

IN THE SUPREME COURT OF INDIA

CIVIL ORIGINAL JURISDICTION

I.A. NO. OF 2024

IN

WRIT PETITION (CIVIL) NO. 1068 OF 2021

IN THE MATTER OF:

Indian Federation of App-Based
Transport Workers (IFAT) & Others ... PETITIONERS

VERSUS

Union of India & Others ... RESPONDENTS

AND IN THE MATTER OF:

Mazdoor Kisan Shakti Sangathan
& Others ... APPLICANTS

I.A. NO. OF 2024 : Application for Intervention

PAPER BOOK
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ADVOCATE FOR THE APPLICANTS: N. SAI VINOD

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AND IN THE MATTER OF:

Soochna Evum Rozgar Adhikar Abhiyan
Through its Authorised Representative
Nikhil Dey
9, Pratap Nagar Scheme III,
Jawahar Nagar Colony,
Bajaj Nagar, Jaipur,
Rajasthan - 302 015 ... APPLICANT NO. 1

Mazdoor Kisan Shakti Sangathan
Through its Founder Member
Aruna Roy
Village Devdungri,
PO Brar, Rajasamand,
Rajasthan - 313 341 ... APPLICANT NO. 2

Social Accountability Forum for
Action and Research (SAFAR)
Through its Trustee
Rakshita Swamy
B 21 Ground Floor,
Gulmohar Park,
New Delhi - 110049 ... APPLICANT NO. 3

APPLICATION FOR INTERVENTION

TO

THE HON'BLE CHIEF JUSTICE OF INDIA AND
HIS COMPANION JUSTICES OF THE
HON'BLE SUPREME COURT OF INDIA

MOST RESPECTFULLY SHOWETH:

1. This application seeks this Hon'ble Court to permit the above-named applicants to intervene in the captioned Writ Petition involving significant constitutional and legal issues concerning the right to social security and general welfare of app-based gig workers ('gig workers' or 'platform workers').
2. All parties before this Hon'ble Court, including major platforms, accept and acknowledge that gig workers possess the right to work, guarantee against exploitation, and entitled to social security under the Indian Constitution. However, these constitutional guarantees remain unfulfilled since platforms do not recognise gig workers as *employees*, allowing them to avoid extending social security and other welfare obligations under various labour laws.
3. The applicants' proposed intervention is rooted in their commitment to the right to work and social security for a broad spectrum of working population, whose interests they represent. They hold no personal or financial stake in the final outcome of these proceedings. They seek to assist this Hon'ble Court based on their extensive interactions and engagements with gig workers, and their expertise in matters of right to work, social security, and accountability.

I. ABOUT INTERVENORS

A. SR ABHIYAN

4. Applicant No. 1, 'Soochna Evum Rozgar Adhikar Abhiyan' (SR Abhiyan, in short), is a coalition of over 100 units including labour unions, public campaigns, social movements, NGOs, and other civil society groups based in Rajasthan. Formed in 2005, SR Abhiyan has been pivotal in campaigning for the passage of Right to Information Act, 2005 ('RTI Act') and the Mahatma Gandhi National Rural Employment Guarantee Act, 2005 ('MGNREGA') in Rajasthan. SR Abhiyan has been overseeing the implementation of various rights-based laws in Rajasthan and has campaigned for measures to enhance transparency that would directly empower ordinary citizens to hold the local administration to account.

5. The composition of SR Abhiyan is diverse in terms of sector and region. Their members work on issues ranging from mining, health, education, Dalit and Adivasi rights, land rights, nutrition, women's rights, disability rights, labour and employment, amongst others. This gives the coalition a remarkable collective understanding of the multiple issues being faced by people, particularly the poorest and the most structurally marginalized, in claiming the most basic of services and opportunities in different parts of the State. SR Abhiyan is unregistered and is represented before this Hon'ble Court through its authorised representative, Nikhil Dey. True copy of resolution dated 27.04.2024 of Applicant No. 1 is marked as **ANNEXURE A-1 (Page No. 24)**.

B. MAZDOOR KISAN SHAKTI SANGATHAN

6. Applicant No. 2 is the Mazdoor Kisan Shakti Sangathan ('MKSS') - a grassroots people's organisation formed in 1990 and headquartered at Devdungri, Rajasthan. MKSS works with workers and peasants in villages across Rajasthan. The organisation was born out of a struggle for access to community land held illegally by a feudal landlord. The need to set up an organisation was felt to fight against non-payment of minimum wages. The subsequent struggle for minimum wages made it evident to the people that transparency and accountability of systems of governance are basic to access any right.
7. MKSS's work is aimed to strengthen participatory democratic processes. MKSS was a crucial part of the social movement that led to the passage of the RTI Act and MGNREGA in 2005. MKSS also pioneered "Jan Sunwais" in Rajasthan which was later institutionalized as social audits in a series of legislations and policies. MKSS operates through community support for its activities and honorarium for its volunteers. Full time volunteers receive minimum wages as their honorarium. It operates a bank account (bearing number 51041231248) with the State Bank of Bikaner and Jaipur at Bhim (Rajasthan). MKSS is unregistered and is represented through one of its founding members, Ms. Aruna Roy. True copy of resolution dated 27.04.2024 of Applicant No. 2 is marked as **ANNEXURE A-2 (Page No. 25)**.
8. MKSS and its founder member(s) have filed numerous petitions before this Hon'ble Court on various issues of public importance, including the constitutional right to work, the right to information,

and the right to peaceful protests. The details of a few such cases include:

- (i) *Mazdoor Kisan Shakti Sangathan v. Union of India*, (2018) 17 SCC 324
- (ii) *Aruna Roy & Another v. Union of India & Another*, W.P. (Civil) No. 10846 of 2020
- (iii) *Aruna Roy & Another v. Union of India and Others*, W.P. (Civil) No. 833 of 2013, in the matter of *Justice K.S. Puttuswamy (Retd.) & Anr. v. Union of India and Others*, (2017) 10 SCC 1
- (iv) *Ms. Aruna Roy and Others v. Union of India and Others*, (2002) 7 SCC 368

C. SAFAR

9. Applicant No. 3 is the Social Accountability Forum for Action and Research ('SAFAR') - a collective of development practitioners and researchers based in New Delhi. It is a registered trust established in February 2022. SAFAR works at the interface of state, law, and society to design, demonstrate, and institutionalize social accountability practices and improve access to welfare rights. Through the process of dialogues and regular consultation between the Government and civil society organizations, SAFAR focuses on development of sustainable solutions that improve governance, enhance citizen engagement, and ultimately lead to the fulfilment of welfare rights. By actively contributing to the discipline of social accountability in theory and practice, SAFAR aspires to foster positive, lasting change that enhances the well-being of communities. In this regard, SAFAR has been actively

involved in the pre-legislative consultations as well as legislative advocacy process around securing the rights of Gig workers in Rajasthan, Karnataka, and Telangana. SAFAR has also been a part of several meetings and consultations organized by various state governments, multinational organizations like the International Labour Organizations, Ministry of Labour (GoI), and other eminent civil society organizations like India Tech. True copy of resolution dated 27.04.2024 of Applicant No. 3 is marked as **ANNEXURE A-3 (Page No. 26)**.

10. Applicant No. 1 and No. 2 have a rich history of almost two decades in working on social security. Applicant No. 3 has provided research support and technical expertise at crucial junctures in the space of social security legislation, welfare rights, and accountability since the year 2022.

II. STATE OF GIG WORKERS IN INDIA

11. India is currently the fifth largest contributor to the global gig workforce. According to Niti Aayog's Policy Brief (published in June 2022),¹ about 77 lakh workers were engaged in gig work in 2020-21, and the figure is expected to rise above 2.35 crore workers - more than 3 times and nearly 4.1% of total workforce - by 2030. The gig and platform economy has seen exponential growth in the last 5 years. According to ASSOCHAM, India's gig economy is growing at a CAGR of 17%.
12. However, through their continuous engagement and extensive on-groundwork with gig workers over the last three years, the

¹ India's Booming Gig and Platform Economy - Perspectives and Recommendations on the Future of Work [Niti Aayog, 2022].

Applicants have found that the accelerated growth of the gig economy has not translated into the financial, social or physical well-being of the gig workers themselves.

13. In the absence of a dedicated legal regime addressing gig work, their employment status remains in a limbo. This has resulted in a situation where the nature of their work, the duration of their engagement with the platform and even their working hours are no different from that of a regular full-time employee, yet gig workers lack access to equivalent income or the social security benefits that their peers are entitled to. This is compounded by the opacity in algorithmic payments and the absence of any grievance redressal mechanism.
14. The Applicants' extensive knowledge of concerns faced by gig workers finds corroboration in the following reputed studies:
 - (i) The RIGHTS Survey (Respect and Integrity of Gig workers; Humanity and Trust in Service), Report on Nationwide Survey of Platform workers in India" by Janpahal ("RIGHTS Survey"), true copy of the report dated 07.03.2024 is marked as **ANNEXURE A-4 (Page Nos. 27 to 78)**.
 - (ii) "Prisoners on Wheels? Report on Working and Living Conditions of App-based workers in India" by PAIGAM, University of Pennsylvania 2024 ("PAIGAM Report"), true copy of the report dated 13.03.2024 is marked as **ANNEXURE A-5 (Page Nos. 79 to 186)**.

(iii) “Socio-Economic Impact Assessment of Food Delivery Platform Workers” by National Council of Applied Economic Research (NCAER) (“NCAER Assessment Report”), true copy of the report dated 28.08.2023 is marked as **ANNEXURE A-6 (Page Nos. 187 to 300)**.

A. “It’s not really a gig!”

15. Contrary to the popular perception, the offer of ‘flexible’ employment and working conditions for gig workers is far from reality. The platforms often contend that gig workers can choose when to work and the number of hours they wish to work. However, recent studies show that this pay-per-job model is merely an illusion, and most gig workers practically function as full-time employees.
16. Janpahal, a non-profit working with gig or platform-based workers conducted a nationwide survey of 5,220 gig workers engaged with 20-plus digital platforms across 23 cities in 2023. The survey found that 57% of drivers or riders surveyed have been engaged in platform-based work for 2 to 5 years, and an additional 16% of them have been working for more than five years. Even in the majority age group of 22-30, who are likely to treat it as a temporary job, the study found that 47% of them have been engaged with gig work for more than two years.²
17. Besides the long and continuing employment through platforms, the study finds that a mere 3% of participants worked for under

² The RIGHTS Survey (Respect and Integrity of Gig workers; Humanity and Trust in Service), Report on Nationwide Survey of Platform workers in India [Janpahal, 2024] at pg. 7.

four hours, 12% of participants for four-eight hours, and a staggering 85% of the participants worked above eight hours a day for the platform! Within that, 21% work more than 12 hours a day.³

18. A more recent survey by the People's Association in Grassroots Action and Movements ('PAIGAM') at the University of Pennsylvania found similar results. The survey of more than 10,000 Indian cab drivers, gig and platform workers (5302 cab drivers and 5082 delivery drivers) across 8 Indian cities found that almost one-third of app-based cab drivers work for over 14 hours a day, while more than 83% work more than 10 hours and 60% work over 12 hours.⁴ Similarly, over 90% of app-based delivery drivers work full-time with their platform.⁵
19. The extensive working hours and the prolonged and continuous nature of engagement with the platform company spanning several years makes it evident that this engagement is not merely a side hustle, and that instead, **platform workers are fully dependent on the gig work for sustenance.**

B. More work, less pay

20. Much of the platform work generates low and grossly inadequate real income and involves medium-to-low skilled work such as deliveries, ridesharing, microtasks, care and wellness. As per the NCAER Assessment Report, a full-time food delivery platform

³ The RIGHTS Survey, at pg. 22.

⁴ Prisoners on Wheels? Report on Working and Living Conditions of App-based workers in India [PAIGAM, University of Pennsylvania, 2024] at pg. 19.

⁵ *Id.*, at pg. 28.

worker on average works 27.7% longer than the average urban youth male worker and generates 59.6 percent more (gross) income than him, creating the perception that ‘gig work pays better’. However, after accounting for fuel costs, the 27.7% longer working hours put in by a gig worker translate to merely a 5% increase in income.⁶ Furthermore, platform workers were working 23% more than their demographically comparable peers (urban male youth (age 18 to 35) with secondary level education or above) and earning 8% less than them.⁷ PAIGAM Report found that 43.10% of the surveyed app-based cab drivers earn below 500 INR a day,⁸ while 74% of surveyed delivery drivers earn less than 600 INR a day, after deducting all costs (food, fuel, etc.).⁹

21. The work-pay imbalance is particularly pronounced for the marginalised sections of the society, with over 60% of the cab drivers from Scheduled Castes and Tribes working for over 14 hours a day, while only 16% from the unreserved social category work such long hours.¹⁰
22. Further, the NCAER Assessment Report identified that the surveyed platform workers were earning lower (Rs. 20,744 per month) than their comparable demographic (urban male youth with at least secondary level education) (Rs 22,494 per month) covered in the PLFS 2021–22.¹¹ **Average real monthly income**

⁶ Socio-Economic Impact Assessment of Food Delivery Platform Workers [NCAER, 2023] at pg. 29.

⁷ *Id.*, at pg. 26.

⁸ PAIGAM, at pg. 48.

⁹ *Id.*, at pg. 87.

¹⁰ *Id.*, at pg. 20.

¹¹ NCAER, at pg. 26.

of food delivery platform workers has come down over time between 2019 and 2022. This is primarily due to inflation. **Workers suffered a double whammy in 2022.** Real incomes came down because of higher inflation. At the same time expenditure went up due to rise in fuel costs at a faster rate than the rise in nominal incomes, resulting in workers having to spend almost 40% of their expenses on fuel costs alone.¹²

C. Outside the safety net

23. Foremost of gig workers' concern stem from absence of any law to grant or regulate social security benefits, and mechanism for grievance redressal. For *one*, gig workers sign transaction or task-based contracts with the platform as opposed to tenure-based contracts, which excludes platforms from providing benefits such as insurance cover and other contributions provided to full-time employees. *Two*, the safeguards provided to gig workers under the Code on Social Security 2020 are yet to come into force. *Three*, Gig workers are ineligible (or excluded) from receiving benefits under the Unorganized Workers' Social Security Act, 2008 ('UW Act'), although their remuneration and working conditions are like wage workers or self-employed unorganized workers. As a result, the range of protections and benefits available to workers under Indian laws are inapplicable.
24. Even the government schemes and initiatives guaranteeing social security benefits are often unavailable to gig workers, either due to restricted access or failure to give publicity or target delivery. The NCAER Assessment Report found that barring food rations,

¹² *Id.*, at pg. 51.

majority of the surveyed platform workers enjoyed no government welfare benefits. Merely 4% were enrolled in the Atal Pension Yojana; only 12.2% had coverage under Ayushman Bharat; and 11.5% had a State Health Card.¹³

25. e-Shram portal is Government of India's initiative for creating a national database of unorganised sector workers, migrant workers as well as gig workers to extend social security benefits to them. However, only 7.1% of the surveyed platform workers in the NCAER Assessment Report had been registered on the portal, undermining the efficacy of the initiative.¹⁴
26. The lack of platform company's accountability for gig workers' occupational health is especially problematic considering the findings on impact of gig work on the physical and mental health of the workers. A staggering 99.3% of the cab drivers surveyed in the PAIGAM Report complained of work-induced physical health issues such as leg, foot or knee pain or back pain and allied ailments. 98.5% reported mental health problems such as stress, anxiety and depression owing to the isolating character of gig work and hostility from customers.¹⁵ 60.8% of the platform workers surveyed in the NCAER Assessment Report received average to no help from their platform during health or family emergencies.¹⁶
27. In addition, per the PAIGAM Report, gig workers lack minimum conditions for their physical safety at work. The study found that 47.1% of cab drivers and 41.5% of delivery drivers reported that

¹³ *Id.*, at pg. 25.

¹⁴ *Id.*, at pg. 26.

¹⁵ PAIGAM, at pg. 24.

¹⁶ NCAER, at pg. 64.

they have faced some kind of violence at work. Moreover, 64.3% of those affected did not get support from companies when faced with violence.¹⁷

D. No Recourse

28. Gig workers lack recourse against unfair or arbitrary termination. Platforms often resort to ‘ID blocking’, wherein the gig workers are unilaterally blocked from their platforms. The PAIGAM Report highlighted that 83% of the app-based cab drivers and 87% of the delivery drivers surveyed were affected by ID block or deactivation.¹⁸ For those who work full-time on the platform and depend on it as their main source of income, a single day without work because of the blocked ID substantially impact their earnings.

29. Gig workers often lack any meaningful recourse against unfair ID Blocking. The RIGHTS Survey found that 45% of the surveyed delivery drivers who had at some point faced ID blocking stated that their IDs were blocked because a customer complained even though it was not their fault. However, the only mechanism by which gig workers can present their case against unfair ID blocking is by calling a customer care number that typically follows the company’s ideology that the “customer is always right.”¹⁹

¹⁷ PAIGAM, at pg. 25.

¹⁸ *Id.*, at pg. 23, 27.

¹⁹ The RIGHTS Survey, at pg. 30.

E. Opacity in Payouts and Platform Operations

30. Platforms are opaque in their norms for payouts to gig workers; 74% of the surveyed food delivery persons in the NCAER Report responded that they were not consulted about commission and incentive structures in the delivery platform and only 59.9% of them said that they received information about changed commission or incentive structures.²⁰ In the PAIGAM Report, 68% of the cab-driver respondents reported that they faced either “unexplained” and “arbitrary” deductions due to skewed app algorithms; deductions due to arbitrary commission rates charged by the companies or arbitrary deductions on online payments.²¹
31. In addition, the platforms control and direct almost every aspect of a gig worker’s job using ‘algorithms’ whose logic is unbeknownst to them. The RIGHTS Survey identified following ramifications of algorithmic management for the gig worker²² –
- a) **No control over task valuation or income earned:** Unlike the traditional set up where the supplier and buyer of any service negotiate and decide its price, the algorithm generates the value of the gig worker’s service based on parameters like the number of deliveries or rides, promptness, customer ratings, order acceptance rate, and other parameters that workers are not privy to. Workers do not have any say in this calculation and can only accept or decline the job.

²⁰ NCAER, at pg. 63.

²¹ PAIGAM, at pg. 51.

²² The RIGHTS Survey, at pg. 15.

- b) **Automated allocation of tasks:** Automated algorithms determine the division of labour between the gig workers and structure a worker's day, such that the labour process in its entirety is unknown to any one worker. The resulting opacity creates a sense of powerlessness and alienation in workers.
32. Therefore, algorithmic management generates opacity which reduces the gig worker's bargaining power against the customer and the platform and takes away his control over his daily life.

III. RECENT LEGISLATIVE INITIATIVES

33. Although the parliament has enacted 'The Code on Social Security, 2020', it has not been given effect, leaving a continuing legal vacuum with respect to the social security of gig workers. The Social Security Code enables a legal framework in which gig workers are classified as a distinct category from workers and are therefore placed outside the purview of the statutory rights that workers are entitled to. Four years since the passage of the law, however, the Code on Social Security, 2020, has not been brought into force.
34. Be that as it may, the social security and welfare of the workforce is a concurrent subject, under Entries 23 & 24 of List III of Schedule VII. Thus, the Centre and as well as the states have the legal competence and obligation to secure the rights of gig workers. To this end, Rajasthan has become the first state to enact a special law for gig workers – the Rajasthan Platform Based Gig Workers Act, 2023. Other States, including Haryana, Telangana,

and Karnataka are currently in the process of enacting similar legislations.

A. RAJASTHAN'S GIG WORKER LAW

35. The Rajasthan Platform Based Gig Workers Act, 2023 was introduced in the Rajasthan Assembly on 21.07.2023 and was brought into force on 14.09.2023. In run to the passage of Rajasthan Act, the Applicants were actively involved in advocating for, and mobilisation gig workers, during consultations held by the Rajasthan Government.

36. In August 2022 the government of Rajasthan invited the Applicants to the 'DigiFest' held in Jaipur to promote growth in the IT sector in the state. Considering the expertise of the Applicants, the government of Rajasthan specifically invited them to organise a workshop regarding issues of the digital technology used by gig workers. In November 2022, a second 'DigiFest' and follow up to the workshop was held in Jodhpur. The Applicants facilitated, organised, and participated in both meetings between local platform-based gig workers, Rajasthan state administration representatives, representatives from the Government of Kerala, and civil society representatives. In January 2023, the Applicants along with the Petitioner No. 1 the Indian Federation of App-based Transport Workers (IFAT) in the captioned Writ Petition, organised a civil society consultation in Jaipur on a potential legal framework for social security for platform based gig workers. True copy of the Rajasthan Platform Based Gig Workers Act, 2023 is marked as **ANNEXURE A-7 (Page Nos. 301 to 318)**.

37. It is submitted that the Rajasthan Act is a rights-based legislation which broadly creates the following significant structures:
- a. **Mandatory Registration of Gig Workers:** The Act imposes an obligation on aggregators to register gig workers on their platform, and thus enable the State Government to track and target schemes for gig workers.²³
 - b. **Welfare Fee:** The Act allows the State Government to impose a welfare fee on aggregators on every transaction on the platform using gig workers. The funds collected through the welfare fee is meant to be utilized for designing beneficial schemes for gig workers, and thereby protecting them against harsh and unfavourable terms of service.²⁴
 - c. **Tripartite Welfare Board.-** The Act establishes a Tripartite Welfare Board with the representation of aggregators, worker organisations, and the state government, to be the nodal authority for the purpose of registration of gig workers and aggregators, ensuring fee deduction, setting up a monitoring mechanism, protection of gig workers including formulating and notifying social security schemes, ensuring time bound redressal of grievances related to the rights of platform-based gig workers and engaging with registered unions working with platform based gig workers and holding regular open consultations with them.²⁵

²³ §8, Rajasthan Platform Based Gig Workers Act, 2023, Act No. 29 of 2023, Rajasthan State Legislature.

²⁴ *Id.*, §11.

²⁵ *Id.*, §3.

- d. **Central Transaction Information and Management System:** The Act enables the gig workers to monitor and track payments entitled from the platform, and to track details of welfare fee collected for their work. The mechanism of transparency and accountability created by the Rajasthan Gig Workers Act is unique in the world and provides workers with the right to know the breakup of every transaction qua themselves.²⁶
- e. **Grievance Redress Architecture:** The Act enables gig workers to submit grievances or complaints with any platforms before the Tripartite Board, which is under an obligation to provide a time bound redressal.²⁷

B. OTHER STATES

- 38. On 09.06.2024, Government of Karnataka released the Karnataka Platform based Gig Workers (Social Security and Welfare) Bill, 2024. Aside from the 5 features that were part of Rajasthan Act, the Karnataka draft Bill incorporates the following additional safeguards for gig workers:
 - a. **Fair Contract:** The draft Bill contains provisions to ensure fairness and better comprehensibility of the gig workers' contractual agreement with the aggregator. It mandates the State Government to issue guidelines for contracts and

²⁶ *Id.*, §18.

²⁷ *Id.*, §14.

confers the power review contract templates used by an aggregator upon latter's request.²⁸

- b. **Automated Monitoring and Decision Making Systems:** The draft Bill mandates aggregators to maintain transparency in respect of algorithmic decision-making by communicating to the gig workers any and all information regarding parameters for distribution and allocation of work, fares, earnings, customer ratings, feedback, and like.²⁹
- c. **Termination (including ID Blocking):** The draft Bill requires that the contract between the aggregators and the gig worker to contain an exhaustive list of grounds for termination of contract, and that the reasons of termination are communicated to the worker in writing.³⁰
- d. **Income security:** The draft Bill makes it obligatory for aggregators to maintain transparency in respect of reasons for any payment deductions, and to disburse gig workers' pay on a weekly basis at least.³¹
- e. **Internal Dispute Resolution Committee:** Apart from the State Government's designated Grievance Redressal Officer, the draft Bill mandates all aggregators with more than 50 platform workers registered on their platform to constitute an Internal Dispute Resolution Committee to receive complaints

²⁸ §12, The Karnataka Platform based Gig Workers (Social Security and Welfare) Bill 2024 [29.06.2024].

²⁹ *Id.*, §14.

³⁰ *Id.*, §15.

³¹ *Id.*, §16.

from gig workers and provide a resolution within 30 days from the receipt of a complaint.³²

True copy of Karnataka Platform based Gig Workers (Social Security and Welfare) Bill, 2024 is marked as **ANNEXURE A-8 (Page Nos. 319 to 334)**.

39. The Haryana Government, too, has announced that a law for gig workers will be introduced through which a dedicated state-level board will be established to provide social and economic security for gig workers.
40. The Applicants represent the interests of civil society and gig workers in the state of Rajasthan and across India. Considering the significance and constitutional importance of this matter, the Applicants seek the leave of this Hon'ble Court to intervene and be permitted to make submissions before this Hon'ble Court on the propositions that may be formulated.
41. No prejudice will be caused to the parties if the Applicants are permitted to intervene and assist this Hon'ble Court.
42. This application is made *bonafide* and in the interests of justice and it is therefore submitted that the Applicants should be permitted to intervene in the present Writ Petition and assist this Hon'ble Court on the questions of law raised.

³² *Id.*, §24.

PRAYER

It is, therefore, most humbly prayed that this Hon'ble Court may graciously be pleased to:-

- A. Allow the above-named Applicant Nos. 1, 2 and 3 to intervene in Writ Petition (Civil) No. 1068 of 2021; and
- B. Pass any other order or direction as may be deemed fit and proper.

DRAWN BY: Praavita Kashyap, N. Sai Vinod &
Kanu Garg, Advocates

FILED BY:

Drawn on : 09 July 2024
Filed on : 29 August 2024

N. SAI VINOD
ADVOCATE FOR THE APPLICANTS