# INTERNATIONAL JOURNAL OF LAW MANAGEMENT & HUMANITIES

[ISSN 2581-5369]

#### Volume 5 | Issue 1

2022

© 2022 International Journal of Law Management & Humanities

Follow this and additional works at: <a href="https://www.ijlmh.com/">https://www.ijlmh.com/</a>
Under the aegis of VidhiAagaz – Inking Your Brain (<a href="https://www.vidhiaagaz.com/">https://www.vidhiaagaz.com/</a>)

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 suggestion or complaint, please contact Gyan@vidhiaagaz.com.

To submit your Manuscript for Publication at the International Journal of Law Management & Humanities, kindly email your Manuscript at <a href="mailto:submission@ijlmh.com">submission@ijlmh.com</a>.

### The Invisible Manual Scavengers of India

#### SHASHWATA SAHU<sup>1</sup>

#### **ABSTRACT**

The act of another individual picking up human excreta with his or her hands is known as Manual Scavenging. It's used in the cleaning of dry latrines and septic tanks. Manual scavengers clean the excreta with hand apparatuses like pails, brushes, and digging tools, and they rarely wear personal protective equipment. Untouchability and manual scavenging go hand in hand and are the most distinct results of the caste system. The caste system's brutal cruelty means that everyone who comes close to an untouchable becomes untouchable. Despite the fact that manual scavengers are members of the Dalit community, Dalit groups have never advocated for their liberation due to casteist beliefs and patriarchal views. The caste system encourages people to believe that all filthy work belongs to Dalits. As a result, not just the ruling feudal castes, but also those Dalit castes that do not scavenge, no longer consider manual scavengers to be humans. Nobody wanted to stare at the dreadful misery that surrounded them. Everyone wanted to close their eyes, put their handkerchiefs over their noses, and deny the existence of this unseen world of manual scavengers. In reality, they would rather be unnoticed. It is quite depressing to observe that such practises persisting in India after 74 years of freedom. This paper seeks to understand the dehumanising practice of manual scavenging in India. This paper will also propose corrective methods and constructive strategies for integrating the scavenging community into our country's mainstream and making a substantial contribution to its growth.

Keywords: Manual Scavengers, India, Untouchability, Caste System, Society.

#### I. Introduction

Manual scavenging has been a curse on Indian society from the dawn of time. Manual scavengers are among India's poorest and most marginalised communities. The bitterness of not being deemed human was felt by women from the manual scavenger community all over the country. The first gift a mother-in-law gives to a newlywed bride in a manual scavenging household is a chunk of her 'Jajmani,' which they proudly display. This means she will leave her daughter-in-law a share of the dry latrines she cleans, even after being abolished by the "Employment of Manual Scavengers and Construction of Dry Latrines (Prohibition) Act,

© 2022. International Journal of Law Management & Humanities

<sup>&</sup>lt;sup>1</sup> Author is a LLM student at KIIT School of Law, India.

1993" this barbaric practice is still practised in India. India has failed in its efforts, despite various programs, legislation, and policy measures because of an absence of a dependable number of manual foragers, insufficient law requirement, debasement, and India's serious station structure, which happens in both rustic and metropolitan regions. Dr B.R. Ambedkar stated that in a societal structure, slaves have always been assigned filthy duties and that human scavenging is a symbol of that enslavement, and he firmly fought for its abolition. At least now, following numerous reports of manual scavenging in print and online media, we are all aware of the practice and its brutal aspect. To recognise the dignity of scavengers, policymakers must adopt a holistic approach that considers factors such as caste, gender, and economic stability.

#### Research Methodology & Research Question

This paper uses an auxiliary examination of hypothetical texts to answer the causes of manual scavenging in India and its drawbacks while keeping focus on constitutional safeguards and the existing legal framework in our country.

### II. MANUAL SCAVENGING: AN ILLEGAL/UNLAWFUL PRACTICE OR A DEHUMANISING PRACTICE

"This issue is close to my heart. It hurts me when I think that even after so many years of independence, they are still doing this. You will have to yourself come forward to eradicate manual scavenging; no one will help you. How can you even hope for help from someone? "-

#### - Meira Kumar (First Dalit women Speaker of Lok Sabha)

#### (A) What is the terminology of Manual Scavenging?

The most twisted form of caste prejudice has been nicknamed manual scavenging

and it has been asked that it be halted soon as possible. In various areas of the nation, manual scavengers are referred by different names. Tina-wali in Bihar, Dabbu-wali in West Bengal, Balti-wali in Kanpur, all of these titles refer to Dalits who scavenge human excrement with their hands and are named after the equipment they use to do so. These names are familiar to scavenger women, as well as certain males. They have mostly forgotten their real names because these phrases have become their identities. The scavenger castes, recognised by various names in different states such as Chandaala in Odisha, Bhangi in Gujarat, Valmiki in Uttar Pradesh, Mazhabi in Delhi, Arunthathiyar in Kerala and many more.

#### (B) In India, who are the Manual Scavengers?

Manual scavenging is an occupation that has existed since the beginnings of civilisation. Manual scavengers are facing disadvantages on two fronts. They are unfortunate not only because they are lower caste individuals who face a lot of discrimination in society but also they are manual scavengers who clean human waste. "According to Section - 2(j) of the Employment of Manual Scavengers and Construction of Dry Latrines (Prohibition) Act, 1993, 'Manual Scavenger' means a person engaged in or employed for manually carrying human excreta and the expression manual scavenging shall be construed accordingly. Though this is a narrower definition, it widened in 2013 after twenty years. As per Section - 2(g) of the Prohibition of Employment as Manual Scavengers and their Rehabilitation Act, 2013, 'Manual Scavenger' means a person engaged or employed, at the commencement of this Act or at any time after that, by an individual or a local authority or an agency or a contractor, for manually cleaning, carrying, disposing of, or otherwise handling in any manner, human excreta in an insanitary latrine or an open drain or pit into which the human excreta from the insanitary latrines is disposed of, or on a railway track or in such other spaces or premises, as the Central Government or a State Government may notify before the excreta fully decomposes in such manner as may be prescribed, and the expression 'manual scavenging' shall be construed accordingly."

#### (C)Why Manual Scavenging is named a disgraceful practice?

Cleaning human faeces by hand is not a type of employment but rather a sort of injustice pretty much equivalent to slavery. This is really amongst the most blatant types of discrimination towards Dalits, and this is at the heart of their crimes against humanity. Women are typically assigned to manual scavenging, while men are assigned to sweeping and cleaning duties in the municipality. There are financial motives for assigning such unpleasant work to women. Working for the municipality pays higher, while working in private homes or communal dry latrines pays relatively little. Several ladies are rendered invisible in our society as a result of their mental debt slavery. Furthermore, the methods they use for manual scavenging vary, as do the wages they receive for doing such filthy work. One thing which binds them together is their Caste. Manual scavenging is a caste-based as well as a gender-based job. Approximately 90 to 80 percent of those involved are usually women. People who manually clean septic tanks are at risk of severe toxic chemical gas inhalation like Carbon Dioxide, Hydrogen Sulphide, Methane, Ammonia, as well as a wide variety of microbes and decomposing organic matter, which can cause rapid unconsciousness and even death.

#### III. REASONS BEHIND REHEARSING OF MANUAL SCAVENGING IN INDIA

One point that is clear about the democracy of India is that no one else will pay attention to their problems until the minority communities themselves raise an uproar about their identity and dignity. The manual scavengers are afflicted with such a sense of inferiority as a result of their involvement in this revolting work that they have been unable to raise their voices. Still present, there remain manual scavengers in the nation and the government, and its programmes have yet to reach the majority of them. The most crucial point is that those who carry a foraging basket on their heads are able to escape their predicament without the assistance of the government. Until yet, neither political parties nor election agendas have included the abolition of manual scavenging in their election manifestos.

The following are some of the reasons why this threatening life work is still practised in India.

#### 1. Ongoing use of dry latrines

Dry latrines of various types can be found throughout the country till today, for example - Vadoliya latrines Vada latrines. These are absent from any form of water facilities, as the name implies. The majority of modern toilets have a flush system and are connected to sewer lines or large drains. On the other hand, excreta is not cleaned off on its own in dry latrines; someone has to do it with his or her own hands. There are other toilets that look to have flushes or running water but require manual scavengers to clean them. Families have flush toilets, but they are attached to a tank because there is no sewer. These tanks, however, are not septic tanks, meaning that the sewage does not decompose by itself inside them. Removing them requires the use of human hands. Dry latrines are used by Jain monks and nuns in their ashrams because they think that flushing away faeces kills creatures, which would go contrary to their spiritual faith. As a result, manual scavengers are used there as well.

#### 2. Societal stigma, Poverty, Unemployment, Absent of sympathy

People born into this field of work have a very low self-helping or improving attitude because they are labelled as untouchables, dirty, uneducated. They prefer to be silent due to fear of losing their jobs and being abused from infancy. They have been subjected to public stigma for years, and despite the existence of social welfare programmes and rules aimed at assisting them, they were unable to seize opportunities due to their ostracism and reviling. As a result, those who work in this harsh and unpleasant manual labour profession become entrenched in it and remain to do so for generations. Mainly they are doing this nasty work only because of their poverty and not getting another means of employment. Because our culture, structure, and society have been unable to rehabilitate or integrate these folks into society, people aspire to join in this activity. One of the most important aspects of the problem is the absolute lack of empathy for the plight of the manual scavengers. Unlike all the other occupations with organised labour unions, manual scavengers have little influence over the political system and,

as a consequence, the country's government.

#### 3. Indian Railway & Manual Scavengers

Despite the fact that manual scavenging is illegal, those who participate in it are not able to reach the criminal justice system because of social discrimination between government officials, police, and the general public. Manual scavenging rules do not appear to be enforced very often. Notwithstanding the fact that a large number of individuals have died as an outcome of manual scavenging in recent times, the administration continues to ignore the community's problems. The issue is made even more ridiculous by the reality that the Railway of India employs the most manual scavengers in the nation, regardless of the fact that they are not directly employed by the government. The narrative of manual scavenging in the railways is a case study in how matters may be stretched out in a country, how people can beat about the bush for years on end, avoiding the central problems. Manual scavenging operations take place in Indian Railways right under its nose but remain unnoticed. They may have any Indian name, come from whatever region, and be standing on the platform of any railway station in the country; such is the prevalence of this scene. Except for human engagement, there is no other way to dispose of human excrement from running or stationary trains. The bio-toilet does not function if a rock or fabric is dropped off in it. It has a possibility that it will become clogged. It cannot be opened without human intervention if it becomes choked. This indicates that even with the bio-toilet, things are not running well. This painful truth is here and in front of us, but nobody can refuse it. The harsh reality is that manual scavenging is done by railway employees legally recognised as 'safe-wallahs' in many places. The railways cannot let this problem go away. They have to find mechanised ways to capture sewage from the railway tracks.

#### IV. Provisions of the constitution of India

Manual scavengers are entitled to specific rights in addition to those guaranteed by the Constitution of India because they are members of the underprivileged portion of society. The following are the crucial Articles of the Indian Constitution regarding this -

"Article-14: Equality before law."

"Article-16: Equality of opportunity in matters of public employment."

"Article-17: Abolition of Untouchability."

"Article-19(1)(a): Right to practice any profession, or to carry on any occupation, trade or business."

"Article-21: Protection of life and personal liberty."

- "Article-23: Prohibition of traffic in human beings and forced labour."
- "Article-41: Right to work, to education and public assistance in certain cases."
- "Article-42: Provision for just and humane conditions of work and maternity relief."
- "Article-46: Promotion of educational and economic interests of Scheduled Castes, Scheduled Tribes and other weaker sections."
- "Article-47: Duty of the State to raise the level of nutrition and the standard of living and to improve public health."
- "Article-338: National Commission for Scheduled Caste."

#### V. CREATIONS OF INDIAN LEGISLATURE

"The Untouchability (Offenses) Act, 1955" was initially framed to end the practice of untouchability and the limitations of society that resulted from it for individuals of the scheduled castes. The Protection of Civil Rights Act of 1955 was revised in 1977 and made it applicable. The practise of untouchability was declared a non-compoundable and cognisable offence under the modified Act, and violators were subjected to stricter penalties. The legislature has passed various bills to help the lower caste people in the society and also for manual scavengers. The following are some of the key acts of parliament —

#### (A)"The Scheduled Castes and Scheduled Tribes (Prevention of Atrocities) Act, 1989"

This Act designates specific categories of crimes as atrocities, imposes harsher penalties for those who commit them, and establishes special tribunals to expedite the trial of such cases. The Act's major idea is to protect atrocity crimes towards people of the scheduled castes (SCs) and tribes (STs), to establish specific tribunals for the prosecution of such crimes, to offer relief and rehabilitation to sufferers of those crimes, and to address other concerns related to or ancillary to these kinds of crimes. The latest revisions to the Act have tightened it even further in regards to Indian manual scavengers.

### (B)"Employment of Manual Scavengers & Construction of Dry Latrines (Prohibition) Act, 1993"<sup>2</sup>

This Act made this illegal to recruit manual scavengers in India and declared this a cognisable offence. This also rendered it a state's, people', and organisations' obligation to establish sanitary latrines. "The Prohibition of Employment as Manual Scavengers and their Rehabilitation Act, 2013" took its place later.

-

<sup>&</sup>lt;sup>2</sup> https://www.hrw.org/reports/1999/india/India994-19.htm

#### "EMSCDL Act, 1993 vs. PEMSR Act, 2013"

"EMSCDL Act,1993"	"PEMSR Act,2013"
This was formed for the purposes of sanitation.	This act was formed for getting the right to dignity.
It is enacted under the State List.	It is enacted under Concurrent List.
It only includes Dry Latrines.	But it includes dry latrines, unsanitary latrines, septic tanks, sewage systems and railway tracks.
The main aim of this act is the prohibition of dry latrines.	The main aim of this act is labour welfare and rehabilitation.
It makes the offence Cognizable.	It makes the offence Cognizable and Non-bailable.

#### (C)"National Commission for Safai Karamcharis Act,1993"<sup>3</sup>

The "National Commission for Safai Karamcharis" was established by this Act to analyse, investigate and supervise the execution of various initiatives for safai karamcharis as a self-governing body and as well as to resolve their problems. This Act is a humanitarian law that was designed for the benefit of people who work in state agencies piping and washing. This Commission has a legislative obligation to supervise the implementation of the PEMSR Act,2013, as well as to investigate any infringements or non-compliance.

### (D) "Prohibition of Employment as Manual Scavengers & their Rehabilitation (Amendment) Bill,2020"4

This recent bill of 2020 will go one step farther than the PEMSR Act,2013, by proposing complete mechanisation and a legal foundation for punishment. The bill will also focus on fully automated sewer and septic tank cleaning.

<sup>&</sup>lt;sup>3</sup> https://www.indiacode.nic.in/handle/123456789/1945?sam\_handle=123456789/1362

https://journalsofindia.com/the-prohibition-of-employment-as-manual-scavengers-and-their-rehabilitation-amendment-bill-2021/

## VI. COMMITTEES, COMMISSIONS & SCHEMES DESIGNATED BY THE INDIAN GOVERNMENT

The Indian government has initiated funds to improve hygiene. Sewage disposal operation is being modernised through the country's sanitation initiatives. The following are specific schemes for the wellbeing of manual scavengers in India -

- 1. Self-employment Scheme for Rehabilitation of Manual Scavenging
- 2. Integrated low-cost Sanitation Scheme, 1981
- 3. National Scheme of Liberation & Rehabilitation of Scavengers & their Dependents
- 4. Sulabh Shauchalaya Scheme (1974)
- 5. Nirmal Bharat Abhiyan, 2009
- 6. The Swachh Bharat Abhiyaan, 2014

The unhygienic sewage treatment procedures are the fundamental cause of manual scavenging in India that's why the "Total Sanitation Campaign" rebranded "Nirmal Bharat Abhiyan in 2012", which was launched in the year 1999 with the goal of achieving 100 percent sanitation in both urban and rural regions by 2017. The Nirmal Bharat Abhiyan was superseded by the Swachh Bharat Abhiyan in the year 2014. The "Swachhta Abhiyan App" has been created by the government for submitting data on unhygienic latrines and manual scavengers.

The Indian government has created a number of committees and commissions to make practical recommendations for the rehabilitation and social integration of scavenging societies on a regular basis, namely -

- 1. Barve Committee
- 2. Malkani Committee
- 3. Pandya Committee
- 4. Committee on Customary Rights
- 5. Kaka Kalelkar Commission
- 6. Central Harijan Welfare Board

#### VII. JUDICIAL CREATIVITY

The judiciary of India has really always taken a major role in advancing the idea of socioeconomic welfare by converting so many directive principles of the Indian Constitution into enforceable rights for the benefit of the weaker and poorer segments of our population. A broad interpretation of the right to life and liberty under Article-21 of our Constitution has resulted in the creation of numerous rights and has given social welfare jurisprudence in India a new vision. In terms of legal intervention to manual scavengers, courts have recently taken a hard line against manual scavenging and chastised state officials for trying to eradicate manual scavenging. According to the Indian Constitution, the dignity of humans is an intrinsic right under Article 21 "(Maneka Gandhi v. Union of India,1978)"<sup>5</sup>. "Equal treatment and protection under the law, as well as equal respect", have been defined as "dignity". It is a universally recognised right and affirmed by the "Universal Declaration of Human Rights Articles 1, 22, and 23".

### "Delhi Jal Board V. National Campaign for Dignity & Rights of Sewerage& Allied Workers (2011)"<sup>6</sup>

The apex court of India ordered a milestone decision in the mentioned case by recognising and emphasising the hopelessness and hardships of the underprivileged communities of the Indian society, especially manual scavengers and sewage workers who sacrifice their lives at risk by getting down the drains with no protective measures and who have been marginalised of their "fundamental rights to equality, life, and liberty" for higher than 60 years. The apex court also chastised the Indian government and the institutions of the state for not being concerned about the issue of security and welfare of all those who are compelled to work in miserable circumstances and are frequently frightened with death as a result of poverty. In PILs, the Supreme Court likewise blackballed the rich class's snobbish mentality.

#### "Safai Karamchari Andolan vs Union of India (2014)"

In this judgement, the apex court recognised the dangers of the practice of manual scavenging in India as an inhumane, demeaning, and dishonourable occupation. "PEMSR Act,2013" and "EMSCDL Act,1993", according to the supreme court, neither dilutes the constitutional obligation of "Article-17 of the Indian constitution" nor condones negligence on the part of a country and provinces underneath the "EMSCDL Act,1993". The apex court again ruled that the "PEMSR Act of 2013" explicitly recognises "Article- 17& 21 of our constitution" as the rights of individuals who clean tanks and sewage as well as individuals who remove human excrement from railway lines. The apex court addressed several international treaties and conventions like – the "Universal Declaration of Human Rights (UDHR)" "Convention on the Elimination of Racial Discrimination (CERD)" in which India is a member country that aim to

<sup>&</sup>lt;sup>5</sup> https://indiankanoon.org/doc/1766147/

<sup>&</sup>lt;sup>6</sup> https://indiankanoon.org/doc/379785/

<sup>&</sup>lt;sup>7</sup> https://indiankanoon.org/doc/6155772/

safeguard a dignified life of a human with respect to his field of work as well as other moves of life. The supreme court also made several recommendations in India based on the manual scavengers' rehabilitation. In provisions of "Part - IV of the PEMSR Act,2013", the honourable supreme court emphasised the rehabilitation of manual scavengers and ordered provincial governments and union territories to completely execute certain aspects of the PEMSR Act,2013 and to initiate effective action in the event of non-implementation or violation of such provisions.

#### "Chinnamma vs State of Karnataka (2016)"8

The Karnataka High Court, in this case, has ruled in support of the family of Chenchaiah, who ended up dead of suffocation as a result of dumping while cleaning a sewer. Despite the fact that the victim's family was awarded Rs 2 lakhs in compensation, they demanded rehabilitation.

#### "Vimla Govind Chorotiya & Ors. v. State of Maharashtra & Ors."9

Recently on 17th of September 2021, the Bombay High Court ordered the District Collector to pay compensation and rehabilitate the widows of three manual scavengers who died while cleaning septic tanks. A division bench of Justices Ujjal Bhuyan and Madhav Jamdar, calling the case an 'eye-opener', issued an interim order directing compensation of ten lakh rupees to be paid within four weeks, in compliance with the apex court's ruling in Safai Karamchari Andolan v. UOI. Even though the incidents of death occurred in a private housing society, the petitioner's lawyer, Miss Isha Singh, contended that the State was absolutely liable and responsible for compensating the families under "Article-17, i.e. abolition of untouchability of the Indian Constitution". The court stated that the State would be free to recover the payments from the affected parties whether they were in public or private status.

#### VIII. LAXMI PURANA: AGAINST UNTOUCHABILITY

As a methodical masterpiece, the Lakshmi Purana primarily addresses issues with Dalit women's rights in Odisha. The Lakshmi Purana is a holy book for each and every family in Odisha, Chhattisgarh, Jharkhand and West Bengal, and they also worshipped Goddess Lakshmi. Many revolutionary Bhakti saints - poets of Odisha criticised the Varna System and the categorisation of human society based on caste during the 16th century. Balarama Dasa (one poet of Panchasakha) penned Lakshmi Purana around that period. He narrated that - On a Dasami during the month of Margashirsha, Sriya Chandaluni, a scavenger lady goes on a fast and worships the Goddess of Wealth Lakshmi. Goddess Lakshmi visits her cottage and rewards

© 2022. International Journal of Law Management & Humanities

<sup>8</sup> https://indiankanoon.org/doc/163042475/

<sup>9</sup> https://indiankanoon.org/doc/163042475/

her by watching her real dedication. When Mata Lakshmi comes back to Puri Jagannath temple, she is stopped by her spouse (Jagannath) and elder brother-in-law (Balabhadra). They criticise her for being toxic because of visiting an untouchable's dwelling. Both brothers experience enormous misery without water, food and shelter after deporting Lakshmi from her residence during the entire literature until they fully understand that no one should be considered as an 'Untouchable'. By presenting a Dalit woman into the discussion, Balaram Dasa not only exposes the problem of caste in the story but also emphasises the need of understanding the issue of gender alongside caste and eradication of untouchability. Everyone has to know the motive why they are performing this religious practice what the core values of it rather than following it blindly are. Article-17 of our Constitution is still an ostensible provision. We have to convert it into factual.

#### IX. INTERNATIONAL SCENARIO OF MANUAL SCAVENGING

The surrounding climate provides very few attributes for India to adopt. Bangladesh has a sewage and garbage disposal problem. Cleaning septic tanks and sewers still require manual labour.

Manual scavenging is common in Pakistan. Certain nations have made attempts to implement sustainable sewage disposal systems as well as to treat wastewater with machines. The ecological sanitation model was implemented by Mexico. "Ecological sanitation is a waste management strategy that regards human excrement, wastewaters and urine as agricultural resources that may be gathered, preserved and handled appropriately." People in the United States implement machines, but adequate tunnels and equipment are in existence. Several Asian countries like Singapore, Japan & Malaysia have effectively solved the sewage management issue. India can adopt these effective measures for the eradication of manual scavenging.

#### X. WIPEOUT MANUAL SCAVENGING: NEED OF THE HOUR

Many people have died as a result of manual scavenging in India, but few prosecutions have been filed against the violators. It is the best time for the Indian government to do more than make laws. Law does not become law by implementing rather;, it becomes law when it passes through the inner order of association.

• It is the need of the hour to implement them and make sure appliances and advanced technology are used to clean septic tanks, drains and sewages so that future generations are set free from the humiliating labour of manual scavenging and restoring their dignity and rights.

- Additional strategies and actions to restrict the practice of manual scavenging and provide them with alternative employment are required.
- One-time remedies are insufficient; instead, a more community-centred strategy should be used with more available resources to the group members to assist them in recovering from this ancient practice.
- The union government should establish a Prevention and Control Commission to monitor the practice of manual scavenging continuously.
- The country's municipal and panchayat-laws should make it illegal to build a new house with a dry latrine. Measures need to be taken to tear down old dry latrines and replace them with a new model of water enclosed latrines i.e. sanitary latrines with advanced technology.
- Manual scavengers earn very little money from their employment which is grossly inadequate for them to teach their kids; the programmes put in place must assist them in doing so.
- The government should assist anyone who is working as a manual scavenger because of joblessness, racism or economic hardship in order to prevent them from returning to this practice.
- Everybody is conscious that it is against the law, and individuals must be familiar with the idea of the penalties they would face if they are detained or engaged in the usage of manual scavengers.
- Communities should discourage and prohibit scavenging groups from subletting services such as septic tank cleaning. People should also make a commitment to follow hygienic procedures and not promote or appoint manual scavengers for such shit jobs. We have to separate our wet and dry waste accordingly.
- Manual workers should be aware of their rights and the regulations that protect them from being exploited by their recruiters or even the general public.
- The government must stay committed to establishing advanced sanitation systems and providing complete backing, including financial stability to those communities seeking to break free from the negative spiral of manual scavenging as these groups are only subjected to racial oppression by the general public.
- Awareness programs are an excellent tool to spread knowledge about indigenous rights, as well as an approach to teaching the people about health hazards, sanitation facilities, and healthy lifestyles.

#### XI. CONCLUSIONS

The removal of manual scavenging is an essential call in India. The provinces and society must be actively involved in addressing the problem and investigate all viable options for evaluating and then stopping this behaviour. It also needs the participation of citizens in the development of total mechanisation and guaranteeing that it is made accessible to all those forced to fight this disgusting behaviour. The sufferers of manual scavenging are mostly protected under Article-21. In order to deal with the situation at present, the judicial system must also provide necessary assistance. If the government takes a strong stance on the subject of manual scavengers, we will be able to eliminate this menace by everyone's participation in our country. Additionally, we must also seek to make the 'Swachh Bharat Abhiyan' program a victory, not only for the sake of hygiene but also for the benefit of our society's marginalised groups. God has not created humans for doing this kind of filthy work rather, human-created machines should be used to do this work.

\*\*\*\*