

STREET-LEVEL BUREAUCRACY AND IMPLEMENTATION UNDER THE CODE ON SOCIAL SECURITY, 2020: A DOCTRINAL ANALYSIS OF LOCAL-LEVEL ADMINISTRATIVE INTERFACES

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The Code on Social Security, 2020 represents a significant step towards consolidating and streamlining India's fragmented social security framework, particularly with respect to unorganised workers. While the Code introduces an institutional architecture for the registration and delivery of social security benefits, its effective implementation is closely tied to the functioning of local-level administrative authorities. This paper undertakes a doctrinal analysis of the implementation framework under the Code through the lens of Street-Level Bureaucracy, which emphasizes the role of frontline officials in translating statutory mandates into practical outcomes. The study critically examines the statutory provisions, delegated powers, and procedural mechanisms that govern local-level administrative interfaces under the Code. It analyses the extent to which the legal framework defines roles, regulates discretion, and structures interactions between the State and beneficiaries. Particular attention is paid to the design of registration systems, distribution of authority between central and state bodies, and the scope of administrative flexibility embedded within the legislation. By focusing on the internal coherence and operational clarity of the statutory scheme, the paper seeks to identify areas of ambiguity, overlap, and potential gaps within the legal framework. Without engaging in empirical evaluation, the study highlights how the design of legal provisions may influence implementation processes at the local level. The paper ultimately contributes to a deeper understanding of the relationship between legislative drafting and administrative execution in the context of social security governance in India.

KEYWORDS: Unorganised Workers, Street-Level Bureaucracy, Administrative Discretion, Implementation Framework

INTRODUCTION

The enactment of the Code on Social Security, 2020 marks a significant legislative effort to consolidate and rationalise India's fragmented social security regime. By subsuming multiple pre-existing enactments into a unified framework, the Code seeks to extend coverage to a broader spectrum of workers, particularly those engaged in the unorganised sector. However, the effectiveness of such a comprehensive statutory framework is not

determined solely by its substantive provisions, but also by the mechanisms through which it is implemented at various levels of administration. Within this context, the role of local-level administrative authorities assumes particular importance. The process of registration, identification of beneficiaries, and facilitation of access to social security benefits is largely mediated through institutional interfaces operating at the ground level. These actors function within the boundaries of statutory

provisions, delegated legislation, and administrative guidelines, thereby forming a crucial link between legislative intent and its realisation in practice. The design of these interfaces, including the allocation of powers, procedural requirements, and the scope of discretion, directly shapes the implementation architecture under the Code.

This study examines the implementation framework of the Code through the lens of Street-Level Bureaucracy, which highlights the significance of frontline administrative actors in interpreting and applying legal norms. While the theory is often employed in empirical analyses, its conceptual foundations offer valuable insights for a doctrinal inquiry into how legislation structures administrative behaviour. By focusing on statutory design rather than field-level outcomes, this paper seeks to analyse the extent to which the Code anticipates, regulates, and constrains the role of local-level authorities. Adopting a doctrinal methodology, the paper undertakes a detailed examination of the provisions of the Code, along with relevant rules and institutional arrangements, to assess the clarity, coherence, and completeness of the legal framework governing implementation. It explores issues relating to delegation of authority, procedural structuring, and the presence of legal ambiguities that may influence administrative functioning. In doing so, the study aims to contribute to a nuanced understanding of the relationship between legislative drafting and administrative execution within the domain of social security law.

RESEARCH QUESTIONS

1. To what extent does the Code on Social Security, 2020 structure and regulate the role of local-level administrative authorities in implementation?
2. Does the Code provide adequate procedural guidance for registration, identification, and delivery of social security benefits to unorganised workers?

3. How does the implementation framework under the Code reflect the principles of Street-Level Bureaucracy in its reliance on frontline administrative actors?
4. How are powers and responsibilities distributed between central, state, and local authorities under the Code, and does this distribution ensure institutional clarity?
5. Does the Code prioritise institutional design over effective operational enforcement mechanisms in its implementation framework?

RESEARCH OBJECTIVES

1. To analyse the statutory framework of the Code on Social Security, 2020 with respect to its implementation structure.
2. To examine the role and functions of local-level administrative authorities in the implementation of the Code.
3. To assess the extent of administrative discretion embedded within the implementation framework.
4. To evaluate the procedural clarity and institutional design governing registration and delivery of social security benefits to unorganised workers.
5. To examine the relevance of Street-Level Bureaucracy in understanding the operational dynamics of the Code.
6. To identify structural gaps, ambiguities, or overlaps in the delegation of powers under the Code.
7. To analyse whether the implementation framework ensures coherence between legislative intent and administrative execution.

RESEARCH METHODOLOGY

This study adopts a doctrinal legal research methodology to examine the implementation framework of the Code on Social Security, 2020 with specific reference to local-level administrative structures. The research is analytical and interpretative in nature, focusing on statutory provisions rather than empirical field data. The primary sources of data include

the text of the Code, relevant rules, delegated legislation, and government notifications governing the implementation of social security schemes. These are examined to understand the legal design, institutional framework, and allocation of administrative responsibilities under the Code.

Secondary sources such as academic articles, commentaries, reports by international organisations, and policy documents are used to support interpretative analysis and to situate the Code within the broader context of labour law reforms in India. The study also employs a conceptual framework based on the theory of Street-Level Bureaucracy to critically analyse how statutory provisions structure administrative discretion and implementation mechanisms at the ground level. However, this theory is used only as an analytical lens within a doctrinal framework and not as an empirical testing tool. The research is purely qualitative in nature and does not involve surveys, interviews, or statistical analysis. It relies on systematic interpretation of legal texts to evaluate the coherence, clarity, and effectiveness of the implementation architecture under the Code.

LIMITATIONS

The study is confined to a doctrinal analysis of the Code on Social Security, 2020, and does not include empirical data collection such as interviews or surveys with stakeholders. The research does not assess ground-level implementation outcomes, as it relies solely on statutory provisions, rules, and secondary legal sources. The study uses the conceptual framework of Street-Level Bureaucracy only as an interpretative lens, without empirical validation in real administrative settings. The analysis is limited to the legal and institutional design of the Code and does not extend to comparative studies with international social security systems. Any conclusions drawn are based on interpretation of available legal texts and may not fully reflect dynamic administrative practices or future amendments to the Code.

LITERATURE REVIEW

The evolution of social security law in India has been widely documented as part of the broader labour law reform agenda aimed at consolidating fragmented welfare legislation into a unified statutory framework. The Code on Social Security, 2020 has been analysed in academic literature as a significant codification exercise intended to extend social protection to both organised and unorganised workers. Scholars observe that while the Code represents legislative consolidation, its effectiveness depends heavily on the clarity of institutional design and implementation mechanisms¹¹³⁵. Commentators such as Vaidya and Sindhu argue that the Code marks a progressive shift towards universal social security but simultaneously highlight concerns regarding administrative preparedness and enforcement capacity¹¹³⁶. Similarly, Sharma and Ragaur, in their review of labour codes, emphasise that ambiguity in definitions and institutional roles may affect the uniform application of social security provisions across states¹¹³⁷. These studies collectively suggest that implementation challenges are deeply embedded in structural design rather than merely operational inefficiencies. From a public administration perspective, the theory of Street-Level Bureaucracy, originally developed by Michael Lipsky, has been widely used to explain how frontline officials shape policy outcomes through discretion in implementation. Lipsky's framework highlights that bureaucrats operating at the ground level effectively become policy interpreters, thereby influencing access to welfare benefits¹¹³⁸. Recent studies in governance literature further reinforce that administrative discretion is a defining feature of

¹¹³⁵ Shivansh Gaur, *Analysing the Code on Social Security, 2020*, IJLSSS (2025).

¹¹³⁶ Vaidya & Sindhu, *Critical Analysis of the Social Security Code, 2020*, Routledge (2024).

¹¹³⁷ Sharma S. & Ragaur S., *Organising the Unorganised: A Review of the Social Security Code 2020*, IRJMS (2021).

¹¹³⁸ Michael Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services* (Russell Sage Foundation, 1980).

welfare delivery systems, particularly in contexts involving large informal populations¹¹³⁹.

Books on Indian labour law, including standard commentaries on the Code, also provide a detailed statutory breakdown of the institutional framework, including the role of central and state boards, registration mechanisms, and digital databases¹¹⁴⁰. These works primarily adopt a descriptive approach, focusing on structural consolidation rather than doctrinal interrogation of implementation design. Bare act compilations and annotated editions further clarify statutory provisions but do not critically analyse the interaction between legal design and administrative discretion¹¹⁴¹. Despite the growing body of literature, a noticeable gap exists in purely doctrinal analyses that systematically examine how the legislative architecture of the Code structures local-level administrative interfaces. Most existing studies either focus on policy evaluation or empirical implementation challenges. There is limited scholarly engagement with the internal legal design of the Code through the lens of administrative theory, particularly in relation to street-level discretion embedded within statutory frameworks. This study seeks to bridge that gap by providing a doctrinal examination of implementation structures under the Code.

FRAMEWORK

The Code on Social Security, 2020 represents a significant legislative reform aimed at consolidating and rationalizing India's previously fragmented social security regime. By subsuming multiple pre-existing labour welfare statutes into a single codified framework, the Code seeks to create a unified and more coherent structure for the administration of social security benefits, particularly for workers in the unorganized

sector¹¹⁴². However, the true effectiveness of this consolidation depends not only on the substantive rights and entitlements created under the statute but also on the mechanisms through which such rights are operationalized in practice.

The implementation framework under the Code is characterized by a multi-tiered institutional structure involving central, state, and local-level administrative authorities. These institutions are collectively responsible for a wide range of functions, including framing schemes, maintaining worker databases, facilitating registration, and ensuring the delivery of social security benefits¹¹⁴³. While the Code sets out the broad contours of this institutional architecture, it largely leaves the operational specifics to delegated legislation, administrative rules, and executive discretion. This design reflects a flexible governance model, but it simultaneously introduces variability in how the law is applied across different jurisdictions. At the core of this implementation structure lies the reliance on local-level administrative interfaces, which serve as the primary point of contact between the State and unorganized workers. These interfaces play a crucial role in translating statutory provisions into actionable outcomes, particularly in processes such as registration, verification of eligibility, and access to welfare schemes. However, the absence of detailed procedural standardization within the statutory text means that these frontline institutions often operate within broad interpretative boundaries, leading to differences in implementation practices¹¹⁴⁴.

This structural reliance on decentralized administrative functioning closely aligns with the conceptual framework of Street-Level Bureaucracy, which emphasizes the decisive role of frontline officials in shaping the practical

¹¹³⁹ Gaurab Pokharel et al., Discretionary Trees: Understanding Street-Level Bureaucracy, arXiv (2023).

¹¹⁴⁰ Commercial Law Publishers, The Code on Social Security, 2020: Bare Act with Comments (2026).

¹¹⁴¹ Bharat Law House, The Code on Social Security, 2020 (Annotated Edition) (2025).

¹¹⁴² Government of India, The Code on Social Security, 2020 (Act No. 36 of 2020).

¹¹⁴³ Ministry of Labour and Employment, Report on Labour Codes Consolidation (Government of India, 2021), <https://labour.gov.in>

¹¹⁴⁴ V. V. Giri National Labour Institute, Social Security for Unorganised Workers in India (NOIDA, 2019).

outcomes of public policy¹¹⁴⁵. In such systems, implementation is not merely a mechanical extension of legislative intent but a dynamic process influenced by institutional capacity, administrative discretion, and contextual constraints. Accordingly, the implementation framework under the Code is best understood as an interaction between legislative design and administrative execution. While the Code provides the foundational legal architecture for social security governance, its practical effectiveness is significantly shaped by the functioning of administrative institutions at various levels. This interplay between statutory structure and administrative practice forms the basis for analyzing the strengths, limitations, and interpretative gaps within the Code's implementation framework¹¹⁴⁶.

INSTITUTIONAL STRUCTURE AND ADMINISTRATIVE DESIGN

The Code on Social Security, 2020 establishes a comprehensive but layered institutional architecture intended to govern the administration of social security in India. At the apex of this structure are central-level bodies, including the Central Board and other designated authorities empowered to frame schemes, lay down policy directions, and coordinate implementation across states¹¹⁴⁷. Parallel to this, state-level institutions are entrusted with the responsibility of adapting and executing these schemes in accordance with regional requirements and administrative capacities¹¹⁴⁸. In addition, scheme-specific authorities and implementing agencies are constituted to manage operational functions such as registration of workers, maintenance of databases, and disbursement of benefits¹¹⁴⁹.

These institutions collectively form a multi-tier governance model designed to integrate policy formulation with implementation. The Code assigns those broad functional responsibilities, including identification of beneficiaries, enrolment of workers, and facilitation of access to social security benefits. However, the statutory provisions largely articulate these roles in a generalised manner, without laying down detailed procedural mechanisms for their execution. As a result, much of the operational framework is developed through subordinate legislation, executive rules, and administrative guidelines issued from time to time¹¹⁵⁰. This structural design reflects a deliberate legislative choice to adopt a flexible and adaptive governance model. By avoiding excessive procedural rigidity, the Code allows implementing authorities to tailor mechanisms according to local socio-economic conditions and administrative realities. However, this flexibility also introduces a degree of indeterminacy in the implementation process, as the absence of uniform statutory procedures may lead to variation in interpretation and application across different jurisdictions¹¹⁵¹. The decentralized nature of the institutional framework further reinforces this variability. While decentralization is intended to enhance efficiency and local responsiveness, it simultaneously places significant reliance on the administrative capacity of individual states and local bodies. Differences in infrastructure, digital readiness, staffing, and institutional efficiency can therefore influence the consistency with which the provisions of the Code are implemented across regions¹¹⁵². From a doctrinal perspective, this design can be understood as creating a governance structure that is heavily dependent on delegated authority and administrative interpretation. The broad statutory outlines provided under the Code necessitate continuous reliance on

¹¹⁴⁵ Michael Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services* (Russell Sage Foundation, 1980).

¹¹⁴⁶ S. C. Srivastava, *Social Security and Labour Welfare Law in India* (Oxford University Press, 2022).

¹¹⁴⁷ Government of India, *The Code on Social Security, 2020 (Act No. 36 of 2020)*, ss. 4–7.

¹¹⁴⁸ Ministry of Labour and Employment, *Report on Labour Codes Consolidation* (Government of India, 2021), <https://labour.gov.in>

¹¹⁴⁹ V. V. Giri National Labour Institute, *Social Security for Unorganised Workers in India* (NOIDA, 2019).

¹¹⁵⁰ S. C. Srivastava, *Social Security and Labour Welfare Law in India* (Oxford University Press, 2022).

¹¹⁵¹ International Labour Organization, *World Social Protection Report 2020–22* (ILO, Geneva, 2021).

¹¹⁵² Guy Standing, *The Precariat: The New Dangerous Class* (Bloomsbury, 2011).

subordinate rule-making and executive discretion to operationalise its provisions. This, in turn, positions administrative agencies not merely as implementers of law, but as active participants in shaping the manner in which statutory objectives are realised in practice¹¹⁵³. In this context, the institutional framework under the Code reflects a balance between centralised policy control and decentralised execution. While the former ensures uniformity in legislative intent, the latter introduces variability in outcomes, thereby making administrative capacity a critical determinant in the effectiveness of social security delivery¹¹⁵⁴.

ROLE OF LOCAL-LEVEL ADMINISTRATIVE INTERFACES

The Code on Social Security, 2020 positions local-level administrative bodies as the crucial operational link between the statutory framework and unorganised workers. These entities include registration authorities, Common Service Centres (CSCs), designated field officers, and other facilitation mechanisms established under the implementation structure of the Code¹¹⁵⁵. Collectively, they function as the first point of contact for workers seeking enrolment into social security schemes and access to welfare benefits. At a functional level, these local administrative interfaces perform multiple interconnected roles. They are responsible for the identification and verification of unorganised workers, processing registration applications, maintaining digital or physical databases, and facilitating access to various welfare schemes notified under the Code¹¹⁵⁶. In this sense, they operationalise the legislative intent by converting abstract statutory entitlements into procedural actions that can be accessed by beneficiaries at the ground level. The importance of these interfaces is further heightened by the nature of

the unorganised workforce, which is characterised by informality, mobility, and lack of systematic documentation. As a result, these administrative bodies often act not only as implementing agencies but also as intermediaries that bridge informational and procedural gaps between the State and workers¹¹⁵⁷. Their role extends beyond mere administrative processing to include facilitation, guidance, and in some cases, interpretation of eligibility requirements. However, despite their critical importance, the statutory framework under the Code does not provide a uniform and detailed procedural blueprint governing the functioning of these local-level interfaces. While the legislation outlines their general responsibilities, it largely delegates the operational specifics to subordinate rules, executive instructions, and administrative discretion¹¹⁵⁸. This results in a situation where implementation practices may vary depending on local administrative capacity, technological infrastructure, and institutional efficiency. Such variability has doctrinal significance, as it highlights the absence of a fully standardised implementation mechanism within the statutory design. In practice, this means that identical legal entitlements under the Code may be accessed differently across jurisdictions, depending on how local authorities interpret procedural requirements and exercise administrative discretion¹¹⁵⁹. From a structural perspective, these local-level interfaces embody the practical manifestation of decentralised governance within the social security framework. Their functioning reflects the interaction between statutory design and administrative execution, where law is not applied in a uniform mechanical manner but is mediated through institutional actors operating within contextual constraints. This reinforces the understanding that the effectiveness of the

¹¹⁵³ Michael Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services* (Russell Sage Foundation, 1980).

¹¹⁵⁴ P. L. Malik, *Handbook of Labour and Industrial Law* (Eastern Book Company, latest edn.).

¹¹⁵⁵ Government of India, *The Code on Social Security, 2020* (Act No. 36 of 2020), ss. 12–15.

¹¹⁵⁶ Ministry of Labour and Employment, *Operational Guidelines for Social Security Schemes* (Government of India, 2021), <https://labour.gov.in>

¹¹⁵⁷ V. V. Giri National Labour Institute, *Social Security for Unorganised Workers in India* (NOIDA, 2019).

¹¹⁵⁸ S. C. Srivastava, Michael Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services* (Russell Sage Foundation, 1980).ava, *Social Security and Labour Welfare Law in India* (Oxford University Press, 2022).

¹¹⁵⁹ Michael Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services* (Russell Sage Foundation, 1980).

Code is significantly shaped by the design and operational clarity of its local implementation architecture¹¹⁶⁰.

ADMINISTRATIVE DISCRETION AND IMPLEMENTATION DYNAMICS

A key feature of the implementation framework under the Code on Social Security, 2020 is the presence of significant administrative discretion at the local level. The statutory scheme, while establishing a broad institutional structure for social security delivery, does not prescribe exhaustive procedural rules for every stage of implementation. As a result, implementing authorities are vested with interpretative flexibility in operational matters such as verification of identity, determination of eligibility, scrutiny of applications, and facilitation of benefit delivery¹¹⁶¹. This discretionary space becomes particularly relevant in the context of the unorganised sector, where documentation and formal records are often incomplete or inconsistent.

The exercise of such discretion is not incidental but structurally embedded within the design of the Code. By relying on delegated legislation and administrative guidelines for procedural detailing, the framework allows authorities at the ground level to adapt implementation practices to local conditions¹¹⁶². While this may enhance responsiveness and administrative adaptability, it simultaneously introduces the possibility of variation in outcomes across different jurisdictions, depending on institutional capacity and interpretative approaches adopted by officials.

This structure aligns closely with the theoretical framework of Street-Level Bureaucracy, which conceptualises frontline officials as key actors in policy execution rather than mere mechanical

implementers of law¹¹⁶³. According to this framework, public policy is effectively shaped at the point of implementation, where bureaucrats exercise discretion in interpreting rules and applying them to individual cases. Within this doctrinal understanding, implementation under the Code is not a purely mechanical or rule-bound process but a function of administrative judgment exercised within the boundaries of statutory authority. The interaction between legal provisions and administrative discretion thus becomes central to understanding how social security entitlements are operationalized in practice. This highlights the dual nature of implementation under the Code—structured by law, yet shaped in execution by interpretative administrative action¹¹⁶⁴.

REGISTRATION AND IDENTIFICATION MECHANISMS

The Code on Social Security, 2020 introduces a centralised registration framework aimed at creating a unified and comprehensive database of unorganised workers across the country. The primary objective of this mechanism is to enable targeted delivery of social security benefits by ensuring that eligible workers are systematically identified and recorded within a formal institutional structure¹¹⁶⁵. This represents a significant shift from fragmented and scheme-specific enrolment systems towards an integrated national-level database architecture. The registration mechanism is designed to function as the foundational gateway for access to welfare entitlements under the Code. By consolidating worker information into a centralised system, the framework seeks to enhance transparency, reduce duplication, and improve efficiency in benefit delivery. However, the statutory provisions primarily outline the broad structure of registration without prescribing detailed operational procedures for

¹¹⁶⁰ International Labour Organization, World Social Protection Report 2020–22 (ILO, Geneva, 2021).

¹¹⁶¹ GoMinistry of Labour and Employment, Report on Implementation of Labour Codes (Government of India, 2021), <https://labour.gov.in/government-of-india-the-code-on-social-security-2020-act-no-36-of-2020>, ss. 6–12.

¹¹⁶² Ministry of Labour and Employment, Report on Implementation of Labour Codes (Government of India, 2021), <https://labour.gov.in>

¹¹⁶³ Michael Lipsky, Street-Level Bureaucracy: Dilemmas of the Individual in Public Services (Russell Sage Foundation, 1980).

¹¹⁶⁴ S. C. Srivastava, Social Security and Labour Welfare Law in India (Oxford University Press, 2022)

¹¹⁶⁵ Government of India, The Code on Social Security, 2020 (Act No. 36 of 2020), ss. 15–18.

implementation. Instead, the practical aspects of enrolment, verification, and data management are largely delegated to subordinate legislation, administrative guidelines, and executive instructions issued by competent authorities¹¹⁶⁶.

As a result, the effectiveness of the registration and identification system is significantly dependent on several non-statutory factors. These include the uniformity of implementation practices across different states, the availability and reliability of digital infrastructure, and the degree of coordination between central, state, and local administrative bodies¹¹⁶⁷. Variations in any of these factors can influence the accuracy, accessibility, and inclusiveness of the registration process. From a doctrinal perspective, this structure reflects a governance model that prioritises centralisation of data while decentralising implementation responsibilities. While such a model is intended to ensure both efficiency and adaptability, it simultaneously introduces potential inconsistencies in execution due to reliance on administrative capacity and technological readiness at the ground level. Consequently, the registration mechanism under the Code functions not merely as a legal requirement but as an administratively mediated process shaped by institutional and infrastructural conditions.

DELEGATION AND REGULATORY GAPS

The legislative framework under the Code on Social Security, 2020 demonstrates a pronounced reliance on delegated legislation for the operationalisation of its provisions. While the parent statute establishes the broad institutional architecture and outlines the general objectives of social security governance, the detailed procedural and operational aspects are largely left to rules, schemes, and executive notifications framed by

the appropriate government¹¹⁶⁸. This legislative design reflects a conscious shift towards a flexible regulatory model that enables adaptability in implementation. However, such reliance on delegated legislation also gives rise to certain interpretative and regulatory gaps. Critical aspects such as procedural timelines for processing applications, uniform standards for verification of identity and eligibility, and clearly defined grievance redressal mechanisms are not exhaustively codified within the primary statute¹¹⁶⁹. As a result, much of the implementation architecture is shaped at the secondary level of rule-making, which may vary across different administrative jurisdictions.

These regulatory gaps have significant implications for the consistency of implementation, particularly in relation to local-level administrative interfaces. Variations in subordinate rules, administrative instructions, and state-specific adaptations may lead to differences in how the same statutory provisions are operationalised across regions¹¹⁷⁰. Such inconsistencies can affect the uniformity of access to social security benefits, depending on the institutional capacity and regulatory interpretation adopted by individual states. From a doctrinal standpoint, the absence of comprehensive statutory standardisation enhances the role of administrative discretion in the implementation process. In the absence of clear legislative directives on procedural uniformity, implementing authorities are often required to rely on interpretative judgment and contextual considerations. This reinforces the central role of administrative actors in shaping the practical application of the law, thereby linking regulatory design with implementation outcomes.

¹¹⁶⁶ Ministry of Labour and Employment, Operational Guidelines for Unorganised Workers' Registration (Government of India, 2021), <https://labour.gov.in>

¹¹⁶⁷ International Labour Organization, World Social Protection Report 2020–22 (ILO, Geneva, 2021).

¹¹⁶⁸ Government of India, The Code on Social Security, 2020 (Act No. 36 of 2020), ss. 1–5, 114–119.

¹¹⁶⁹ S. C. Srivastava, Social Security and Labour Welfare Law in India (Oxford University Press, 2022).

¹¹⁷⁰ Ministry of Labour and Employment, Report on Implementation Challenges under Labour Codes (Government of India, 2021), <https://labour.gov.in>

OBSERVATIONS

The implementation framework under the Code on Social Security, 2020 reflects a consolidated yet administratively dependent structure for social security delivery in India. The Code establishes a multi-tier institutional arrangement involving central, state, and local-level authorities; however, while these institutions are assigned broad functional responsibilities, the statutory provisions largely lack detailed procedural codification for operational execution. As a result, there is significant reliance on delegated legislation and executive guidelines to translate legislative intent into practice. In this structure, local-level administrative interfaces emerge as the primary operational link between statutory entitlements and unorganised workers, particularly in processes such as registration, verification, and benefit delivery. The framework also provides considerable space for administrative discretion, especially in matters where procedural standards are not explicitly defined, leading to interpretative flexibility at the implementation stage. This discretion, combined with variations in administrative capacity and technological infrastructure across states, contributes to potential inconsistencies in implementation outcomes. The design of the Code therefore reflects characteristics consistent with the theory of Street-Level Bureaucracy, wherein frontline officials play a decisive role in shaping the practical application of policy. Furthermore, the effectiveness of the registration and identification systems is closely linked to digital infrastructure and inter-governmental coordination, reinforcing the importance of administrative capability in achieving policy objectives. Overall, the observations indicate that while the Code provides a strong institutional foundation, its practical success is heavily contingent upon the efficiency and consistency of administrative implementation at the ground level.

CONCLUSION

The implementation framework under the Code on Social Security, 2020 represents a hybrid governance model that combines statutory consolidation with significant administrative flexibility. While the Code seeks to unify India's fragmented social security regime under a single legislative structure, its operational effectiveness is largely dependent on the manner in which institutional mechanisms function across central, state, and local levels. The statutory design outlines a broad institutional architecture, but leaves substantial procedural and operational details to delegated legislation and executive discretion. This structure results in a decentralised implementation system where local-level administrative interfaces play a pivotal role in translating legal entitlements into practical access for unorganised workers. However, the absence of detailed procedural codification in several areas creates reliance on interpretative administrative practices, leading to variation in implementation outcomes across jurisdictions. Consequently, administrative discretion becomes a defining feature of the system, particularly in processes such as registration, verification, and benefit delivery. From a doctrinal perspective, the framework reflects principles associated with Street-Level Bureaucracy, where frontline officials function as key actors in shaping policy implementation. The effectiveness of the Code is therefore not determined solely by legislative intent but by the capacity, consistency, and interpretative practices of implementing authorities at the ground level. In conclusion, the analysis indicates that while the Code provides a strong structural foundation for social security governance, its success is closely tied to the clarity of institutional design and the regulation of administrative discretion. The interaction between statutory provisions and implementation mechanisms emerges as the central determinant of policy effectiveness. Strengthening procedural clarity, standardisation, and administrative

coordination would therefore be essential to enhancing the uniform and effective delivery of social security benefits under the Code across India.

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