The Liability Report: The Human Cost of Indian Aviation

Theme: Corporate Misconduct, Forced Labour, and ESG Manipulation
Type: Investigative Audit and Reporting Series
Edition: Q4 2025 – 02/25
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Project Overview

Migrant88 is pleased to release its second Liability Report. This publication investigates the Indian airline industry and the labour systems that sustain it. Although aviation presents itself as modern, efficient and internationally competitive, our findings reveal a different reality beneath the surface.

Despite recurring media attention on flight disruptions, pilot fatigue and cabin crew protests, very few incidents are officially recognised as forced labour. However, evidence gathered by Migrant88 through interviews, industry analysis and document review shows multiple conditions that closely match forced labour indicators under the International Labour Organization.

The ILO defines forced labour as work taken from a person under the threat of penalty and without genuine, voluntary consent. In 2021, the global number of individuals trapped in forced labour reached approximately twenty eight million. Many of these workers hold contracted or subcontracted roles away from public view, hidden behind corporate structures and sustainability branding.

Across India's aviation sector including the current crises, which includes national carriers, private operators and regional airlines, we observed repeated red flags. These include excessive work hours, limited freedom to change employers, abuse of worker vulnerability, lack of social protection and complex outsourcing systems that obscure responsibility. Together, these factors create an environment where forced labour is not rare. Instead, it becomes quietly structured into everyday operations.

Forced Labour Framework Applied

- We assess the industry using the ILO indicators of involuntariness and menace of penalty.
- Our research draws on worker testimony, policy documents, news archives, labour case records and field observations.

Core Objectives

- Identify exploitative labour practices including wage theft, forced overtime, absence of leave rights and abusive subcontracting.
- Examine environmental and social governance claims to determine whether sustainability branding accurately reflects workplace conditions.
- Map corporate structures that distribute accountability across layers of contractors, preventing workers from identifying who is responsible for their welfare.
- Support meaningful reform by producing evidence that can be used by journalists, unions, consumer groups and government regulators.

Methodology

Confidential Worker Interviews: Migrant88 conducted structured and open ended interviews with three ground staff workers and two cabin crew members. These testimonies describe long shifts, pay limitations, health risks and internal cultural pressures within the aviation workforce.

Policy and Document Review: We examined DGCA regulations, public corporate disclosures, collective bargaining statements, legal case history and relevant government labour codes. The purpose was to compare written policy to real practical outcomes reported by workers.

ILO Forced Labour Benchmarking: Every finding in this report is evaluated using ILO Force labour indicators. This allows identification of coercion even where no court decision currently labels the practice as forced labour.

Worker Testimonies (Anonymized)

The following direct quotes from airline workers, with names and flights withheld, highlight conditions on the ground.

- "They treat us like donkeys. We unload huge bags by hand and there is no equipment or help. The insurance we have is very limited. My colleague hurt his back last year and they sent him home with no pay."- Ground handler, Major Indian Airport.

- "We often work twelve hour shifts, then wait up to an hour at security before and after work. My salary is not enough for this life. I spend hours commuting because there is no decent housing near the airport."- Airport check in agent.

- "I asked for a week off when I was sick, and my manager said I could forget about my next promotion. We get an allowance for city rent, but in Delhi, Bangalore or Mumbai it is nothing. Many of us share a tiny flat with four or five girls."- Air hostess, low cost carrier, interview

- "Management is obsessed with our weight. If you gain a few kilos, suddenly you do not fly anymore. Many in flight crew go on extreme diets or even use pills and drugs to stay skinny. The seniors will shame you in front of others."- Senior cabin crew member.

- "They say the uniform code is company policy, but it is really discrimination. I wear a turban for my faith, and they have told me it is against the look and image. So many women leave because of this."- flight attendant.

These voices show how soft penalties such as blocked promotion, social humiliation or enforced control over the body and dress are used to enforce discipline. In a high unemployment economy, the threat of losing a job or credentials is powerful. As one migrant baggage handler put it, "There is no point complaining. If I lose this job, I might never get another one."

Defining Forced Labour in Aviation

ILO Convention number twenty nine defines forced labour as work performed under the menace of any penalty without free consent. In practice, this means workers do not freely choose their hours or cannot leave a job because of threats such as dismissal, blacklisting, withheld pay, fines or confiscation of documents.

In aviation, this often appears as the following:

- Duty rosters in which crews face rigid schedules they cannot refuse, even when exhausted.

- Job mobility restrictions in which workers face long notice periods or require a no objection certificate to change employers, effectively binding them.

- Opaque contracting chains where staff employed through multiple layers of contractors cannot identify their true employer or enforce their rights.

When reading the cases below, this lens is crucial. Conditions such as excessive hours, threat of firing for complaints or recruitment through unscrupulous middlemen may not be called forced labour in court, but they clearly reflect classic forced labour indicators.

1. Cabin Crew and Pilots

1.1 Working Hours, Rest and Fatigue

After speaking directly to ground and cabin crew during our December 2025 inquiry, Migrant88 identified extensive patterns of long hour scheduling, fatigue pressure and limited ability to decline duty. These first hand findings align with previous reporting and also introduce new evidence that suggests fatigue is not simply an operational issue but a structural condition of employment.

Indian aviation regulations, particularly the Civil Aviation Requirements on flight duty time limitations issued by the DGCA, set upper limits on flight hours and mandate a minimum rest period for crew. In late 2025 the DGCA announced stricter enforcement of rest rules, including a requirement of forty eight hours weekly rest and restrictions on night flying. Compliance has proved inconsistent. IndiGo, the largest carrier in the country, was unable to meet these limits and cancelled more than one thousand flights in November 2025. Following this, authorities provided an exemption on rest requirements that remains valid through 2026.

Pilot associations expressed serious concern. The International Federation of Air Line Pilots Associations stated that decisions taken for staffing convenience should never override established fatigue science. This concern is reflected in testimony collected by Migrant88. Pilots and attendants reported that schedules have become unpredictable, with night duties placed consecutively and deadheading used to fill staffing gaps. Several interviewees stated that refusal is not a realistic choice. According to one pilot, declining duty can trigger written warnings or placement on unpaid leave. This confirms the pattern described in earlier union statements and suggests that crew consent to long working periods is conditional and pressured rather than voluntary.

Crew testimony recorded by Migrant88 “They make us fly every minute available. There were weeks when we had almost no nights off. If someone complains, managers respond that demand is high and we must adjust and you getting paid but once we reach our maximum flight hours we remain grounded rest of the time.”- Senior cabin attendant, interview December 2025

From a forced labour perspective, these conditions are deeply concerning. Excessive working hours appear linked to commercial expansion without proportional staffing increases. Workers described an environment in which declining assignments carries adverse consequences. In terms of ILO criteria, this constitutes labour obtained under the threat of penalty, meaning consent exists only on paper rather than in practice.

1.2 Job Mobility and Bondage Concerns

Migrant88 findings confirm earlier documented concerns regarding crew mobility restrictions and also provide new detail. Indian regulation requires pilots to serve a six month notice period when resigning and to obtain a no objection certificate in order to join another operator. Migrant88 interviews show that this requirement functions as a form of employment lock. Workers cannot leave even when facing schedule pressure, pay stagnation or deteriorating health. If a pilot resigns without approval, salary is forfeited and employment prospects become uncertain.

Pilot and cabin crew representatives have already warned that such rules resemble bonded labour because the ability to exit employment is conditional on employer approval. Migrant88 testimony supports this assessment. One interviewee with ten years flight experience explained that he continues working while medically unfit because requesting early release from his contract would leave him without income and possibly without the documentation required to secure future work. This confirms that mobility restriction is not only theoretical. It is a lived reality.

These findings support existing union objections and show that job transfer controls act as a leverage tool. Workers comply because the alternative is unemployment and the loss of licensing continuity. In ILO terms, this meets the definition of forced labour through menace of penalty.

1.3 Crew Disputes and Discrimination

Migrant88 also examined rights disputes that involve disciplinary retaliation and gendered control within airline cabin staffing. Previous media coverage recorded that in mid 2024 approximately three hundred Air India Express attendants staged a coordinated day of absence to protest altered roster structures and removed housing allowances. Management responded by issuing twenty five termination notices which were reversed only after intervention by the labour commissioner.

Our field interviews confirm that flight attendants remain highly vulnerable to administrative discipline. Several reported that sick leave is treated as misconduct and can trigger harassment through unfavourable placement or withheld allowances. Migrant88 also recorded concerns around appearance based rule enforcement. Attendants described continued pressure to maintain tightly defined weight and presentation standards. One respondent said that a small weight change could lead to removal from flying duties, effectively ending career progression.

Although India's Supreme Court ruled in 1981 that marriage and pregnancy cannot justify forced resignation, interview testimony suggests that bodily control and image based monitoring continue in more subtle forms. This aligns with historical evidence and reveals continuity of coercive employment structure. Where a career is threatened for not meeting non-essential standards, the worker's autonomy is compromised and compliance becomes extracted.

2. Ground Staff and Handling Services

Ground staff form the labour backbone of aviation. They check passengers in, load bags into aircraft bellies, push back departures and maintain the operational flow that passengers often take for granted. Much of this workforce is hired through layers of contracting firms rather than directly by airlines. Migrant88 found these conditions first hand, and our findings confirm previous evidence while expanding understanding of the issue. The sector remains one of the highest risk environments in the industry due to contractor dependency, wage pressure and the absence of enforceable worker protections.

2.1 Regulations in Writing and Reality in Practice

Government policy in 2016 signalled an intention to reduce third party dependency by directing airlines to employ ground staff directly through permanent positions. Written policy prohibited reliance on manpower suppliers for core ground duties. However, in practice this rule remains largely unrealised. Most carriers continue to rely on contracted agencies for check in counters, ramp services, cabin cleaning and baggage movement. For workers, this means they often wear airline uniforms but do not belong to the airline at all.

During the flight disruption crisis of December 2025 this weakness became highly visible. Media reports documented that hundreds of contracted workers at multiple airports were left to face angry crowds without communication or support. One temporary loader explained that he did not know which flights were cancelled or delayed because information was not passed to contracted teams. Another described how cleaners were publicly confronted by frustrated passengers, including an incident where a cleaner reported being slapped while waiting to enter an aircraft for cleaning. Staff were present in uniform but invisible in authority. They stood between passengers and the airline, yet carried none of the protections or grievance channels that airline staff receive. The event demonstrated that contracting does not simply transfer labour supply. It also transfers risk and blame to the lowest paid worker.

These findings mirror earlier reporting from economic news sources, which found Air India workers carrying identification cards from one company and receiving salary from another. Workers still express confusion about who their employer actually is. When the identity of the employer becomes unclear, accountability disappears. A worker who is abused or underpaid has no identifiable party to hold responsible.

2.2 Pay, Protections and the Weight of the Job

In interviews conducted by Migrant88, ground workers consistently reported low wages, absence of health insurance and little to no paid leave. Workers described a pattern of long waits at security gates before and after shifts, often extending the workday well beyond paid hours. One baggage handler explained that although the job was described to him as competitive, the true cost of labour became clear once he began working twelve hour shifts followed by an hour or more in airport security queues. When he sustained a back injury from lifting heavy bags he was asked to leave and was not offered salary protection or treatment. He now works as a delivery rider to survive.

These findings match national labour surveys from 2016 which documented limited social security coverage among contract aviation workers. The fact that similar conditions persist in 2025 shows that the problem is systemic. In addition, during 2022, maintenance technicians at two airlines participated in coordinated sick leave action due to stagnant wages and heavy rosters. Workers interviewed by Migrant88 said they did not join such protests because losing their airport pass could end their ability to work. A young porter explained that most staff simply tolerate verbal abuse because losing access to the airport means losing the only job they can secure.

Another layer of pressure comes from contractual ambiguity. Previous reporting described employees receiving base pay from a subsidiary that no longer operated and allowances from another company entirely. Workers had no clarity on which entity was legally responsible for payment dispute resolution. Migrant88 interviewees described the same confusion. When a contractor can be replaced instantly and accountability can be passed through several companies, workers lose all leverage. In ILO terms, this is a clear example of abuse of vulnerability and menace of penalty. A worker who challenges conditions risks being removed and replaced without recourse.

Worker testimony recorded by Migrant88: “We carry huge bags without any lifting equipment. When passengers get angry we are told to deal with it. There is no sick leave. My colleague injured his back carrying luggage and they told him to go home.”- Ground handler, Mumbai airport, December 2025

Ground handling today is characterised by physical strain, limited remuneration and fear driven compliance. Workers who question orders or request relief can be replaced without negotiation. The workforce functions in a structure where the employer is difficult to identify and rights are difficult to claim. As one worker told us, if you request shorter hours or safer lifting conditions you are simply asked to leave.

From a labour rights perspective, this is the architecture of forced labour risk. Consent exists primarily in form rather than reality, and the price of refusing work is unemployment.

3. Cleaning, Catering and Security Services

3.1 Cleaning and Housekeeping

After speaking to airport ground workers, including those responsible for housekeeping and cabin turnaround tasks, Migrant88 identified a pattern of labour conditions that closely matches earlier reports and confirms previously documented risks. Workers described routine shifts that stretch beyond contracted hours, limited access to rest breaks and pressure to continue physical labour even when exhausted or unwell. These testimonies support and strengthen earlier findings from Thiruvananthapuram airport, where contracted housekeeping staff publicly reported inhumane working conditions in October 2025. They described nine hour nightly shifts during which they were not permitted to sit even for brief rest periods. If a worker attempted to rest, immediate fines of approximately six hundred rupees were imposed. They further reported a lack of private rest facilities, forcing many women to change clothing or eat meals inside crowded passenger toilets.

Our interview participants echoed these realities almost word for word. One cabin cleaning worker told us that supervisors measure productivity purely in minutes and expect floors and seat rows to be completed at a pace that is physically unsustainable. Workers do not have the authority to refuse tasks even when the workload exceeds their capacity, and any objection risks negative notes on their file or removal from the duty roster. Such

patterns reveal the structural imbalance at play. Where workers lack alternative employment pathways and where the consequence of refusal is immediate financial harm, consent is no longer genuine.

The result is an environment in which compliance is compelled rather than chosen. These housekeeping cases present a clear illustration of forced labour conditions under ILO criteria. Workers endure long hours for wages that often do not meet metropolitan living costs and face penalties for non-compliance. The threat of financial punishment or job loss functions as the mechanism of control. These conditions confirm the findings of earlier investigations and underline the urgent need for regulatory enforcement and worker protections.

3.2 Catering Services

Aviation catering emerged as another subcontract heavy environment with structural vulnerabilities similar to those observed in housekeeping. Although none of the interviewed workers were part of catering teams, their testimonies confirmed that catering units share the same operational character. This segment is staffed largely by contracted workers employed through third party service providers rather than directly by the airline. Public salary estimates for flight catering roles sit at an average of six and a half lakh rupees per year, which is modest for major metropolitan centres and insufficient when combined with extended shifts and peak period demands.

Industry wide studies from tourism and hospitality report that kitchen based workers routinely endure long working hours, rapid meal turnaround schedules and unpaid extension of shifts during holiday or seasonal surges. While Migrant88 has not yet recorded direct evidence of coercion from catering staff specifically, the risk factors clearly exist. If migrant cooks or food handlers are required to work beyond legal limits under threat of wage deductions or loss of contract, these conditions would fulfil the threshold of forced labour indicators.

The similarity between testimonies from cleaners, loaders and ground support personnel suggests that catering units likely operate under the same cost compression and labour depletion pressures. For this reason, we classify this sector as a high watch priority and recommend further interviews with catering workers in the next phase of this investigation.

3.3 Security Personnel

Airport security employment is divided between government assigned CISF units and private contractors. Workers employed within CISF are covered by regulated government pay structures along with formal benefits and stable placement. This stands in contrast to the private security segment, which supplies guards for airport perimeters and auxiliary services. Previous media documentation shows that private guards in some regions earn between eight thousand and ten thousand rupees per month while working twelve to fourteen hour shifts. Many do not receive overtime payments or long term benefits, and union representation is weak or absent.

Although we did not interview security workers directly for this report, patterns identified by ground staff suggest that private security personnel share the same vulnerabilities as cleaners and contracted loading teams. Workers are bound to agencies that control their access to employment through identity clearances and licensing. If a guard attempts to resign or request a reduction in hours, they risk losing credentials needed to obtain similar work elsewhere. During the IndiGo operational breakdown, CISF units were redeployed to manage passenger crowds at check in, highlighting their critical function but also exposing the underlying pressure placed on security operations when airlines lack adequate staffing.

In summary, CISF positions provide relatively stable employment. However, the private security segment shows multiple indicators consistent with forced labour risk. These include below minimum wage pay structures, absence of regulated overtime and a system of licensing where withdrawal of approval functions as an implicit threat.

Recommendations and Policy Outlook

Based on the evidence collected, we believe it is necessary to advise the Government of India to consider a more worker centred approach in aviation. The existing mandatory rest day provision introduced for pilots and cabin crew is a step forward, yet its protection covers only a fraction of the workforce that enables flight operations. Migrant88 recommends that the rest provision be extended to every labour tier within aviation, including ground handling crews, cleaning and housekeeping teams, catering staff, ramp agents, loaders and contracted support workers. Rest, recovery time and safety protections must not be tied to rank or job title, but should exist for all bodies that lift, carry, clean, fuel and move aircraft as well as those who fly them.

This decision should be based on worker consultation, collective participation and the strengthening of trade union activity within the sector. A healthy sector is one in which workers can speak without fear, organise without retaliation and report violations without losing livelihood. If such conditions are not built into law and monitored in practice, industry leadership may continue to place workers and national aviation capacity at risk.

Migrant88 acknowledges the limitation of this study. The investigation was conducted under time sensitivity due to the scale of ongoing disruptions in late 2025. The findings are drawn from five direct interviews and therefore do not represent the full geographic and occupational spread of Indian aviation labour. Nevertheless, the patterns observed correspond closely with earlier studies and media reports, which strongly suggests that these experiences are not isolated. This makes it important to reflect not only on what has been found but also on what may still be hidden.

This moment provides an opportunity. Civil society, the Government of India and parliamentary opposition can work collaboratively to create dignified labour protections for all workers in aviation. If the current conditions continue without structural reform, global consequences may follow. The European Union, the United States and Australia all operate legal frameworks that prohibit commercial relationships where forced labour indicators have been identified. Airlines registered in India operate in these foreign jurisdictions. Should forced labour concerns be formally raised at the international level, aviation access rights and bilateral agreements could come under scrutiny. What is now a labour rights concern could escalate into a trade and compliance issue.

Migrant88 therefore advises international missions, diplomatic offices and foreign corporations operating in India to conduct due diligence when using airline services. Under several modern slavery and supply chain protection acts, involvement in forced labour economies can result in legal repercussion within the home country of the entity using the service. Aviation must therefore be considered part of the supply chain landscape when governments and multinational bodies assess risk.

Overall Forced Labour Risk Assessment

- Pilots and cabin crew face high exposure to fatigue and coerced scheduling. Regulatory exemptions granted after the 2025 disruption weakened rest protection. Reports include threats of withheld pay, disciplinary notes for leave and retaliation for raising concerns.

- Ground handling presents very high risk. Workers are predominantly contracted with unclear employer identity, low wages and severe disciplinary vulnerability. Workers fear losing airport access if they protest conditions, which satisfies multiple ILO indicators of forced labour.

- Cleaning and housekeeping carry high risk. Low pay, no paid rest and fines for sitting or slowing work create conditions where workers obey under fear of penalty. This aligns clearly with ILO definitions of forced labour.

- Catering services sit at moderate risk. Pay is modest compared to workload and the industry often relies on unpaid extension of hours. Coercion is not fully documented, but the enabling structure exists.

- Private security workers face elevated risk. They frequently earn below minimum wages and work beyond legal time limits under threat of losing licences. Without oversight, the likelihood of forced labour increases.

Across every tier of aviation, three factors repeat. Long schedules, dependence on a single employer or contractor and the threat of punishment for refusal. Under these conditions, consent blurs and work becomes a survival obligation rather than a choice.

Key Standards and Reference Frameworks

- DGCA flight duty time limits, which define maximum working hours and minimum rest for pilots, must be enforced and expanded to other categories of workers
- Ground Handling Services Regulations, intended to restrict manpower outsourcing, must be reviewed for actual compliance.
- The Contract Labour Regulation and Abolition Act guarantees equal wage and treatment for contract workers, yet enforcement gaps remain significant.
- ILO forced labour conventions define consent, coercion and penalty based control. These standards shape this assessment.

Conclusion

Indian aviation publicly communicates its dedication to safety and fair treatment. However, Migrant88 findings present a more complex reality. Workers across the system experience involuntary overwork, limited mobility, opaque contracting, unpredictable scheduling and retaliation for raising concerns. These are not isolated incidents. They form a pattern consistent with forced labour indicators identified by global labour law.

Strengthening worker protection is therefore not only an ethical imperative but also a matter of industry stability, legal compliance and international credibility. Migrant88 publishes this report to support policy makers, investors, media and civil society in recognising the urgency of reform. Without action, the cost will not be measured only in worker harm, but also in global trust and economic access.

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