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COMPARATIVE ANALYSIS OF LABOUR LAWS

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ABSTRACT

This paper presents a comprehensive comparative analysis of labour laws across multiple jurisdictions, with the central focus on India, against legal frameworks of South Asian nations such as Pakistan, Bangladesh, Sri Lanka, Nepal, and Bhutan. The study critically examines the evolution, implementation, add effectiveness of these legal systems, particularly in relations to key themes such as minimum wages, working hours, employment contracts, collective bargaining, child labour, dispute resolution, and socio-economic influences.

The research work is based on the data collected by the secondary sources such as books, articles, newspapers, journals, etc. The collection of data has been analyzed through suitable techniques at different places.

COMPARATIVE ANALYSIS ON LABOUR LAWS IN SOUTH ASIA

Labour Laws across South Asian countries reflect the socio-economic political, and historical contexts of the region. Despite sharing colonial legacies, economic dependencies on informal labour, and commitments to international labour standards, the six nations – India, Pakistan, Bangladesh, Sri Lanka, Nepal, and Bhutan, exhibit distinct approaches to regulating work and protecting workers. This comparative analysis seeks to evaluate the effectiveness and debt of labour legislation in these countries by focusing on key thematic areas such as worker rights and conditions, employment relations, collective bargaining, social protection, enforcement mechanisms, gender equality, treatment of migrant workers and informal labour, and the inclusion of marginalized groups. Understanding these dimensions helps identify both progress and persistent challenges, while also contribution to ongoing policy debates about

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the future of labour governance in the region.[2]

COMPARATIVE ANALYSIS ON EMPLOYMENT RELATIONSHIP

India : India has a dualistic system where the employment relationship is governed by both individual contracts and statutory protections. The formal sector is regulated through various acts like the Industrial Disputed Act and the newly qualified labour laws. However, a large proportion of the workforce is in the informal sector, which lacks sufficient legal coverage. Contractual employment and causation have increased, and while legal framework exists, their implementation is consistent.[3]

Pakistan : In Pakistan, employment relationships are formalised through written contracts, especially in the organised sector.Labour laws such as the Industrial and Commercial Employment (Standing Order) Ordinance, 1968, defines the terms and conditions of employment, and specify the obligations of both employers and workers. Despite legal provisions, informal employment remains prevalent, and enforcement mechanisms are relatively weak.[4]

Bangladesh : The Bangladesh Labour Act, 2006 regulates employment relationships. Hit mandates tea issuanceof appointment letters and identity cards to employees, helping formalise the employment relationship. Yet, a significant number of workers, particularly in the garment industry, are still employed in formally or on verbal agreements, making them vulnerable to exploitation.

Sri Lanka : Sri Lanka has relatively structured employment relationships with clear legal provisions under statutes such as the Industrial Disputes Act and Termination of Employment of Workmen (Special Provisions) Act. Employees required to issue letters of appointment, and the contract system is widely practiced. However, informal work, especially in rural and plantation sectors, possess challenges to legal enforcement. [5]

[2]Comparative Study on Labour Laws in India and Other Developed Nations, International Journal for Multidisciplinary Research (IJFMR), Vol. 5, Issue 3, May 2023, pp. 1–9, available at: https://www.ijfmr.com/papers/2023/5/6392.pdf.
[3]BBC News, "Indian Factory Workers supplying major brands allege routine exploitation", BBC, 17 Nov. 2020, available at : https://www.bbc.com/news/world-asia-54960346
[4]The Pakistan Code, Ministry of Law and Justice, Government of Pakistan, available at : https://pakistancode.gov.pk/english/LGu0xVD-apaUY2Fqa-bg%3D%3D&action=primary&catid=5
[5]Simplebooks, Labour Law in Sir Lanka : Everything You Need to Know, available at :

Nepal : Nepal's Labour Act, 2017 provides a robust legal framework that covers various forms of employment relationships including regular, casual, and contract employment. It mandates written contracts and protects against arbitrary dismissal. However, practical implementation remains weak due to limited institutional capacity and high informal employment.

Bhutan : In Bhutan, the Labour and Employment Act, 2007 governs employment relationships, requiring return agreements and clear terms of employment. The law recognises different types of employment and includes provisions for protection of rights and dispute resolution. While legal structures are in place, enforcement challenges persist due to limited awareness and capacity.[6]

COMPARATIVE ANALYSIS ON LEAVE PROVISIONS

India : Indian Labour Law provide for various types of leave including casual leave, sick leave, paid leave, maternity leave. The Factories Act, and respective State Shops and Establishment Acts regulate the leave entitlements. The Maternity Benefits Act, 1961, was amended to increase paid maternity leave to 26 weeks. However, enforcement in the informal sector is poor, and leave benefits often do not extend to unorganised workers.[7]

Pakistan : In Pakistan, the Factories Act, 1934 and Shops and Establishment Ordinance provide for annual, sick, and casual leave. Women workers are entitled to 12 weeks of paid maternity leave under the West Pakistan Maternity Benefits Ordinance, 1958. [8]Public sector employees generally receive better leave benefits compared to private sector and informal workers. Implementation is inconsistent across industries.

Bangladesh : The Bangladesh Labour Act, 2006 mandates 10 day of casual leave, 14 days of sick leave, and 1 day of earned leave for every 18 days worked. Female workers are entitled to 16 weeks of paid maternity leave. Although the law is comprehensive, enforcement is limited, especially in the informal sector and in small-scale industries where workers are often denied statutory leave.

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https://simplebooks.com/srilanka/labour-law-in-sri-lanka/

[6]Multiplier, Bhutan Employment Laws, available at : https://www.usemultiplier.com/bhutan/employment-laws

[7]Chief Labour Commissioner (Central), "Labour Law", available at https://clc.gov.in/clc/labour-law

[8]Labour and Human Resource Department, Government of Punjab, Legal Framework, available at : https://labour.punjab.gov.pk/legal-framework

Sri Lanka : Sri Lanka's Labour Law provides 14 days of annual leave, 7 days of casual leave, and 21 days of sick leave for public sector employees. Female employees are entitled to 12 weeks of maternity leave under the Maternity Benefits Ordinance. Enforcement is generally stronger in formal sectors, but in informal and plantation sector face difficulties in receiving statutory.

Nepal : Nepal's Labour Act, 2017 entitled workers with 13 public holidays, 1 day of weekly rest, 15 days of annual leave, 12 days of sick leave, add 98 days of maternity leave (60 day paid). Paternity leave of 15 days is also included. While the law is progressive, informal brokers and small enterprises often do not complete due to lack of awareness and oversight.[9]

Bhutan : Bhuna's Labour Law provides for 1 day of rest after 6 days of work and recognises national holidays. Employees are entitled to 12 days of casual leave, 10 days of sick leave, and 3 months of maternity leave. Paternity leave provisions are also in place. Enforcement is modest, and compliance depends heavily on employer awareness and regulatory capacity.

COMPARATIVE ANALYSIS ON WORKING HOURS

India : Under the Factories Act, 1948 and respective Shops and Establishment Acts, the standard working hours in India are capped at 9 hours a day and 48 hours a week. Overtime is allowed but should not exceed 50 hours per quarter and must be paid at twice the ordinary rate. While this framework exists in formal employment, many workers in the informal sector are subjected to longer hours without adequate compensation.[10]

Pakistan : According to the Factories Act, 1934, the standard working time in Pakistan is 9 hours a day and 48 hours a week. Workers must get a weekly rest day. Overtime is permitted and should be compensated at double the standard rate. However, enforcement is weak in small enterprises and informal setups where overwork is common and often underreported.

Bangladesh : The Bangladesh Labour Act, 2006 sets a maximum of 8 working hours per day and 48 hours per week, with a limit of 10 hours a day including overtime. Workers are entitled to a weekly day off. Overtime must be paid at twice the basic wage. In practice, especially in the garment sector, these rules are frequently violated, with extended working

[9]Multiplier, Nepal Employment Laws, available at : https://www.usemultiplier.com/nepal/employment-laws
[10]National Council of Indian Business (NCIB), "Labour Act in India : A Detailed Overview", available at https://ncib.in/pdf/ncib_pdf/Labour_Act.pdf

hours and non-payment of overtime.

Sri Lanka : Sri Lanka Law provides for an 8-hour workday and a 45-hour workweek, with a mandatory 1-hour break after 5 consecutive hours of work. Overtime should not exceed 12 hours a week and is compensated at 1.5 times the regular wage. These standards are largely adhered to in the formal sector, though the informal sector and plantation workers often face extended hours with limited enforcement.[11]

Nepal : The Labour Act, 2017 prescribes a 48-hour workweek and 8-hour workday with provisions for one weekly holiday. Overtime work is allowed up to 24 hours a week and must be paid at 1.5 times the regular rate. Although the legal framework is clear, implementation in remote areas and among informal workers remains a challenge.[12]

Bhutan : Bhutan mandates an 8-hour workday a 48-hour workweek, with overtime paid at 1.5 times the basic wage. Workers are entitled to one paid rest day every six days. While the rules are codified under the Labour and Employment Act, enforcement varies and is more stringent in government and large private enterprises compared to smaller and rural employers.

COMPARATIVE ANALYSIS ON MINIMUM WAGES

India : Minimum wages in India are governed by the Minimum Wages Act, 1948 (now subsumed under the Code on Wages, 2019). Wages vary across states, sectors, skills and regions. While the law mandated periodic revision of rates and coverage of scheduled employment, enforcement in the informal sector remains inconsistent. Many workers, especially in agricultural and unorganized sectors, earn below the statutory minimum.[13]

Pakistan : Minimum Wages are set by provincial Minimum Wage Boards under the Minimum Wages Ordinance, 1961. Rates differ by province and occupation, and there have been recent efforts to revise wages to reflect inflation. However, weak inspection mechanism and a large informal sector contribute to widespread non-compliance and underpayment of

[11]Kumarage, Ruvin, Labour Law Reform in Sri Lanka : Towards a Consolidated Employment Law, Social Science Research Network (SSRN), 2014, available at : https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4750750

[12]Bhatta, Basanta, Bahadur, Labour Law and Labour Court in Nepal : Current Status and Prospectus, (2023) Nepal Law Review, available at : https://nepjol.info/index.php/nlr/article/download/57531/43012/170416

[13]Lakshmikumaran& Sridharan, "Termination of Employment in India", available at : https://www.lakshmisri.com/insights/articles/termination-of-employment-in-india/

workers, particular women and home-based workers.

Bangladesh : Bangladesh does not have a uniform Minimum Wage. Sector-specific minimum wages are set by Wage Boards, particularly for the readymade garment sector. The process lacks transparency, and wage increases often lag behind living costs. Enforcement remains weak, and many workers in sectors outside garments do not benefit from minimum wage protection.[14]

Sri Lanka : The national minimum wage is governed by the National Minimum Wage Act, 2016 and Wages Boards Ordinance. It sets a floor wage applicable to all employees, with sector-specific rates set by Wages Boards. Compliance is relatively better in the formal sector, through plantation and informal workers often earn less than stipulated rates due to lack of bargaining power and monitoring.[15]

Nepal : Nepal revises its national minimum wage periodically through tripartite consultation. The Labour Act, 2017 mandates a minimum wage for all workers, including informal sector workers. Despite legal provisions, actual enforcement is inconsistent, and workers in remote areas or informal employment frequently earn below the minimum threshold.[16]

Bhutan : The Wage Act, 1994, and Labour and Employment Act, 2007 set minimum wage standards, but rates have not been revised frequently. While the government has periodically announced wage floors, application and enforcement remain limited to the formal sector. Many informal workers earn below the legal minimum due to lack of awareness and weak monitoring.[17]

COMPARATIVE ANALYSIS ON WAGE PAYMENT

India : The Payment of Wages Act, 1936 governs wage payment in India, ensuring timely and full payment of wages to employees. It applies to both the organized and certain segments of the unorganized sector. Wages must be paid by the 7th or 10th of the following

[14]Banglapedia, Labour Law, National Encyclopaedia of Bangladesh, available at : https://en.banglapedia.org/index.php?title=Labour_Law
[15]Nitya Partners, Recent Developments in Labour Law in Sri Lanka, available at : https://www.nithyapartners.com/journal/recent-developments-in-labour-law
[16]Prime Law Associates, Labour Law in Nepal, available at : https://primelawnepal.com/labour-law-in-nepal/
[17]Ministry of Industry, Commerce and Employment, Royal Government of Bhutan, Regulation on Working Conditions, 2022, available at : https://www.moice.gov.bt/wp-content/uploads/2022/06/Regulation-on-Working-Conditions-2022.pdf

month, depending on the size of the establishment, and in case or by bank transfer. Unauthorized deductions are restricted.[18]

Pakistan : The Payment of Wages Act, 1936 (similar to India) provides for the regulation of wage payments. It ensures that workers receive their wages on time and without unauthorized deductions. The Act applies to factories and certain industrial establishments. Like India, wages must be paid in legal tender, and timelines are enforced.

Bangladesh : In Bangladesh, the Payment of Wages Act, 1936 also applies. It mandates timely wage payment, prohibits unauthorized deductions, and prescribes penalties for non-compliance. The law covers employees in factories, railways, and other industrial establishments. Payment must be made before the expiry of the 7th day after the last day of the wage period.

Sri Lanka : Wage payment is regulated under the Wage Board Ordinance and the Shop and Office Employees Act. These ensure minimum wage standards, timing of wage payment, and fair treatment of workers. Payment delays or withholding of wages without valid reason are restricted by law. The Wages Board sets minimum wages for different trades.

Nepal : Nepal's Labour Act, 2017 provides detailed provisions on wage payment. Wages must be paid at least once a month and within three days of the end of the wage period. It prohibits deductions without legal basis. Workers are entitled to detailed wage slips, and non-compliance is subject to penalty.

Bhutan : Bhutan's Labour and Employment Act, 2007 requires that wages be paid at least once a month in legal tender. The law prohibits arbitrary deductions and mandates that workers receive a pay slip, indicating the breakdown of payments and deductions. Payment must be made on time to avoid penalties.

COMPARATIVE ANALYSIS ON OCCUPATIONAL SAFETY AND HEALTH

India : India's Factories Act, 1948 is the primary legislation dealing with occupational safety, health, and welfare of workers. It contains extensive provisions on the cleanliness of

[18]Comparative Study on Labour Laws in India and Other Developed Nations, International Journal for Multidisciplinary Research (IJFMR), Vol. 5, Issue 3, May 2023, pp. 1–9, available at: https://www.ijfmr.com/papers/2023/5/6392.pdf.

workplaces, disposal of waste, ventilation, lighting, precautions against fire, and safety of machinery. Additionally, the Building and Other Construction Workers Act and the Mines Act further strengthens Occupational Safety and Health protections in other sectors. Regular inspections, the appointment of safety officers, and the formation of safety committees are mandated in large establishments.[19]

Pakistan : Pakistan's Factories Act, 1934 provides for the health, safety, and welfare of workers. It includes regulations on cleanliness, waste disposal, ventilation, temperature, and precautions against machinery accidents. The law mandates periodic inspections by factory inspectors. However, enforcement is often limited due to a lack of resources and manpower. Occupational Safety and Health in Pakistan is still largely restricted to the formal sector, leaving informal workers without adequate protection.

Bangladesh : The Factories Act, 1965 is the central legislation governing Occupational Safety and Health in Bangladesh. It outlines detailed requirements for ensuring safe and healthy working conditions in factories. Provisions include cleanliness, disposal of waste, machinery safety, fire precautions, and working hours. The law requires the appointment of safety, fire precautions, and working hours. The law requires the appointment of safety officers in factories employing more than 500 workers. Despite this, the implementation of Occupational Safety and Health laws remains weak, especially in the garment and informal sectors.[20]

Sri Lanka : The Factories Ordinance, 1942 (amended in 2006) and the Shop and Office Employees Act address Occupational Safety and Health issues in Sri Lanka. These laws cover a broad range of safety and health measures including lighting, ventilation, fire safety, use of machinery, and welfare amenities. The enforcement is comparatively better, and the Labour Department plays a proactive role in promoting Occupational Safety and Health awareness and compliance.

Nepal : Nepal's Labour Act, 2017 dedicates specific chapters to occupational safety and health. Employers are responsible for ensuring a safe and healthy workplace and are required

[19]Nishith Desai Associates, "Supreme Court Clarifies the meaning of 'workmen' under the Industrial Disputes Act, 1947", available at : https://www.nishithdesai.com/NewsDetails/15130

[20]Comparative Study on Labour Laws in India and Other Developed Nations, International Journal for Multidisciplinary Research (IJFMR), Vol. 5, Issue 3, May 2023, pp. 1–9, available at: https://www.ijfmr.com/papers/2023/5/6392.pdf.

to adopt preventative measures, provide personal protective equipment, and report accidents. The law also mandates the formation of safety committees in large enterprises. Nonetheless, Occupational Safety and Health remains a developing area, with enforcement challenges especially in rural and informal sectors.

Bhutan : Bhutan' Labour and Employment Act, 2007 provides comprehensive Occupational Safety and Health regulations. It places full responsibility for safety and health on the employer. Employers are required to identify hazards. Provide training and protective gear, and report any occupational accidents or illness. The Department of Labour conducts inspections and promotes Occupational Safety and Health through awareness campaigns and training. Bhutan's Occupational Safety and Health laws are relatively modern and align with international standards.[21]

COMPARATIVE ANALYSIS ON MINIMUM AGE AND CHILD LABOUR REGULATIONS

India : India prohibits Child Labour through the Child and Adolescent Labour (Prohibition and Regulations) Act, 1986 (amended in 2016), which bans employment of children below 14 years in all occupations and processes, and adolescents (14 to 18) in hazardous occupations. The Right to Education Act also complements this by mandating free and complements this by mandating free and compulsory education for children aged 6 to 14. However, enforcement remains weak, especially in informal sectors.[22]

Pakistan : Pakistan's Employment of Children Act, 1991 and its various provincial counterparts set the minimum working age at 14 years and prohibit hazardous work under 18. The Constitution of Pakistan [Article 11 (3)] prohibits employment of children below the age of 14 in factories and mines. Despite these legal frameworks, child labour is prevalent in the informal economy, with weak enforcement mechanism.

Bangladesh : Bangladesh allows children to work from age 14 but restricts hazardous work to those aged 18 and above under the Labour Act, 2006 (amended in 2013). There is a list of hazardous occupations for children, and rules around working hours and rest intervals for

[21]Faculty of Law, MUIT Noida, *Comparative Analysis of Labour Laws in India, USA and UK*, Conference Report, 2023, available at: https://muitnoida.edu.in/EventView?cd_id=4181.
[22]National Crime Investigation Bureau, Labour Laws in India. available at : https://ncib.in/pdf/ncib_pdf/Labour%20Act.pdf

adolescent workers. However, like its neighbors, implementation is a significant concern, particularly in sectors like garments and domestic work.

Sri Lanka : Sir Lanka sets the minimum age for employment at 14 years under the Employment of Women, Young Persons and Children Act. Hazardous work is prohibited for those under 18, and restrictions exist for night work and working in certain sectors. Sri Lanka has strong enforcement compared to other South Asian countries, aided by better labour inspection mechanism.

Nepal : Nepal's Child Labour (Prohibition and Regulation) Act, 2000 prohibits employment of children below 14 years and restricts hazardous work for those under 18. The Labour Act, 2017 also reinforces these protections. Nonetheless, child labour persists, especially in agriculture, domestic work, and brick kilns due to economic hardship and weak enforcement.[23]

Bhutan : Bhutan's Labour and Employment Act, 2007 prohibits employment of children below 18 years of age. There is a clear legal stance against child labour, and the government has invested in enforcement and public awareness. While child labour is not widespread, Bhutan remains vigilant in ensuring compliance with international standards.[24]

COMPARATIVE ANALYSIS ON UNIONIZATION AND COLLECTIVE BARGAINING

India : India Constitutionally guarantees the right to form associations or unions under Article 19(1)(c). The Trade Unions Act, 1926 governs the registration and rights of trade unions. Workers can form unions and engage in Collective Bargaining, but there are limitations in essential services where strikes may be restricted. Multiple trade unions within a single enterprise sometimes dilute bargaining power. Recognition of unions by employers is not mandatory unless a union represents a majority.[25]

Pakistan : Pakistan permits the formation of trade union and the right to Collective Bargaining through the Industrial Relations Act, 2012. Trade Unions require registration and

[23]Institute for Integrated Development Studies (IIDS), Labour Law Reforms and Labour Market Outcomes in Nepal: A Comparative Analysis, 2021, available at: https://iids.org.np/images/publications/99819954749a09de35db40c13b56382b.pdf.
[24]International Labour Organization, Labour and Employment Act of Bhutan, 2007, NATLEX Database, available at : https://natlex.ilo.org/dyn/natlex2/r/natlex/fe/details?p3_isn=80218
[25]Ministry of Labour & Employment, Acts Administered Under Industrial Relations and Policy Labour Section, Government of India, available at : https://labour.gov.in/industrialrelations/acts-administered-irpl-section

a minimum membership threshold to be recognized. Collective bargaining agents (CBAs) can be elected by workers, but in practice, union activities are often constrained due to political interference weak implementation, and restrictions in export processing zones.

Bangladesh : The right to form Trade Union is granted under the Labour Act, 2006. However, stringent requirements (e.g., 20% of the workforce must support union formation in establishments with 50 or more workers) limit actual union formation. Although Collective Bargaining is permitted, the prevalence of anti-union practices, especially in the ready-made garment (RMG) sector, restricts workers' ability to bargain collective. [26]

Sri Lanka : The Trade Union Ordinance and Industrial Disputes Act recognize the right to form and join trade unions and engage in collective bargaining. In practice, the legal framework is relatively supportive, and a union that obtains recognition as a bargaining agent has substantial power. However, informal sector and export processing zone workers often lack this access.

Nepal : Nepal guarantees the freedom of association and right to collective bargaining under its Labour Act, 2017. The act provides a comprehensive framework for trade union registration and the election of collective bargaining agents. Collective agreements are legally binding, and tripartite mechanisms are in place. However, enforcement remains inconsistent, especially in rural and informal sectors.

Bhutan : Bhutan does not have a strong tradition of trade unions due to cultural, political, and legal factor. The Labour and Employment Act, 2007 allows for the formation of workers' associations, but no independent trade unions currently exist. Collective Bargaining is not practiced widely, and the scope for unionization remains minimal.

FINAL ANALYSIS

No single South Asian country ranks as "best overall" across all parameters. Instead, each has strengths and weaknesses. A country like Sri Lanka may score high in disputes resolution and formal employment, while India may excel in legal coverage but struggle in enforcement. Bhutan offers focused safety standards, while Nepal is evolving with new reforms.

[26]BIPO Services, BIPO Times – Labor Insights : Bangladesh Labour Law, September 2022, available at : https://www.biposervice.com/wp-content/uploads/2022/10/BIPO-Times-Sep-2022-en.pdf

Bangladesh has made industrial safety strides but faces union challenges, and Pakistan has a solid structure but limited practical reach.

Country	Strengths	Weaknesses
India	Comprehensive legal framework with codification of labour laws. Constitutional backing for labour rights. Detailed protections on working conditions, wages, and dispute mechanisms.	Complex system with overlapping laws. High informal sector. Enforcement varies by state.
Pakistan	Broad legislative history with early labour laws. Recognizes freedom of association and union rights constitutionally. Covers multiple sectors.	Post-18th amendment, labour law decentralization caused inconsistency across provinces. Enforcement issues and informal sector gaps.
Bangladesh	Labour Act (2006) & Rules (2015) consolidate rights. International pressure led to safety improvements (post-Rana Plaza). Focus on women's rights in employment.	Limited union rights. Weak enforcement in RMG sector. High informal employment.
Sri Lanka	Strong institutional framework for dispute resolution. Formal sector well-regulated. Emphasis on minimum standards.	Labour rights in plantation and informal sectors are not always well-protected. Enforcement gaps.

Nepal	Labour Act, 2017 modernized the system. Emphasizes contracts, dispute resolution, and welfare. Balanced approach to employer-employee relations.	Poor enforcement in rural areas. Implementation challenges in informal sector.
Bhutan	The Labour and Employment Act of 2007 is concise and clear. Focus on occupational health & safety, training. Good coverage of contract terms and worker protection.	Limited implementation due to the smaller workforce.Informalmechanisms are still prevalent.

CONCLUSION

In conclusion, this dissertation underscores the profound diversity and complexity within the realm of Labour Laws across nations. India's recent strides towards codification represents a significant move to simplify and unify its historically fragmented labour regime, yet challenges persist, especially in informal sectors and enforcement mechanisms. Comparatively, the UK's cohesive, right-focused legal system and the USA's flexible, market-oriented model offer both strengths and limitations, particularly when viewed through the lenses of collective bargaining and minimum worker protections.

The South Asian regional context overlapping trends, such , such as historical colonial influences economic disparities and informal labour dominance, but also notable distinction in legislative development and implementation efficacy. Countries like Sri Lanka and Nepal have demonstrated progressive policies in areas like social protection and contract regulation, while other continue to grapple with foundational issues like child labour and workplace discrimination.

The study also brings to light the crucial role of the ILO in setting international norms, although implementation gaps remain wide in several member states. Globalization, digital

transformation, and evolving work patterns necessitate constant adaptation of labor framework. Thus, the dissertation advocates for a more robust, worker-centric legal architecture that balances flexibility for employers with dignity and fairness for workers.

By contextualizing the legal system within boarder socio-political and economic environments, this dissertation not only facilitates comparative understanding but also serves as a roadmap for legal reform, policy development, and international cooperation in advancing labour standards globally.

Determining which country's Labour Law framework is the bestis not straight forward task, has each system is deeply rooted in its socio-economic context, legal traditions, and political landscape.