A COMPARATIVE STUDY OF MENSTRUAL LEAVE IN INDIA AND OTHER NATIONS

Author: Aditi Chauhan, III Year of B.Com., LL.B. from Ramaiah College of Law

ABSTRACT

There has been a huge and sudden upliftment in the society regarding the predominantly focused issue of Menstruation. Through this research paper, the researcher has done a critical analysis on the concept of "Redefining Menstrual Equity for All". The research in this research paper has been done by Doctrinal method i.e. secondary sources. This research basically discusses the concept and aspects of Menstrual leave in India and other nations and the impacts of menstrual leave on workforce.

Menstruation is a process new to a girl when she hits her puberty. And being new to this process, she is also new to the socio-cultural taboos. The researchers discussed the menstruation challenges of women (representing all stages of life) and focused on understanding it more widely and deeply. The agenda behind choosing this particular idea was that menstrual matters till today are noticeably absent from public discussion and policy. Though we know that, there's a lot of awareness regarding the customs and traditional aspect of menstruation but very less number of people are actually aware of the concept of menstrual leave. Majority of the women are working in the private sectors and are only offered paid leave i.e. charges for absence are deducted from salary or wages. Paid menstrual leave is the need of the hour because menstruation is not a choice but a biological process. This paper emphasizes on the meaning of menstruation, impacts of menstruation on human body, concept of menstrual leave and it's affectivity in other nations and also the suggestive measures to that why should our nation provide menstrual leave. The researchers have also elaborated the provisions regarding menstrual leave provided in India.

Keywords: Puberty, tradition, menstruation, health surveys, genital growth, legislative impact, reproductive health, menstrual leave, bills and regulations, labor laws, human rights, international provisions, gender equality

HYPOTHESIS

- ➤ Whether menstrual leave and sick leave are different.
- Whether there are already existing policies regarding menstrual leave nationally and internationally.

OBJECTIVES OF RESEARCH:

- Toclearly state the meaning menstruation and menstrual leave and not confusing menstrual leave with sickness.
- To elaborate the international and national policies regarding menstrual leave.
- > Suggestive measures to why should our nation implement it.

INTRODUCTION

India has seen quite progressive changes in the recent years and hopefully will be more progressive in coming future. However, there are still some issues which have were and are still a taboo in our country and one of such issue is 'Menstruation'. In this twenty-first century too, it's very difficult to have an open discussion about it as people seem to get extremely uncomfortable and prefer to discuss it behind doors only. But there's nothing to be uncomfortable about it as it is a natural process in which the uterus sheds blood and tissues through the vagina¹. Although menstruation is a natural biological process affecting half of the world's population at reproductive age, it continues to be surrounded by varying degrees of stigma, silence and shame in many contexts and is a barrier to gender equality². It being a natural process has nothing to do with choice and hence there should be no stigma and indoor discussion about menstruation anymore. So to widely discuss the social aspects of menstruation, the researcher first discussed the meaning, process and impacts of menstruation on human body.

Menstruation, often called as periods, is a normal vaginal bleeding that occurs as a part of woman's monthly cycle. This is a healthy process for girls and women of reproductive age.

¹Menstruation and Human Rights, United Nations Populations Fund, (Oct. 02, 2021, 10:04 AM) https://www.unfpa.org/menstruationfaq.

²Supra 1.

In some nations, especially the Western countries, this is often called "the periods". It typically lasts 2 to 5 days, but this varies by individual. Menstruation is a biological cycle that takes place in the reproductive system of a woman or girls' body to prepare her body for potential pregnancy. The cycle begins when a girl reaches her age of puberty and continues till she reaches the end of her fertility i.e. Menopause³. Menopause is the time when the menstrual cycle of a woman ends. The menstrual cycle can be short or long but it is roughly 28 days long. Menstruation is basically the shedding of the lining of the uterus and the remnants of the unfertilized egg. It continues with an increase in the hormone estrogen, and the lining of the uterus becomes thick and spongy again (typically day 6-8)⁴. The egg is then released from one of the ovaries, called "ovulation", this usually happens within 14 days, but it may vary. Then the egg moves through the fallopian tube toward the uterus (typically day 15-24). If the egg is not fertilized, it will not be implanted in the uterus wall but instead fall apart, and the hormone levels such as estrogen and progesterone, will drop. And again a new cycle will start⁵. Most of the people have a consistent cycle, even predictable but some may face changes and variance too, especially in the initial years after menarche i.e. the first occurrence of menstruation⁶. Some changes in the menstrual cycle like absence of bleeding, sometimes symbolizes pregnancy and sometimes, it may be just because of use of contraceptive pills, stress, lack of proper nutrition, physical activities or other health concerns. And some of the cycle changes are just a natural part of ageing⁷. And this was the process which each and every menstruating girl faces until she reaches the age of menopause.

There are some impacts or can say symptoms of menstruation. They include breast swelling and tenderness; tension; stress; bloating; acne breakout; leg; back or stomach cramps; premenstrual syndrome etc. Not all the women may face this. There may be different impacts on different human body. Some women may confuse the symptoms of menstruation with those of early pregnancy, as they can be similar. These include a missed period, breast tenderness or swelling, nausea, frequent urination and even tiredness. Apart from these natural impacts, some of them face irritation and lack of confidence due to lack of proper sanitation facilities or lack of availability of properly cleaned and hygienic washrooms at

³PLAN International UK's research on period and poverty stigma, PLAN International, (Oct. 02, 2021, 10:12 AM), https://plan-uk.org/media-centre/plan-international-uks-research-on-period-poverty-and-stigma.

⁴Supra 1.

⁵Supra 1.

⁶Supra 1.

⁷Supra 1.

workplace and public place; and especially when the society is not much supportive and understanding regarding menstruation. Women also experience pain before and during menstruation called dysmenorrhea. It is of two types: Primary dysmenorrhea occurs in people who experience pain before and during menstruation. And if you've had normal periods that become painful later in life, it may be secondary dysmenorrhea. Every day, more than 300 women⁸ are menstruating and there is an increasing recognition that this natural process is experienced negatively and presents a barrier to health and gender equality in low and middle-income contexts⁹. A study conducted by University of Manchester, UK shows that access to clean and reliable materials to absorb menses, supportive sanitation infrastructure, and biological and pragmatic information about menstruation are still the core challenges 10. Fewer studies of adult women have highlighted that they too lack resources and support 11, which may contribute to stress and absence from employment 12. These above mentioned impacts effectively prove that menstruation affects the effective working and normal schedule of a woman and the same have been proven by various surveys and studies too. Menstruation is never to be considered as an excuse by a woman for escaping from any work or obligation, whether working, studying or a woman engaged with the house chores. It should be considered appraisable that they try to work in the same manner as they work otherwise. But because they go through this process biologically, they should be given proper care and attention during their menstrual days. During one's menstrual cycle, one goes through a lot of physical pain and sufferings, which if not taken proper care of may affect their health in future and may also cause problems in a woman's pregnancy, which is not good for one's health and such health issues may also affect the emotional state of a woman and may also lead to future complications mentally and physically. Also working hard, during menstrual days leads to internal weakness.

8

⁸George R, Celebrating Womanhood: How Better Menstrual Hygiene Management Is the Path to Better Health, Dignity and Business: Break the Silence, Mar. 8, 2013, at 3.

⁹Sommer M, Caruso BA, Sahin M, Calderon T, Cavill S, Mahon T, A Time for Global Action: Addressing Girls' Menstrual Hygiene Management Needs in Schools,(Oct. 02,2021, 10:30 AM), https://doi.org/10.1371/journal.pmed.1001962.

¹⁰Julie Hennegan, Alexandra K Shannon, Jennifer Rubli, KellogiJ.Schwab, G.J. Mlelndez Torres, Women's and girls' experiences of menstruation in low- and middle-income countries: A systematic review and qualitative metasynthesis, (Oct. 02,2021, 10:35 AM).

¹¹MarniSommer, Where the education system and women bodies collide: The social and health impact of girls' experiences of menstruation and schooling in Tanzania, (Oct. 02, 2021, 10:40 AM), https://doi.org/10.1016/j.adolescence.

¹²Garg S, Sharma N, Sahay R, Socio- Cultural aspects of menstruation in an urban slum in Delhi, India-Reproductive Health Matters, (Oct. 02, 2021, 10:55 AM), https://www.ncbi.nlm.nih.gov/pubmed/11468832.

CONCEPT OF MENSTRUAL LEAVE

Menstrual leave is a type of leave, where a woman may have the option to take paid or unpaid leave from her employment if she is menstruating and is unable to go to work because of it¹³. A study shows that, 40% women¹⁴ are a part of labor force and 20% of them experience dysmenorrhea¹⁵. According to the American Academy of Family Physicians, nearly one in five women have pain so severe that it interferes with daily activities. Doctors across the globe acknowledge that dysmenorrhoea or menstrual cramps can be as painful as heart attacks. However, some women do experience very little or no pain during their menstruation and it is inappropriate for such women who go through not so painful periods to generalize their experience of menstruation for rest of the women. Menstrual leave is to be considered as the mark of organizations sensitivity regarding the needs of women employed. In 2016, John Guillebaud, professor of reproductive health at University College London, explained that period pain can be as "bad as having a heart attack" And for a factual matter, women's concerns about periods and pains are the third biggest reproductive health problems¹⁷. And since women made up 21.8% of the workforce in 2019 according to International LabourOrganization, paid menstrual leave is worth a discussion¹⁸.

Menstrual leave should not be considered 'an excuse from work for pain' but a 'treatment for pain'. The concept of menstrual leave raises a number of questions regarding women's health, workforce participation and gender equity at work. The question regarding gender equality and workforce participation do not arise because men and women are genetically different and there can be no comparison between two biologically different bodies and one need to acknowledge this fact. So the concept of menstrual leave is unquestionably an equitable approach. And if we talk about the census and surveys, then there are nine countries which have fewer women working rate than India. This statement is proven by statistics

https://web.archive.org/web/20110813171350/http://cleanclothes.org/newslist/252-labour-rights-in-indonesia-what-is-menstruation-leave.

¹³Labour Rights Indonesia: What is Menstrual Leave, (Oct. 02, 2021, 11:30AM)

¹⁴International Labour Organization, ILOSTAT database, (Oct.02, 2021, 11:30 AM), https://data.worldbank.org/indicator/SL.TLF.CACT.ZS.

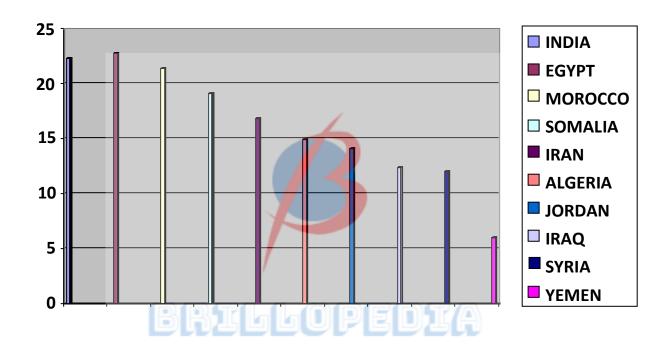
¹⁵Supra 9.

¹⁶Moitraye Das, Why do we need the menstrual policy in India,(Oct. 02, 2021, 11:45 AM), https://feminisminindia.com/2019/09/20/need-menstrual-leave-policy-india/.

¹⁷Supra 16.

¹⁸Supra 14.

given by World Bank Development Indicators while surveying the Labour Force Participation Rate (LFPR). LFPR is the section of working population in the age group of 16-64 in the economy currently employed or seeking employment. People who are still undergoing studies, housewives and persons above the age of 64 are not factored in the labour force¹⁹. According to the data retrieved by International LabourOrganizationSeptember 2019, the world female LFPR is $38.96\%^{20}$.



STATISTICS BY WORLD BANK DEVELOPMENT INDICATORS DEPICTING INDIA AND NINE COUNTRIES HAVING FEW WOMEN WORKING RATE 21

The above mentioned graphs were given be the World Bank Development Indicators. It clearly states that only few countries have fewer women working rate than India. Human resource officials said that both organizational and societal factors play a role in the fewer number of women joining the workforce. And India still lacks in it.According to World Economic Forum's Gender Gap Index, India is ranked112thout of 153 countries²². According

¹⁹Supra 14.

²⁰ Report by World Bank Development Indicators, The Economic Times.

²¹Supra 20.

²²Data retrieved from International LabourOrganisation Law profile, Japan.

to the World Economic Forum, women representation on company boards in India is as low as 13.8%²³. India has moved downwards four places in terms of gender equality amid increasing disparity in terms of women's participation in the development of the country. The country is ranked in the bottom five on health and economic fronts.

Scientists in Netherlands have conducted a study asking 33,000 women aging from 15-45 yrs to discuss their menstrual cycles and they're symptoms. The result concluded that women loose almost nine days of work place productivity on average from menstrual cramp discomfort, which is caused by uterine contractions²⁴. Through the various schematics collected from various reliable sources, it can be clearly concluded that the working rate of women in India is low as compared to other countries. This low rate may be the consequence of personal or social reasons. The personal reasons being out of our control can't be influenced. But the social reasons can be influenced by us because we together make the society and we are the one to stigmatize it. Also because productivity is a state of mind and a person can work better and up to the required expectations only when he/she is in a proper state of working. Menstruation leads to distraction of mind because a lot of thing goes inside the body of a women while menstruating and dysmenorrhoea also being one of the reasons.

It is commonly understood that if a person is sick, he cannot work to his full capability, in comparison to the when that person is completely well. Comparing this situation to menstruation, a woman would work efficiently on her regular days as compared to her period cycle. The researchers in this research paper have supported the concept of menstrual leave but it does not mean that the researchers concluded menstrual leave as a disease or affliction or a symbol of women weakness. It's just an initiative supporting favorable and comfortable working conditions for women. Women hesitate to use up their regular leave during their period but when they go to work they cannot be at their productive best due to their physical discomfort. Anyways a woman who can work without being bent double with cramps is a better employee and the better the employee the better the organization. Though it is easy to stick around the typical stereotypic traditions but the revolutionary idea would be something not changing the traditions but the way we practice the traditions.

WWW.BRILLOPEDIA.NET

²³Comparison of the Japenese Laws and Model Laws on maternity protection, Japan, asianfoodworks.

²⁴JSTOR, "Japan's 1986 Equal Employment Opportunity Law and the Changing Discourse on Gender",(Oct. 02,2021, 11:45 AM), JSTOR 3174950.

PROVISIONS REGARDING MENSTRUAL LEAVE: INDIAN AND INTERNATIONAL ASPECTS:

• INTERNATIONAL PROVISIONS REGARDING MENSTRUAL LEAVE:

If we talk internationally, menstrual leave policies exist in some countries, and also individual companies in countries that do not have national laws regarding it may choose to implement such policies. The basic idea for the granting of menstrual leave to female employees' is that a good employer should take proper care of his employees. As it is very necessary for an employee to be fresh while working and willingness to work should be there. This menstrual policy would improve conditions for women in the workforce. To break the pre-existing taboo regarding menstrual leave, it is vital to have some provisions and advancements regarding it. There are many countries which have discussed or are already providing menstrual leave. Few counties in Asia like Indonesia, Japan, Taiwan, South Korea, African country Zambia and China's three provinces i.e. Shanxi, Hubei and Ningxiaare already granted menstrual leave. And countries like Germany, Australia, Russia and Europe (some parts) are presenting provisions to legalize it but yet there's no legal sanction or provision regarding it.

- ➤ In Japan, women have been granted menstrual leave since 1947. The idea of menstrual leave was initiated in the early 20th century. This initiative was taken by Japanese labour unions in 1920's²⁵. They called it as SEIRI KYUKAi.e. physiological leave. In 1947, a law came into force by the Japanese Labor Standards allowing all female workers to take one or two days off work. The menstrual leave provided is paid²⁶.
- ➤ In South Korea, female workers have been entitled to a day off each month i.e. the first day of their menstrual cycle, since 2001. According to Article 71 of the Labor

²⁶Supra 24.

WWW.BRILLOPEDIA.NET

²⁵Supra 24.

Standards Law²⁷, if women will not take menstrual leave then they will be entitled to additional pay²⁸ i.e. women must be paid for unused menstruation leave.

- ➤ Taiwan amended its legislation in 2014 to provide one day menstrual leave. Under the Act of gender equality in employment, women are given three days of menstrual leave per year, which will not be calculated toward the thirty days of "common sick leave" giving women up to thirty three days of "health related leaves" per year²⁹.
- ➤ In Indonesia women are granted two days per month menstrual leave by law³⁰.
- ➤ In Zambia, women are legislatively entitled to a day off monthly and they call it as Mother's Day leave. And if a female employee is denied of this policy, she has the right to prosecute the employer in the court of law³¹. And they have also included it in their Labour Laws.
- ➤ China, as a whole do not provide Menstrual leave but three provinces i.e.Shanxi, Hubei and Ningxia grants two days menstrual leave to all the working women in that region. If some company or organizations do not provide it, then the women have the right to take legislative action against those³².
- ➤ Italy became the first European country to allow three days paid period leave for women. But there's a condition that the leave will only be available to women who have dysmenorrhea³³.

Some international companies providing menstrual leave holidays are:

20m G:

²⁷SerMyo-ja Staff Re, Once again court orders menstrual leave payout, (Oct. 02, 2021, 11:50 AM), http://koreajoongangdaily.joins.com/news/article/article.aspx?aid=2885715.

²⁸Supra 27.

²⁹The China Post, "Gender equality in employment act revised".

³⁰Carolyn Tate, There Are Countries Where 'Menstrual Leave' Is Actually A Thing, (Oct. 02,2021, 11:55AM), https://www.whimn.com.au/strength/health/there-are-countries-where-menstrual-leave-is-actually-a-thing/news-story/a79079fc84a2bd80372940f2b97d930d.

³¹Zambia's controversial menstrual leave law, https://www.trtworld.com/life/zambian-women-can-take-menstrual-leave-but-some-say-its-not-fair-286497.

³²Shen Lu and Elain Yu, Chinese province grants women leave for menstrual pain. (Oct. 02, 2021, 12:30 PM), https://edition.cnn.com/2016/02/16/asia/china-menstruation-leave/index.html

³³Sharika Nair, Culture Machine initiates monthly leave foe women employees for first day of periods.

- ➤ Nike, a US based company, introduced menstrual leave in 2007. The partners in the company signed a Memorandum of Understanding to ensure that the company's standards regarding menstrual leave are being maintained³⁴.
- ➤ Coexist, a UK based firm in Bristol, is the first company in United Kingdom's to tackle the taboo of menstruation and to introduce the policy of menstrual leave. Coexist comprises of a large workforce and ensures providing favorable working conditions to all the employees³⁵.
- ➤ The Victoria Women's Trust, Australia introduced the policy of menstrual leave three years ago for 14 of its employees out of which 13 were women. The policy comprises ofaccommodations for the workers to make them comfortable and even provides the option of working from home, and up to 12 days paid menstrual leave is provided³⁶.

On the basis of the research mentioned above, it can be clearly stated that there are people who understand the need to provide a healthy and favourable working conditions and aims in providing a supportive social environment to make working women feel comfortable. The need of implementing menstrual leave should not be confused with women being or considering them to be weak or to act pitiful. It should be understood that it's not like women enjoy it or want to be in extreme pain every month, as it's not a matter of choice.

• INDIAN PROVISIONS REGARDING MENSTRUAL LEAVE:

Menstrual leave is a critical as well as neglected subject in India. As we know that the subject of menstruation is unaddressed and under- researched in India. People talking about it in public are still a hypothetical situation. Our society believes that it is shameless to talk about one's body in public. But with the evolution of time, changes are occurring in the society. People are becoming open about it and having open discussions regarding it. The stereotype mindset regarding menstruation is changing, though menstrual leave being a two edged sword. The provisions regarding menstrual leave is the need of the hour and it should be

³⁶Supra 34.

³⁴Kavita Krishnan, Period leave debate is a reminder that workplaces must provide for women's need, (Oct. 02, 2021, 12:30 PM), https://scroll.in/article/844732/period-leave-revival-of-debate-is-a-reminder-that-workplaces-must-provide-for-womens-needs.

³⁵Supra 34.

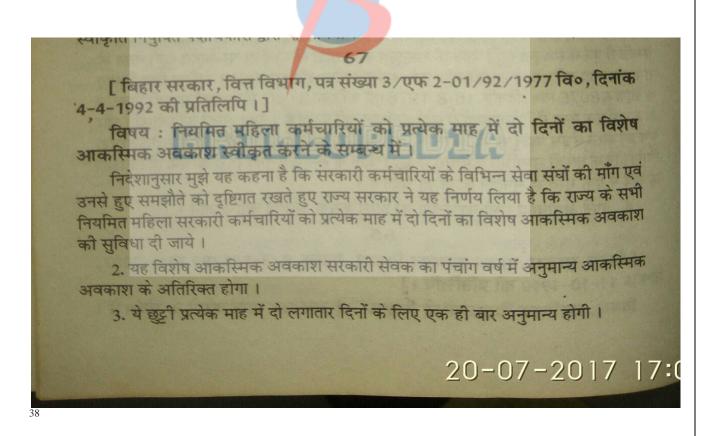
expressed politically soon. Workplace facilities are equal rights of men and women, and when men are offered favourable and supportive working environment, women should also get the same.

Talking about the existing provision and initiatives in India, there are many, like:

➤ Bihar, a state in India, is offering menstrual leave since 1992. The Bihar's Human Resource guidelines states that:

"All women staff is eligible to avail two days of special leave every month because of biological reasons. This is an addition to all other eligible leaves."

The Bihar government passed this order on January 2,1992 stating stated that in keeping with the demand raised by various employee associations and the agreement arrived at with them, all women who are regular government employees will be given two consecutive days of special casual leave every month³⁷.



³⁷Supra 34.

³⁸Supra 34.

- NinongEring, a LokSabha Member of Parliament from Arunachal Pradesh representing Congress, took an initiative under Private Members' Bill and presented 'the Menstruation Benefit Bill, 2017' which proposed two days paid menstrual leave for women working in the private and the public sector. The bill also talks about providing better facilities for rest at workplace during menstruation³⁹. Ering said that this is the need of the hour to amend the Labour Laws and provide two days paid menstrual leave during menstruation and also to provide intermediate breaks for rest at workplace during menstruation. Though the Ministry of Women and Child Development has given no pilot legislation or provision regarding it yet.
- ➤ Malayalam media giant, Mathrubhumi started granting one day menstrual leave to all of its female employees⁴⁰. Mathrubhumi's director MV Shreyams Kumar stated that the act is not to empower women but to understand their needs. Also that this move is an attempt to remove the taboo from the society. The leave being granted is optional; the employee may or may not take it.
- ➤ Culture Machine, digital media startup, headquartered in Mumbai, has implemented menstrual leave policy allowing women to take a day off on the first day of her periods⁴¹. The Human Resource of the company told that they implemented this policy to provide the women, a supportive working environment and considerate policies regarding it.
- ➤ Gozoop, a digital marketing firm for brands such as Dell and Asian Paints, started granting a day off menstrual leave monthly⁴². Ahmed AftabNaqvi, CEO of Gozoop said that they implemented this policy under "cultural sensibilities" and to break the taboo regarding menstruation and to have a friendlier environment about it at the workplace.

30,

³⁹Supra 34.

⁴⁰Ramesh Babu, Kerela Media Group Mathrubhumi announces period leave for women employees,(Oct. 02,2021, 12:15 PM), https://www.hindustantimes.com/india-news/kerala-media-group-mathrubhumi-announces-period-leave-for-women-employees/story-EbzM6a6c8MyfV6tlvNS8sK.html. ⁴¹Supra 33.

⁴²AmritDhillon, Silly and Regressive: Indian firms introduce period days.

SHOULD INDIA IMPLEMENT THE POLICY OF MENSTRUAL LEAVE : SUGGESTIVE MEASURES ?

India is worldwide known for its customs and traditions and the way people of India respect and follow it. But there are some customs and practices which need to be modified with time. One such concept is menstruation. In India culture and menstruation are used inclusively. Though the cultural aspect of menstruation is how society views menstruation. Menstruation, in Indian society is considered as a taboo because it is considered to be unclean, embarrassing, inhibiting, ritually unclean and impure. It is said that the body of a woman is impure during menstruation and hence women are not allowed inside kitchens, religious places etc. and at some places they are even asked to use separate vessels, clothes and even not allowed to sleep on bed. But with the passage of time, our society is overcoming and suppressing such beliefs and are actually being supportive towards women. People at large platforms are having open discussions about it through movements and campaigns like Happy to bleed, movies like Padman are being directed, campaigns like Pad against Sexisms are taking place in the society. Also revolutionary judgments like SabarimalaJudgment⁴³, which allowed all pilgrims regardless of gender, including women in the menstruating age group, to enter the temple.

Menstrual leave is a basic right of a woman. It cannot be stated as gender inequality because according to the Article 15(3) of Constitution of India, "Nothing in this article shall prevent the State from making any special provision for women and children" ⁴⁴

It clearly indicates that the government can make any policy benefitting the condition of women in India. And also this discrimination (if to be termed as discrimination) is a protective discrimination because it is important to maintain social equity specially when there has been a history of discrimination against women.

⁴³India Young Lawyers' Association v. State of Kerela, 2018

⁴⁴INDIA CONST. art.15, cl. 3.

Again, Article 42 of the Constitution of India states that, "Provision for just and humane conditions of work and maternity relief - The State shall make provision for securing just and humane conditions of work and for maternity relief".

The above mentioned article states that the State should provide humane conditions at work olace or basic necessities at work place. One of such example is the Maternity Benefit (Amendment) Act, 2017⁴⁶ which provides 12 weeks maternity leave to a female employee to take care of her new born child. When the State can provide maternity leave then why cannot they provide menstrual leave, especially when we know maternity is a choice but menstruation is an inescapable monthly process. Providing menstrual leave would enable an organization to achieve more only as several studies indicate that the efficiency levels of women is low during menstruation⁴⁷. Therefore, availing a leave during the menstrual cycle would not affect the productivity of the organization and the economy. Emphasis must be on labour product quality of output rather than long hours of work.

With the evolution of time, the society is also evolving. And with this evolving society, the researchers have tried to put forth one more evolving policy and i.e. menstrual leave. Menstrual leave is necessary not because it would empower the women but because it would provide them a sense of being comfortable in public. It is necessary for women to take proper care of her during menstruation because it is directly related to one's heath. In a country where the word menstruation is met with raised eyebrows and disgust, proposing for a 'Menstrual Leave' policy will be difficult but nevertheless a much needed change in the right direction. And this change is requisite to take place as soon as possible to increase the ratio of working women and to ensure our women that yes, the nation understands their pain and is willing to support them.

⁴⁵INDIA CONST. art. 42.

⁴⁶Maternity Benefit Amendment Act, 2017.

⁴⁷Chitra V, menstrual leave an ignored issue, (Oct. 02, 2021, 04:30 PM), https://www.deccanherald.com/opinion/perspective/menstrual-leave-ignored-issue-713746.html.