reviewed or modified to suit the conditions and ensure the compliance with applicable laws on working time and adhere to the standards to stop exploitation of women. All the

²² *Id.*

²³ Supra note 11.

industries need to provide the dependent care assistance, child care facilities, laundry facilities and canteen facilities.

Women have to set their priorities in their professional as well as family lives to strike a balance between their work and family. They need support at work as well as at home. Policies and practices at work place should be supportive of women to carry out their dual responsibilities without any conflict and lead a peaceful life. The governments also need to relook into these above concepts of work from home and the flexible working time in the present era of technology and the Pandemic. Women being the torchbearers of society need all the help from the national and international law makers to ensure balanced work and quality life for a better future generation.