Sleepless in Mumbai
Spotlight on Elderly Security Guards

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The anti-migrant political environment in the city of Mumbai has created a confused sociopolitical and economic environment, where the migrant worker, essential to manufacturing and service provision, is able to find work, but is unwelcome in terms of occupying physical, social, political and cultural spaces in the city. The paper attempts to bring this contradiction to the fore through a study of elderly migrant labour employed in the private security provision industry. From the study it becomes apparent that the reality of the lives of workers is shaped by factors beyond work and wages. Their living conditions, inability to cope with any exigency, including illness or death, the atomised lives that they lead in the city in comparison to the villages, and absence of social security or access to quality welfare services force these workers and their families to live in precarious conditions.

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1 Introduction

Working and living in cities is noticeably difficult for the poor with informalisation of work, and the resultant social insecurity is palpable. Living in insecure conditions, lacking identity and documents that define their citizenship and related entitlements, millions of people move in and out of cities and villages in order to survive. Their number is increasing with spatial reorganising of manufacturing at the global level and restructuring of manufacturing industries. In recent times, studies have examined different types of work and the specificities of workers' lives in the informal economy, their working conditions, as well as industry-level changes (Fakier and Ehmke 2014).

For the poor and those working in insecure conditions, there is no alternative to the state in terms of provision of social security. But the state now has a neo-liberal agenda that individuals and collectives have to negotiate with. The characteristics of such an agenda are: the belief in the market to allocate resources most efficiently and to encourage economic development; the privatisation of state-owned enterprises in order to encourage market forces and to stimulate economic efficiency; "deregulating" (which often simply means regulating in a different way) the economy—particularly labour markets—so as to limit the "distorting" effects of governmental intervention; the slashing of state expenditures on social welfare provisions; and the ideological attack upon notions of collectivism and an ideological support for the values of economic individualism (Herod and Aguiar 2006: 3). These features of the state are evident in countries such as India and must now inform any analysis of conditions of the urban and rural poor.

Cities such as Mumbai have been built through the labour of migrants from various parts of the country, but the discourse on migrant labour in the city is complex due to its politicisation. This has resulted in an environment where the migrant worker, essential to manufacturing and service provision, is able to find work, but at the same time is unwelcome in terms of occupying physical, social, political and cultural space in the city. In this paper, I have attempted a detailed examination of the conditions in which the poor in the informal economy live and labour through a study of elderly migrant labour working as security guards. It strengthens the case for a calibrated analysis of this section of the economy in order that their issues are highlighted and addressed.

The fieldwork for the study was undertaken in Mumbai through interviews with elderly workers employed in the private security industry, who were identified and contacted

individually. Those who agreed to participate in the study were interviewed at their place of residence or work. Because of the lack of job security, none of them wanted to mention the names of their contractors or employers.

2 From 'Informal Labour' to the 'Precariat'

With the coinage of the term "informal sector" in the 1970s by Keith Hart, it was acknowledged that this unregulated and expanding sector of the economy was here to stay. However, with the dominance of capital and its ability to control labour power, the definition of informal as "sector" proved inadequate, leading to a body of research that followed Martha Chen's explication of the informal "economy." She pointed out that it should be the employment relationship that should determine the definition of the informal and not the nature of the enterprise within which it is located, since informal employment could exist within what is understood as the formal sector, while enterprises in the informal sector could offer secure employment (Chen 2007).

In 1999, the International Labour Organization (ILO) formally advocated the agenda of "decent work," which refers to "work that is productive and delivers a fair income," workplace security and social protection, "better prospects for social integration and personal development," and freedom to "organise and participate in the decisions that affect one's life." The comprehensiveness of this concept has aided in a clearer assessment of living and working conditions of workers and strategising advocacy for worker rights. Yet, like other ideas, it has been severely criticised as "a *social-liberal* adjustment and response to *neo-liberal* globalisation" (Waterman 2013).

Further conceptualisations of precarious work, precarity, and precariat (Arnold and Bongiovi 2012; Standing 2013) are theoretically interesting and useful in practice, because they recognise differential vulnerabilities such as education, age, occupation, family responsibility, and labour market processes among others. They also acknowledge that geographies of production have expanded, with margins for workers shrinking. Clearly, power relations are skewed in favour of capital, which is able to control the labour process. Precarious work in this context is shaped by the relationship between employment status, form of employment, dimensions of labour market insecurity, social context, and the social location (Arnold and Bongiovi 2012; Standing 2011). Standing's typology identifies seven categories of workers located on a continuum of insecurity; at the bottom of the ladder is the precariat, which is marked by minimum trust relationship with the state and "has none of the social contract relationships of the proletariat" (Standing 2013: 2). Some of the features that define the precariat are: lack of social income (community support, state benefits and private benefits), lack of work-based identity, not being part of solidaristic economy, and lack of occupational identity (Standing 2013: 5). The concept of precarity seeks to signify a new phase of capitalism that is different from previous ones, with new ways of looking at the system as a whole. It refers to the condition of precarious workers as well as a more general state and is "not only about disappearance of jobs, but questions of housing, debt, welfare provision, and availability of time for building effective personal relations" (Neilson and Rossiter 2008; Arnold and Bongiovi 2012).

These ideas are contested because of their inclination towards post-work politics. However, they are relevant as they make a case for "re-entering precarious, casual, and informal workers as a new kind of political subject, rather than an anomaly from standard employee" (Arnold and Bongiovi 2012: 15).

Against this backdrop, the initial questions raised by this study were: what brings into the workforce these populations that should now ideally have the choice of leading less strenuous lives? Why do they take up these jobs with poor working conditions? What does this indicate about the role of the state and the structural violence embedded in poverty? Perhaps the answers to these will point to the nature of "precarity."

3 The Elderly in the Workforce

For those familiar with the city, one of the visible changes in Mumbai is the presence of significant numbers of what appear to be elderly migrants, working as security guards across various types of properties.

Population projections for the elderly in India show an upward trend in the next few decades. The demographic profile of India has projected that the total number of elderly in the country is expected to increase from 6.9% of the population in 2001 to 12.4% of the population in 2026 (Subaiya and Bansod 2011). According to estimates released by the United Nations Population Fund, by 2050, India will be home to one out of every six of the world's older persons, and only China will have a larger number of elderly people (*Hindu* 2012). Using the National Sample Survey Office (NSSO) data from 1983 to 2004–05, Selvaraj et al (2011) estimated the total number of elderly workers in India to be about 7% of the total workforce.

Research on the elderly in the workforce in India seems to be inadequate. Most of it has focused on issues of health, residential arrangements, social security and ill-treatment (Dhar, Husain and Dutta 2014: 4). The few studies that have looked at workforce participation, have described trends in employment and wages (Dhar, Husain and Dutta 2014). An overview indicates that

> nearly 40% of persons aged 60 years and above (60% of men and 19% of women) were working. In rural areas, 66% of elderly men and above 23% of aged women were still participating in economic activity, while in urban areas only 39% of elderly men and about 7% of elderly women were economically active (GOI 2011).

Workforce participation trends for the elderly workers differ across age groups as well as rural and urban areas. While most of the elderly workers belong to the 60 to 69 years age group, the workforce participation decreases with increase in age. A study of workforce participation among the elderly in India (GOI 2011) finds that there is a decline in workforce participation rate among the elderly as well as increasing informalisation of the aged workforce—by about 6% in the 60–65 years bracket. While this may be attributed to jobless growth in the Indian economy, squeezing out the elderly from the formal sector, such an explanation overlooks recent trends in employment in India. The easy nature of entry into the informal sector labour force has led to the aged workers from low-income

households to flock to this sector to augment their household income (GoI 2011: 20). Workforce participation of the elderly, may in the short run, enable them to be economically independent, "particularly in view of its externalities." But the declining workforce participation rate for the elderly is most likely due to declining job opportunities, poor health, skills incompatible with modern production techniques, and unfriendly public transport (Dhar, Husain and Dutta 2014: 14). The elderly workers in urban areas are found more in the service sector. What is a matter of concern is that they are employed in sectors that are marked by low earning, with their earnings being lower than those of younger workers employed by better regulated firms in the sector. Inadequate social security adds to the financial distress, dependence, and health problems of the elderly, particularly for the rural elderly, female elderly living in nuclear families, and elderly with health problems.

Further, Selvaraj et al (2011) found that more than 70% of the elderly workers are illiterate or do not have primary education. This implies that "it is economic vulnerabilities that 'force' the aged to work in India. Labour force participation is higher among the poor elderly than among the richer elderly. However, this difference is more marked among the female elderly workers" (Dhar, Husain and Dutta 2014: 6). In developing countries, on the other hand, policies targeting the elderly from low income households have failed to attain their objectives (Dhar, Husain and Dutta 2014: 30–31).

More interestingly, although the elderly workers receive lower wages than the non-elderly, their contribution to the total household income is substantial, amounting to 4%–5% on an average (Dhar, Husain and Dutta 2014). Data of 2009–10 finds that the elderly among the Scheduled Castes are participating more than others in urban areas, while in the rural areas, it is the elderly among the Scheduled Castes and Scheduled Tribes who participate more. Since care work, household chores and care of grandchildren is not being counted here (Dhar, Husain and Dutta 2014: 7), it is likely that the work of women, elderly in particular, is highly underestimated.

The NSSO (GoI 2006: 34) data states that the percentage of elderly persons (urban males) not dependent on others is 56%, partially dependent on others 13%, and fully dependent on others 30%. However, it is not only in the home that the elderly participate.

> The combination of extreme poverty and the lack of adequate social security in India make the elderly a part of the expanded labour force in the country. The unorganized sector has no retirement age. Labour force participation rates and other conventional indicators tracked globally mostly look at persons of working age when assessing the available labour force. A large section of the elderly, usually classified as 'dependent' due to their age, is actually independent and engaged in remunerative work (Centre for Equity Studies 2014: 115).

4 Security Provision Industry

The existing literature on security provision highlights some of its key features, viz, the shift from public to private sphere and its implications and new spatial realities of social processes. In the North American context (United States and Canada), the shift of this service from the public to the private sphere occurred as early as the 1970s. Research by Shearing and Stenning (1983), points to the growth in "private security," which provides police services on a fee-for-service basis to anyone willing to pay. The service offered by private security is also seen as more comprehensive than that provided by the public police force. Further, public policing and private security operate in different contexts—the former within the ambit of public law and the criminal justice system, and the latter within the context of "private justice." Private security in North America now outnumbers the public service, resulting in restructuring of institutions for maintenance of order, and a gradual erosion of the role of the state in this regard. Further, the nature of spaces that need to be protected has changed. With increase in "mass private property," private corporations have taken charge of the protection of these properties. This shift has taken place without any opposition because of the nexus between private property and private security and the consequent legitimation of the latter. The analysis of this industry reveals its non-specialised character, its client-defined mandate, and the character of the sanctions that it employs (Shearing and Stenning 1983: 499–500). Though this was the situation several decades ago in North America, these issues are perhaps increasingly relevant in the Indian context.

A study in Kenya points to the fact that the sector of security provision in the country is a highly unregulated one (Abrahamsen and Williams 2005: 426–28). While it is an important part of the economy and a significant employer, it is a "notoriously low paid occupation … long hours and very little remuneration." In spite of a minimum wage stipulation in 2003, there are variations across companies, and many do not pay the minimum wage. At the industry level, survival for the smaller companies becomes a challenge if they have to adhere to the norm minimum wages; the justification for this rests upon the labour surplus economy, where there is competition for low-paying jobs.

In India, the high demand for security provision notwithstanding, there is a predominance of informal, and hence insecure, employment. The industry here was born in the 1960s with a handful of players. According to the Federation of Indian Chambers of Commerce and Industry (FICCI), the private security industry is estimated to be worth ₹22,000 crore and is likely to cross ₹40,000 crore by 2015. "The number of companies operational is approximately 15,000, including both unorganised and organised. There are over 5 million private security guards available as compared to 3.2 million police officers contributing to one of the major factors in boosting the demand in the industry. Today the industry is perceived to be growing at 40%" (FICCI nd). The supply of manpower to the industry is most often from the rural and interior parts of India. They are barely literate and most often not trained to assume the role of a security guard. However, considering that the demand to supply mismatch is to the tune of 30%, all of them get absorbed. In fact, "the private security sector is expected to generate over 50 lakh new jobs in India by 2020 on the back of rising demand for manned guards" (*Hindu Business Line* 2014).

Sanjay Upadhyaya's study on the plight and predicament of security guards in the National Capital Region (Delhi) "clearly reveals that though the private security service industry is highly organized but most of the security personnel engaged

by thousands of such industries are unorganized," and "hardly 1%–1.5% of the total private security personnel are members of trade unions" (2011). Further, "most of the private security personnel have very little awareness about most of their legitimate dues and rights under various labour laws."

5 Mumbai Metropolitan Region

An appraisal of the security provision industry in Thane city, which is part of the Mumbai Metropolitan Region (MMR),[1] points to the existence of tens of registered companies that provide security personnel for protection of various types of properties, owned by the government, individuals/collectives, or private firms. The offices of the labour commissioner and the police commissioner provide licences to these registered companies engaged in security provision and monitor their functioning. A Security Guards Board for Brihan Mumbai and Thane District,[2] constituted by the state government, works according to the Maharashtra Private Security Guards (Regulation of Employment and Welfare) Act, 1981 and has mandated rules for the companies, including minimum wage payment (monthly wages to range from ₹10,705–₹13,015, depending on the category of guard) and upper and lower age limits for recruitment and employment of security guards.

The reality of this industry is complex. First, the sector has multiple stakeholders: the government that is attempting to control and regulate this industry, the companies as the contractors/recruiters, private property owners as the employers, and the security guards who are at the bottom of this hierarchy. The security guard is the least in control of his work conditions and choices and has multiple agencies that determine his work situation.

Second, the ineffectiveness of the regulatory system, manifest through the legal framework and law enforcement machinery, creates a split in the industry in terms of the visible and regulated segment and the invisible underbelly or the grey segment that survives despite the regulations. Rather than viewing the latter segment as unregulated, it would be appropriate to say that this segment is perhaps "differently regulated" in that the authorities have knowledge of its existence, and "regulate" it through rent-seeking behaviour and intimidation of the contractors. For instance, one of the legal stipulations is that the recruits must be between 18 and 60 years of age. While the lower age limit is one that recruiting companies adhere to, they do not do so with the upper age limit. There is an internal justification for it: the housing societies as employers are loathe to pay the stipulated wage, and they seek alternatives and are ready to employ an older worker who is ready to work at less than the official wage. It is evident that when rules are not followed, it sets in motion a series of interactions between the regulatory authorities and the companies, where things are covered up through bribery on one level and through underpayment of wages on another. A small time contractor who supplies security guards for some housing societies in the MMR says that what is a physically able worker above 60 years of age, and in need of a means of subsistence, to do? In a context where social networks provide opportunities for contractors to bring in "their own" people for doing such jobs, such informality thrives and is sustained in the underground economy.

Third, there is considerable heterogeneity in the industry with variation in the scale at which the companies operate—some have 30 to 35 employees, while others claim to have 1,500 to 2,000 recruits that are placed across various properties. Wages vary significantly across companies, ranging from less than the minimum wage to what may be termed as a more decent wage. Some service provider firms provide proper and periodic training to their recruits, while others do not. In particular, those employed through contractors who may not be adhering to the rules work in the most precarious conditions.

6 Work and Life of Elderly Security Guards

The elderly among the urban poor take up jobs as security guards, because they have never received any social security benefits throughout their working lives: informality and insecurity, therefore, breeds further informality. Family circumstances and inadequacy of single incomes have also brought women from migrants' families into the workforce and have made the male member take up multiple jobs. The gradual entry of the older migrants into the occupation of security guard has largely been prompted by the fact that they find it difficult to undertake more physically demanding jobs at their age.

For the migrants arriving in Mumbai, the initial years of finding a foothold in the city are filled with struggle. Sushil Surve, now 73 years old, migrated to Mumbai from the neighbouring Raigad district at the age of 15 with his uncle. He had studied till the second standard in a Marathi medium school. Landlessness and poverty compelled him to migrate to the city. In Mumbai, he started working in a hotel for ₹2.5 per month. After two months, he got a job as a cleaner at a branch of the Central Bank of India. This gave him stability, as the job was permanent in nature and offered him ₹68 per month. However, his services were terminated in 1980, since he did not have the educational qualification that had been prescribed after the nationalisation of banks. He then worked at the canteen of a multinational firm for ₹250 per month for the next nine years, after which he was asked to leave because he had greyed, and the employers thought he was past the retirement age. Thereafter, a dejected Sushil began working in a pest control company for ₹1,200 per month. He quit this job after six or seven months, as he started to develop eye and other health problems due to the pest control chemicals.

The chain of jobs with relatively decent working conditions followed by the terrible working conditions at the pest control firm demoralised him, and he decided to stop working and rested at home for two years. In this period, his household was supported by his savings and his wife's income who worked as domestic help. After two years, he started working as a security guard in Navi Mumbai, where he worked for more than a year at a salary of ₹1,800 per month. After that he did not take up a job for a while. In 2012, through a private security agency he was placed at the office of a voluntary organisation for ₹7,500 per month, which is where he now works. He receives no social security benefits.

From the time he came to the city, Sushil has lived in a slum in the north-east part of the city in a semi-concrete tenement. His wife even today works as domestic help to support the family. She

is now 65 years old. Their two older sons earn ₹5,000 per month and work as assistants at the clinic of a dentist. The youngest son works as a driver and earns ₹9,000 per month. Sushil lives in one house with two of his sons and their families; the eldest son lives in the same colony in a rented tenement due to paucity of space in his father's house. The family still functions as a joint family and Sushil's wife manages the salary of all her three sons. The household income of ₹29,000 per month supports him, his wife, three sons, and five grandchildren and their education.

Precarious Conditions at Home

Narayan Mishra belongs to an upper caste family and came to Mumbai from Uttar Pradesh when he was 16, with a person from his village, in order to support his family and three sisters who were yet to be married. He dropped out of school after the eighth standard. Notwithstanding the 30 acres of fertile land his family owned, they were still hard pressed for money. In Mumbai, he started living in a central suburb in a tenement provided by his employer, a flour mill owner. He worked here for ₹50 per month and free accommodation. His elder brother was already in Mumbai for a year when Narayan arrived in the city. Narayan continued to work at the flour mill for six years; his salary was ₹150 per month. He would start work at 10 am and handle all the operations of the flour mill; at 2 pm he took a break to go to his room to cook, eat, and rest and then resumed work at 5 pm and continued till 11 pm. He was assisted by a cleaner. Narayan purchased the flour mill after six years through his savings and by selling his land in the village. In the next four years, he was able to start new flour mills in three other locations, while repaying a loan of ₹6.75 lakh.

Narayan was married at a very young age before he came to Mumbai. In 1980, he brought his wife and two sons to the city too. His sons then started school. His monthly income was ₹12,000 of which he saved ₹6,000 each month. With the savings, he bought a Fiat car and started driving it as a taxi, which he did for the next 35 years. In the meantime, he bought two more taxis by taking a loan and repaid it over the next 15 years. In 2011, he stopped driving the taxi and started visiting the village frequently in order to support the family of his deceased brother. Narayan's wife passed away in 2011, and in 2014, he came back to Mumbai to be with his children as none of his peers in the village were alive, and he was lonely.

His sons drive his taxis but do not support him financially. He lives by himself in a room and has taken up the job of security guard at an ATM outlet of a bank some distance away. He has to work 12-hour shifts and earns ₹7,000 per month. He has developed a severe spinal problem over the last two years due to his years of arduous work at the flour mill and taxi driving and has been advised complete rest by the doctor. However, he continues to work without telling his doctor.

Rajendra Kamble, who came to Mumbai from his village at the age of 30, worked at a textile mill and worked in the spinning department for eight hours a day. He recalls difficult times with noisy machines, smoke, heat and steam in the mill. He recollects it as "dangerous" work. While other departments had relatively better conditions, the spinning department was the worst. After retirement in 2003, he stayed in the village for some years. He used to get ₹782 as pension, which was highly inadequate to support the family. So, he returned to Mumbai and took up the job of a security guard in 2008. Initially, he started at ₹3,500–₹4,000 per month and at present gets ₹11,000 per month in a security company. He is anxious and is working under compulsion to feed his family and save money for his daughter. He finds this job to be better than that at the mill, because it has eight hour shifts and is not very difficult.

Asif Khan, now 75, hailing from a family of carpet weavers, came to Mumbai when he was barely 12 years old. After dropping out from school, he spent three years with a *karigar* (skilled person) and learnt how to repair cycles. He took up the job of cycle repairing when he came to the city and worked for an uncle for a few years before getting a job at a cycle company. He once assembled a cycle for the son of a sheikh from Dubai, who then went on to win a cycle race. The sheikh was impressed with Asif and called him to Dubai, where he gave him a job to help with visas in a travel company. Asif worked there for four months and then returned to Mumbai, where he started doing some work for the Dubai consulate. He lives with his wife, son and daughter-in-law, and his five daughters are married. He started working as a security guard in 2013, primarily because he was bored sitting at home. However, his physical condition tells another story—he looks lean and fragile and does not appear to be in good health. He has no savings, since he spent them all on the weddings of his daughters and has taken up this job in order to feed his wife and himself. As a person who witnessed the "Quit India Movement" in Mumbai, he has views about how the city has deteriorated since independence.

Shinde, now 63, worked in a textile mill, which shut down in 2007, rendering him jobless. He was desperate to get any work, and between November 2007 and August 2008, he worked at a wholesale outlet of a tea company as a security guard for ₹4,500 per month. However, he complained that it was difficult to run the household, since his income was almost reduced to half of what he was earning at the mill. He is now with a private security company. He finds that this job offers more dignity than the smoke-filled mill, and his health is not at risk in this job, as he sits all the time. He traces his journey of working with two security agencies before joining the present one. His son is 22 and has studied till the 12th standard. He is worried about his son's future and will continue working till his health permits; he is afraid that if he stays at home, he may lose dignity at home and among relatives.

In their old age, these migrants seem to face precarious conditions at home. When asked about the city or having to work at this age, Sushil smiles and says that he has no complaints about the city. It has given him a livelihood and a better life than that of his parents who were landless agricultural labourers in the village. Although he looks healthy even at the age of 71, working as a security guard for 12 hours does not allow any time for rest and leisure, and life is monotonous. But he consoles himself by saying that he and his wife are in good health and can work to support their children. Most of Narayan's salary, which he earns as an ATM guard, goes towards his medical treatment

since the support from his sons is not adequate. An emotional and fragile looking Narayan said that his flour mills were in his brother's name, and so he has no income from them. He is depressed; his sons blame him for not doing anything for them and giving away all the money to his brother.

It is evident that none of these workers are getting the stipulated wages; their poor bargaining position is also evident from the description of social and economic conditions in their respective homes. The legal provisions, while necessary, have led to the flourishing of the underground security provision industry, with security guards being subjugated by the contractors. They seem to have built the lives of their family through immense hard labour in difficult conditions and have slipped back into difficult conditions again due to family relationships and other vulnerabilities.

7 Conclusions

The analysis of the living and working conditions of the elderly workers in the security provision industry reveals the privatisation and growing contractualisation of the workforce in this industry. The state in its role as a regulator and provider of social protection has clearly failed in its duty towards these people. Age aggravates precarity for these workers. In absorbing the elderly as security guards, the law is broken, but it does not really seem to matter to anybody, because the huge underbelly of the informal economy has a system and mechanism to allow this. The lives of these security guards emphasise the connection between poverty, informal work, and precarity and its persistence across time and generations. This reproduction of the precariat within the increasingly inadequate welfare regime promises to be one of the biggest challenges for the country in the years to come.

The inability and unwillingness of the children to provide for their parents in their old age has economic, social, as well as systemic dimensions to it. The consequent rupture in village and familial ties indicates that the household is a site of conflict in the context of poverty in large cities. This dynamic highlights the interplay between distress/compulsion to work, ineffectiveness of the state and its social security measures, and the role of family as a provider and buffer for its members.

As ties with the village weaken, the worker and his family becomes more a part of the city where the elderly have built their lives and those of their family. In their subjective understanding, they are not "migrants" in the sense of being unsettled; they are rooted in the city. However, the objective reality is that the city uses them but does not want to own them and still labels them as migrants even after decades of their being in the city.

The benign image of elderly security guard in a housing society who performs an extension of care work—supervising children at play, noting the entry/exit of vendors and visitors, and communicating messages to the society members—and of the guard at the ATM outlet, who is poorly paid and working a 12-hour shift, is indicative of the indifference towards informal labour in the country. The image of the city as a place of energy and a social, political, economic, and cultural synergising ground does not seem to hold true. It is now a more competitive ground, under the control of the profit seekers, with large numbers of tired, insecure residents labouring day and night.

NOTES

1 MMR comprises Mumbai city, and its neighbouring urban agglomerations.

2 The board has 3,000 registered principal employers and 35,000 registered security guards working with registered principal employers.

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