

INTERNATIONAL JOURNAL OF LAW  
MANAGEMENT & HUMANITIES  
[ISSN 2581-5369]

---

Volume 9 | Issue 4

---

2026

---

© 2026 International Journal of Law Management & Humanities

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

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

---

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

In case of any suggestions or complaints, kindly contact [support@vidhiaagaz.com](mailto:support@vidhiaagaz.com).

---

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

---

# The Struggles of the Slum Dwellers for a Dignified Standard of Living in India: A Socio-Legal Analysis

---

YASHODHARA PATTANAİK\*

## ABSTRACT

*The slum is commonly depicted as unclean and unsafe place with most people residing there by reason of force rather than choice. As a series of interventions have been laid out by the different governments through the years to meet the needs of the slum dwellers, less has been tackled to alter their lives. The absence of these very basic needs, in fact, affects the health and economic well-being of the slum dwellers. Presently, the government is concerned with planning the building infrastructure, which will serve as the abode for them in the future, while ignoring the present condition of living. The study attempts to focus on the view that the standard of living of slum dwellers, impacted by a lack of facilities, road and health, is closely tied to their right to live in a clean and healthy environment. Furthermore, the study emphasizes the lack of essential amenities in slums, such as safe and potable drinking water, decent and sanitary toilets, functioning drainage, proper electricity supply, appropriate garbage collection and disposal, and well-constructed, weather-resistant roads. Past attempts have only aimed to bring the most horrendous living conditions of slum residents into the limelight on account of lack of basic facilities. This paper intends to demonstrate that the need of slum residents better living conditions is a rightful extension of the right to shelter. The right to a decent shelter eventually shall be conferred. However, until then, some constructive and urgent action needs to be taken for the betterment of the prevailing conditions.*

**Keywords:** *Right to shelter, Right to adequate standard of living, slum, slum dwellers, housing, living condition.*

## I. INTRODUCTION

Urban areas are rapidly overflowing with people due to urbanization thereby becoming the magnet of opportunity. There is an imbalance between people who are in need of housing and the supply of the same due to the remarkable increase in population, coupled with the massive influx of people into these places. A slum establishes itself when the number of people greatly exceeds the number of available and affordable houses, and it provides a cheap alternative

---

\* Author is a Research Scholar at SOA National Institute of Law, Siksha O Anusandhan University, Bhubaneswar, Odisha, India.

where no affordable housing option exists. As per UN-Habitat, a slum household is one whose inhabitants suffer one or more of five deprivations: lack of access to improved drinking water, lack of access to improved sanitation, lack of sufficient living area, lack of housing durability, and lack of security of tenure.<sup>1</sup> The slum was found as a response to extremely poor economic conditions and the shortage of affordable housing, whereby people constructed their own houses and so made their own demand for housing less. Slums are an unfortunate and automatic by-product of the urbanization and industrialization process, of increase in population, of poverty and of the lack of reasonably priced housing options. All of this does not go without stating that slums are generated largely because of breakdowns in the ability of people to find themselves adequate and affordable housing. Slums provide improvised homes that are not only unsafe and unstable but are also overcrowded, lack basic minimum comforts, and carry no land rights. The scale is global. As of 2022 about 1.1 billion people were living in slums or slum-like conditions, and 85 per cent of them were concentrated in three regions, two of which lie in Asia: Central and Southern Asia, with about 359 million, and Eastern and South-Eastern Asia, with about 306 million.<sup>2</sup>

### **A. Slums in India**

Under the Indian law, slum has been defined by the National Sample Survey Office as “a compact settlement with a collection of poorly built tenements, mostly of temporary nature, crowded together usually with inadequate sanitary and drinking water facilities in unhygienic conditions.”<sup>3</sup> Odisha has legislated separately on the subject. Section 2(r) of the Odisha Land Rights to Slum Dwellers Act 2017 adds a household threshold and a land qualifier, defining a slum as “a compact settlement of at least twenty households with a collection of poorly built tenements, mostly of temporary nature, crowded together usually with inadequate sanitary and drinking water facilities in unhygienic conditions, which may be on the State Government land in an urban area”,<sup>4</sup> and section 2(s) defines a slum dweller as “any landless person in occupation within the limits of a slum area”.<sup>5</sup>

---

<sup>1</sup> UN-HABITAT, SDG INDICATOR 11.1.1 TRAINING MODULE: ADEQUATE HOUSING AND SLUM UPGRADING (UNITED NATIONS HUMAN SETTLEMENTS PROGRAMME 2018).

<sup>2</sup> UNITED NATIONS, THE SUSTAINABLE DEVELOPMENT GOALS REPORT 2023: SPECIAL EDITION, TOWARDS A RESCUE PLAN FOR PEOPLE AND PLANET (UNITED NATIONS 2023), Goal 11.

<sup>3</sup> NATIONAL SAMPLE SURVEY OFFICE, URBAN SLUMS IN INDIA, 2012, NSS Report No. 561 (69/0.21) (MINISTRY OF STATISTICS AND PROGRAMME IMPLEMENTATION 2014); see also REPORT OF THE COMMITTEE ON SLUM STATISTICS/CENSUS (NATIONAL BUILDINGS ORGANISATION, MINISTRY OF HOUSING AND URBAN POVERTY ALLEVIATION 2010).

<sup>4</sup> Odisha Land Rights to Slum Dwellers Act, 2017 (Odisha Act 10 of 2017), s. 2(r).

<sup>5</sup> *Id.* s. 2(s).

That Act does not, however, reach the field site of the present study. It operates in Municipalities and Notified Area Councils and does not extend to Odisha's five Municipal Corporations, one of which is Cuttack. The parallel provision for Corporation areas was made in the same year by the Odisha Municipal Corporation (Amendment) Act 2017, which wrote into the Odisha Municipal Corporation Act 2003 a scheme substantially similar to that of the 2017 Act for conferring property rights on households living in slums within Corporation limits.<sup>6</sup> The two statutes are not drafted alike. The Odisha Municipal Corporation Act 2003 uses numbered rather than lettered clauses, carries no twenty-household threshold, and contains no separate definition of a slum dweller at all. Its section 2(75) defines "slum or informal settlements" far more broadly, as "all under serviced settlements, be they unauthorized occupation of land, congested inter-city built up areas, fringe areas, unauthorized developments, villages within Corporation area and in the periphery [*sic*], irrespective of tenure of ownership of land use".<sup>7</sup> The narrower definitions in sections 2(r) and 2(s) of the 2017 Act are adopted in this study as a working description of the settlement examined, and not as the law governing the site.

The administrative vehicle for both statutes is the Odisha Liveable Habitat Mission, known as the Jaga Mission, which surveys slums, issues Land Rights Certificates and upgrades settlements *in situ* rather than by relocation. The Mission began under the 2017 Act in Municipalities and Notified Area Councils. It was extended by a decision of the State Cabinet to the five Municipal Corporations of Bhubaneswar, Cuttack, Berhampur, Rourkela and Sambalpur, and Land Rights Certificates began to be issued in Corporation areas from 2022; in August 2023 certificates were distributed to about 65,000 families in 875 slums, the first phase covering the five Corporations.<sup>8</sup> The settlement studied here therefore lies within the Mission's extended reach, and the tenure position of its residents turns on the Corporation-side amendment rather than on the 2017 Act.

The homeless have no option but to go to the slums, since the place is less of a hassle and provides cheap housing, which is affordable to the extremely poor. Various reasons for the formation of slums go as follows:

I. Migration had happened because of the fast urbanization and industrialization since these two attracted work opportunities. The uncontrolled growth of population due to migration strained

---

<sup>6</sup> Odisha Municipal Corporation (Amendment) Act, 2017, amending the Odisha Municipal Corporation Act, 2003; see Mugdha Mohapatra, *Land Rights for Urban Slum Dwellers: A Review of the Odisha Land Rights to Slum Dwellers Act, 2017 and the Jaga Mission* (CENTRE FOR POLICY RESEARCH Working Paper, 2022).

<sup>7</sup> Odisha Municipal Corporation Act, 2003, s. 2(75).

<sup>8</sup> HOUSING AND URBAN DEVELOPMENT DEPARTMENT, GOVERNMENT OF ODISHA, JAGA MISSION: ODISHA LIVEABLE HABITAT MISSION (2023); Mohapatra, *supra* note 6.

the urban areas. The emergence of sudden population increase was not planned ahead, thus it was not absorbed into the present system of living. For many uneducated and unskilled, a better living condition and financial circumstances was alluring enough for the migrants to stay on and keep looking for better opportunity in the work force.

II. Migration altered the supply and demand of housing in great contrast. In the urban areas available housing does not meet the needs and financial constraints of these migrants and affordable housing is comparatively far scarcer. Also, the urban region was deficient in terms of resources available for the impoverished to avail themselves of land in planning, development, and expansion.

III. Although they migrate in search of better economic opportunities and sustenance, they have to take low wages due to high competition in the job market. This further allows the employers to take advantage of paying the smallest amount possible for difficult work. This forces them to continue living in slums for longer.

IV. For the last twenty years, funding deficiencies have plagued government efforts to provide housing and other essential infrastructure and facilities. The absence of financial resources has much to do with corruption at manifestly high places. Generally, at the lowest level, political connection can put a person on the house allotment lists even when they do not meet eligibility criteria. This ultimately robs the deserving of their chance, thus keeping on with the cycle of deprivation.

The term slum evokes stigma and a perception of impoverished and filthy neighborhoods. Residents of slum areas are perceived to be often marginalized by mainstream society. However, these are the people that carry out tasks that give society a sense of comfort, such as garbage collectors, rickshaw pullers, garage mechanics, maids and coolies, which is usually just swept under the carpet. The 2011 Census enumerated 65.49 million people living in slums, in 13.92 million households across 2,613 slum-reported towns, which is 17.4 per cent of the urban population of the reporting States and Union Territories.<sup>9</sup> The State-wise distribution is set out in Table I.

The State-wise and Union Territory-wise distribution of slum households and slum population recorded in the 2011 Census is set out in Table I.<sup>10</sup>

---

<sup>9</sup> NATIONAL BUILDINGS ORGANISATION, *SLUMS IN INDIA: A STATISTICAL COMPENDIUM 2015* (MINISTRY OF HOUSING AND URBAN POVERTY ALLEVIATION 2015) (65.49 million persons in 13.92 million households across 2,613 slum-reported towns in 31 States and Union Territories, being 17.4 per cent of their urban population).

<sup>10</sup> MINISTRY OF HOUSING AND URBAN AFFAIRS, *State/UT-wise Number of Towns, Slum Households and Slum Population under PRADHAN MANTRI AWAS YOJANA (Urban) as per Census 2011*, Open Government Data Platform India (as on 29 July 2024), <https://www.data.gov.in/resource/stateut-wise-number-towns-slum-households-and->

| State/UT                    | Slum Household | Slum Population |
|-----------------------------|----------------|-----------------|
| Andaman and Nicobar Islands | 3324           | 14172           |
| Andhra Pradesh              | 2431474        | 10186934        |
| Arunachal Pradesh           | 3479           | 15562           |
| Assam                       | 42533          | 197266          |
| Bihar                       | 216496         | 1237682         |
| Chandigarh                  | 21704          | 95135           |
| Chhattisgarh                | 413831         | 1898931         |
| Dadra and Nagar Haveli      | 0              | 0               |
| Daman and Diu               | 0              | 0               |
| Goa                         | 5497           | 26247           |
| Gujarat                     | 345998         | 1680095         |
| Haryana                     | 332697         | 1662305         |
| Himachal Pradesh            | 14385          | 61312           |
| Jammu and Kashmir           | 103633         | 662062          |
| Jharkhand                   | 72544          | 372999          |
| Karnataka                   | 707662         | 3291434         |
| Kerala                      | 45417          | 202048          |
| Lakshadweep                 | 0              | 0               |
| Madhya Pradesh              | 1117764        | 5688993         |
| Maharashtra                 | 2499948        | 11848423        |
| Manipur                     | 0              | 0               |
| Meghalaya                   | 10518          | 57418           |
| Mizoram                     | 15987          | 78561           |
| Nagaland                    | 17152          | 82324           |
| NCT of Delhi                | 367893         | 1785390         |
| Odisha                      | 350032         | 1560303         |
| Puducherry                  | 34839          | 144573          |
| Punjab                      | 293928         | 1460518         |
| Rajasthan                   | 394391         | 2068000         |
| Sikkim                      | 7203           | 31378           |
| Tamil Nadu                  | 1463689        | 5798459         |
| Tripura                     | 34143          | 139780          |
| Uttar Pradesh               | 1066363        | 6239965         |
| Uttarakhand                 | 93911          | 487741          |
| West Bengal                 | 1391756        | 6418594         |

Table I: State/Union Territory wise slum household and slum population as per Census 2011

## **B. Slum Dwellers Right to Shelter and Right to an Adequate Standard of Living**

The right to life is enshrined as a fundamental right of every citizen of India in Article 21 of the Constitution. The judiciary has expanded the interpretation of this right to include varying definitions of life and of what is entitled to be called by that name, in a plethora of judgments and decisions, rather than restricting it simply to animal needs. Two such major rights under the legal interpretation of the right to life are the right to shelter and the right to a decent standard of living. While the right to shelter gives rise to a man being able to live and grow in a respectable environment, the right to a decent standard of living provides the sustenance to do so.

An individual's shelter is a prerequisite for his existence and development; hence, the right to shelter has come into play with increasing poverty and homelessness. This is an internationally acknowledged right, coming under Article 25 of the 1948 Universal Declaration of Human Rights and Article 11 of the 1966 International Covenant on Economic, Social and Cultural Rights. Though there is no formal declaration of the need for shelter as a fundamental right under the Indian Constitution, it has become one because of the judgments passed. The first significant evolution of the concept arose in *Olga Tellis v. Bombay Municipal Corporation*,<sup>11</sup> wherein the municipality removed residents of pavements who had built homes on land meant for passage. The petitions arose out of a demolition drive begun in the monsoon months, carried out without notice and without any offer of an alternative, which left the dwellers destitute in the worst weather of the Bombay year. The Court did not, however, condemn the municipality. It upheld the constitutional validity of sections 312 to 314 of the Bombay Municipal Corporation Act 1888 and held that the procedure they lay down for removing encroachments from public streets and footpaths was not unreasonable. What the Court did hold was that livelihood is inseparable from life, so that the right to livelihood is a facet of the right to life in Article 21, and that the power of eviction must accordingly be exercised fairly and after hearing those affected. On that footing it directed that no dwelling be removed until 31 October 1985, one month after the end of that year's monsoon, that pavement dwellers recorded in the 1976 census be given alternative pitches, and that slums standing for twenty years or more not be cleared unless the land was required for a public purpose, in which case alternative sites were to be provided. The right to shelter itself came later. In *Chameli Singh v. State of U.P.* the Supreme Court held the right to shelter to be an integral part of the right to life, and therefore a fundamental right under Article 21.<sup>12</sup>

---

<sup>11</sup> *Olga Tellis v. Bombay Municipal Corporation*, (1985) 3 SCC 545 : AIR 1986 SC 180.

<sup>12</sup> *Chameli Singh v. State of U.P.*, (1996) 2 SCC 549 : AIR 1996 SC 1051.

Further, in *Shantistar Builders v. Narayan Khimalal Totame*,<sup>13</sup> the bench drew a fine line between the needs of humans and the needs of animals. It is important to bear this in mind, the bench said, that the right to life goes beyond clothing, food and shelter in a civilized society. Its width further broadens to include rights to decent housing, work, clothes, and environments conducive to growth and all-round development. An adequate and well built house with a safe and livable standard of living would be sufficient. This case widened the interpretation of Article 21 and established the right to shelter as a fundamental right of citizens, drawn from the right to life, covering the right to shelter along with a reasonable quality of living.

Article 25 of the Universal Declaration of Human Rights, 1948, and Article 11 of the International Covenant on Economic, Social and Cultural Rights of 1966 are both aimed at achieving a better quality of life for all people in the world. Through the judicial interpretation of Article 21, this right is further entrenched into Indian law. It must be noted that this interpretation of the law shall cover all aspects of life which may be touched upon, without being tainted by prejudice and economic inequality. The bench in *Chameli Singh* maintained that the right to life contained in Article 21 contains the right to live with dignity, and that such dignity encompasses access to shelter, which assures fundamental human development rather than just the protection of an individual's basic interests. A modestly built and modestly priced house with a sufficient level of facilities would provide an adequate quality of life. The Court described the right to shelter as amounting to considerably more than a roof over one's head: it takes in adequate living space, a safe and decent structure, clean surroundings, sufficient light, pure air and water, electricity, sanitation and other civic amenities such as roads.<sup>14</sup> Read together with *Olga Tellis*, the position that emerges is that an eviction carried out without due process and without any provision of an alternative is inconsistent with the right to live with dignity. Development must also ensure the protection of slum dwellers' rights. The right to an adequate standard of living has thereby been solidified as an ingredient of Article 21. There can be no question that a house would be of little use to anyone who does not have a decent living environment and basic amenities such as water, electricity, sanitation, roads and access to civic services. Without these amenities and civic services, there can hardly be any fulfilling of a decent standard of living. This very case says that the right to shelter goes well beyond fulfilling the needs of cats and dogs; it is a basic human need that must be met for the development of people.

---

<sup>13</sup> *Shantistar Builders v. Narayan Khimalal Totame*, (1990) 1 SCC 520 : AIR 1990 SC 630.

<sup>14</sup> *Chameli Singh v. State of U.P.*, *supra* note 12.

### **C. Lack of Shelter and Adequate Standard of Living**

Even today, several slums are devoid of basic utilities and decent housing infrastructure. Even after all legislative enactments and court pronouncements, these areas have still not achieved a minimum standard of living, for various reasons that infringe on the dignity of their residents. Some prime justifications for the absence of it are as follows:

i. The migratory movement of people in large numbers to urban areas is the principal cause of the lack of affordable housing and essential services. Furthermore, the metropolitan area simply cannot cope with this much demand because it is already very difficult to provide basic services and housing infrastructure to all the people there at present.

ii. Inequality in earnings is the next most important factor. A low-income population has to manage on whatever meager resources it can secure, irrespective of their quality. The slum dwellers are part of the economically weaker section. The low income makes it difficult for them to access the basic necessities of a human life, forcing them to settle with cheap and poor quality alternatives.

iii. Many of the slum areas are not legally recognized by the municipality. They fall in the category of non-notified slums. This cuts off their chances of getting any assistance from the government and leaves them unable to take the benefit of any assistance schemes provided for slum inhabitants. Basic services and civic amenities are significantly impacted by the legal prescription.

iv. The slum dwellers are mostly dependent on politicians for their identification and for the provision of services such as housing, water and sanitation, electricity and healthcare. Politically, the slum is relevant till the elections, only to get the votes of the slum dwellers in their favor. Though they responded by setting up programs and making promises, after elections such commitments tend to become meaningless to those politicians. The slum dwellers are often treated as vote banks. They are promised the earth and the moon, but as of now nothing has been fruitful. Due to the lack of adequate political representation, the dwellers have barely gained any assistance to secure better services and resources.

v. The fiscal constraints besides an ill-managed allocation of funds have hampered the ability to provide facilities and infrastructure. The worst aspects of this shortfall are the widespread corruption and the personal benefit-driven abuse of the current infrastructure. The impoverished slum dwellers wait for government, non-governmental organizations, civil society, or the legal system to come up with the promise and action of help.

#### **D. Literature Review**

The uncontrolled growth of population and poor economic situations are two factors that led to slums' formation (Sinthia, 2020). The article talks about the need for a better living standard and better infrastructural conditions in urban slums, and the problems slum dwellers encounter due to urbanization. Due to urbanization, the slum community has further grown over the years, concentrating mainly in urban areas (Demehin, 2022). The increase of slums, being unofficial and illegal settlements especially in the urban region, is adversely due to the growth of population (Kaibarta et al., 2022). A better quality of life, more opportunities and facilities have proved to be influential factors in the creation of slums (Ghosh and Chakrabarti, 2021). There is no longer housing available as there previously was; hence, slums are growing (Shekhar, 2020). Better living standards at urban regions make them attractive destinations, but homes are scarce and the people at the bottom are most affected by this shortage. Even semi urban cities are not spared by this phenomenon, as slums are also springing up in these areas. Basic amenities are mutually denied in slums (Padhi et al., 2022). Differences are caused by unequal development within slums as a result of uneven development efforts. Interregional disparity is increasingly blamed for the continued existence of slums. Nayak and Jatav (2023) have observed that basic services vary in availability and accessibility between notified and non-notified slums.

More than two people cramped up in a single room is a characteristic of a slum house (Nix et al., 2020). It has been reviewed in the article that a basic minimal infrastructure is necessary to enjoy a decent standard of life. The two primary types of dwellings available in slums are kutcha and pucca houses. While pucca houses are considered as development, a detailed study of the housing conditions in informal settlements paints a clear picture of why such residences in slum areas must not be counted as development. The housing condition of slum dwellers mostly subjects them to adverse environmental situations, often due to overcrowding (Chhetri, 2023). For long, the idea of one-size-fits-all has been used in the name of legislation and policy concerning slums. The size here refers to Delhi, which is modeled to create a knowledge hegemony through laws and policies for slums (Palat Narayanan, 2020). It would be incorrect to take Delhi, an urban metropolitan center with strong political connections, as a test case while designing measures for slums. Killemsetty et al. (2022) draw attention to the drawbacks of one-size-fits-all policies and to the experiences of slum dwellers who have spent time living without basic amenities and shelter. The article advocates community participation, which would bring to light those multiple needs within the slum that government needs to know about. Again, schemes and programs developed for slums have probably some bias, assuming similar needs

of everyone within the slum (Rigon, 2022). The article has addressed that community participation would be able to bring out the various needs of the dwellers. Admittedly, poor addressing of the preferences of slum dwellers is due to a lack of community participation (Killemsetty and Patel, 2024). In order for policies to actually be effective in improving housing and quality of life, the article argues that policymakers must take slum inhabitants' preferences into consideration. Dupont and Gowda (2020) explain the plight of slum dwellers as a result of wrong eligibility conditions or of being denied entry into the schemes. Many deserving recipients are kept out of the loop and prevented from participating in programmes and policies due to the lack of proper eligibility criteria.

Sharing sanitary facilities is what the socio-economic concept of the slum propounds, because such shared facilities are free from cost barriers and accessible to all the residents (Lee, 2023). However, hygiene conditions, usability and security are still at stake. Unrecognized and non-notified slums are in a worse position for this. The government's sluggish provision of essential services has caused a backlog in delivery to slums (Chikozho et al., 2019). The need for waste management and sanitation in slums has been acknowledged; however, water quality is on the decline. This emphasizes that overall improvement in essential services is needed, and not just some specific services. Slums are filthy, dirty and in appalling conditions, all of which compromises health (Alaazi and Aganah, 2020). Poor road conditions will limit the development potential of an area (Sewell, 2016). A very poorly maintained road steals away so many advantages and opportunities of living. As always, women become the worst victims, having to carry the load themselves. Many students started dropping out because they are required to walk for miles to reach school. These unpaved or partially paved roads also make it hard for people to access health care. Slums offer subsidized and accessible housing; despite this unfriendly atmosphere and these horrible conditions of living, they continue to grow in population and in number as well.

In household and life, electricity plays a crucial role. It makes the more common domestic duties easier, but more significantly it ensures safety, thereby elevating standards of living. Electricity access is a disputed subject for slums since the access might be legally or illegally obtained. Some may have inadequate access while some may be totally cut off from electricity supply. Some slums or slum households have to turn to informal energy access to meet their electricity requirement (Yaguma et al., 2022). Many slum women do not care to make their way outside after dusk because there is no lighting. Accidents occur frequently because the road through the slum is not properly illuminated and is full of potholes. Ngwenyama (2023) comments on a judgment in the *Sibanyoni* case, which held that an occupier's access to electricity falls within

the protection of human dignity under the Extension of Security of Tenure Act 1997 of South Africa.

The impacts of climate change and of natural calamities upon slum people are hardly noticed. These problems further accumulate the vulnerability. The effect of climate change on the slum is prominently seen in the form of property damage (Pandey et al., 2018). Habeeb and Javaid (2019) have mentioned that the lack of discussion on the effects of natural disasters and climate change on slums and their inhabitants reflects the absence of such research, even though the effects of natural disasters are known to affect slums more than any other settlement. During natural disasters and monsoons, the previously poor environment and sanitation deteriorated into worse conditions. These are the evidence of socio-economic struggle and environmental vulnerability found in the slum (Khan et al., 2024). The effects of these climates actually extend beyond urban slums to rural impoverished neighboring locations and even to mountainous locales. It urges the need to investigate the socio-ecology of slums to lessen the effects of disasters while also increasing the involvement of communities in inclusive planning.

After going through all these pieces of literature and reports, the study presents two objectives and two hypotheses. The first objective is to study the right to shelter and to an adequate standard of living of the slum dwellers. The second objective is to identify the reality of inadequate basic services and to understand the problems caused by it. Similarly, this work presents two hypotheses. The first hypothesis says that poor infrastructure has a major impact on the life of slum dwellers. The second hypothesis says that the right to life also includes the right to an adequate standard of living. This research work will prove or disprove both the hypotheses through both qualitative and quantitative work.

## **II. METHODOLOGY**

In the State of Odisha, one can find slums here and there. The dwellings are mostly constructed on government properties without permission. This research was conducted at a slum situated in the Kalyani Nagar region of Cuttack city. As noted above, it is the Odisha Municipal Corporation (Amendment) Act 2017, together with the extension of the Jaga Mission to Corporation areas, that empowers the Cuttack Municipal Corporation to recognise slums within its limits and to confer land rights on their residents, which makes this settlement a useful choice for study. The selection of the site was made by convenience sampling; the respondents within the site were then chosen purposively. This study uses both qualitative and quantitative research methodology. The study used non-participant observation and a structured questionnaire for data collection. For that, twenty questions were translated into the local language and were then

put to the target sample. The answers to the questionnaire, along with the observations from non-participant observation, were then analyzed qualitatively. The sample consists of forty participants. The recorded respondents are slum dwellers who have no understanding of their legal rights. They do not speak English. After the questionnaire was translated into their local language, they were able to answer the questions, which were recorded (the author is fluent in the local language). They were then asked to grade the use of basic facilities from 1 to 5, where the scale goes from strongly dissatisfied (1) to dissatisfied (2), to neither dissatisfied nor satisfied (3), to satisfied (4) and then strongly satisfied (5). The responses to the satisfaction question were put into a bar graph. The process of data collection was voluntary; the participants responded freely, without any coercion, and the participants were all adults.

### **III. RESULTS AND DISCUSSION**

#### **A. Findings**

Millions of people face the lack of basic amenities in the slums. While some slums would be enjoying access to some type of amenity, another slum would be enjoying some other type. The lack of basic amenities affects the living standard of the people in the slum. Another issue that seriously needs discussion is the atmospheric and fire safety of the impoverished population and their dwellings. The observation method used for this research has gathered the findings presented below. Increased population and urbanization primarily become the reason for the rise in slums. Because of the large number of migrants and with very few affordable houses, slums are usually overcrowded. Nothing in the house offers privacy or space. Tight and narrow areas to live in will also force many family members to adapt to their limited living space.

Slum housings are usually improvised due to their way of emergence and the financial problems of the people living in them. The dwellings are usually constructed using cardboard, tarpaulin, asbestos, straw thatches, bamboo, and many other cheap and unsafe materials. Most of these improvised materials are cheap and fairly available. The dire financial conditions of the inhabitants tend to motivate them to build a dwelling with anything they can find.

It is important to note that the land on which slum residents have built their houses does not belong to them. Either the government owns the land or some private entity owns it. The owner can easily ask them to vacate, or evict them without any prior notice and without following the required procedure, at any time, which though it is a violation of law is a common practice. This increases the threat of eviction, and a sudden eviction without any assistance for resettlement has the potential to leave them helpless, forcing them to start from scratch again, which is quite difficult.

There are no individual taps in the slums; the water comes from the government provided community tap, tube wells, or a nearby pond or groundwater. Some slums have to rely on getting water only from government taps because broken sewage systems have affected most wells. Access to these taps is not easy at any given time of the day, as water is available only a few hours and women have to queue to get water from them. Still, the water from these taps is used for consumption and is found to be reasonably safe.

The sewage systems exist poorly where they do exist, and they are often not maintained properly, leading to a breakdown in their functioning. This allows sewerage to flow above the ground surface and eventually contaminate the groundwater, which is the source of drinking water and of other forms of consumption for many slum residents. The incredibly poor waste management prevalent in the slum only goes to contribute to the heaps of waste abandoned in the open, turning the slum into a place where disease thrives.

Many slums do not have toilets. Some slums have community toilets but they are mostly unsanitary or unsafe for use due to structural defects. The few toilets available in the slum are further reduced by a lack of maintenance. This leads to open urination and defecation. There are quite a few occurrences where men and children are found bathing in the open, while women cannot enjoy a good shower and usually end up missing a bath for a few days. Sometimes, people bathe using makeshift bathrooms made from tarpaulin, large sheets of polythene or sarees whenever they can.

Generally speaking, health issues related to the slums are many. The unclean and filthy living conditions and the filthy restrooms with tainted water are the main reason why people experience health issues. Waste disposal is observed to have been done in local drainage or in the open. The slum today is covered in litter because of neglect and poor waste management. This converts the dwelling ground into a disease ground, with a heightened possibility of health hazards, adding further disadvantage to the ecosystem. Improper disposal of waste contaminates and destroys the environment. Strictly, in the city of Cuttack there is a waste management body that sends a garbage vehicle to visit the slums once a day, just as it does to all other areas in the municipality. This has helped the people live in a clean surrounding, at least with fewer health related issues.

Not every slum has streetlights, forcing the people to depend on alternative means of energy. Such alternate means as kerosene or firewood not only adversely affect the environment but also the health of these people, leading to respiratory diseases. Slums that come under the category of registered and notified ones also face partial or total power cuts. The condition of

the non-notified slums is worse because the municipality has neither registered nor notified them, and as such they often fall completely into darkness. Loss of electricity does not just disrupt everyday life but also miserably impacts health, livelihood activities and access to education. In many slums, the use of toilets by women at night is majorly dependent on electricity.

There are slums found in and around areas without roads, or with very poor quality roads. The quality of roads in slum areas is mostly either bad or deplorable, where walking on foot is the only way out. Most residents are affected by natural disasters because houses are constructed with cheap quality materials, leaving them to fend for themselves. The overall degree of satisfaction with the amenities is presented in Figure I.

Figure I. The slum dwellers, on a scale of 1 to 5, rated their experience and satisfaction with the basic amenities they are using.

## **B. Government Schemes**

At all levels of government, many programs have been launched for the purpose of providing housing and other essentials for the urban poor. Here, the three programs most popularly known as the Pradhan Mantri Awas Yojana (PMAY), the Rajiv Awas Yojana (RAY) and Basic Services for the Urban Poor have certainly laid down measures for providing better living conditions to many homeless people. Yet some very important issues must be properly resolved before these projects can actually benefit the underprivileged.

Under the PMAY (Urban) guidelines a beneficiary family comprises husband, wife, unmarried sons and unmarried daughters; the family must own no pucca house anywhere in India, and every applicant must furnish an Aadhaar number.<sup>15</sup> Though the scheme is a substantial initiative for housing slum and pavement dwellers, these requirements sit awkwardly with the conditions observed in the field. Many dwellers hold no proof of identity, no title to the land they occupy and no formal record of income, which makes it difficult for them to establish eligibility. The difficulty is documented in the literature: exclusion from slum housing programmes has been traced to eligibility conditions that deserving households cannot satisfy, so that beneficiaries who ought to qualify are kept out.<sup>16</sup> The definition of the beneficiary family is also narrower than Odisha's own statute, which counts as family any other person related by blood and wholly

---

<sup>15</sup> MINISTRY OF HOUSING AND URBAN AFFAIRS, PRADHAN MANTRI AWAS YOJANA (URBAN): HOUSING FOR ALL, SCHEME GUIDELINES (2021) (beneficiary family to comprise husband, wife, unmarried sons and/or unmarried daughters; no pucca house to be owned anywhere in India; Aadhaar to be furnished).

<sup>16</sup> Veronique Dupont & M. M. S. Gowda, *Slum-free City Planning versus Durable Slums: Insights from Delhi, India*, 12 INT'L J. URB. SUSTAINABLE DEV. 34 (2020).

dependent on the slum dweller, and so reaches the dependent aged and the dependent sick whom the central scheme does not name.

As per the guidelines set forth in RAY, it was aimed particularly at urban slums.<sup>17</sup> The omission of slums in rural, remote and urban fringe areas from that housing policy is rather regrettable. Poor execution of the policies led to financial losses, bad planning and inadequate provision of the basic necessities, which further aggravated the impoverishment of slums and the agony of slum residents.

The Basic Services for the Urban Poor project under the Jawaharlal Nehru National Urban Renewal Mission looked into providing affordable housing, basic utilities and municipal services for the urban poor residing in slum settlements. Having said that, this sub-mission fell short in implementation, as only a handful of cities could carry out the task. The failure to address the basic requirements of the urban poor was largely attributed to an ignorance of the realities on the ground. The program did not involve sufficient community participation to understand the needs of the poor effectively. A lack of funds and poor design were primarily responsible for the failure of this scheme to uplift the living standards of the urban poor.

### **C. Judicial Pronouncements**

The majority of the slum population are the poorest of the poor. They make up the most deprived section of society. Article 38 of the Indian Constitution places on the State the duty to secure a social order for the promotion of welfare and to strive to minimise inequalities in income, status, facilities and opportunities. Article 46 further obliges the State to promote with special care the educational and economic interests of the weaker sections of the people, and in particular of the Scheduled Castes and the Scheduled Tribes, and to protect them from social injustice and all forms of exploitation. Raising the level of nutrition and the standard of living and improving public health are mentioned in Article 47. These provisions leave little doubt that it is the duty of the State to promote and uplift its people in ensuring their overall growth and well-being. But, for many reasons, the slum population is still on the rise. Sadly, the obstinate issue of poverty and inequality persists in society amid intermittent promises, while many are still languishing in the poorest areas. The rights of slum residents have long engaged the judiciary. The following case laws show how the judiciary helps the less fortunate.

---

<sup>17</sup> MINISTRY OF HOUSING AND URBAN POVERTY ALLEVIATION, RAJIV AWAS YOJANA: SCHEME GUIDELINES 2013-2022 (2013). The scheme was discontinued by order dated 19 May 2015 and subsumed into PRADHAN MANTRI AWAS YOJANA (Urban).

In *Pani Haq Samiti v. Brihanmumbai Municipal Corporation*<sup>18</sup> it was held that the fundamental rights of slum dwellers are not to be violated merely because their homes are unauthorised. The court held that the right to get water is an integral part of the right to life under Article 21, and directed the corporation to frame a policy for supplying water to all citizens, including occupants of illegal structures. The court was careful to add that such a supply confers no legality on the structure and no protection from demolition, and that water may be charged for at a higher rate than for authorised premises.

In *Almitra H. Patel v. Union of India*<sup>19</sup> the Court dealt with solid waste management in Delhi and enforced the statutory sanitation duties of the municipal bodies, issuing directions on street sweeping, littering fines, landfill sites and compost plants. The case is authority for the proposition that the relevant authorities must discharge their sanitation functions with the vigilance required and maintain a clean and healthy environment. It should be read with care by anyone arguing for slum dwellers, because on the question of encroachment the Court directed the authorities to prevent fresh occupation of public land for dwellings.

The bench ruled in *Virendra Gaur v. State of Haryana*<sup>20</sup> that every person has the right to live in a pollution-free, hygienic environment. The right to hygiene is subsumed in the right to life and the right to lead a healthy life. The right to a hygienic environment was brought within the scope of Article 21, being an aspect of the right to life. A pollution free environment *vis-a-vis* the right to life was made the responsibility of the State to secure, because pollution is detrimental to the health and the quality of life of the people.

The Court in *State of Himachal Pradesh v. Umed Ram Sharma*<sup>21</sup> opined that good roads are essential to a good life. It made very clear that in order for people to exercise their right to life there must be roads of good quality, and that the failure to provide them denies that right. Roads were therefore held to be very much a necessity and one of the important means of communication in life. Furthermore, good roads become a means of enhancing living standards, and this connotation that Article 21 invokes further clarifies its meaning. The Court also cautioned, however, that courts cannot direct expenditure beyond the amounts the legislature has budgeted.

---

<sup>18</sup> *Pani Haq Samiti v. Brihanmumbai Municipal Corporation*, PIL No. 10 of 2012 (Bombay High Court, 15 December 2014).

<sup>19</sup> *Almitra H. Patel v. Union of India*, (2000) 2 SCC 679 : AIR 2000 SC 1256.

<sup>20</sup> *Virendra Gaur v. State of Haryana*, (1995) 2 SCC 577 : 1994 Supp (6) SCR 78.

<sup>21</sup> *State of Himachal Pradesh v. Umed Ram Sharma*, (1986) 2 SCC 68 : AIR 1986 SC 847.

The bench in *Municipal Council, Ratlam v. Vardhichand*<sup>22</sup> addressed the public health responsibilities of the municipality. Proceedings had been taken under section 133 of the Code of Criminal Procedure over open drains, stagnant water, stench and open defecation in a Ratlam ward. The Court rejected the municipality's plea of financial inability, holding that statutory obligations and fundamental rights must be discharged regardless of budgetary provision, and that a body constituted for the very purpose of preserving public health cannot run away from its principal duty by pleading a want of funds. The court made it very clear that insufficient funding is no excuse for a drain that does not work.

The Sustainable Development Goals Report 2023 indicates that the Sustainable Development Goals set for 2030 will not be met on present trends: of roughly 140 assessable targets, only about 15 per cent are on track, close to half are moderately or severely off track, and more than 30 per cent have seen no movement or have regressed below the 2015 baseline.<sup>23</sup> One goal, the elimination of poverty, has been hard on the government since the emergence of the corona pandemic. The most worrisome point about it is the lack of basic infrastructure and amenities. The allocation of residences takes such a long period, and the slum dwellers would not vacate the slum area unless rehabilitated satisfactorily or offered some other alternative place of dwelling. Until then, the residents of the slum should at least have a decent place for living, with the conditions provided there being acceptable to live with. Daily, slums are afflicted with many problems. Some such small occurrences have become daily problems for the slum dwellers and are now a part of their life. Hence, after thorough analysis, our research has affirmed both of our hypotheses. The observation and questionnaire method used for this research affirmed the first hypothesis. The judicial interpretations mentioned in the study have affirmed the second.

#### IV. CONCLUSION AND SUGGESTIONS

The existence of slums is due to uncontrolled population growth and urbanization. Owning a house is the greatest aspiration of slum inhabitants. It is considered a necessity and will definitely be provided to the slum dwellers sooner or later. Nevertheless, that intention takes priority over the present need. It is frightful to see how little consideration is given to the fact that there is not enough money to achieve a decent living standard today. When housing is likely to be built or allocated is anybody's guess; unless some remedial action is taken now, slum dwellers will continue to face miserable conditions. A need arises to examine the absence of basic amenities: clean toilets, electricity, a working sewage system, waste disposal and good

---

<sup>22</sup> *Municipal Council, Ratlam v. Vardhichand*, (1980) 4 SCC 162 : AIR 1980 SC 1622.

<sup>23</sup> THE SUSTAINABLE DEVELOPMENT GOALS REPORT 2023, *supra* note 2.

roads, all essential to support a person's growth and a basic standard of living. Adding all the very basic amenities to the slum constitutes an extension of the right to shelter which needs immediate attention. For now, the government should be concerned with improving the living conditions of slum dwellers and preparing to achieve the larger goal of housing them.

The need is to have better pro-poor laws and policies more specifically targeting slums, as well as active community involvement to consider the slums which also exist in remote and rural terrain. Isolated and rural slum settings, where the topography and the climate are altogether different from things in cities, should be treated with care. Good roads, an adequate supply of water and electricity, the provision of restrooms and the upkeep of cleanliness are their key essentials. Since they are in really poor conditions, they appear to have been forever left out. They are mostly left out of the slum housing and population counts if one does not actively look for them. Non-notified residents of the slum have similar conditions. To legitimize the existence of these slum settlements, appropriate action has to be initiated by the municipal corporation for their notification and registration. Until they become lawfully noted, they cannot avail themselves of the benefits made available to them.

As a key component of pro-poor slum strategies, an assessment of slums nationwide must be included, from every point of view. The government and NGOs focused on improving the living conditions of slum dwellers should work this out in collaboration. Small groups should be formed to evaluate the conditions in wards, municipalities, villages and gram panchayats within blocks. The evaluation results will go to the district level of the National Building Organization and the Committee on Slum Statistics/Census. These will then be forwarded as district assessment reports that can also be used for reality checking present policies, as they enable one to have direct sight of the condition of slums in remote and rural places besides urban areas. This too could go to the State Housing and Urban Development Department so that they can contemplate the status of slums. A fact should be kept in mind, that the slum assessment being talked about above must be an exhaustive evaluation covering both registered and unnotified slums. Moreover, this assessment will not only provide information regarding slums at the state level but also address the prevailing scenario of slums in rural and remote areas.

Many poor or low-income community members are slum residents. And most of the funding will go into improving the essential services of roads, electricity supply, water supply, sanitation and housing in the slums. It takes a lot of time to rely solely on the government for efficacy. Besides, the community should adjust with some little maintenance by themselves. Skills development programs should be run to address minor repairs, basic building and the maintenance of the supplied utilities. It should be noted that this will not only solve their

problems but perhaps provide some income, while also reducing the dependence of slum dwellers on the government for anything and everything. The government, in conjunction with private investment, should develop public-private partnerships to solve the financial crisis as well as offer more incentives to the poor. It is a time consuming effort to build homes, but it is important to provide basic necessities for the time being to lessen the dire needs of the people living in slums. The construction of homes should be as per each individual family's need. In addition to this, houses should also be built with an eye towards safety, in view of the resilience needed against threats of fire or natural disaster. Different active forms of involvement should be given importance for any decision or action that has the potential to change their lives.

As for every slum, water is a concern. As far as improvement is concerned, the government should ensure that it makes available sources of safe and clean drinking water identified by certified water sources. Contaminated water is, as pointed out earlier, the most urgent problem which needs immediate redress. True, community taps and water pipelines have been supplied in the local setup with the government's effort. But very few of these are usable and the rest are broken-down taps that need repair. This does lead to attention towards the functional taps that hold long queues of women waiting to get good-quality water. Government should provide enough water channels to the slums by either laying new pipelines or repairing the broken ones. This very simple skill of repair can further minimize the government setup and can be converted into a permanent position, improving the slums' economic and infrastructural conditions. The initiative called Swachh Bharat Abhiyan was meant for cleaning up the country. This initiative was meant to reduce open defecation and provide adequate toilets. If there had been proper consideration of setting up an adequate number of bathrooms and toilets, as well as due consideration of their maintenance, this mission would have turned into a great success in the actual sense. People defecate outside because of the non-availability of toilets, the bad maintenance of toilets and unhealthy conditions. Much thought is to be given to maintaining the required levels of hygiene compliance, to fixing the sanitary infrastructure and to performing the necessary maintenance. By carrying out the necessary changes, this issue could lead to potential job generation in the sanitation sector. Public education and awareness on cleanliness and garbage disposal practice in slums will also contribute to reducing the health risks attached to it.

The government should construct better sewage lines, which would also increase hygiene, and get them frequently checked, cleaned and maintained in the slum settlements. This would improve the use of presently available water resources which get contaminated by sewage water. Dirty water overflows from the sewage through the pipe due to foreign materials completely

blocking it. One may consider a routine cleaning program of drain pipes to avert flooding and the accumulation of rubbish. Environmental education and sensitization are needed to reduce the amount of waste thrown into drains by slum dwellers, which results in the clogging of drains. If required, new drainage pipelines should be constructed. Proper maintenance will help prevent such incidents, which are detrimental to the health and environment of slum residents. Residents can depend less on the municipality through unified efforts. The foreign materials discussed above consist mostly of disposed-of waste which is discarded carelessly. There is a need to sensitize people on proper waste disposal in slums. Garbage collection from slum areas must also be integrated into the municipality's collection program. There should be well-defined bins set up in the slum, and the focus must be on awareness creation and on educating the residents on their use. Where door to door collection is not practical, waste should be collected along every street. Proper waste management within the residential houses and the surrounding community should enhance cleanliness and hygiene in slum areas. There should be adequate training on recycling and composting waste to reduce the amounts produced in slums. Proper education and understanding of waste collection, removal and management do improve the conditions in slum environments.

Electricity availability inside and outside the slum dwellings makes a difference to living standards, and especially when streetlights are installed it lets women move freely after dark. People returning home from work late suffer due to terrible road conditions or inadequate lighting. Fairly priced electricity should be available in the slum given these dire economic conditions. The unnotified slums should also receive the electricity benefits enjoyed by the notified slums. Some small strides have been made in the sustainable energy sector in India, and much more is yet to be done to facilitate the accessibility of electricity to slum-based people. Though a little research was done on the use of solar energy, complete application would eradicate the problems concerning the electricity supply in the slums. The government should construct better quality roads, considering the monsoon rains that typically result in water-logging conditions. It is a challenge for the people in slums to reach important services such as schools, hospitals and workplaces, and it is difficult for people coming from work to get home late at night in such conditions. No private water pipelines are available for slum households. The women have to work hard, walking long distances to fetch water, mostly carrying it on their heads or waists. Good roads will thus help reduce the strain that these water containers place upon the bodies of the women. Good roads will improve the quality of life for slum dwellers and grant easy access to places of employment, schools and medical facilities.

Connecting these minimum facilities to a slum area will require concerted efforts from a variety of stakeholders such as the government, NGOs, civil societies, municipalities and utility corporations. The government should ensure that the funds meant for the poor are set aside and also subject these funds to close scrutiny about where they have been used. Encouragement of public-private partnership will also scale up government financial capacity. Awareness of water conservation, of the maintenance of sewage and toilets, and of sustainable energy options should be raised. This will help absorb and further advance the sustainable environment movement and improve the lives of slum residents.

## V. BIBLIOGRAPHY

1. Alaaazi, D. A., & Aganah, G. A. M. (2020). *Understanding the slum-health conundrum in sub-Saharan Africa: A proposal for a rights-based approach to health promotion in slums*. GLOBAL HEALTH PROMOTION, 27(3), 65-72. <https://doi.org/10.1177/1757975919856273>.
2. Chhetri, B. (2023). *Assessing the urban sustainability of the slum settlements in the hill resorts of India: a case study of Darjeeling town*. GEOJOURNAL, 88(2), 1807-1828. <https://doi.org/10.1007/s10708-022-10728-y>.
3. Chikozho, C., Kadengye, D. T., Wamukoya, M., & Orindi, B. O. (2019). *Leaving no one behind? Analysis of trends in access to water and sanitation services in the slum areas of Nairobi, 2003-2015*. JOURNAL OF WATER, SANITATION AND HYGIENE FOR DEVELOPMENT, 9(3), 549-558. <https://doi.org/10.2166/washdev.2019.174>.
4. Demehin, M. O. (2022). *Urbanization, urban-slum settlements and its implications on health: An insight from Lagos State, Nigeria*. INTERNATIONAL JOURNAL OF SOCIAL SCIENCES: CURRENT AND FUTURE RESEARCH TRENDS, 13(1), 117-132.
5. Dupont, V., & Gowda, M. M. S. (2020). *Slum-free city planning versus durable slums: Insights from Delhi, India*. INTERNATIONAL JOURNAL OF URBAN SUSTAINABLE DEVELOPMENT, 12(1), 34-51. <https://doi.org/10.1080/19463138.2019.1666850>.
6. Edelman, B., & Mitra, A. (2007). *Slums as vote banks and residents' access to basic amenities: The role of political contact and its determinants*. INDIAN JOURNAL OF HUMAN DEVELOPMENT, 1(1), 129-150. <https://doi.org/10.1177/0973703020070107>.
7. Ghosh, S., & Chakrabarti, S. (2021). *Urbanization and exclusion: A study on Indian slums*. INTERNATIONAL CRITICAL THOUGHT, 11(3), 450-479. <https://doi.org/10.1080/21598282.2021.1966820>.

8. Habeeb, R., & Javaid, S. (2019). *Social inclusion of marginal in the great climate change debate: Case of slums in Dehradun, India*. SAGE OPEN, 9(1). <https://doi.org/10.1177/2158244019835924>.
9. Kaibarta, S., Mandal, S., Mandal, P., Bhattacharya, S., & Paul, S. (2022). *Multidimensional poverty in slums: an empirical study from urban India*. GEOJOURNAL, 87, 527-549. <https://doi.org/10.1007/s10708-021-10571-7>.
10. Khan, S., Rathore, D., Singh, A., Kumari, R., & Malaviya, P. (2024). *Socio-economic and environmental vulnerability of urban slums: a case study of slums at Jammu (India)*. ENVIRONMENTAL SCIENCE AND POLLUTION RESEARCH, 31(12), 18074-18099. <https://doi.org/10.1007/s11356-023-30630-5>.
11. Killemsetty, N., Johnson, M., & Patel, A. (2022). *Understanding housing preferences of slum dwellers in India: A community-based operations research approach*. EUROPEAN JOURNAL OF OPERATIONAL RESEARCH, 298(2), 699-713. <https://doi.org/10.1016/j.ejor.2021.06.055>.
12. Killemsetty, N., & Patel, A. (2024). *Slum-dwellers as experts: A problem structuring approach to understand housing challenges in slum communities of India*. JOURNAL OF URBAN AFFAIRS, 46(5), 1020-1038. <https://doi.org/10.1080/07352166.2022.2099283>.
13. Leckie, S. (1989). *The UN Committee on Economic, Social and Cultural Rights and the right to adequate housing: Towards an appropriate approach*. HUMAN RIGHTS QUARTERLY, 11(4), 522. <https://doi.org/10.2307/762090>.
14. Lee, Y. J. J. (2023). *Understanding the use of shared sanitation facilities in Delhi's slums*. DEVELOPMENT IN PRACTICE, 33(8), 874-886. <https://doi.org/10.1080/09614524.2022.2156479>.
15. Mohapatra, M. (2022). *Land rights for urban slum dwellers: A review of the Odisha Land Rights to Slum Dwellers Act, 2017 and the Jaga Mission* (CENTRE FOR POLICY RESEARCH Working Paper).
16. Nayak, S., & Jatav, S. S. (2023). *Are livelihoods of slum dwellers sustainable and secure in developing economies? Evidences from Lucknow, Uttar Pradesh in India*. HELIYON, 9(9). <https://doi.org/10.1016/j.heliyon.2023.e19177>.
17. Ngwenyama, L. R. (2023). *Access to electricity for ESTA occupiers: TM Sibanyoni and Sibanyoni Family v Van Der Merwe (LCC 119/2020) [2021] ZALCC 33*. POTCHEFSTROOM ELECTRONIC LAW JOURNAL, 26. <https://doi.org/10.17159/1727-3781/2023/v26i0a15453>.

18. Nix, E., Paulose, J., Shrubsole, C., Altamirano-Medina, H., Davies, M., Khosla, R., & Wilkinson, P. (2020). *Evaluating housing health hazards: Prevalence, practices and priorities in Delhi's informal settlements*. JOURNAL OF URBAN HEALTH, 97(4), 502-518. <https://doi.org/10.1007/s11524-020-00442-w>.
19. Padhi, B., Mishra, U. S., & T, T. (2022). *Assessment of the living condition of the urban slum dwellers in India in the new millennium*. URBAN RESEARCH AND PRACTICE, 15(4), 604-626. <https://doi.org/10.1080/17535069.2021.1887923>.
20. Palat Narayanan, N. (2020). *The Delhi bias: knowledge hegemony of India's slum governance*. SINGAPORE JOURNAL OF TROPICAL GEOGRAPHY, 41(1), 105-119. <https://doi.org/10.1111/sjtg.12306>.
21. Pandey, R., Alatalo, J. M., Thapliyal, K., Chauhan, S., Archie, K. M., Gupta, A. K., & Kumar, M. (2018). *Climate change vulnerability in urban slum communities: Investigating household adaptation and decision-making capacity in the Indian Himalaya*. ECOLOGICAL INDICATORS, 90, 379-391. <https://doi.org/10.1016/j.ecolind.2018.03.031>.
22. Porter, B. (2021). *The right to adequate housing in Canada*. In NATIONAL PERSPECTIVES ON HOUSING RIGHTS (pp. 107-139). Brill Nijhoff. [https://doi.org/10.1163/9789004482128\\_011](https://doi.org/10.1163/9789004482128_011).
23. Rao P., S., Royo-Olid, J., & Turkstra, J. (2022). *Tenure security and property rights: The case of land titling for 'slum' dwellers in Odisha, India*. INTERNATIONAL JOURNAL OF URBAN SUSTAINABLE DEVELOPMENT, 14(1), 349-367. <https://doi.org/10.1080/19463138.2022.2054815>.
24. Rigon, A. (2022). *Diversity, justice and slum upgrading: An intersectional approach to urban development*. HABITAT INTERNATIONAL, 130. <https://doi.org/10.1016/j.habitatint.2022.102691>.
25. Sewell, S. J. (2016). *The impacts of undeveloped roads on the livelihoods of rural women*. REVIEW OF SOCIAL SCIENCES, 1(8). <https://doi.org/10.18533/rss.v1i8.40>.
26. Shekhar, S. (2020). *Effective management of slums: Case study of Kalaburagi city, Karnataka, India*. JOURNAL OF URBAN MANAGEMENT, 9(1), 35-53. <https://doi.org/10.1016/j.jum.2019.09.001>.
27. Sinthia, S. A. (2020). *Analysis of urban slum: Case study of Korail slum, Dhaka*. INTERNATIONAL JOURNAL OF URBAN AND CIVIL ENGINEERING, 14(11), 416-430.

28. Yaguma, P., Parikh, P., & Mulugetta, Y. (2022). *Electricity access in Uganda slums: Multi-stakeholder perspectives from Kampala*. ENVIRONMENTAL RESEARCH COMMUNICATIONS, 4(12). <https://doi.org/10.1088/2515-7620/aca9ad>.
29. UNITED NATIONS CLIMATE CHANGE. (2023). *Towards vibrant green urban slums, India*. 2023 UN Global Climate Action Awards, Winning Projects Activity Database.
30. Odisha Land Rights to Slum Dwellers Act, 2017 (Odisha Act 10 of 2017).
31. Odisha Municipal Corporation Act, 2003.
32. Odisha Municipal Corporation (Amendment) Act, 2017.
33. The Constitution of India.
34. The International Covenant on Economic, Social and Cultural Rights, 1966.
35. The Universal Declaration of Human Rights, 1948.

\*\*\*\*\*