

Date: November 7, 2013

To
Shri. Arvind Kumar
Principal Secretary,
Ministry of Labour, Government of Maharashtra

Subject: Seeking permission to maintain labour registers in electronic form

Dear Sir,

It is my pleasure to write to you on behalf of the Retailers Association of India (RAI)!

Retailers Association of India (RAI) is the unified voice of Indian retailers. RAI works with all the stakeholders for creating the right environment for the growth of the modern retail industry in India. It encourages, develops and supports retailers to become modern and adopt best practices that will delight customers.

RAI is the representative body of Retailers in India having over 900 member establishments including large and small retailers in the country and represents over 98000 stores in India. RAI has a three charter aim of Retail Development, Facilitation and Propagation.

We understand that for the purpose of compliance, labour laws provide for the maintenance of numerous registers in a physical form.

Please find a list of registers to be maintained under labour laws:

Act/section	Requirement
Contract Labour (Regulation and Abolition) Act, 1970 / Section 29	Every employer and contractor must maintain registers containing particulars of contract labourers employed nature of work and rates of wages. A register of contractors (in Form XII) is required to be maintained in respect of each registered establishment. Registers shall be maintained legibly in English and Hindi or in the language understood by the majority of the persons employed in the establishment.

<p>Child Labour (Prohibition and Regulation) Act, 1986 / Section 11 of part 4</p>	<p>Registers need to be maintained containing the name and date of birth of every child employed, hours and periods of work for such child and nature of work for such child.</p>
<p>Minimum Wages Act, 1948</p>	<p>The following registers be maintained and updated on a timely basis:</p> <ol style="list-style-type: none"> 1. Register of fines (in Form I), 2. Register of deductions for damages or loss (in Form II) 3. Register of overtime (in Form IV) 4. Muster Roll (in Form V) 5. Register of Wages 6. Inspection Book
<p>Payment of Bonus Act, 1965</p>	<p>The following registers be maintained and updated on a timely basis:</p> <ol style="list-style-type: none"> 1. Register (in Form A) to be maintained showing computation of allocable surplus 2. Register (in Form B) to be maintained showing set-on and set-off of allocable surplus 3. Register (in Form C) to be maintained showing details of amount of bonus due to each employee
<p>Maternity Benefits Act, 1961</p>	<p>Muster roll must be updated and maintained from time to time.</p>
<p>Various State Shops and Establishments</p>	<p>The following registers be maintained for a period of at least 2 years from the date of last entry therein:</p> <ol style="list-style-type: none"> 1. Register of employment (if the opening and closing hours and period of

legislations	interval is uniform), as the case may be 2. Register of leave 3. Leave Book to be provided to each employee 4. Visit Book - To maintain the remarks of inspection of the visiting inspector
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Issue and probable solution:

As required by labour laws, these registers need to be maintained separately and in the physical form which is difficult given the big size of the hypermarket stores and large back-end facilities like warehouses which the retailers operate. The large number of employees and high attrition rate in retail business makes the necessary maintenance of registers tedious and leaves room for unintentional non-compliance.

We propose that these registers be consolidated into one register which can be electronically maintained in a soft copy format as this would allow the employer to comply with such provisions in an accurate and environment-friendly manner.

We hope and believe that you will receive our representation favorably and look forward to your kind action in this regard.

Looking forward to an early reply,

Yours sincerely,

For Retailers Association of India



Gautam Jain
Head – Advocacy & Finance