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Asif Iqbal

Assistant Professor,

School of Legal Studies, Babu Banarasi Das University, Lucknow

Megha Gupta

Research Scholar

School of Legal Studies, Babu Banarasi Das University, Lucknow

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From Dehumanization to Rehabilitation: Analyzing the Socioeconomic Rehabilitation of Manual Scavengers in India

Asif Iqbal

Assistant Professor,
School of Legal Studies, Babu Banarasi Das University, Lucknow

Megha Gupta

Research Scholar
School of Legal Studies, Babu Banarasi Das University, Lucknow

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ABSTRACT

*Manual scavenging—defined as the manual handling of human excreta—continues to represent one of the most egregious forms of caste-based labour exploitation in India, despite explicit statutory prohibitions. While the Employment of Manual Scavengers and Construction of Dry Latrines (Prohibition) Act of 1993 and the more comprehensive Prohibition of Employment as Manual Scavengers and Their Rehabilitation Act of 2013 have outlawed the practice and mandated rehabilitation, thousands remain trapped in this dehumanizing occupation. This paper interrogates the persistent gap between legal abolition and ground realities, posing two core questions: Why does manual scavenging endure despite its criminalization? And to what extent have rehabilitation initiatives achieved their intended goals? The study fills a critical gap in existing literature by undertaking an interdisciplinary analysis that integrates constitutional interpretation, legal doctrine, and empirical policy assessment. Special emphasis is placed on the implementation of the Self Employment Scheme for Rehabilitation of Manual Scavengers (SRMS), judicial pronouncements such as *Safai Karamchari Andolan v. Union of India*, and state-level efforts. Furthermore, the research incorporates a comparative perspective by examining alternative models of inclusive sanitation labour reform and social reintegration from South Africa, Brazil, Japan, and the United States. The findings reveal systemic flaws in policy design and execution—ranging from bureaucratic*

inertia to caste denialism—that continue to marginalize former manual scavengers, especially Dalit women. These shortcomings underscore the urgent need for rights-based, community-driven approaches that prioritize dignity, empowerment, and structural reform. By framing rehabilitation as a constitutional obligation rooted in the principles of equality and justice, the paper advocates for the institutionalization of inclusive and enforceable mechanisms to dismantle the legacy of manual scavenging in India.

KEYWORDS

Manual Scavenging, Caste, Rehabilitation, Constitutional Morality, Human Dignity.

I. INTRODUCTION

The persistence of manual scavenging in India, a practice involving the manual handling and disposal of human excreta from dry latrines, open drains, and sewers, starkly contradicts the country's constitutional promise of dignity and equality.¹ Despite its legal abolition and repeated affirmations of human rights through both legislative enactments and judicial mandates, manual scavenging continues to exist in various regions, reflecting deep-seated social hierarchies entrenched in the caste system.²

This study critically examines the disconnect between legal reforms and their practical enforcement, with a focus on the socioeconomic rehabilitation of manual scavengers. Central to the analysis are two primary inquiries: why has manual scavenging endured despite statutory bans, and how effective are existing rehabilitation strategies in restoring the rights and human dignity of those formerly engaged in the practice?

Drawing upon statutory frameworks, case law, policy documents, and multidisciplinary academic literature, the paper argues that the persistence of manual scavenging is not merely the result of policy failure, but is also deeply tied to the invisibilization of marginalized identities within India's sanitation governance. This problem is compounded by structural casteism, bureaucratic inertia, and the absence of a rights-based rehabilitation framework.

The inquiry is especially relevant in light of India's constitutional

¹ Gupta, M. & Kumar, S., Manual Scavenging in India: A Legal and Social Perspective, 8 Int'l J. L., Mgmt. & Human. 4719, 4720 (2024).

² Id.

commitments under Articles 14, 15, 17, and 21, which enshrine equality, non-discrimination, the abolition of untouchability, and the right to life with dignity. By analyzing the implementation of the Prohibition of Employment as Manual Scavengers and Their Rehabilitation Act, 2013 and the jurisprudence laid down in *Safai Karamchhari Andolan v. Union of India*,³ the paper seeks to identify legal and structural gaps and to propose a more inclusive, dignity-centered rehabilitation model for affected communities.

II. HISTORICAL AND SOCIAL CONTEXT OF MANUAL SCAVENGING

Manual scavenging in India cannot be viewed in isolation as a labour issue; rather, it must be understood as a manifestation of entrenched caste-based exclusion. Historically assigned to Dalit communities—particularly the Valmiki caste in northern India—manual scavenging has been legitimized and perpetuated by rigid social hierarchies associating sanitation work with ritual impurity.⁴ As Chauhan notes, individuals born into these communities are often forced into such occupations not by choice, but by the oppressive realities of inherited caste discrimination.⁵

The colonial administration formalized and institutionalized manual scavenging by assigning sanitation duties to so-called “*lower castes*,” particularly in urban municipalities. This model continued post-independence, despite the constitutional prohibition of untouchability under Article 17.⁶ Although legislative and judicial interventions have sought to dismantle these structures, the occupation remains entrenched in many rural and urban localities due to economic necessity, social stigma, and policy inefficiencies.

In the present day, manual scavenging takes on various forms, including the cleaning of septic tanks, sewers, and railway tracks. Workers performing these hazardous duties are frequently deprived of protective equipment and health safeguards.⁷ According to a 2020 report by the National Human Rights Commission (NHRC), over 50,000 individuals were still engaged in this practice, with Dalit women making up a disproportionate

³ *Safai Karamchhari Andolan v. Union of India*, (2014) 11 S.C.C. 224 (India).

⁴ Chawla, G., *Manual Scavenging in India: A Human Rights Perspective*, 8 J. Int'l Pol'y & Dev. 11, 13 (2024).

⁵ Chauhan, K., *Manual Scavenging and Human Rights*, 6 Int'l J. Novel Res. & Dev. (2021).

⁶ India Const. art. 17.

⁷ Malik, N. S. & Gupta, S., *Manual Scavenging in South Asia*, 13 Indian J. L. & Just. 21, 24 (2023).

share of the workforce.⁸

Kumari emphasizes the grave health implications of such labour, which range from skin and respiratory ailments to frequent fatalities due to toxic gas inhalation in confined spaces.⁹ Beyond physical harm, the practice reproduces cycles of poverty, educational exclusion, and social marginalization, particularly for women and children. Thus, caste, gender, and labour intersect to produce a uniquely dehumanizing form of structural violence that cannot be eliminated through prohibition alone.

Despite frequent denial by state authorities, civil society initiatives such as the *Safai Karamchari Andolan (SKA)* have played a pivotal role in documenting cases of death, negligence, and non-compliance with statutory obligations.¹⁰ The organization's 2025 report reveals that over 900 sanitation workers have died in sewers since the passage of the 2013 Act, underscoring the urgency of moving beyond legal bans to a comprehensive model of rehabilitation rooted in constitutional morality and social justice.

III. LEGAL FRAMEWORKS AND LEGISLATIVE RESPONSES

India's legislative journey toward the eradication of manual scavenging reflects a gradual but incomplete transition from prohibition to rehabilitation. Over time, the law has evolved in scope, yet it has consistently struggled with ineffective implementation due to bureaucratic inertia, insufficient political resolve, and fragmented institutional accountability.

A. The 1993 Act: A Limited Prohibition Approach

The earliest comprehensive attempt to eliminate manual scavenging was the enactment of the Employment of Manual Scavengers and Construction of Dry Latrines (Prohibition) Act, 1993 ("1993 Act").¹¹ This law criminalized the construction of dry latrines and the employment of individuals for manually cleaning human excreta.¹² However, the Act suffered from critical limitations. It applied only to areas officially notified by the state governments, and enforcement remained largely symbolic. The definition of manual scavenging under the Act was narrow and did not encompass hazardous sanitation work such as sewer and

⁸ Nat'l Hum. Rts. Comm'n, Know Your Rights: Manual Scavenging, <https://nhrc.nic.in> (last visited July 4, 2025).

⁹ Kumari, A., Manual Scavengers of India: Health and Rights, 6 Int'l J. Res. Pub. & Rev. 13925, 13927 (2025).

¹⁰ Safai Karamchari Andolan, Campaign Reports and Data, <https://www.safaikaramchariandolan.org> (last visited July 4, 2025).

¹¹ Employment of Manual Scavengers and Construction of Dry Latrines (Prohibition) Act, No. 46 of 1993, § 3, India Code (1993).

¹² Id. §§ 5–6.

septic tank cleaning, which remains widespread.

Moreover, there were no explicit mechanisms for the rehabilitation of those previously engaged in such work. As Alys and Arockiaraj have pointed out, the law failed to challenge the underlying caste-based ideologies that perpetuate such occupations, nor did it adopt a human rights-based framework.¹³ The absence of a concrete rehabilitative mandate and the lack of monitoring mechanisms severely curtailed the law's potential impact.

B. The 2013 Act: Emphasis on Prohibition with Rehabilitation

Acknowledging the 1993 Act's shortcomings, the Indian Parliament enacted a more progressive statute—the Prohibition of Employment as Manual Scavengers and Their Rehabilitation Act, 2013 ("2013 Act")—which broadened the legal definition of manual scavenging and prioritized rehabilitative measures.¹⁴ The law included the following key provisions:

- Mandatory surveys to identify manual scavengers in urban and rural areas;
- An outright ban on employment in insanitary latrines, open drains, and septic tanks;
- Provisions for financial assistance, skill development training, housing support, and alternative livelihood options for those identified;¹⁵
- Penal provisions for employers violating the law, including imprisonment and fines.¹⁶

Despite its comprehensive provisions, the enforcement of the 2013 Act has been sporadic and inconsistent. In practice, many states have either not undertaken surveys or have reported artificially low figures, thereby excluding thousands of workers from the scope of protection and rehabilitation.¹⁷ Studies have found that rehabilitation efforts, where implemented, are often delayed or rendered ineffective by administrative bottlenecks and underutilized central funds.¹⁸

Gupta and Kumar have critiqued the Act's implementation as

¹³ Alys, A. J. & Arockiaraj, A. L., Trapped in Cycles of Poverty, SDNB Vaishnav College Repository (2024).

¹⁴ Prohibition of Employment as Manual Scavengers and Their Rehabilitation Act, No. 25 of 2013, § 2(1)(g), India Code (2013).

¹⁵ Id. §§ 4–6.

¹⁶ Id. § 8.

¹⁷ Jarupula, S., Rehabilitation of Manual Scavengers, <https://www.researchgate.net/publication/355183096> (2021).

¹⁸ Id.

overly dependent on state discretion, which, in turn, allows entrenched caste biases and governance apathy to dictate outcomes.¹⁹ Without institutionalized participation from affected communities and civil society watchdogs, the progressive intent of the legislation remains largely unfulfilled.

IV. JUDICIAL INTERVENTIONS AND CONSTITUTIONAL INTERPRETATION

India's higher judiciary has played an instrumental role in highlighting the plight of manual scavengers and reaffirming constitutional principles such as equality, dignity, and the right to life. While judicial interventions have created strong normative frameworks, their real-world impact is frequently undermined by a lack of institutional follow-through and enforcement.

A. *Safai Karamchari Andolan v. Union of India (2014)*

The landmark judgment in *Safai Karamchari Andolan v. Union of India* marked a turning point in the legal discourse on manual scavenging. In this case, the Supreme Court unequivocally declared that manual scavenging constituted a violation of Articles 14 (*equality before the law*), 17 (*abolition of untouchability*), and 21 (*protection of life and personal liberty*) of the Constitution.²⁰

The Court issued comprehensive directions, including:

- Payment of ₹10 lakh compensation for each sewer death;
- Strict implementation of the 2013 Act across all states and Union Territories;
- Completion of rehabilitation programs within a stipulated time frame.²¹

The judgment emphasized that manual scavenging is not merely a labour issue but a form of caste-based social injustice that contradicts constitutional morality.²²

However, despite the strength of the ruling, follow-up by state governments has been patchy. Jarupula notes that while the judiciary established legal mandates, enforcement mechanisms at the state and municipal levels have been *weak, symbolic, or non-existent*.²³ The absence of punitive consequences for non-

¹⁹ Gupta & Kumar, *supra* note 1, at 4722.

²⁰ *Safai Karamchari Andolan v. Union of India*, (2014) 11 S.C.C. 224, pp 10–18 (India).

²¹ *Id.*

²² *Id.* p 14.

²³ Jarupula, *supra* note 7.

compliance has rendered many of the Court's orders aspirational rather than actionable.

B. Expanding the Right to Dignity Through Constitutional Morality

Indian jurisprudence has consistently expanded the interpretation of Article 21 to include the right to live with dignity. In *Francis Coralie Mullin v. Administrator, Union Territory of Delhi*, the Supreme Court affirmed that *the right to life encompasses the ability to live with human dignity and not merely exist*.²⁴ This principle has guided subsequent judicial reasoning, including the *Safai Karamchari Andolan* ruling.

While the judiciary has been proactive in expanding constitutional interpretations, Malik and Gupta argue that the transformative potential of such judgments is diluted in the absence of executive accountability.²⁵ Legal declarations of rights need to be supplemented with institutional frameworks that ensure their realization on the ground. Otherwise, courts risk becoming arenas of rhetorical justice with limited impact on structural inequality.

V. REHABILITATION POLICIES AND GOVERNMENT SCHEMES

While legal prohibition is essential in addressing manual scavenging, it remains insufficient without a parallel framework that ensures the comprehensive rehabilitation of those affected. Various governmental initiatives have been introduced with the intent of socio-economic reintegration. However, they often fall short due to flawed execution, absence of intersectional sensitivity, and institutional neglect.

A. The Self-Employment Scheme for Rehabilitation of Manual Scavengers (SRMS)

The primary scheme at the national level is the Self-Employment Scheme for Rehabilitation of Manual Scavengers (SRMS), first introduced in 2007 and subsequently revised.²⁶ It promises a range of benefits including one-time financial assistance, vocational training, capital subsidies for starting enterprises, and housing support.

²⁴ *Francis Coralie Mullin v. Administrator, Union Territory of Delhi*, (1981) 1 S.C.C. 608 (India).

²⁵ Malik & Gupta, *supra* note 6, at 27.

²⁶ Ministry of Social Justice and Empowerment, Self Employment Scheme for Rehabilitation of Manual Scavengers, <https://socialjustice.gov.in> (last visited July 4, 2025).

In reality, implementation has remained inadequate. Many identified manual scavengers have not received these benefits due to unreliable survey processes, administrative opacity, and limited awareness at the grassroots level.²⁷ Further compounding the issue is the assumption that entrepreneurship alone can facilitate reintegration—an approach that overlooks deep-rooted caste stigma and systemic social exclusion.

Chauhan observes that SRMS fails to recognize that manual scavenging is not simply an economic issue but a historically entrenched caste-based oppression, particularly targeting Dalit women.²⁸ The absence of gender-specific provisions—such as support for maternal health, counselling services, and protection against workplace abuse—makes the scheme ill-suited to the lived realities of women scavengers.

B. State-Specific Initiatives

Some states have independently developed additional support programs. Tamil Nadu and Maharashtra, for instance, have implemented housing assistance and employment reservations for former manual scavengers.²⁹ Yet, these programs often depend on executive discretion rather than being enshrined in enforceable legal mandates.

Gupta and Kumar argue that rehabilitation efforts remain symbolic unless recognized as a constitutional right.³⁰ Without statutory entitlements and robust oversight mechanisms, such schemes are vulnerable to budgetary neglect and political fluctuations.

VI. CASTE, GENDER, AND INTERSECTIONAL REALITIES

Manual scavenging cannot be fully understood without examining the intersectional forces of caste, gender, and poverty. While Dalits overwhelmingly constitute the manual scavenging workforce, Dalit women in particular bear the brunt of the physical, emotional, and social consequences.

A. Women and the Hidden Violence of Sanitation Work

Women involved in manual scavenging are often assigned to clean

²⁷ Chawla, G., Manual Scavenging in India: A Human Rights Perspective, 8 J. Int'l Pol'y & Dev. 19, 22 (2024).

²⁸ Chauhan, K., Manual Scavenging and Human Rights, 6 Int'l J. Novel Res. & Dev. (2021).

²⁹ Jarupula, S., Rehabilitation of Manual Scavengers, <https://www.researchgate.net/publication/355183096> (2021).

³⁰ Gupta & Kumar, supra note 1, at 4723.

dry latrines—a task considered the most degrading.³¹ These women not only face occupational hazards but are also burdened with unpaid domestic responsibilities, social ostracization, and a high risk of sexual violence.³²

Kumari highlights that the compounded invisibility of these women—by virtue of both caste and gender—leads to their systematic exclusion from policymaking and welfare entitlements.³³ For example, the SRMS neither mandates disaggregated data collection nor provides tailored services such as sexual harassment protection or reproductive healthcare.³⁴ As a result, even those who benefit from state schemes are not equipped for lasting reintegration into mainstream society.

B. Intergenerational Deprivation

Children of manual scavengers continue to face significant barriers in accessing quality education, healthcare, and employment opportunities. Dropout rates among these children remain disproportionately high due to poverty, caste-based discrimination in schools, and absence of targeted social support.³⁵

Alys and Arockiaraj emphasize that unless policies are designed to disrupt this cycle by addressing generational deprivation, the social reproduction of caste-based occupations will persist.³⁶ Measures such as educational quotas, scholarships, and community mentorship programs remain crucial but largely underutilized.

VII. COMPARATIVE INTERNATIONAL APPROACHES

Although manual scavenging in India is a uniquely caste-embedded phenomenon, lessons can be drawn from international examples where states have responded to similar labour exploitation and marginalization in sanitation sectors. These models highlight best practices that combine legislative reform, social transformation, and community empowerment.

³¹ Nat'l Hum. Rts. Comm'n, Know Your Rights: Manual Scavenging, <https://nhrc.nic.in> (last visited July 1, 2025).

³² Kumari, A., Manual Scavengers of India: Health and Rights, 6 Int'l J. Res. Pub. & Rev. 13928 (2025).

³³ Id.

³⁴ Id.

³⁵ Alys, A. J. & Arockiaraj, A. L., Trapped in Cycles of Poverty, SDNB Vaishnav College Repository (2024).

³⁶ Id.

A. Post-Apartheid South Africa: Equity in Sanitation Labor

Following apartheid, South Africa implemented the Employment Equity Act of 1998, which introduced structural reforms to promote fair labour practices among historically marginalized communities.³⁷ The Act mandated formalization of sanitation work, provision of protective gear, fair wages, and access to retirement benefits.³⁸

Moreover, these legal measures were supported by community education and destigmatization efforts. Malik and Gupta note that South Africa's approach demonstrates how legal reform must be integrated with social reconditioning to achieve sustainable inclusion.³⁹

B. Brazil: Empowering Workers Through Cooperatives

In Brazil, a novel model emerged through the formation of sanitation and waste management cooperatives. These organizations—comprising former informal workers—partner with municipalities, receive fair remuneration, and benefit from healthcare and education schemes.⁴⁰

Though caste is not a determinant in Brazil, the success of cooperatives in empowering marginalized sanitation workers offers key insights. The emphasis on collective bargaining, social protection, and municipal collaboration could be meaningfully adapted to India's decentralized administrative framework.⁴¹

C. Technological Solutions in Japan and the United States

Japan and the United States have prioritized mechanization and engineering innovations to eliminate hazardous sanitation work. Investments in robotics, sewer-cleaning vehicles, and occupational safety systems have greatly reduced human involvement in dangerous cleaning tasks.⁴²

India's failure to integrate such technologies reflects a neglect of the right to safe work. The continued use of manual labour in sewers and septic tanks, often without protective gear, underscores a need for state investment in mechanized alternatives.⁴³

³⁷ Employment Equity Act 55 of 1998 (S. Afr.).

³⁸ Malik & Gupta, *supra* note 6, at 28.

³⁹ *Id.*

⁴⁰ Chawla, *supra* note 2, at 25–27.

⁴¹ *Id.*

⁴² Jarupula, *supra* note 4.

⁴³ *Id.*

VIII. STRUCTURAL BARRIERS TO IMPLEMENTATION

Despite a strong legal foundation and growing judicial concern, India's efforts to eradicate manual scavenging face persistent structural impediments. These include administrative denial, bureaucratic fragmentation, and unaddressed social discrimination.

A. Denial and Underreporting

A common pattern across many states is the denial of the existence of manual scavengers.⁴⁴ Surveys are either not conducted or are executed without transparency, leading to gross underrepresentation. The 2011 Census reported over 750,000 households using insanitary latrines, yet official records continue to show disproportionately low figures of manual scavengers.⁴⁵

The Safai Karamchari Andolan (SKA) asserts that such denial is the first step in perpetuating dehumanization—excluding affected individuals from receiving legal protections and rehabilitation.⁴⁶

B. Diffused Institutional Responsibility

The implementation of rehabilitation schemes involves multiple ministries—including Social Justice, Housing and Urban Affairs, and local municipal bodies—resulting in fragmented accountability.⁴⁷ With no central monitoring authority or coordinated strategy, enforcement becomes inconsistent and ineffective.

Even flagship programs like the Swachh Bharat Mission, while focusing on sanitation infrastructure, largely overlook labour rights and occupational safety. Gupta and Kumar assert that unless sanitation workers are recognized as stakeholders in urban reform, their exclusion from policy frameworks will persist.⁴⁸

C. Social Prejudice and Occupational Stigma

Caste-based discrimination continues even after individuals leave manual scavenging. Former workers are often denied alternative employment, housing, or education due to their caste or

⁴⁴ Safai Karamchari Andolan, Campaign Reports and Data, <https://www.safaikaramchariandolan.org> (last visited July 4, 2025).

⁴⁵ Census of India 2011, Houses, Household Amenities and Assets.

⁴⁶ Safai Karamchari Andolan, *supra* note 19.

⁴⁷ Nat'l Hum. Rts. Comm'n, *supra* note 6.

⁴⁸ Gupta & Kumar, *supra* note 1, at 4725.

occupational history.⁴⁹

Kumari notes that women in particular face severe ostracism, with many employers refusing to hire them once their backgrounds become known.⁵⁰ This enduring stigma undermines even the most well-intentioned rehabilitation efforts, often forcing affected individuals back into informal sanitation work under hazardous conditions.

IX. CONCLUSION AND SUGGESTIONS

The continued existence of manual scavenging in contemporary India underscores a profound disconnect between the nation's constitutional promises and its social practices. Despite legislative measures—such as the 1993 and 2013 Acts—and landmark judicial interventions, notably *Safai Karamchari Andolan v. Union of India*, manual scavenging remains a grim reality for thousands, particularly among Dalit communities, with Dalit women bearing the brunt of this dehumanizing occupation.

This enduring practice is not attributable to a lack of legal architecture but rather to systemic failures—ranging from state-level denial and inadequate identification processes to bureaucratic inertia and fragmented institutional accountability. The Self Employment Scheme for Rehabilitation of Manual Scavengers (SRMS), though progressive in its conception, has often proven ineffective in practice due to complex procedures, insufficient funding, and a lack of tailored support for marginalized groups.

Comparative experiences from countries such as South Africa, Brazil, Japan, and the United States reveal that the eradication of exploitative labour requires not only legal reform but also structural transformation—encompassing social reintegration, technological advancement, and institutional accountability. India must transition from a prohibitionist stance to a framework that affirms the dignity and citizenship of those historically engaged in manual scavenging.

A. Key Policy Suggestions

- **Community-Based Identification:** Identification of manual scavengers should be undertaken through participatory, community-led surveys, supervised by independent institutions. This would ensure credibility, inclusiveness, and transparency, helping eliminate underreporting and exclusion.

⁴⁹ Alys & Arockiaraj, *supra* note 10.

⁵⁰ Kumari, *supra* note 7, at 13929.

- **Legally Enforceable Rehabilitation:** Existing welfare schemes must be reimagined as statutory entitlements, enforceable through legal remedies. Mechanisms for judicial review and penalties for non-compliance must be integrated into the rehabilitation process to enhance accountability.
- **Intersectional, Gender-Inclusive Policies:** Rehabilitation strategies must specifically address the needs of Dalit women, who face overlapping forms of exploitation. Policies should incorporate provisions for health care, maternity benefits, childcare, and legal protection against workplace harassment.
- **Investment in Technological Alternatives:** Municipalities must be mandated to adopt mechanized systems for sewer and septic tank cleaning. Simultaneously, manual scavenging should be criminalized not only in law but in practice, with penalties for officials who permit unsafe labour practices.
- **Educational Access and Generational Change:** Interventions should extend to the next generation through scholarships, residential education facilities, and psychological support. This will disrupt the cycle of caste-occupation transmission and facilitate long-term social mobility.
- **National Commission for Rehabilitation of Sanitation Workers:** A dedicated constitutional or statutory body should be established to oversee the enforcement of rehabilitation schemes across states. Empowered with monitoring, audit, and punitive authority, such a body would institutionalize accountability.

B. Reclaiming Constitutional Morality

At its core, the challenge of eradicating manual scavenging is not simply administrative or economic—it is fundamentally constitutional. As affirmed by the Supreme Court in *Safai Karamchari Andolan*, *the right to live with dignity under Articles 14, 17, and 21 cannot coexist with a labour system rooted in caste-based subjugation and human degradation.*⁵¹

True transformation will require a shift from welfare rhetoric to constitutional enforcement—one that centers the lived experiences of manual scavengers and affirms their right to equality, liberty, and fraternity. Dismantling the structural underpinnings of caste-based labour must become a national priority. Without this, legislative and judicial mandates will

⁵¹ *Safai Karamchari Andolan v. Union of India*, (2014) 11 S.C.C. 224 (India).

remain hollow promises, and the republic's commitment to social justice will remain unfulfilled.