

**INVISIBLE YET INDISPENSABLE: WOMEN'S CONTRIBUTIONS IN UNDEFINED
AREAS OF DEVELOPMENT****Dr. Swaleha Mansuri****Assistant Professor,****Ananya Institute of Commerce and Law, Kalol (KIRC)****Abstract:**

Women play an indispensable role in the social, economic, and cultural development of every nation. However, a significant portion of their contributions remains invisible because it is performed outside the formal economy and often goes unrecognized by law and public policy. Unpaid care work, domestic responsibilities, emotional labour, informal employment, caregiving, community service, and voluntary social support are essential for sustaining families, communities, and economic productivity. Despite their importance, these activities are rarely measured in national economic indicators or adequately protected by legal frameworks.

This paper examines the contributions of women in these undefined and invisible areas of development from a constitutional, socio-legal, and judicial perspective. It analyses how the Constitution of India, particularly Articles 14, 15, 16, 21, and the Directive Principles of State Policy, supports the principles of equality, dignity, and social justice. The study further examines recent judgments of the Supreme Court of India that have increasingly acknowledged the economic and social value of women's unpaid work, domestic labour, and caregiving responsibilities. It argues that judicial recognition represents an important step towards expanding the understanding of development beyond conventional economic measures.

The paper also explores the challenges faced by women engaged in invisible labour, including lack of economic recognition, social undervaluation, absence of legal protection, and limited policy support. It contends that excluding these contributions from development discourse results in an incomplete understanding of national progress and reinforces gender inequality. The study concludes that sustainable and inclusive development cannot be achieved unless women's invisible contributions are formally recognised, economically valued, and legally protected. It recommends integrating unpaid care work into policy planning, strengthening social security measures, promoting gender-sensitive budgeting, and adopting legal reforms that acknowledge women's indispensable role in nation-building. Recognising invisible labour

is not merely an issue of gender equality but a constitutional obligation essential for achieving substantive justice and inclusive development.

Keywords: Invisible labour, Women and development, Unpaid care work, Informal sector, Gender justice, Constitutional dignity

1. Introduction

National development is generally measured through economic indicators such as Gross Domestic Product (GDP), industrial growth, employment rates, infrastructure development, and technological progress. While these indicators are important, they often fail to recognise a significant portion of productive work performed by women outside the formal economy. Every day, millions of women contribute to the well-being of families and society through unpaid domestic work, caregiving, household management, agricultural assistance, informal employment, and community service. Although these activities are essential for maintaining social stability and supporting economic growth, they receive little legal, economic, or policy recognition.

Women's invisible labour forms the foundation upon which the formal economy functions. By caring for children, the elderly, and family members, preparing food, managing households, and supporting community welfare, women contribute significantly to the development of human resources and the nation's overall progress. However, since much of this work is unpaid and performed within the home or informal sector, it remains excluded from national income calculations and development planning.

The invisibility of women's contributions is not merely an economic issue but also a matter of social and legal inequality. Traditional gender roles have long treated domestic and caregiving responsibilities as natural duties of women rather than productive work deserving recognition and value. As a result, women engaged in such activities often lack economic independence, social security, and legal protection despite making substantial contributions to society.

In recent years, Indian courts have increasingly acknowledged the value of women's unpaid work and recognised that domestic labour contributes significantly to the nation's economy and social development. Constitutional principles of equality, dignity, and social justice further support the need to recognise women's invisible contributions. This paper examines the role of women in these undefined areas of development from a constitutional and socio-legal perspective. It also analyses judicial developments and highlights the need for legal and policy reforms to ensure that women's invisible labour receives the recognition and protection it deserves.

1.2 Meaning and Scope of "Undefined Areas of Development"

The expression "**undefined areas of development**" refers to forms of work and contribution that are essential for society but remain largely unrecognised in economic statistics, labour laws, and public policy. These activities are generally unpaid, underpaid, informal, or performed within households and communities without formal employment status. Although they contribute significantly to social welfare and economic productivity, they are rarely considered part of the conventional concept of national development.

These undefined areas include:

- **Unpaid household and caregiving work**, such as cooking, cleaning, childcare, caring for elderly family members, and managing household responsibilities.
- **Informal sector and home-based work**, including small-scale production, handicrafts, tailoring, food preparation, and other income-generating activities carried out from home.
- **Agricultural work without ownership or wages**, where women actively participate in farming, livestock management, and allied activities without legal ownership of land or direct financial compensation.
- **Community health, nutrition, and social support**, including voluntary work performed through self-help groups, Anganwadi services, health awareness programmes, and local community initiatives.
- **Emotional and reproductive labour**, which includes emotional support to family members, maintaining family relationships, pregnancy, childbirth, and other caregiving responsibilities that sustain families and communities.

Although these activities are often invisible in official statistics, they are indispensable for the functioning of households, communities, and the national economy. Recognising these contributions is essential for achieving gender equality, inclusive development, and substantive social justice.



Figure: Women engaged in unpaid care work, informal labour, self-help groups, and community-based development activities.

1.3 Constitutional Vision and Gender-Just Development

The Constitution of India provides a strong foundation for achieving gender equality and inclusive development. It recognizes that women are entitled to equal rights, equal opportunities, and a life of dignity. Several constitutional provisions support the recognition of women's contributions, including those performed in unpaid and informal sectors.

- **Article 14** guarantees equality before the law and equal protection of the laws.
- **Article 15(3)** empowers the State to make special provisions for women and children to achieve substantive equality.
- **Article 16** ensures equality of opportunity in matters of public employment.
- **Article 21** guarantees the right to life with dignity, which includes the right to live with respect, autonomy, and security.
- **Article 39(a) and (d)** direct the State to secure adequate livelihood and equal pay for equal work.
- **Article 42** requires the State to provide humane working conditions and maternity relief.

Although these constitutional provisions promote gender justice, women's unpaid domestic work, caregiving responsibilities, and informal labour continue to receive limited legal and economic recognition. This reflects a significant gap between constitutional ideals and the everyday realities experienced by millions of women.

2. Literature Review

Existing literature highlights that women's contributions to national development extend far beyond the formal economy. **Marilyn Waring**, in *If Women Counted* (1988), argued that unpaid household and care work performed by women is excluded from national income accounting despite its immense economic value. In India, **Flavia Agnes**, in *Law and Gender Inequality: The Politics of Women's Rights in India* (1999), examined how legal and social structures undervalue women's work within the family and society. Reports of the **International Labour Organization (ILO)**, **UN Women**, and the **National Sample Survey Office (NSSO)** also show that women spend substantially more time on unpaid domestic and caregiving work than men. However, most existing studies focus on economic valuation, while limited attention has been given to the constitutional and judicial recognition of women's invisible contributions. This study attempts to bridge that gap by examining the issue from a constitutional and socio-legal perspective.

3. Objectives of the Study

1. To examine the concept of women's invisible and undefined contributions to national development.
2. To analyse the constitutional framework protecting women's equality and dignity.
3. To study the judicial recognition of unpaid care work and invisible labour.
4. To examine the contribution of women in informal and unpaid sectors.
5. To identify the legal, social, and economic challenges faced by women.
6. To evaluate the importance of recognising invisible labour for sustainable development.
7. To analyse India's position in light of international standards.
8. To suggest legal and policy reforms for recognising women's invisible contributions.

4. Research Methodology

The study adopts a **doctrinal and analytical research methodology** based on secondary sources, including constitutional provisions, Supreme Court judgments, statutes, books, journal articles, government reports, UN publications, ILO reports, and other scholarly literature. The research analyses the constitutional and judicial recognition of women's invisible labour and evaluates its significance for inclusive and sustainable development.

5. Research Problem

Despite making substantial contributions through unpaid care work, domestic responsibilities, informal labour, agricultural work, and community service, women continue to receive limited legal, economic, and social recognition. Their invisible labour remains largely excluded from national accounting systems and public policy. The study therefore examines whether the existing constitutional and legal framework adequately recognises women's contributions in these undefined areas of development.

6. Hypothesis

H1: Women's invisible and unpaid contributions are inadequately recognised in India's legal and economic framework.

H2: Judicial recognition has strengthened the legal value of women's invisible labour but comprehensive legislative and policy reforms are still required.

7. Analysis and Interpretation

7.1 Judicial Recognition of Women's Invisible and Undefined Contributions

In recent years, the Supreme Court of India has increasingly recognised the importance of women's unpaid labour, caregiving responsibilities, dignity, and autonomy. Through progressive judicial interpretation, the Court has expanded the meaning of equality and

acknowledged that women's invisible contributions are essential for family welfare, social stability, and national development.

7.1.1 Kirti v. Oriental Insurance Co. Ltd., (2021) 2 SCC 166

The Supreme Court held that the unpaid domestic work performed by homemakers has measurable economic value and should be considered while determining compensation in motor accident claims. The Court observed that household work contributes significantly to the family and cannot be treated as having no economic worth.

Relevance: This landmark judgment recognised household labour as productive and economically valuable, thereby strengthening the legal recognition of women's invisible work.

7.1.2 Deepika Singh v. Central Administrative Tribunal, (2022) 7 SCC 1

The Supreme Court adopted an inclusive interpretation of the concept of family and recognised that caregiving responsibilities extend beyond traditional family structures. The judgment emphasised dignity, equality, and the importance of care work.

Relevance: The decision recognised caregiving as an important social contribution and reinforced women's right to dignity under Article 21 of the Constitution.

7.1.3 X v. Principal Secretary, Health and Family Welfare Department, (2022) 9 SCC 1

The Supreme Court held that reproductive autonomy forms an integral part of the right to personal liberty and extended access to abortion services irrespective of marital status.

Relevance: The judgment strengthened women's autonomy over reproductive choices and promoted their equal participation in education, employment, and development.

7.1.4 Secretary, Ministry of Defence v. Babita Puniya, (2020) 7 SCC 469

The Supreme Court granted permanent commission to women officers in the Indian Army and rejected gender stereotypes regarding women's capabilities.

Relevance: The judgment recognised women's equal contribution to nation-building and affirmed their right to equal opportunity and leadership.

7.1.5 Aparna Bhat v. State of Madhya Pradesh, (2021) 6 SCC 247

The Supreme Court directed courts to avoid gender stereotypes while deciding cases involving women and emphasised gender-sensitive judicial reasoning.

Relevance: The decision challenged patriarchal attitudes within the justice system and promoted equal treatment of women before the law.

7.2 Women in Informal and Unpaid Sectors

7.2.1 Unpaid Care and Domestic Work

Women spend a substantial part of their lives performing unpaid household work, childcare, elderly care, cooking, cleaning, and emotional support. These activities are essential for the

well-being of families and society but are rarely recognised in economic policies or national income calculations. Their invisible labour contributes significantly to human development and supports the functioning of the formal economy.

7.2.2 Informal Economy

A large proportion of Indian women work in the informal sector, including agriculture, home-based industries, domestic work, handicrafts, street vending, and self-help groups. Most of these workers lack formal employment contracts, social security benefits, maternity protection, health insurance, and fair wages. Despite their significant contribution to economic development, they remain among the most vulnerable sections of the workforce.

7.3 Challenges Faced by Women in Undefined Fields

Women engaged in invisible and informal work continue to face several legal, economic, and social challenges, including:

- Lack of legal recognition of unpaid labour.
- Absence of economic valuation of domestic and caregiving work.
- Patriarchal social norms that treat such work as a natural duty rather than productive labour.
- Double burden of paid employment and unpaid household responsibilities.
- Limited access to social security, healthcare, pensions, and financial independence.

These challenges reduce women's economic security, reinforce gender inequality, and hinder the achievement of inclusive and sustainable development.

7.4 International Perspective

International human rights instruments increasingly recognise the importance of women's unpaid and invisible labour.

- The **Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)** encourages States to recognise, reduce, and redistribute unpaid care work.
- **Sustainable Development Goal (SDG) 5** promotes gender equality and specifically calls for the recognition and valuation of unpaid care and domestic work.
- **Sustainable Development Goal (SDG) 8** promotes decent work, inclusive economic growth, productive employment, and protection of labour rights for all workers.

India's constitutional commitment to equality, dignity, and social justice should be implemented in harmony with these international standards to ensure inclusive, equitable, and sustainable development.

8 Findings

1. Women's unpaid work contributes significantly to national development.
2. Invisible labour remains largely excluded from economic measurement.
3. Constitutional principles support recognition of women's unpaid contributions.
4. The Supreme Court has increasingly recognised the value of domestic and caregiving work.
5. Women in the informal sector continue to lack adequate legal and social protection.
6. Patriarchal social norms continue to undervalue women's labour.
7. Lack of social security increases the economic vulnerability of women.
8. Recognition of invisible labour is essential for achieving substantive equality.
9. International frameworks encourage valuation of unpaid care work.
10. Stronger legal and policy measures are necessary for inclusive and gender-just development.

9. Conclusion

Women's invisible and unpaid contributions form the foundation of families, communities, and the national economy. Despite constitutional guarantees of equality and dignity, these contributions remain insufficiently recognised in law, policy, and economic planning. Recent judicial decisions have acknowledged the importance of domestic work, caregiving, and women's autonomy, marking an important step towards gender justice. However, meaningful empowerment requires comprehensive legal recognition, social protection, and policy reforms. Sustainable development can be achieved only when women's invisible labour is valued as an essential component of national progress.

9. Suggestions

1. Recognise unpaid care work in national accounting systems.
2. Extend social security benefits to women in the informal sector.
3. Enact legislation recognising the economic value of domestic labour.
4. Promote gender-responsive budgeting.
5. Strengthen legal awareness and financial literacy programmes.
6. Improve access to healthcare and maternity benefits.
7. Encourage equal sharing of caregiving responsibilities.
8. Conduct regular surveys to measure unpaid work.

10. Recommendations

1. Develop a national policy on recognition of unpaid care work.
2. Include unpaid labour statistics in official economic reports.
3. Strengthen implementation of constitutional protections for women.

4. Expand welfare schemes for informal women workers.
5. Increase investment in childcare and eldercare facilities.
6. Improve skill development and employment opportunities for women.
7. Promote judicial and administrative gender-sensitisation programmes.
8. Encourage research on invisible labour and gender economics.
9. Strengthen implementation of SDG 5 and SDG 8.
10. Enhance coordination between government agencies working on women's development.
11. Promote public awareness regarding the economic value of women's unpaid work.
12. Ensure that future development policies recognise women as equal contributors to nation-building.

11. Conclusion

Women play an indispensable role in national development through their contributions in unpaid care work, domestic responsibilities, informal employment, agriculture, and community service. Although these forms of work remain largely invisible in economic statistics and public policy, they are essential for the well-being of families, communities, and the nation's overall progress. Their efforts support human development, strengthen the labour force, and contribute significantly to social and economic stability.

Recent judgments of the Supreme Court of India have marked an important step towards recognising the economic and social value of women's invisible labour. By acknowledging the importance of homemakers, caregivers, reproductive autonomy, and equal participation in nation-building, the judiciary has reinforced the constitutional principles of equality, dignity, and social justice. These decisions reflect a progressive approach towards recognising that women's contributions extend far beyond the formal workforce.

However, judicial recognition alone is not sufficient to achieve substantive gender equality. Comprehensive legislative reforms, effective policy measures, social security for women in the informal sector, and greater public awareness are necessary to ensure that women's invisible work receives the recognition, protection, and value it deserves. National development cannot be truly inclusive unless the contributions of women in undefined and unpaid sectors are formally acknowledged and integrated into development planning.

Therefore, recognising women's invisible labour is not merely an issue of gender equality but a constitutional and social responsibility. A truly developed nation is one that values every form of productive work and ensures that the indispensable contributions of women are respected, protected, and rewarded equally.

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